### State of Florida



# **Public Service Commission**

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

**DATE:** August 1, 2025

**TO:** Adam J. Teitzman, Commission Clerk, Office of Commission Clerk

**FROM:** Lynn Deamer, Bureau Chief, Office of Auditing & Performance Analysis

**RE:** Docket No.: 20250007-EI

Company Name: Duke Energy Florida, LLC.

Company Code: EI801

Audit Purpose: A3d: Environmental Cost Recovery Clause (ECRC)

Audit Control No.: 2025-037-1-2

Attached is the final audit report for the Utility stated above, I am sending the Utility a copy of this memo and the audit report. If the Utility desires to file a response to the audit report, it should send a response to the Office of the Commission Clerk. There are no confidential work papers associated with this audit.

Attachment: Audit Report

Cc: Office of Auditing & Performance Analysis

## State of Florida



# **Public Service Commission**

Office of Auditing and Performance Analysis
Bureau of Auditing

# **Auditor's Report**

Duke Energy Florida, LLC Environmental Cost Recovery Clause

Twelve Months Ended December 31, 2024

Docket No. 20250007-EI Audit Control No. 2025-037-1-2 July 31, 2025

> Kathryn Guan Audit Manager

Lynn M. Deamer Reviewer

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### **Purpose**

To: Florida Public Service Commission

We have performed the procedures described later in this report to meet the objectives set forth by the Division of Engineering in its audit service request dated January 31, 2025. We have applied these procedures to the attached summary exhibit and to several related schedules prepared by Duke Energy Florida, LLC in support of its 2024 filing for the Environmental Cost Recovery Clause in Docket No. 20250007-EI.

The report is intended only for internal Commission use.

### Objectives and Procedures

#### General

#### Definition

Company/Duke refers to the Duke Energy Florida, LLC. ECRC refers to the Environmental Cost Recovery Clause.

#### **Capital Investments**

### Capital Investments

**Objective:** The objectives were to verify net investments associated with the following capital projects:

- 1) Project 6.1 Phase II Cooling Water Intake 316(b) Base Bartow
- 2) Project 19 Reclaimed Water Interconnection Peaking
- 3) Project 21 CCC Water Treatment System Base

**Procedures:** We obtained the general ledger of capital investment transactions from the Company. We recalculated the CWIP-non interest bearing balances and capital investments for Projects 6.1, 19 and 21, and reconciled to Form 42-8A. We judgmentally selected a sample of capital investment for each project, and traced to the supporting documentation. No exceptions were noted.

#### Revenue

#### Operating Revenues

**Objectives:** The objectives were to determine the actual Kilowatt Hours (kWh) sold for the period January 1, 2024, through December 31, 2024, and determine whether the Company applied the Commission-approved cost recovery factor to actual kWh sales for the ECRC.

**Procedures:** We recalculated the ECRC revenues from the general ledger, and reconciled to Form 42-2A. We computed the factors by rate code and compared them to Commission Order No. PSC-2023-0344-FOF-EI. The customer bills have been tested and recalculated in Fuel and Purchased Power Cost Recovery Clause audit with Docket No. 2025001-EI, Audit Control No. 2025-003-1-3. No exceptions were noted.

#### **Expense**

#### Operation and Maintenance Expense

**Objectives:** The objectives were to verify that Operation and Maintenance (O&M) Expenses listed on Form 42-5A filing are supported by adequate documentation and that the expenses were appropriately recoverable through the ECRC.

**Procedures:** We recalculated the O&M expenses from the general ledger, and traced to the Form 42-5A. We judgmentally selected the sample of O&M expenses for testing. The source documentation for selected items was reviewed to ensure the expenses were for the current period, charged to the correct accounts, and appropriately recoverable through the ECRC. No exceptions were noted.

#### **Depreciation and Amortization**

**Objective:** The objective was to verify that the most recent Commission-approved depreciation rates or amortization periods were used in calculating depreciation expense.

**Procedures:** We recalculated depreciation expense and traced it to the Company's Depreciation Schedule. We traced total year depreciation expense for each capital project listed on Form 42-8A to the depreciation rates from the Commission Order No. PSC-2021-0202-AS-EI, to the Company's Depreciation and Amortization Schedule. The Company does not provide project-level break outs of depreciation and amortization to the general ledger or the filing. No exceptions were noted.

#### Other Issues

#### SO<sub>2</sub> and NOx Emissions

**Objectives:** The objectives were to verify investments, inventory, expensed amounts, allowance auction proceeds and to verify amounts included in Working Capital, Form 42-8A.

**Procedures:** We traced 2024 consumption for SO<sub>2</sub> Allowances from the Company's detailed Allowances Reports to the Total Emissions Schedule on Form 42-8A. We verified the single sale of NO<sub>x</sub> Allowance to Reedy Creek Improvement District. We traced the jurisdictional factors to Commission Order No. PSC-2023-0344-FOF-EI. No exceptions were noted.

### True-up

**Objective:** The objective was to determine if the True-Up and Interest Provision as filed on Form 42-2A was properly calculated.

**Procedures:** We traced the December 31, 2023, True-Up Provision to Commission Order No. PSC-2023-0344-FOF-EI. We recalculated the True-Up and Interest Provision amounts as of December 31, 2024, using the Commission-approved beginning balance as of December 31, 2023, the Financial Commercial Paper rates, and the 2024 ECRC revenues and costs. Audit staff noted that the Company used different rates from January to July 2024 to calculate the interest provision. The effect on net the true-up was deemed immaterial. No further work performed.

## **Analytical Review**

**Objective:** The objective was to perform an analytical review of the Company's ECRC Revenues and Expenses to determine if there were any material changes or inconsistencies from the prior year.

**Procedures:** We compared 2024 revenues and expenses to 2023. We obtained the explanation from the Company for the substantial changes, and the explanation was sufficient. Further follow-up was not required.

# **Audit Findings**

None

# **Exhibit**

# Exhibit 1: True Up

#### DUKE ENERGY FLORIDA, LLC Environmental Cost Recovery Clause Final True-Up January 2024 - December 2024

# End-of-Period True-Up Amount (in Dollars)

Form 42-2A

Docket Ne. 20250007-El

Duke Energy Florids

Witness: C. P. Deen
Exhibit No. GPD-1

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Line	Description	_	Actual Jan-24	Actual Feb-24	Actual Mar-24	Actual Apr-24	Actual May-24	Actual Jun-24	Actual Jul-24	Actual Aug-24	Actual Sep-24	Actual Oct-24	Actual Nov-24	Actual Dec-24	End of Period Total
1 2	ECRC Revenues (net of Revenue Taxes) True-Up Provision	(2,781,842)	\$1,308,980 {231,820}	\$1,256,793 (231,820)	\$1,202,856 (231,820)	\$1,254,677 (231,820)	\$1,556,040 (231,820)	\$1,810,004 (231,820)	\$1,900,835 (231,620)	\$1,912,349 (231,820)	\$1,849,925 (231,820)	\$1,584,266 (231,820)	\$1,372,331 (231,820)	\$1,254,044 (231,820)	18,263,112 (2,781,842)
3	(Order No. PSC-2023-0344-FOF-EI) ECRC Revenues Applicable to Period (Lines 1 + 2)	_	\$1,077,160	1,024,973	971,046	1,022,857	1,324,220	1,578,184	1,669,015	1,680,529	1,618,105	1,352,446	1,140,511	1,022,224	15,481,270
4	Jurisdictional ECRC Costs a. O & M Activities (Form 42-5A, Line 9) b. Capital Investment Projects (Form 42-7A, Line 9) c. Other (A) d. Total Jurisdictional ECRC Costs	_	\$670,259 378,359 0 \$1,048,618	\$204,649 377,425 0 \$582,074	\$200,218 377,816 0 \$578,034	\$337,799 374,185 0 \$711,984	\$763,993 370,436 0 \$1.134,429	\$1,641,527 372,674 0 \$2,014,201	\$941,582 374,113 0 \$1,315,695	\$325,290 374,992 0 \$700,282	\$718,317 374,973 0 \$1,093,290	(\$348,543) 373,456 0 \$24,913	\$231,053 370,836 0 \$601,889	\$517,487 376,710 0 \$894,177	\$6,203,611 4,495,976 0 \$10,699,587
	Over/(Under) Recovery (Line 3 - Line 4d)		\$28,542	\$442,899	\$393,012	\$310,873	\$189,790	(\$436,017)	\$353,320	\$980,247	\$524,815	\$1,327,533	\$538,622	\$128,047	\$4,781,683
6	Interest Provision (Form 42-3A, Line 10)		(4,887)	(2,831)	29	2,615	4,752	5,277	6,132	10,026	13,856	17,954	21,932	23,220	98,075
7	Beginning Balance True-Up & Interest Provision  a. Deferred True-Up - January 2023 - December 2023		(2,781,842)	(2,526,367)	(1,854,480)	(1,229,618)	(684,310)	(257,948)	(456,868)	134,404	1,356,498	2,126,989	3,704,297	4,496,670	(2,781,842)
	(2023 TU filing dated April 1, 2024)		1,548,518	1,548,518	1,548,518	1,548,518	1,548,518	1,548,518	1,548,518	1,548,518	1,548,518	1,548,518	1,548,518	1,548,516	1,548,518
8	True-Up Collected/(Refunded) (see Line 2)	_	231,820	231,820	231,820	231,820	231,820	231,820	231,820	231,820	231,820	231,820	231,820	231,820	2,781,842
9	End of Period Total True-Up (Lines 5+6+7+7a+8)		(\$977,850)	(\$305,962)	\$318,899	\$864,208	\$1,290,570	\$1,091,650	\$1,682,922	\$2,905,016	\$3,675,507	\$5,252,814	\$6,045,188	\$6,428,275	\$6,428,275
10	Adjustments to Period Total True-Up Including Interest	_	0	0	0	0	0	0	0	0	0	00	0	0	0
11	End of Period Total True-Up Over/(Under) (Lines 9 + 10)	_	(\$977,850)	(\$305,962)	\$318,899	\$864,208	\$1,290,570	\$1,091,650	1,682,922	\$2,905,016	\$3,675,507	\$5,252,814	\$6,045,188	\$6,428,275	\$6,428,275

## **Exhibit 2: Interest Provision**

#### DUKE ENERGY FLORIDA, LLC Environmental Cost Recovery Clause Final True-Up January 2024 - December 2024

tnterest Provision (In Dollars) Docket No. 20250007-El Duke Energy Florida

Form 42-3A

Duke Energy Florida Witness: G. P. Dean Exhibit No. GPD-1 Page 4 of 20

Line		Actual Jan-24	Actual Feb-24	Actual Mar-24	Actual Apr-24	Actual May-24	Actual Jun-24	Actual Jul-24	Actual Aug-24	Actual Sep-24	Actual Oct-24	Actual Nov-24	Actual Dec-24	End of Period Total
1	Beginning True-Up Amount (Form 42-2A, Line 7 + 7a + 10)	(\$1,233,324)	(\$977,850)	(\$305,962)	\$318,699	\$864,208	\$1,290,570	\$1,091,650	\$1,682,922	\$2,905,016	\$3,675,507	\$5,252,814	\$6,045,188	
2	Ending True-Up Amount Before Interest (Line 1 + Form 42-2A, Lines 5 + 8)	(972,963)	(303,131)	318,870	861,593	1,285,818	1,086,373	1,676,790	2,894,990	3,661,651	5,234,860	6,023,256	6,405,055	
3	Total of Beginning & Ending True-Up (Lines 1+2)	(2,206,287)	(1,280,980)	12,909	1,180,492	2,150,026	2,376,943	2,768,440	4,577,912	6,566,667	8,910,367	11,278,071	12,450,244	
4	Average True-Up Amount (Line 3 x 1/2)	(1,103,144)	(640,490)	6,455	590,246	1,075,013	1,188,472	1,384,220	2,268,956	3,283,334	4,455,184	5,638,036	6,225,122	
5	Interest Rate (First Business Day of Current Month)	5.32%	5.32%	5.29%	5.33%	5.30%	5.30%	5.35%	5.31%	5.21%	4.91%	4.75%	4.58%	
6	Interest Rate (First Business Day of Subsequent Month)	5.32%	5.29%	5.33%	5.30%	5.30%	5.35%	5.28%	5.21%	4,91%	4.75%	4,58%	4.36%	
7	Total of Beginning & Ending Interest Rates (Lines 5 + 6)	10.64%	10.61%	10.62%	10.63%	10.60%	10.65%	10.63%	10.52%	10.12%	9.66%	9.33%	8.94%	
8	Average Interest Rate (Line 7 x 1/2)	5.320%	5.305%	5.310%	5.315%	5.300%	5.325%	5.315%	5.260%	5.060%	4.830%	4,665%	4.470%	
9	Monthly Average Interest Rate (Line 8 x 1/12)	0.443%	0.442%	0.443%	0.443%	0.442%	0.444%	0.443%	0.438%	0.422%	0.403%	0.389%	0.373%	
10	Interest Provision for the Month (Line 4 x Line 9)	(\$4,887)	(\$2,831)	\$29	\$2,615	\$4,752	\$5,277	\$6,132	\$10,026	\$13,856	\$17,954	\$21,932	\$23,220	\$98,075