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DEPUTY GENERAL COUNSEL

April 21, 2020

VIA ELECTRONIC FILING

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

Re: *Proposed Amendment of Rule 25-6.064, F.A.C., Contribution-in-Aid-of-Construction for Installation of New or Upgraded Facilities; Rule 25-6.078, F.A.C., Schedule of Charges; Rule 25-6.115, F.A.C., Facility Charges for Conversion of Existing Overhead Investor-Owned Distribution Facilities; and Rule 25-6.0343, F.A.C., Municipal Electric Utility and Rural Electric Cooperative Reporting Requirements; Docket No. 20200091-EU*

Dear Mr. Teitzman:

Please find enclosed for filing on behalf of Duke Energy Florida, LLC, its response to Staff's First Data Request (Nos. 1-4) in the above-subject Docket.

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 matter.

Respectfully,

/s/ Dianne M. Triplett

Dianne M. Triplett

DMT/cmkn
Enclosure

cc: Sevini Guffey
Adria Harper

**DUKE ENERGY FLORIDA, LLC'S (DEF), RESPONSE TO STAFF'S
FIRST DATA REQUEST (NOS. 1-4) REGARDING PROPOSED AMENDMENT
OF RULE 25-6.064, F.A.C., CONTRIBUTION-IN-AID-OF-CONSTRUCTION
FOR INSTALLATION OF NEW OR UPGRADED FACILITIES, ETC.**

Docket No. 20200091-EU

1. Recommended revision to Section (5) of Rule 25-6.064, F.A.C., states that new or upgraded overhead and underground facility costs applied to the formula in subsections (2) and (3) of Rule 25-6.064, F.A.C., should be based on the requirements of Rule 25-6.030, F.A.C., Storm Protection Plan, Rule 25-6.034, F.A.C., Standard of Construction, Rule 25-6.0341, F.A.C., Location of the Utility's Electric Distribution Facilities, and Rule 25-6.0345, F.A.C., Safety Standards for Construction of New Transmission and Distribution Facilities. Would the above requirements.
 - a) Increase Duke Energy Florida, LLC's (DEF) regulatory costs in excess of \$200,000 in the aggregate within one year after implementation of the rule?
 - b) Reduce DEF's regulatory costs?
 - c) Increase DEF's transactional costs (such as filing fees, license fees, cost of equipment required to be installed/used, procedures required to comply with rule requirements, additional operating costs, monitoring and/or reporting costs, and any other costs necessary to comply with the rule) in excess of \$200,000 in the aggregate within one year after implementation of the rule?
 - d) Please describe typical types of transactional costs that would be incurred by DEF to implement the proposed revision to Section (5) of Rule 25-6.064, F.A.C.
 - e) Please provide an explanation for the estimated transactional costs and methodology used.
 - f) Would the proposed revision to Section (5) of Rule 25-6.064, F.A.C., have any adverse or positive impacts on small businesses, small cities, or small counties defined in Chapter 120.541(2)(e), F.S.?

RESPONSE:

(a) No.

(b) No.

(c) No.

(d) DEF would not incur any incremental transactional costs to implement these revisions, because it is already complying with the requirements of this rule.

(e) N/A

(f) DEF is unaware of any such impact.

2. Recommended revision to Section (2) of Rule 25-6.078, F.A.C., states that for the purpose of calculating the Estimated Average Cost Differential, cost estimates should reflect the requirements of Rule 25-6.030, F.A.C., Storm Protection Plan, Rule 25-6.034, F.A.C., Standard of Construction, Rule 25-6.0341, F.A.C., Location of the Utility's Electric Distribution Facilities, and Rule 25-6.0345, F.A.C., Safety Standards for Construction of New Transmission and Distribution Facilities. Would the above requirements:

a) Increase DEF's regulatory costs in excess of \$200,000 in the aggregate within one year after implementation of the rule?

b) Increase DEF's transactional costs (such as filing fees, license fees, cost of equipment required to be installed/used, procedures required to comply with rule requirements, additional operating costs, monitoring and/or reporting costs, and any other costs necessary to comply with the rule) in excess of \$200,000 in the aggregate within one year after implementation of the rule?

c) Please provide typical types of transactional costs that would be incurred by DEF to implement the proposed revision to Section (2) of Rule 25-6.078, F.A.C.

d) Please provide an explanation for the estimated transactional costs and methodology used.

e) Would the proposed revision to Section (2) of Rule 25-6.078, F.A.C., have any adverse or positive impacts on small businesses, small cities, or small counties defined in Chapter 120.541(2)(e), F.S.?

RESPONSE:

(a) No.

(b) No.

(c) DEF would not incur any incremental transactional costs to implement these revisions, because it is already complying with the requirements of this rule.

(d) N/A

(e) DEF is unaware of any such impact.

3. Recommended revisions to Section (8)(a) of Rule 25-6.115, F.A.C., states that, the charge for the proposed underground facilities shall include: The estimated cost of construction of the underground distribution facilities based on the requirements of Rule 25-6.030 Storm

Protection Plan, F.A.C., Rule 25-6.034, F.A.C., Standard of Construction, Rule 25-6.0341, F.A.C., Location of the Utility's Electric Distribution Facilities, and Rule 25-6.0345, F.A.C., Safety Standards for Construction of New Transmission and Distribution Facilities, including the construction cost of the underground service lateral(s) to the meter(s) of the customer(s); Would the above requirements:

- a) Increase DEF's regulatory costs in excess of \$200,000 in the aggregate within one year after implementation of the rule?
- b) Reduce DEF's regulatory costs pursuant to the proposed revisions as opposed to the existing requirements? Please explain.
- c) Increase DEF's transactional costs (such as filing fees, license fees, cost of equipment required to be installed/used, procedures required to comply with rule requirements, additional operating costs, monitoring and/or reporting costs, and any other costs necessary to comply with the rule) in excess of \$200,000 in the aggregate within one year after implementation of the rule?
- d) Please describe typical types of transactional costs that would be incurred by DEF to implement the proposed revision to Section (8)(a) of Rule 25-6.115, F.A.C.
- e) Please provide an explanation for the estimated transactional costs and methodology used.
- f) Would the proposed revision to Section (8)(a) of Rule 25-6.115, F.A.C., have any adverse or positive impacts on small businesses, small cities, or small counties defined in Chapter 120.541(2)(e), F.S.?

RESPONSE:

(a) No.

(b) No.

(c) No.

(d) DEF would not incur any incremental transactional costs to implement these revisions, because it is already complying with the requirements of this rule.

(e) N/A

(f) DEF is unaware of any such impact.

4. Recommended revisions to Section (9) of Rule 25-6.115, F.A.C., states that, the charge for overhead facilities shall be the estimated construction cost to build new overhead facilities, including the service drop(s) to the meter(s) of the customer(s). Estimated construction

costs shall be based on the requirements of Rule 25-6.030 Storm Protection Plan, F.A.C., Rule 25-6.034, F.A.C., Standard of Construction, Rule 25-6.0341, F.A.C., Location of the Utility's Electric Distribution Facilities, and Rule 25-6.0345, F.A.C., Safety Standards for Construction of New Transmission and Distribution Facilities. Would the above requirements.

- a) Increase DEF's regulatory costs in excess of \$200,000 in the aggregate within one year after implementation of the rule?
- b) Reduce DEF's regulatory costs pursuant to the proposed revisions as opposed to the existing requirements? Please explain.
- c) Increase DEF's transactional costs (such as filing fees, license fees, cost of equipment required to be installed/used, procedures required to comply with rule requirements, additional operating costs, monitoring and/or reporting costs, and any other costs necessary to comply with the rule) in excess of \$200,000 in the aggregate within one year after implementation of the rule?
- d) Please describe typical types of transactional costs that would be incurred by DEF to implement the proposed revision to Section (9) of Rule 25-6.115, F.A.C.
- e) Please provide an explanation for the estimated transactional costs and methodology used.
- f) Would the proposed revision to Section (9) of Rule 25-6.115, F.A.C., have any adverse or positive impacts on small businesses, small cities, or small counties defined in Chapter 120.541(2)(e), F.S.?

RESPONSE:

(a) No.

(b) No.

(c) No.

(d) DEF would not incur any incremental transactional costs to implement these revisions, because it is already complying with the requirements of this rule.

(e) N/A

(f) DEF is unaware of any such impact.