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DEPUTY GENERAL COUNSEL

April 20, 2021

**VIA ELECTRONIC FILING**

Adam J. Teitzman, Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Re: *Duke Energy Florida, LLC's Petition for Limited Proceeding to Approve  
2021 Settlement Agreement, Including General Base Rate Increases;*  
Docket No. 20210016-EI

Dear Mr. Teitzman:

Enclosed for filing on behalf of Duke Energy Florida, LLC ("DEF") is DEF's Response to Staff's Questions regarding the Informal Meeting held on February 16, 2021.

Thank you for your assistance in this matter. Please feel free to call me at (727) 820-4692 should you have any questions concerning this filing.

Sincerely,

*s/ Dianne M. Triplett*

Dianne M. Triplett

DMT/mw  
Enclosure

**CERTIFICATE OF SERVICE**

Docket No. 20210016-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic mail to the following this 20<sup>th</sup> day of April, 2021.

*s/ Dianne M. Triplett*

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**Duke Energy Florida, LLC's (DEF) Response to  
Staff's Informal Meeting Questions (Nos. 1-8)  
regarding  
DEF's Petition to Approve 2021 Settlement Agreement**

**Docket No. 20210016-EI**

**Paragraph 2. (b) ROE Adjustment Trigger Provision (AFD)**

1. What source will the parties use to determine the reported 30-year U.S. Treasury bond rates for the ROE Trigger? DEF should provide the details of how they will determine the current 30-year Treasury Bond Yield Rate at the time of the Commission vote on the settlement so we all know what the baseline will be going forward.

**Response:**

DEF proposes using Bloomberg's "Generic U.S. 30-year Government Bond" security, which can be accessed from Bloomberg screen GT30 Govt. See attached screenshots for reference. DEF also proposes that the rate be set at the close of market on the day the Commission votes on the settlement. This way the rate can easily be referenced at a future date versus a "live" spot rate intraday.

**Paragraph 3. Rate Increases and DOE Award Funds. (ECO)**

2. Paragraph 3 of the Settlement Agreement appears to presume that the expected DOE award of \$173 million (retail) will be received by DEF during the term of the 2021 Settlement Agreement. In the event that the DOE award is not received by DEF until after the expiration of the settlement term (2025 or later), how will DEF account for the DOE award when it is received, and what effect does such later-than-anticipated receipt of funds have on the proposed accounting discussed in Paragraph 3 during the term of the agreement?"

**Response:**

The timing of receipt of the DOE award does not have any effect on the amounts recorded in earnings from 2022-2024. Prior to receiving the award, DEF will debit regulatory asset and credit earnings. Upon receipt of the award, assuming the award is greater than the balance of the regulatory asset, DEF will debit cash for the amount of the award, credit the balance of the regulatory asset, and the difference will be recorded in a regulatory liability. Then DEF will continue to record earnings by debiting the regulatory liability. If the DOE award isn't received until after 2024, which is highly unlikely, DEF will have a regulatory asset on its books for \$173 million until receipt of that award. Upon receipt, DEF will debit cash and credit the regulatory asset for the amount of the award. If the award is more or less than \$173 million (retail portion), then DEF will refund or recover the difference through the Capacity Cost Recovery clause. The following examples provide the accounting impacts under different DOE award outcomes:

- A. DEF credits base rate revenue requirements in 2022, \$38 million, in 2023, 35

million and 2024, \$100 million. \$173 million is received on January 1, 2023.

Year	Description	Cash	Reg Asset	Reg Liab	Amort Exp
2022	Accrue Earnings		38		(38)
2023	DOE Award	173	(38)	(135)	
2023	Accrue Earnings			35	(35)
2024	Accrue Earnings			100	(100)
Total		173	0	0	(173)

B. Same as A, but the money is received September 30, 2022.

Year	Description	Cash	Reg Asset	Reg Liab	Amort Exp
2022	DOE Award	173		(173)	
2022	Accrue Earnings *			38	(38)
2023	Accrue Earnings			35	(35)
2024	Accrue Earnings			100	(100)
Total		173	0	0	(173)

\* For simplicity, table assumes the entire 2022 earnings impact is recorded in Dec 2022.

C. Same as A, but the money is received June 30, 2024.

Year	Description	Cash	Reg Asset	Reg Liab	Amort Exp
2022	Accrue Earnings		38		(38)
2023	Accrue Earnings		35		(35)
2024	DOE Award	173	(73)	(100)	
2024	Accrue Earnings*			100	(100)
Total		173	0	0	(173)

\* For simplicity, table assumes the entire 2024 earnings impact is recorded in Dec 2024.

D. Same as A, but the money is received February 1, 2025.

Year	Description	Cash	Reg Asset	Reg Liab	Amort Exp
2022	Accrue Earnings		38		(38)
2023	Accrue Earnings		35		(35)
2024	Accrue Earnings		100		(100)
2025	DOE Award	173	(173)		
Total		173	0	0	(173)

E. Same as A, but amount received is \$165 million.

Year	Description	Cash	Reg Asset	Reg Liab	Amort Exp	Revenue
2022	Accrue Earnings		38		(38)	
2023	DOE Award	165	(30)	(135)		
2023	Accrue Earnings			35	(35)	
2024	Accrue Earnings			100	(100)	
2024	CCR recovery	8	(8)		8	(8)
Total		173	0	0	(165)	(8)

F. Same as A, but amount received is \$180 million,

Year	Description	Cash	Reg Asset	Reg Liab	Amort Exp	Revenue
2022	Accrue Earnings		38		(38)	
2023	DOE Award	180	(38)	(142)		
2023	Accrue Earnings			35	(35)	
2024	Accrue Earnings			100	(100)	
2024	CCR recovery	(7)		7	(7)	7
Total		173	0	0	(180)	7

Note, for the scenarios A through F, DEF will not apply a carrying charge to the balance in the regulatory asset or liability related to the DOE award. DEF will continue to apply a carrying charge to the dry cask storage regulatory asset included in the CCR clause.

### Paragraph 17 EV Program (ECO)

3. 17b. Please refer to Exhibit 5, under “Type of charging”. Can you please identify what type of charging is eTRU ?

**Response:**

TRU stands for Transport Refrigeration Unit, a refrigeration system that’s used on insulated trailers, straight trucks, intermodal shipping containers, and rail cars to keep temperature-sensitive goods at the right temperature. eTRU stands for Electric Transport Refrigeration Unit. The term is used to describe alternatives to conventional diesel-powered TRUs. In an eTRU, the refrigeration system’s compressor (the part that works to move the refrigerant through the system) is driven by an electric motor all or at least part of the time.

eTRUs allow operation of the TRU on electric power, eliminating diesel fuel use and emissions. TRUs are commonly stationary when loading/unloading at distribution centers and retail facilities or in over-the-road applications (OTR) for driver rest periods at truck stops or intermodal facilities. TRUs may be parked for less than an hour at a time while loading/unloading or may be used for cold storage for up to 24 hours a day. From an electric infrastructure standpoint, eTRU connectors typically operate with 480V, three-phase power at a capacity of ~10-15kW per plug.

4. 17c. How was the “average cost of Fast Charging provided by other Fast Charging operators across Florida” calculated and for what time period? Please provide workpapers and any other supporting documentation.?

**Response:**

The proposed initial level of FCF-1 of \$0.33/kWh was calculated in the fourth quarter of 2020 by gathering pricing information from existing statewide operators of public Fast

Charging in Florida which included Tesla, EVgo, and Electrify America. Pricing information was gathered from each operator's website, if given, or from PlugShare in the case of operators which do not publicly share pricing. In order to compare on a level basis, the time-based pricing of EVgo and Electrify America was converted to per-kWh pricing using an assumed average charging session length of 30 minutes at a power level of 50kW. Attached is the spreadsheet that was used to make the calculation. DEF proposes updating the calculation on a quarterly basis.

### **Paragraph 19 (ECO)**

5. Referring to Exhibit 6 of the 2021 Settlement Agreement, page 120 of 832, the increase in total cost between this Dismantlement Study (2022 dollars) and DEF's 2008 Dismantlement Study (2010 dollars) is \$253,153,036. Staff also notes large increases in dismantlement costs between studies on the plant level (ex. Hines PB4 dismantlement increasing from \$661,543 to \$18,511,599). Please elaborate on what is driving these increases in estimated dismantlement costs between the two studies.

#### **Response:**

There are several drivers of the approximately \$253 million in cost increases:

1. Power generating facilities that were included in both the 2010 Dismantlement Costs and 2022 Dismantlement Costs in Exhibit 6 would be subject to inflation over this time period for labor, equipment & materials, hauling, and disposal costs. This would account for approximately \$70 million in cost increases.
2. The following facilities were acquired or constructed after the completion of the 2008 study, and are now included in the current Dismantlement Study, resulting in approximately \$157 million in new costs.
  - a. Citrus Combined Cycle
  - b. Osceola Solar Center
  - c. Osprey Station
  - d. Perry Solar Center
  - e. Suwanee Solar
  - f. Hamilton Solar
  - g. Lake Placid Solar
  - h. Trenton Solar
  - i. Debary Solar
  - j. Columbia Solar
  - k. Twin Rivers Solar

- l. Santa Fe Solar
  - m. Duette Solar
  - n. Charlie Creek Solar
  - o. Archer Solar
3. Scrap pricing decreased significantly, with scrap steel prices falling approximately 40% from the time DEF's 2008 Dismantlement Study was performed to the time current Dismantlement Study was performed. This resulted in an increase in total net costs of approximately \$40 million for facilities that were included in the 2010 Dismantlement Costs and 2022 Dismantlement Costs in Exhibit 6.
4. Costs for end-of-life inventory values less a 10% scrap value credit were not included in the 2010 Dismantlement Costs but have been included in the 2022 Dismantlement Costs in Exhibit 6. This resulted in an increase in total net costs of approximately \$59 million for facilities that were included in the 2010 Dismantlement Costs and 2022 Dismantlement Costs in Exhibit 6.
5. There are several generating units that were included in the 2010 Dismantlement Costs but are no longer included in the 2022 Dismantlement Costs in Exhibit 6. These facilities would account for a decrease of approximately \$54 million in total net cost.
  - a. Bartow (Steam)
  - b. Bartow-Anclote Pipeline
  - c. Rio Pinar
  - d. Suwannee - Steam units 1 – 3
  - e. Turner Gas Turbine Units 1 - 2
  - f. Turner Gas Turbine Units 3 - 4
6. The remaining difference in total net costs is due to physical changes to the plants, and updates to study methodology to refine quantity estimates.

In regard to the increase in Hines PB4 costs, it is all due to common facility costs being included in the PB4 costs in the 2022 values. The addition of the end-of-life inventory values less a 10% scrap value credit that were not included in the 2010 Dismantlement Costs but have been included in the 2022 Dismantlement Costs in Exhibit 6 added \$7.5 million in net costs to the Hines PB4 costs. There were also significant common facility costs that were excluded from the 2010 Dismantlement Costs that have now been included in the 2022 Dismantlement Costs, including removal of roads, grading and seeding, etc. that contributed approximately \$7 million of additional costs that are all allocated to

PB4. The remainder of the increase is the result of decreased scrap values and updates to study methodology to refine quantity estimates.

6. In accordance with Rule 25-6.04364, 3(b), Electric utilities' Dismantlement Studies are required to provide a list of all entities owning an interest in each generating unit and the percentage of ownership by each entity. It appears that this list was omitted from DEF's 2020 Dismantlement Study. Please explain

**Response:**

It was not the intent to leave out this information, and it appears that the language in the report was not clear and did not directly answer this question. In the second paragraph on page 4-1 of the Dismantlement Study, it states that "Included are the costs to dismantle all the assets owned by DEF at the site, including power generating equipment and BOP facilities, as well as environmental site restoration activities." This language was intended to communicate that all assets and equipment included in the study are wholly owned by DEF.

7. In accordance with Rule 25-6.04364, 3(e), Electric utilities' Dismantlement Studies are required to provide the methodology selected to dismantle each generating unit and support for the selection. It appears that this information was omitted from DEF's 2020 Dismantlement Study. Please explain.

**Response:**

The dismantlement methodology for the facilities that serves as the basis of the dismantlement cost estimates is included in Section 4.0 of the Dismantlement Study on pages 4-1 and 4-2. As stated in the report, means and methods will not be dictated to the contractor by Burns & McDonnell. It will be the contractor's responsibility to determine means and methods that result in safely dismantling the Plants at the lowest possible cost. However, the types of dismantlement methodologies that are assumed to be used are listed and are consistent with the cost estimates produced. As included in this section of the report, Burns & McDonnell has assumed that each site will be demolished as a single project, allowing the most cost-effective demolition methods to be utilized. The reason these methodologies were selected is that they result in safe dismantlement of the Plants at the lowest possible cost.

8. Please refer to Paragraph 20, is it the Parties intent that the \$132 million storm reserve be considered replenished with the approval of the proposed settlement agreement? If not, when and how will the reserve be replenished?

**Response:**

Approval of the Settlement facilitates replenishment of the storm reserve but not upon approval of the agreement. DEF is replenishing its storm reserve until it reaches \$132 million via \$12.892 million of tax saving monthly (Order No. PSC-2019-0268-PCO-EI). The settlement MFRs estimate that the reserve will reach the \$132 million level by

early 2022. DEF will follow Paragraph 30.c. for recovery of storm costs. This method is consistent with the methodology employed through 2021 in the 2017 Second Revised and Restated Settlement Agreement.

Spot 30-year UST

Time of pricing

6-month average

GT30 Govt									
Export			Settings			Historical Price Table			
Range	08/17/2020	02/17/2021	Period	Daily	High	2.093 on	02/16/21		
Market	Mid Price	M Yld Cnv	Currency	USD	Low	1.342 on	08/21/20		
View	Price Table				Average	1.634	1.634		
					Net Chg	.605	42.12%		
Date	Mid Price	M Yld Cnv	Date	Mid Price	M Yld Cnv	Date	Mid Price	M Yld Cnv	
Fr 02/19/21			Fr 01/29/21	1.831	1.831	Fr 01/08/21	1.875	1.875	
Th 02/18/21			Th 01/28/21	1.806	1.806	Th 01/07/21	1.855	1.855	
We 02/17/21	2.040	2.040	We 01/27/21	1.775	1.775	We 01/06/21	1.816	1.816	
Tu 02/16/21	H 2.093	2.093	Tu 01/26/21	1.792	1.792	Tu 01/05/21	1.709	1.709	
Mo 02/15/21	2.011	2.011	Mo 01/25/21	1.793	1.793	Mo 01/04/21	1.657	1.657	
Fr 02/12/21	2.011	2.011	Fr 01/22/21	1.848	1.848	Fr 01/01/21	1.646	1.646	
Th 02/11/21	1.952	1.952	Th 01/21/21	1.871	1.871	Th 12/31/20	1.646	1.646	
We 02/10/21	1.909	1.909	We 01/20/21	1.831	1.831	We 12/30/20	1.657	1.657	
Tu 02/09/21	1.949	1.949	Tu 01/19/21	1.835	1.835	Tu 12/29/20	1.676	1.676	
Mo 02/08/21	1.954	1.954	Mo 01/18/21	1.834	1.834	Mo 12/28/20	1.661	1.661	
Fr 02/05/21	1.972	1.972	Fr 01/15/21	1.834	1.834	Fr 12/25/20	1.663	1.663	
Th 02/04/21	1.940	1.940	Th 01/14/21	1.873	1.873	Th 12/24/20	1.663	1.663	
We 02/03/21	1.927	1.927	We 01/13/21	1.817	1.817	We 12/23/20	1.683	1.683	
Tu 02/02/21	1.871	1.871	Tu 01/12/21	1.873	1.873	Tu 12/22/20	1.650	1.650	
Mo 02/01/21	1.856	1.856	Mo 01/11/21	1.885	1.885	Mo 12/21/20	1.674	1.674	

GT30 Govt Export Settings Page 2/3 Historical Price Table

Range 08/17/2020 - 02/17/2021 Period Daily High 2.093 on 02/16/21  
 Market Mid Price M Yld Cnv Currency USD Average 1.342 on 08/21/20  
 View Price Table Net Chg 1.634 1.634  
 .605 42.12%

Date	Mid Price	M Yld Cnv	Date	Mid Price	M Yld Cnv	Date	Mid Price	M Yld Cnv
Fr 12/18/20	1.693	1.693	Fr 11/27/20	1.572	1.572	Fr 11/06/20	1.602	1.602
Th 12/17/20	1.681	1.681	Th 11/26/20	1.625	1.625	Th 11/05/20	1.525	1.525
We 12/16/20	1.657	1.657	We 11/25/20	1.625	1.625	We 11/04/20	1.543	1.543
Tu 12/15/20	1.652	1.652	Tu 11/24/20	1.607	1.607	Tu 11/03/20	1.682	1.682
Mo 12/14/20	1.630	1.630	Mo 11/23/20	1.554	1.554	Mo 11/02/20	1.618	1.618
Fr 12/11/20	1.629	1.629	Fr 11/20/20	1.521	1.521	Fr 10/30/20	1.662	1.662
Th 12/10/20	1.628	1.628	Th 11/19/20	1.546	1.546	Th 10/29/20	1.604	1.604
We 12/09/20	1.685	1.685	We 11/18/20	1.601	1.601	We 10/28/20	1.555	1.555
Tu 12/08/20	1.664	1.664	Tu 11/17/20	1.607	1.607	Tu 10/27/20	1.554	1.554
Mo 12/07/20	1.681	1.681	Mo 11/16/20	1.664	1.664	Mo 10/26/20	1.593	1.593
Fr 12/04/20	1.735	1.735	Fr 11/13/20	1.648	1.648	Fr 10/23/20	1.642	1.642
Th 12/03/20	1.655	1.655	Th 11/12/20	1.640	1.640	Th 10/22/20	1.677	1.677
We 12/02/20	1.687	1.687	We 11/11/20	1.743	1.743	We 10/21/20	1.637	1.637
Tu 12/01/20	1.670	1.670	Tu 11/10/20	1.743	1.743	Tu 10/20/20	1.593	1.593
Mo 11/30/20	1.569	1.569	Mo 11/09/20	1.711	1.711	Mo 10/19/20	1.562	1.562

GT30 Govt Export Settings Page 3/3 Historical Price Table

Range 08/17/2020 - 02/17/2021 Period Daily High 2.093 on 02/16/21  
 Market Mid Price M Yld Cnv Currency USD Average 1.342 on 08/21/20  
 View Price Table Net Chg 1.634 1.634  
 .605 42.12%

Date	Mid Price	M Yld Cnv	Date	Mid Price	M Yld Cnv	Date	Mid Price	M Yld Cnv
Fr 10/16/20	1.530	1.530	Fr 09/25/20	1.402	1.402	Fr 09/04/20	1.473	1.473
Th 10/15/20	1.514	1.514	Th 09/24/20	1.409	1.409	Th 09/03/20	1.363	1.363
We 10/14/20	1.506	1.506	We 09/23/20	1.418	1.418	We 09/02/20	1.380	1.380
Tu 10/13/20	1.512	1.512	Tu 09/22/20	1.424	1.424	Tu 09/01/20	1.421	1.421
Mo 10/12/20	1.574	1.574	Mo 09/21/20	1.416	1.416	Mo 08/31/20	1.476	1.476
Fr 10/09/20	1.574	1.574	Fr 09/18/20	1.454	1.454	Fr 08/28/20	1.503	1.503
Th 10/08/20	1.588	1.588	Th 09/17/20	1.440	1.440	Th 08/27/20	1.511	1.511
We 10/07/20	1.588	1.588	We 09/16/20	1.460	1.460	We 08/26/20	1.414	1.414
Tu 10/06/20	1.538	1.538	Tu 09/15/20	1.433	1.433	Tu 08/25/20	1.395	1.395
Mo 10/05/20	1.591	1.591	Mo 09/14/20	1.413	1.413	Mo 08/24/20	1.357	1.357
Fr 10/02/20	1.488	1.488	Fr 09/11/20	1.413	1.413	Fr 08/21/20	L 1.342	1.342
Th 10/01/20	1.456	1.456	Th 09/10/20	1.420	1.420	Th 08/20/20	1.384	1.384
We 09/30/20	1.456	1.456	We 09/09/20	1.458	1.458	We 08/19/20	1.425	1.425
Tu 09/29/20	1.416	1.416	Tu 09/08/20	1.423	1.423	Tu 08/18/20	1.397	1.397
Mo 09/28/20	1.416	1.416	Mo 09/07/20	1.473	1.473	Mo 08/17/20	1.435	1.435

DOE Award Examples

*Presumption: \$173 million award expected from DOE.*

**Scenarios:**

1. DEF credits base rate revenue requirements in 2022, \$38 million, in 2023, \$35 million and 2024, \$100 million. \$173 million is received on January 1, 2023.

Q: Explain the accounting entries and ratemaking impacts in base rates and CCR.

A:

Year	Description	Cash	Reg Asset	Reg Liab	Amort Exp
2022	Accrue Earnings		38		(38)
2023	DOE Award	173	(38)	(135)	
2023	Accrue Earnings*			35	(35)
2024	Accrue Earnings			100	(100)
Total		173	0	0	(173)

2. Same as #1, but the money is received September 30, 2022.

Q: Explain the accounting entries and ratemaking impacts in base rates and CCR.

A:

Year	Description	Cash	Reg Asset	Reg Liab	Amort Exp
2022	DOE Award	173		(173)	
2022	Accrue Earnings *			38	(38)
2023	Accrue Earnings			35	(35)
2024	Accrue Earnings			100	(100)
Total		173	0	0	(173)

\* For simplicity, the table assumes the entire 2022 earnings impact is recorded in December 2022.

3. Same as #1, but the money is received June 30, 2024.

Q: Explain the accounting entries and ratemaking impacts in base rates and CCR.

A:

Year	Description	Cash	Reg Asset	Reg Liab	Amort Exp
2022	Accrue Earnings		38		(38)
2023	Accrue Earnings		35		(35)
2024	DOE Award	173	(73)	(100)	
2024	Accrue Earnings*			100	(100)
Total		173	0	0	(173)

\* For simplicity, the table assumes the entire 2024 earnings impact is recorded in December 2024.

4. Same as #1, but the money is received February 1, 2025.

Q: Explain the accounting entries and ratemaking impacts in base rates and CCR.

A:

Year	Description	Cash	Reg Asset	Reg Liab	Amort Exp
2022	Accrue Earnings		38		(38)
2023	Accrue Earnings		35		(35)
2024	Accrue Earnings		100		(100)
2025	DOE Award	173	(173)		
Total		173	0	0	(173)

5. Same as #1, but amount received is \$165 million.

Q: Explain the accounting entries and ratemaking impacts in base rates and CCR.

A:

Year	Description	Cash	Reg Asset	Reg Liab	Amort Exp	Revenue
2022	Accrue Earnings		38		(38)	
2023	DOE Award	165	(30)	(135)		
2023	Accrue Earnings			35	(35)	
2024	Accrue Earnings			100	(100)	
2024	CCR recovery	8	(8)		8	(8)
Total		173	0	0	(165)	(8)

6. Same as #1, but amount received is \$180 million,

Q: Explain the accounting entries and ratemaking impacts in base rates and CCR.

A:

Year	Description	Cash	Reg Asset	Reg Liab	Amort Exp	Revenue
2022	Accrue Earnings		38		(38)	
2023	DOE Award	180	(38)	(142)		
2023	Accrue Earnings			35	(35)	
2024	Accrue Earnings			100	(100)	
2024	CCR recovery	(7)		7	(7)	7
Total		173	0	0	(180)	7

7. For the scenarios #1 through #6, explain whether a carrying charge will be applied and how the carrying charge is to be calculated.

A: DEF will not apply a carrying charge to the balance in the regulatory asset or liability related to the DOE award. DEF will continue to apply a carrying charge to the dry cask storage regulatory asset included in the CCR clause.

Calculated Cost Per Charge					
Charge Power (kW)	Time to Charge (Minutes)	Tesla	Evgo	EA	Average Cost per kWh
50	30.0	\$ 7.00	\$ 10.50	\$ 7.30	\$ 0.33

kWh 25