

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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In re: Application for limited proceeding for recovery of incremental storm restoration costs related to Hurricanes Irma and Nate by Duke Energy Florida, LLC

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Docket No. 20170272-EI

Dated: March 4, 2019

**DUKE ENERGY FLORIDA, LLC'S RESPONSE TO  
CITIZENS' FIFTH SET OF INTERROGATORIES (NOS. 101-104)**

Duke Energy Florida, LLC ("DEF") incorporates the objections filed contemporaneous with this response and responds to the Citizens of the State of Florida, through the Office of the Public Counsel's ("Citizens" or "OPC") Fifth Set of Interrogatories to DEF (Nos. 101-104) as follows:

**INTERROGATORIES**

101. With regard to the crew identified on Bates numbered page 20170272-DEF-OPC POD 1-6-0056560 for the date of September 15, 2017, please answer the following:
- a. State the beginning and ending time of the crew's restoration work for that day;
  - b. State whether the work hours represent overtime work for that day (Reference 20170272- DEF-OPC POD 1-6-0056560);
  - c. State, for the activities shown on 20170272-DEF-OPC POD 1-6-0056562, whether the total time spent on the activities that relate to the time stamp of 08:27 PM were included in the calculation of overtime hours on September 15, 2017 for all 6 members of the crew;
  - d. State whether the crew performed restoration work after 08:27 PM on September 15, 2017;
  - e. State with specificity what additional work, if any, was done after 08:27 PM, given the logistics of leaving the location and driving to a storm work restoration job site;
  - f. State how much total time was associated with the activity associated with the time stamp of 08:27 PM, from the time the crew began to travel toward that location where they were at 08:27 PM until they actually left the location;
  - g. State whether DEF adjusted the invoice at 20170272-DEF-OPC POD 1-6-0056555 for any of the hours reported on the time sheet at 20170272-DEF-OPC POD 1-6-0056560;
  - h. State the reason for any adjustment made before February 15, 2019, if any, related to the activities shown on 20170272-DEF-OPC POD 1-6-0056562;
  - i. State when the "Duke Approval" was given for the activity at 20170272-DEF-OPC POD 1-6-0056562, including whether such approval was given prior to the activity being undertaken;
  - j. State why approval was given for the activity represented at 20170272-DEF-OPC POD 1- 6-0056562;

- k. State the purpose of the documentation at 20170272-DEF-OPC POD 1-6-0056560 and whether it was verified by Duke;
- l. State when “Duke Approval” was given for the documentation at 20170272-DEF-OPC POD 1-6-0056561;
- m. State whose signature appears next to “Duke Approval” at 20170272-DEF-OPC POD 1-6-0056561 and 20170272-DEF-OPC POD 1-6-0056562;
- n. State the general work location to which the crew was assigned;
- o. State the number of customer in that specific crew’s assigned general work location area who were awaiting service restoration at 6:30 PM on September 15, 2017; and
- p. State the number of meals provided by Duke for the crew that day.

**Answer:**

- a. In response to significant events such as hurricanes that requires mobilization of mutual assistance resources, Duke Energy establishes a 16hr daily work schedule with a 5am start time and 9pm end time. The goal is to maximize productivity during the daytime hours and allow for 8 hours of rest and recovery before returning to work each day.
- b. Yes, all hours for 9/15 are overtime. The contractor met their 40-hour straight time requirement for the week. All additional hours are overtime.
- c. Yes. Those hours are included in the overtime hour calculations on 9/15.
- d. No, the crew did not perform restoration work after the 8:27pm time referenced on September 15, 2017.
- e. Based on the start time of 5am and the 16hr work schedule, the crew would have completed restoration task prior to 8:27pm, consumed their evening meal and completed their workday as of 9pm. They would be off the clock for 8hours before returning to work the next day.
- f. The crew completed restoration work, consumed their meal at 8:27pm and lodged (coded off for 8hrs) within Volusia County on September 15, 2017.
- g. DEF would not adjust an invoice. The revision of the invoice was made by the contractor. The original timesheets did not provide the crew member’s names, only job classifications, therefore they could not be cross referenced against rosters. The vendor sent the updated timesheets back with names and found billing errors which resulted in the submission of a revised invoice of \$183,031.81 (Original amount of \$185,320.21).
- h. Not aware of any adjustments made to the activities shown on 20170272-DEF-OPC POD 1-6-0056562.
- i. Approval was communicated to the Crew Leadership during on initial onboarding and adjusted, as needed, by their Duke Energy Field Coordinator daily during the restoration efforts.
- j. The primary strategy within Duke Energy’s response plans are to feed resources at the active base camps. During Irma based on the level of magnitude, logistics support plans

for the over 12,000 resources were expanded to include multiple feeding options that included eating at base camps, assigned hotels for lodging and available restaurants.

- k. In order to compete the review of the invoice and validate hours, detailed timesheets with employee’s names and hours by day were needed. This timesheet was based on Bates numbered page 20170272-DEF-OPC POD 1-6-0056561.
- l. Resource Acquisition confirms the straight-time and overtime policies with the mutual assistance company, as part of the acquisition and onboarding process. Logistics plans and approval were communicated to the crew leadership during the initial onboarding, confirmed daily by their Duke Energy field leader daily during the restoration efforts.
- m. The signature that appears next to “Duke Approval” is Greg Briley (Contractor Resources Manager).
- n. Volusia County.
- o. This crew was assigned to support the Volusia County restoration efforts on 9/15.

 **Florida Outages by County Report**

9/15/17 6:00 PM

County	Customers Served	Customers Out	Customers Restored	Estimated Restoration Time
Alachua	4,880	427	3,276	Midnight on Sunday, Sept. 17
Bay	2,273	173	1,391	Midnight on Sunday, Sept. 17
Brevard	16	1	8	Midnight on Sunday, Sept. 17
Citrus	46,897	4,712	33,273	Midnight on Sunday, Sept. 17
Columbia	566	45	362	Midnight on Sunday, Sept. 17
Dixie	1,800	148	1,185	Midnight on Sunday, Sept. 17
Flagler	16	2	12	Midnight on Sunday, Sept. 17
Franklin	10,202	-	7,276	Restored
Gilchrist	1,637	131	1,049	Midnight on Sunday, Sept. 17
Gulf	6,470	-	4,538	Restored
Hamilton	2,927	240	1,930	Midnight on Sunday, Sept. 17
Hardee	2,661	374	2,467	
Hernando	11,357	1,161	8,196	Midnight on Sunday, Sept. 17
Highlands	54,209	36,265	20,945	
Hillsborough	25	3	18	Midnight on Sunday, Sept. 17
Jefferson	4,639	371	2,980	Midnight on Sunday, Sept. 17
Lafayette	845	68	548	Midnight on Sunday, Sept. 17
Lake	84,056	7,955	54,250	Midnight on Sunday, Sept. 17
Leon	61	5	38	Midnight on Sunday, Sept. 17
Levy	3,702	343	2,538	Midnight on Sunday, Sept. 17
Madison	3,811	313	2,513	Midnight on Sunday, Sept. 17
Marion	65,525	7,609	52,147	Midnight on Sunday, Sept. 17
Orange	369,171	31,578	201,684	Midnight on Sunday, Sept. 17
Osceola	48,065	3,347	22,910	Midnight on Sunday, Sept. 17
Pasco	139,992	14,356	103,049	Midnight on Friday Sept 15
Pinellas	540,933	59,808	409,592	Midnight on Friday Sept 15
Polk	100,519	9,278	65,634	Midnight on Sunday, Sept. 17
Seminole	156,103	16,227	104,220	Midnight on Sunday, Sept. 17
Sumter	10,171	1,227	8,351	Midnight on Sunday, Sept. 17
Suwannee	797	65	522	Midnight on Sunday, Sept. 17
Taylor	6,026	487	3,911	Midnight on Sunday, Sept. 17
Volusia	81,055	9,510	62,054	Midnight on Sunday, Sept. 17
Wakulla	6,814	536	4,306	Midnight on Sunday, Sept. 17
<b>Total</b>	<b>1,768,021</b>	<b>206,765</b>	<b>1,187,173</b>	

- p. The crew was provided 2 meals and approved to secure their dinner meal on September 15, 2017. The normal strategy is for crews to be provided 3 meals per day (breakfast, lunch, and dinner) out of the active base camp locations. If a base camp cannot support the feeding of resources, the Duke Energy representative overseeing the crews informs

the crews they should eat at local eating establishments and bill Duke Energy for the transactions. In the alternative, the crew may be finishing a project that requires them to miss the meal at the base camp, so the crew would inform base camp that they will be responsible for procuring their meal.

102. With regard to the crew identified on Bates numbered page 20170272-DEF-OPC POD 1-6-0056564 for the date of September 15, 2017, please answer the following:
- a. State the beginning and ending time of the crew's restoration work for that day;
  - b. State whether the work hours represent overtime work for that day (Reference 20170272- DEF-OPC POD 1-6-0056563);
  - c. State, for the activities shown on 20170272-DEF-OPC POD 1-6-0056565, whether the total time spent on the activities that relate to the time stamp of 07:50PM (with special note of the time stamp at 07:06 PM) were included in the calculation of overtime hours on September 15, 2017 for all 7 members of the crew;
  - d. State whether the crew performed restoration work after 07:50 PM on September 15, 2017;
  - e. State with specificity what additional work, if any, was done after 07:50 PM given the logistics of leaving the location and driving to a storm work restoration job site;
  - f. State how much total time was associated with the activity associated with the time stamp of 07:50 PM, from the time the crew began to travel toward that location where they were at 08:27 PM until they actually left the location;
  - g. State whether DEF adjusted the invoice at 20170272-DEF-OPC POD 1-6-0056555 for any of the hours reported on the time sheet at 20170272-DEF-OPC POD 1-6-0056563;
  - h. State the reason for any adjustment made before February 15, 2019, if any, related to the activities shown on 20170272-DEF-OPC POD 1-6-0056565;
  - i. State when the "Duke Approval" was given for the activity at 20170272-DEF-OPC POD 1-6-0056565, including whether such approval was given prior to the activity being undertaken;
  - j. State why approval was given for the activity represented at 20170272-DEF-OPC POD 1- 6-0056565;
  - k. State the purpose of the documentation at 20170272-DEF-OPC POD 1-6-0056563 and whether it was verified by Duke;
  - l. State when "Duke Approval" was given for the documentation at 20170272-DEF-OPC POD 1-6-0056564;
  - m. State whose signature appears next to "Duke Approval" at 20170272-DEF-OPC POD 1- 6-0056564 and 20170272-DEF-OPC POD 1-6-0056565;
  - n. State the general work location to which the crew was assigned;
  - o. State the number of customer in that specific crew's assigned general work location area who were awaiting service restoration at 6:30 PM on September 15, 2017; and
  - p. State the number of meals provided by Duke for the crew that day.

**Answer:**

- a.** In response to significant events such as hurricanes that requires mobilization of mutual assistance resources, Duke Energy establishes a 16hr daily work schedule with a 5am start time and 9pm end time. The goal is to maximize restoration efforts during the daytime hours and allow for 8 hours of rest and recovery before returning to work each day.
- b.** Yes, all hours for 9/15 are overtime. The contractor met their 40-hour straight time requirement for the week. All additional hours are overtime.
- c.** Yes. Those hours are included in the overtime calculations on 9/15.
- d.** No, the crew did not perform restoration work after the 7:50 (7:06) pm time referenced on September 15, 2017.
- e.** Based on the start time of 5am and the 16hr work schedule, the crew would have completed restoration task prior to 7:50 (7:06) pm, consumed their evening meal and completed their workday as of 9pm. The crew would be off the clock for 8hours before returning to work the next day.
- f.** The crew in referenced was part of the over 12,000 resources engaged in restoration efforts. The crew completed restoration activities, were released to secure dinner that was consumed at 7:50 (7:06) pm, return to their lodging location, be off the clock for 8hrs on September 15, 2017 and return to work the next day.
- g.** DEF would not adjust an invoice. The revision of the invoice was made by the contractor. The original timesheets did not provide the crew member's names, only job classifications, therefore the invoices could not be cross referenced against rosters. The vendor sent the updated timesheets with names and found billing errors which resulted in the submission of a revised invoice of \$183,031.81 (Original amount of \$185,320.21).
- h.** Not aware of any adjustments made to activities shown on 20170272-DEF-OPC POD 1-6-0056565.
- i.** Approval would have been communicated to the crew leadership during initial onboarding and adjusted, as needed, by their Duke Energy field leader daily during the restoration efforts.
- j.** The primary strategy within Duke Energy's response plans are to feed resources at the active base camps. During Irma based on the level of magnitude, logistics support plans for the over 12,000 resources were expanded to include multiple feeding options that included eating at base camps, assigned hotels for lodging and available restaurants. This crew referenced in 20170272-DEF-OPC POD 1-6-0056565 was mobilized from restoration efforts in Davenport, Polk County area to restoration efforts in the Deland, Seminole and Volusia County area.

- k. In order to compete the review of the invoice and validate hours, detailed timesheets with employee's names and hours by day were needed. This timesheet was based on Bates numbered page 20170272-DEF-OPC POD 1-6-0056564.
- l. Duke Energy confirms the straight-time and overtime policies with the mutual assistance company, as part of the acquisition and onboarding process. Approval of hours worked are confirmed daily by their Duke Energy field leader daily during the restoration efforts.
- m. The signature that appears next to "Duke Approval" is Greg Briley (Contractor Resources Manager).
- n. This crew would have been part of the restoration efforts in Polk, Seminole and Volusia counties.
- o. The Crew was engaged in restoration efforts in Polk, Seminole and Volusia Counties on September 15, 2017.

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- p. The crew referenced was not provided any meals out of active base camps and were approved to secure their breakfast, lunch and dinner meals at available restaurants on September 15, 2017 as the crew was mobilized from Polk to Seminole and Volusia counties. Duke Energy's logistics plans include crews to be provided 3 meals per day (breakfast, lunch, and dinner) out of active Base Camp locations. If a base camp cannot

support the feeding of resources, the Duke Energy representative overseeing the crews informs the crews they should eat at local eating establishments and bill Duke Energy for the transactions. In the alternative, the crew may be finishing a project that requires them to miss the meal at the base camp, so the crew would inform base camp that they will be responsible for procuring their meal.

q.

103. Please describe the policy that Duke established (or contracted for) with regard to line restoration (distribution and transmission) crews, vegetation management crews and damage assessors (teams or crews) eating non-Duke-provided meals, including the policy relating to “sit-down” restaurant meals with wait service (e.g. whether they are allowed and if allowed under what circumstances such as duration, driving distance and if they are reimbursed by Duke, both as to time spent and the cost of meals) during billed work time.

**Answer:**

Regarding questions 103 and 104, there is not a policy that specifically states whether or not a contractor can be reimbursed for a “sit down” meal or not. Duke Energy adheres to the following guidelines regarding meals:

Contractors are responsible for making their own arrangements during travel to Duke Energy, and their return trip home. (Pre- and Post-Storm) Contractors are able to bill Duke Energy for these expenses. During restoration, contractors will be supplied or reimbursed for all meals within reason. If a meal is offered to a contractor, but the contractor chooses to make other arrangements, the contractor will not be reimbursed. However, there may be times when a crew is still performing restoration for Duke Energy’s customers and are unable to safely break away during a regular meal service time. If we are not able to get the meals to the crew, the crew would be allowed to purchase a meal at a local eating establishment and bill Duke Energy for it. A Duke Energy representative is normally with the crews in the field and would be able to ensure it isn’t taking more than a reasonable amount of time.

When contractors submit their rate sheets for a storm contract, contractors are asked to define how they will “bill for meals when not provided by Duke Energy.” The response is varied. For ex.: Union based contractors are obligated to follow union based rules regarding travel compensation. Some contractors submit receipts as a “pass through” cost, some mark up 10% or more. Other contractors have a daily or per meal rate, etc. It really depends on each specific contractor on the amount that is entitled to. Regardless of the amount, Duke Energy only reimburses if the meal is not provided by Duke Energy.

104. Please describe the policy that Duke *enforced* with regard to line restoration (distribution and transmission) crews, vegetation management crews and damage assessors (teams or crews) eating non-Duke-provided meals, including the policy relating to “sit-down” restaurant meals with wait service (e.g. whether they are allowed and if allowed under what circumstances such as duration, driving distance and if they are reimbursed by Duke, both

as to time spent and the cost of meals) during billed work time, to the extent that such enforced policy is different than the established (or contracted for) policy.

**Answer:**

Please see the response to Q 103.



**AFFIDAVIT**

STATE OF FLORIDA

COUNTY OF PINELLAS

I hereby certify that on this \_\_\_\_\_ day of March, 2019, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared JASON CUTLIFFE, who is personally known to me, and has acknowledged before me that he provided the answers to interrogatory number(s) 101 and 102 of CITIZENS' FIFTH SET OF INTERROGATORIES TO DUKE ENERGY FLORIDA, LLC (NOS. 101-104) in Docket No. 20170272-EI, and that the responses are true and correct based on his personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this \_\_\_\_\_ day of March, 2019.

\_\_\_\_\_  
Jason Cutliffe

\_\_\_\_\_  
Notary Public  
State of Florida, at Large

My Commission Expires:\_\_\_\_\_

**AFFIDAVIT**

STATE OF FLORIDA

COUNTY OF PINELLAS

I hereby certify that on this \_\_\_\_\_ day of March, 2019, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared SHARON BOGDANOS, who is personally known to me, and has acknowledged before me that she provided the answers to interrogatory number(s) 103 and 104 of CITIZENS' FIFTH SET OF INTERROGATORIES TO DUKE ENERGY FLORIDA, LLC (NOS. 101-104) in Docket No. 20170272-EI, and that the responses are true and correct based on her personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this \_\_\_\_\_ day of March, 2019.

\_\_\_\_\_  
Sharon Bogdanos

\_\_\_\_\_  
Notary Public  
State of Florida, at Large

My Commission Expires: \_\_\_\_\_