Commissioners: Gary F. Clark, Chairman Art Graham Andrew Giles Fay Mike La Rosa

STATE OF FLORIDA

KEITH C. HETRICK GENERAL COUNSEL (850) 413-6199

Public Service Commission

April 5, 2021

Dianne M. Triplett/Catherine Stempien 299 First Avenue North St. Petersburg, FL 33701 Dianne.triplett@duke-energy.com **STAFF'S THIRD DATA REQUEST** *via e-mail*

Matthew R. Bernier 106 E. College Avenue, Suite 800 Tallahassee, FL 32301 <u>matthew.bernier@duke-energy.com</u> <u>FLRegulatoryLegal@duke-energy.com</u>

RE: Docket No.20210016-EI – Petition for limited proceeding to approve 2021 settlement agreement, including general base rate increases, by Duke Energy Florida, LLC.

Dear Ms. Triplett, and Mr. Bernier:

By this letter, the Commission staff requests that Duke Energy Florida, LLC (DEF) provide responses to the following data requests:

Paragraph 3

1. Commission Order No. PSC-2020-2089-FOF-EI (Order), page 17, includes the following excerpt as pertains to the anticipated DOE award:

DEF is requesting that all funds recovered from DOE be deposited into the NDT. DEF intends to do so in 2022 and convert the funds to a rainy-day fund to provide further protection from construction risks. The 2017 Settlement does not address the regulatory treatment of non-capital spent fuel management costs. These spent fuel management expenses are free to be deposited in the NDT as proposed by DEF.

a. Paragraph 3 of the Settlement specifies that the DOE award will be used to manage earnings. What is the impact of that provision on the deposits in the NDT as originally proposed by DEF and allowed per the Order?

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- b. What is the lowest annual balance now projected for the NDT reserve subaccount through 2038 if the amount identified in response to Question No. 1.a. above is redirected as proposed, and in what year does that lowest balance occur?
- c. What is the expected impact on the growth of the NDT reserve subaccount (in real dollars) through 2038 that would result from redirecting the anticipated DOE award to earnings?

Paragraph 17

- 1. What information resources does DEF plan to make available to its customers regarding DEF's proposed Electric Vehicle (EV) charging program(s)?
- 2. Please refer to DEF's response to Staff's First Data Request, No. 8.g., which indicates customers must install EVSE and provide proof of installation to receive the rebate in the C&I rebate program. Please elaborate on the process by which customers would be guided by DEF to contract for EVSE, and what vendor information (names, contact information, specifications, rates, etc.) would be provided by DEF, if any.
- 3. Please refer to DEF's Electric Vehicle Charging Station Pilot Program 3rd Annual Report (Document No. 13637-2020, filed in Docket No. 20170183-EI) for the following questions.
 - a. On Page 7 of the report, in the DEF Contractor section, DEF states that it selected NovaCharge to provide equipment, installation services, communications networking, and customer service support for the full term of the EV pilot period based on a competitive bid process. Now that the pilot period is nearing its conclusion, does DEF anticipate it will continue to contract NovaCharge to provide any of these services on behalf of DEF customers for the proposed C&I Rebate and/or Direct Current Fast Charging (DCFC) EV programs?
 - b. If the response to 3.a. is affirmative, please specify how NovaCharge would administer the customer support demands pertaining to installed EVSE.
 - c. If the response to 3.a. is negative, please identify what entity(ies), as well as DEF's rationale for their selection, will be providing DEF with the following services/assets pertaining to the proposed EV charging programs: equipment, installation services, communications networking, and customer service support. Further, please also specify how the selected entity(ies) would administer the customer support demands pertaining to installed EVSE.
 - d. On page 7 of the report, in the Network Communication section, DEF states that all EVSE deployed in the pilot program is connected to Greenlots communications network (via cellular nodes within each EVSE) which "allows data collection and remote management of units (i.e., price configuration, charging load management, and ability to "push" unit software upgrades)." Does

Staff's Third Data Request to Duke Energy Florida, LLC Docket No. 20210016-EI Page 3

> DEF anticipate that it will continue to utilize Greenlots communications network for DEF's new EV program(s)? Further, please identify any other sources of EV charging data that will be available to DEF.

- 4. Please explain how DEF's proposed DCFC EV program is distinct from the EV fast charging options proposed under the proposed C&I Rebate Program in terms of geographic locations, target customers, and EV charging market.
- 5. Please identify the technical specifications for what qualifies as a "fast charging" station (charging capacity, port size, etc.) for the proposed DCFC EV Program.

Please file all responses electronically no later than April 12, 2021 from the Commission's website at <u>www.floridapsc.com</u>, by selecting the Clerk's Office tab and Electronic Filing Web Form. Please feel free to email me at <u>wtrierwe@psc.state.fl.us</u> if you have any questions.

Sincerely,

/s/ Walt Trierweiler

Walt Trierweiler Senior Attorney

WLT/lms

cc: Office of Commission Clerk
Charles J. Rehwinkel - Office of Public Counsel
Jon Moyle – Florida Industrial Power Users Group
Corey Allain- Nucor Steel Florida, Inc.
James W. Brew/Laura Wynn Baker - PCS Phosphate - White Springs
Michael K. Lavanga - Stone Law Firm