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January 5, 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 a Limited Proceeding to Approve Third Solar Base Rate Adjustment*; Docket 20200245-EI

Dear Mr. Teitzman:

Enclosed for electronic filing, please find Duke Energy Florida, LLC Response to Staff's First Data Request (Nos. 1-15) regarding the above-referenced Docket.

Thank you for your assistance in this matter. If you have any questions, please feel free to contact me at (850) 521-1428.

Sincerely,

/s/ Matthew R. Bernier

Matthew R. Bernier

MRB/cmK
Enclosure

cc: Parties of Record

**Duke Energy Florida, LLC's (DEF) Response to
Florida Public Service Commission's First Data Request (Nos. 1-15) re.
DEF's Petition for a Limited Proceeding to Approve Third Solar Base Rate Adjustment**

Docket No. 20200245-EI

1. Please refer to DEF witness Stout's direct testimony, page 4, lines 19 through 22. For the Twin Rivers project, please specify the amount of land used for the solar installation and adjacent facilities, land unused but suitable for future projects, and land not suitable for use. As part of this response, please explain why any land would be unsuitable for use.

Response:

The Twin Rivers project has three land components. (1) DEF is leasing 515.43 acres for the solar installation, all land is being used for this facility, there is no land that is not suitable for use and there is no land unused but suitable for future projects. The project could add battery storage at a later time within the existing land, since the batteries and associated equipment can be added within the solar installation design and do not require much space. (2) DEF acquired 26.32 acres for the generation substation, transmission switching station and structures to connect to the grid. All land is suitable and being used for this project, no land is reserved for future projects. (3) DEF secured a 7.88 acre easement between the solar installation and the substation parcel to connect the project to the grid. The easement is only used by this project and all land is usable and occupied by the generation-tie line. The project is not acquiring any land for future projects or excess.

2. Please refer to DEF witness Stout's direct testimony, page 6, lines 6 through 9. For the Santa Fe project, please specify the amount of land used for the solar installation and adjacent facilities, land unused but suitable for future projects, and land not suitable for use. As part of this response, please explain why any land would be unsuitable for use.

Response:

The Santa Fe project only has one land component. (1) DEF is purchasing 607 acres for the solar installation; all land is being used for this facility except for vegetative buffer areas that are required by the county permit. There is no land unused but suitable for future projects. The generation switching station is located within the purchased property. The project could add battery storage at a later time within the existing land, since the batteries and associated equipment can be added within the solar installation design and do not require much space. The project is not acquiring any land for future projects or excess.

3. Please refer to DEF witness Stout's direct testimony, page 7, lines 15 through 17. For the Charlie Creek project, please specify the amount of land used for the solar installation and adjacent facilities, land unused but suitable for future projects, and land not suitable for use. As part of this response, please explain why any land would be unsuitable for use.

Response:

The Charlie Creek project has two land components. (1) DEF is leasing 610 acres for the solar installation; all land is being used for this facility. The property does have some wetlands and jurisdictional agricultural drainage ditches which are designed around, but otherwise there is no land that is not suitable for use. The project could add battery storage at a later time within the existing land since the batteries and associated equipment can be added within the solar installation design and do not require much space. (2) DEF is acquiring 7 acres for the generation substation, transmission switching station and structures to connect to the grid. All land is suitable and being used for this project, no land is reserved for future projects. (The project is not acquiring any land for future projects or excess.)

4. Please refer to DEF witness Stout's direct testimony, page 8, lines 18 through 20. For the Duette project, please specify the amount of land used for the solar installation and adjacent facilities, land unused but suitable for future projects, and land not suitable for use. As part of this response, please explain why any land would be unsuitable for use.

Response:

The Duette project has three land components. (1) DEF is purchasing 506.87 acres for the solar installation, all land is being used for this facility and there is no land unused but suitable for future projects. The property does have a small amount of wetlands and agricultural drainage ditches which are designed around, but otherwise there is no land that is not suitable for use. The generation switching station is located within the purchased property. The project could add battery storage at a later time within the existing land since the batteries and associated equipment can be added within the solar installation design and do not require much space. (2) DEF secured a 3.75 acre easement between the solar installation and the DEF Dry Prairie Substation property. The easement is only used by this project and all land is usable and occupied by the generation-tie line. (3) Part of the generation-tie line will be constructed on the DEF Dry Prairie Substation property. The project is not acquiring any land for future projects or excess.

5. Please refer to DEF witness Stout's direct testimony, page 9, lines 19 through 21. For the Sandy Creek project, please specify the amount of land used for the solar installation and adjacent facilities, land unused but suitable for future projects, and land not suitable for use. As part of this response, please explain why any land would be unsuitable for use.

Response:

The Sandy Creek project has two land components. (1) DEF will lease approximately 625 acres for the solar installation, a final lease boundary survey is underway, all land is being used for this facility and there is no land unused but suitable for future projects. The property does have a small amount of wetlands and cattle ponds which will be designed around, but otherwise there is no land that is not suitable for use. The generation switching station is located within the leased property. (2) DEF's lease agreement enables DEF to negotiate a purchase option for the land needed for the transmission switching station,

REDACTED

which has not yet been negotiated, but DEF has included a budget of [REDACTED] for this land purchase. The project could add battery storage at a later time within the existing land since the batteries and associated equipment can be added within the solar installation design and do not require much space. [REDACTED]

6. Please refer to DEF witness Stout's direct testimony, page 9, lines 18 to 20. Please specify if the land for the Sandy Creek project has been or will be purchased by DEF.

Response:

The Sandy Creek project is leasing the land for the project. The land has been secured via a Solar Option and Lease Agreement and will exercise the option prior to construction. Additionally, DEF plans to purchase the land required for the transmission switching station, which is permitted under the Solar Option and Lease Agreement.

7. Please refer to DEF witness Stout's direct testimony, page 15, line 12 through 14. For the Twin Rivers, Charlie Creek and Sandy Creek projects, please specify the amount of lease payments for the useful life of the facility. As part of this response, please also provide a net present value for all lease payments.

Response:

The annual lease payment for the Twin Rivers project is [REDACTED], [REDACTED] at [REDACTED]. The net present value for all lease payments for the 30-year useful life is [REDACTED]. The annual lease payment for the Charlie Creek project is [REDACTED] at [REDACTED]. [REDACTED] The net present value for all lease payments for the 30-year useful life is [REDACTED]. The annual lease payment for the Sandy Creek project is estimated to be [REDACTED] at [REDACTED], the final lease boundary survey is underway but expected to be approximately 625 acres. The net present value for all lease payments for the 30-year useful life is [REDACTED].

8. Please refer to DEF witness Stout's direct testimony, page 15, lines 12 through 14. Please specify the length of the lease and the expected useful life of the Twin Rivers, Charlie Creek and Sandy Creek projects.
 - a. Please compare the estimated lifespan of the solar facility to the duration of the lease.

- b. Please explain whether or not DEF has the option to extend the lease[s], and if so, under what terms.

Response:

DEF assumes a thirty (30) year useful economic life for all of its solar power plants. The 30-year life was approved in Order No. PSC-2016-0115-PAA-EI. The initial lease term for the Twin Rivers project is twenty-eight (28) years and DEF has the ability to extend the lease terms for two (2) consecutive five (5) year periods but is not obligated to extend the term. This give DEF the option to lease the land for up to thirty-eight (38) years. The initial lease term for the Charlie Creek project is thirty (30) years and DEF has the ability to extend the lease terms for two (2) consecutive five (5) year periods but is not obligated to extend the term. This give DEF the option to lease the land for up to forty (40) years. The initial lease term for the Sandy Creek project is thirty (30) years and DEF has the ability to extend the lease terms for one (1) consecutive five (5) year period but is not obligated to extend the term. This gives DEF the option to lease the land for up to thirty-five (35) years.

- 9. Please refer to DEF witness Borch’s direct testimony, Exhibit BMHB-4. For the combined SoBRA projects, please provide the annual and cumulative values over the period 2020-2052 (in nominal and net present value) for each of the following categories: capital, incremental fixed O&M, and other cost(s) for the SoBRA projects, and avoided capital, fixed O&M, capacity purchases, fuel cost, emissions cost (excluding carbon), carbon emissions cost, variable O&M, and other cost(s) for the system as a whole. Please provide the response in electronic (Excel) format.
 - a. Please explain in detail the assumptions used to determine the value of each of the components evaluated in this analysis.
 - b. Explain whether DEF’s emissions savings include carbon emissions. If so, provide a sensitivity analysis without those costs and provide the revised annual and cumulative values for each category in electronic format.
 - c. Please provide sensitivity analysis for each of the alternative fuel forecasts (high and low) included in the exhibit, with revised annual and cumulative values for each category in electronic (Excel) format.

Response:

Please see the attached document bearing Bates numbers 20200245-STAFF1DR-000001 through 20200245-STAFF1DR-000013. The documents are confidential. A redacted version is attached hereto and unredacted copies have been filed with the Florida Public Service Commission (“Commission”) along with DEF’s Notice of Intent (“NOI”) dated January 5, 2021.

Please note in the attached the negative values reflect savings.

- 10. Please refer to DEF witness Borch’s direct testimony, Exhibit BMHB-4. Please complete the table below providing the annual list of unit additions, retirements, and uprates/derates

including the capacity used to determine the proposed savings for each scenario, with and without the proposed SoBRA projects.

Scenario	With SoBRA Units / Without SoBRA Units		
Year	Unit Additions (MW)	Retirements (MW)	Upgrades/Downrates (MW)

Response:

Please see the attached document bearing Bates number 20200245-STAFF1DR-000014. The document is confidential. A redacted version is attached hereto and an unredacted copy has been filed with the Commission along with DEF’s NOI dated January 5, 2021.

Please note in the attached the Resource Plan optimization performed is from year 2020 through year 2044 and the Load Forecast and Mix of Resources constant is from years 2044 through year 2051.

- Please refer to DEF witness Borsch’s direct testimony, Exhibit BMHB-4. Please complete the table below providing the annual reserve margin for each scenario, with and without the proposed SoBRA projects.

Scenario	With SoBRA Units / Without SoBRA Units			
Year	Total Available Capacity (MW)	Net Firm System Demand (MW)	Reserve Margin (MW)	Reserve Margin (%)

Response:

Please see the attached document bearing Bates numbers 20200245-STAFF1DR-000015 through 20200245-STAFF1DR-000016.

Please note in the attached the Resource Plan optimization performed is from year 2020 through year 2044 and the Load Forecast and Mix of Resources constant is from years 2044 through year 2051.

- Please refer to DEF witness Borsch’s direct testimony, Exhibit BMHB-4. Please provide the monthly bill impact for a residential customer (1,000 kilowatt-hour usage) annually for the estimated life of the proposed SoBRA projects for each scenario, with and without the proposed.

Scenario	With SoBRA Units / Without SoBRA Units
Year	Monthly Bill impact (\$/1,000-kWh)

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Response:

DEF has calculated the estimated impact on monthly residential bills for the period of 2020-2051 based on the dollars provided in response to Question 9; 2051 was the last full year in-scope for the SoBRA 3 project analysis, based on a 30-year life of the projects.

Please see the attached document bearing Bates number 20200245-STAFF1DR-000017. This attachment shows the monthly residential bill impact (\$/1000-kwh-mo) differential between scenarios "with" and "without" SoBRA 3 projects and assumes perfect ratemaking as opposed to modeling periodic rate cases.

13. Please refer to the Direct Testimony of Duke Energy Florida, LLC witness Thomas G. Foster, "Exhibit No. (TGF-1)," Pages 2-3, for the following request. Please further define or discuss what the "Jurisdictional Interest Expense" appearing on line 13 (both pages) is referring to or capturing.

Response:

The amount shown on Line 13, the "Jurisdictional Interest Expense," is the annual interest expense incurred for each SoBRA project. The calculation to develop the value is the following: Line 5 Jurisdictional Net Plant (Pages 2-3) multiplied by DEF's Weighted Cost of Debt (Sum of Lines: 2, 3, & 4 on Pages 4-6) for each respective project.

14. Please refer to DEF witness Stout's direct testimony, page 15, lines 12 through 14. Please provide copies of the land leases for the Twin Rivers and Charlie Creek projects.

Response:

Please see the attached document bearing Bates numbers 20200245-STAFF1DR-000018 through 20200245-STAFF1DR-000073. The documents are confidential. A redacted version is attached hereto and unredacted copies have been filed with the Commission along with DEF's NOI dated January 5, 2021.

15. Please refer to DEF witness Foster's direct testimony, Exhibit TGF-1. Please provide a copy of the exhibit in electronic/spreadsheet format (MS Excel, cells unlocked and formulas intact).

Response:

Please see the attachment document bearing Bates number 20200245-STAFF1DR-000074 through 20200245-STAFF1DR-000079.

Slip Sheet

Bates Numbers 20200245-STAFF1DR-000001 through 20200245-STAFF1DR-000013 are confidential in their entirety and have been filed under separate cover.

Slip Sheet

Bates Number 20200245-STAFF1DR-000014 is confidential in its entirety and has been filed under separate cover.

11. Please refer to DEF witness Borch’s direct testimony, Exhibit BMHB-4.
Please complete the table below providing the annual reserve margin for each scenario, with and without the proposed SoBRA projects.

SoBra Tranche 3 without the Proposed Solar Projects				
Winter				
Year	Total Available Firm Capacity (MW)	Net Firm System Demand (MW)	Reserve Margin (MW)	Reserve Margin (%)
2020	12,933	9,406	3,528	38%
2021	12,889	8,789	4,101	47%
2022	12,465	9,167	3,298	36%
2023	12,465	8,922	3,543	40%
2024	12,350	9,012	3,339	37%
2025	12,068	8,777	3,291	38%
2026	11,726	8,880	2,846	32%
2027	11,726	8,941	2,785	31%
2028	11,288	9,003	2,285	25%
2029	11,288	9,038	2,250	25%
2030	11,528	9,091	2,437	27%
2031	11,536	9,036	2,500	28%
2032	11,536	9,222	2,314	25%
2033	11,776	9,249	2,527	27%
2034	11,776	9,316	2,460	26%
2035	11,969	9,379	2,590	28%
2036	11,969	9,075	2,894	32%
2037	11,581	9,109	2,472	27%
2038	11,581	9,173	2,409	26%
2039	11,917	9,236	2,681	29%
2040	11,917	9,338	2,578	28%
2041	12,156	9,358	2,798	30%
2042	12,156	9,336	2,820	30%
2043	12,508	9,491	3,017	32%
2044	12,508	9,594	2,915	30%

SoBra Tranche 3 with the Proposed Solar Projects				
Winter				
Year	Total Available Firm Capacity (MW)	Net Firm System Demand (MW)	Reserve Margin (MW)	Reserve Margin (%)
2020	12,933	9,406	3,528	38%
2021	12,889	8,789	4,101	47%
2022	12,465	9,167	3,298	36%
2023	12,465	8,922	3,543	40%
2024	12,350	9,012	3,339	37%
2025	12,068	8,777	3,291	38%
2026	11,726	8,880	2,846	32%
2027	11,726	8,941	2,785	31%
2028	11,049	9,003	2,046	23%
2029	11,288	9,038	2,250	25%
2030	11,288	9,091	2,197	24%
2031	11,297	9,036	2,261	25%
2032	11,297	9,222	2,075	22%
2033	11,536	9,249	2,287	25%
2034	11,536	9,316	2,221	24%
2035	11,730	9,379	2,350	25%
2036	11,730	9,075	2,655	29%
2037	11,342	9,109	2,232	25%
2038	11,342	9,173	2,169	24%
2039	11,677	9,236	2,442	26%
2040	11,677	9,338	2,339	25%
2041	11,917	9,358	2,558	27%
2042	11,917	9,336	2,581	28%
2043	12,269	9,491	2,778	29%
2044	12,269	9,594	2,675	28%

11. Please refer to DEF witness Borch’s direct testimony, Exhibit BMHB-4. Please complete the table below providing the annual reserve margin for each scenario, with and without the proposed SoBRA projects.

Summer		SoBra Tranche 3 without the Proposed Solar Projects		
Year	Total Available Firm Capacity (MW)	Net Firm System Demand (MW)	Reserve Margin (MW)	Reserve Margin (%)
2020	11,934	8,915	3,019	34%
2021	11,467	8,946	2,522	28%
2022	11,466	9,007	2,460	27%
2023	11,465	8,735	2,730	31%
2024	11,206	8,769	2,437	28%
2025	11,090	8,588	2,502	29%
2026	10,814	8,612	2,202	26%
2027	10,520	8,666	1,854	21%
2028	10,475	8,759	1,715	20%
2029	10,699	8,829	1,870	21%
2030	10,724	8,904	1,820	20%
2031	10,723	8,940	1,784	20%
2032	10,948	9,031	1,917	21%
2033	10,947	9,102	1,845	20%
2034	11,193	9,191	2,001	22%
2035	11,192	9,283	1,909	21%
2036	10,879	8,984	1,895	21%
2037	10,878	9,067	1,811	20%
2038	11,241	9,158	2,082	23%
2039	11,240	9,294	1,946	21%
2040	11,465	9,405	2,059	22%
2041	11,464	9,494	1,970	21%
2042	11,737	9,570	2,167	23%
2043	11,736	9,679	2,057	21%
2044	12,047	9,985	2,061	21%

Summer		SoBra Tranche 3 with the Proposed Solar Projects		
Year	Total Available Firm Capacity (MW)	Net Firm System Demand (MW)	Reserve Margin (MW)	Reserve Margin (%)
2020	11,934	8,915	3,019	34%
2021	11,553	8,946	2,607	29%
2022	11,669	9,007	2,662	30%
2023	11,667	8,735	2,931	34%
2024	11,406	8,769	2,637	30%
2025	11,289	8,588	2,701	31%
2026	11,012	8,612	2,400	28%
2027	10,491	8,666	1,825	21%
2028	10,671	8,759	1,912	22%
2029	10,669	8,829	1,840	21%
2030	10,693	8,904	1,788	20%
2031	10,691	8,940	1,751	20%
2032	10,915	9,031	1,884	21%
2033	10,913	9,102	1,811	20%
2034	11,157	9,191	1,966	21%
2035	11,156	9,283	1,873	20%
2036	10,842	8,984	1,858	21%
2037	10,840	9,067	1,773	20%
2038	11,202	9,158	2,043	22%
2039	11,200	9,294	1,906	21%
2040	11,424	9,405	2,018	21%
2041	11,422	9,494	1,928	20%
2042	11,694	9,570	2,124	22%
2043	11,692	9,679	2,014	21%
2044	12,002	9,985	2,017	20%

DEF Response to Staff's First Data Request (Question #12)
Docket No. 20200245
Estimated Monthly Residential Bill Impacts 2020-2051

Year	Monthly Bill impact (\$/1,000-kWh) *
2020	\$0.00
2021	\$0.58
2022	\$1.23
2023	\$1.22
2024	\$0.99
2025	\$0.88
2026	\$0.61
2027	\$0.36
2028	\$0.12
2029	\$0.11
2030	-\$0.33
2031	-\$0.41
2032	-\$0.43
2033	-\$0.52
2034	-\$0.88
2035	-\$1.20
2036	-\$1.28
2037	-\$1.56
2038	-\$1.60
2039	-\$1.62
2040	-\$1.72
2041	-\$1.72
2042	-\$1.98
2043	-\$1.86
2044	-\$2.08
2045	-\$2.21
2046	-\$2.27
2047	-\$2.25
2048	-\$2.60
2049	-\$2.36
2050	-\$2.44
2051 **	-\$1.37

*Negative values represent Customer Bill Savings from the Combined SoBRA 3 Projects Scenario vs. No Projects Scenario.

**2051 is the final year of service for SoBRA 3 (30 yr life projects).

Slip Sheet

Bates Numbers 20200245-STAFF1DR-000018 through 20200245-STAFF1DR-000073 are confidential in their entirety and have been filed under separate cover.

Description	Reference	Twin Rivers	Santa Fe	Charlie Creek	Duette	Sandy Creek ^(Note 2)
1 Jurisdictional Adjusted Rate Base	Pages 2 & 3	\$ 95,333	\$ 103,788	\$ 93,346	\$ 103,467	\$ 71,384
2 Rate of Return on Rate Base	Pages 4, 5 & 6	<u>6.430%</u>	<u>6.430%</u>	<u>6.460%</u>	<u>6.460%</u>	<u>6.480%</u>
3 Net Operating Income Required	Line 1 x Line 2	6,130	6,674	6,030	6,684	4,626
4 Net Operating Income Achieved	Pages 2 & 3	<u>(3,710)</u>	<u>(3,782)</u>	<u>(3,250)</u>	<u>(3,284)</u>	<u>(2,577)</u>
5 Net Operating Income Deficiency/(Excess)	Line 3 - Line 4	9,840	10,456	9,280	9,968	7,203
6 Net Operating Income Multiplier	Note (1)	<u>1.330</u>	<u>1.330</u>	<u>1.344</u>	<u>1.344</u>	<u>1.344</u>
7 Revenue Requirement	Line 5 x Line 6	<u>\$ 13,083</u>	<u>13,902</u>	<u>\$ 12,475</u>	<u>\$ 13,400</u>	<u>\$ 9,683</u>

Note 1: Net Operating Income Multiplier is based on MFR C-44 in Docket No. 20090079, except federal tax rate changed to 21%, state tax rate 4.458% for 2021, and 5.5% for 2022.
The Florida corporate income/franchise tax rate was reduced from 5.5% to 4.458% for taxable years beginning on or after January 1, 2019 through 2021, and will to revert back to 5.5% on January 1, 2022.

Note 2: The SoBRA 3 Revenue Requirements for Sandy Creek are based on 56.6MW of the the 74.9MW site costs.

Duke Energy Florida, LLC
SoBRA 3 First Year Annualized Revenue Requirement
(\$000)

Docket No. 20200153-EI
Witness: T.G. Foster
Exhibit No. ____ (TGF-1)
Page 2 of 6

Net Plant (13 month average):	Twin Rivers		Santa Fe		Jurisd. Factor
	Total Company	FPSC Jurisd.	Total Company	FPSC Jurisd.	
1 Solar Production Plant	\$ 98,993	\$ 95,929	\$ 107,853	\$ 104,515	96.905%
2 Accumulated Reserve - Solar Production Plant	(1,650)	(1,599)	(1,798)	(1,742)	96.905%
3 Transmission GSU	1,045	1,012	1,057	1,024	96.905%
4 Accumulated Reserve - Transmission GSU	(9)	(9)	(10)	(9)	96.905%
5 Net Plant	\$ 98,378	\$ 95,333	\$ 107,103	\$ 103,788	
Operating Expenses:					
	Total Company	FPSC Jurisd.	Total Company	FPSC Jurisd.	
6 O&M	\$ 1,303	\$ 1,263	\$ 1,027	\$ 995	96.905%
7 Depreciation Expense - Solar Production Plant	3,300	3,198	3,595	3,484	96.905%
8 Depreciation Expense - Transmission GSU	19	18	19	19	96.905%
9 Dismantlement	193	187	215	209	96.905%
10 Property Insurance	122	118	133	129	96.905%
11 Property Tax	368	356	434	421	96.905%
12 Total Operating Expenses	\$ 5,304	\$ 5,140	\$ 5,424	\$ 5,256	
13 Jurisdictional Interest Expense		\$ 1,649		\$ 1,796	
14 Operating Expenses		FPSC Jurisd. \$ (5,140)		FPSC Jurisd. \$ (5,256)	
15 Income Tax - Operating Expenses (Line 12 x tax rate)		\$ 1,026		\$ 1,033	Blend
16a Income Tax - Current Interest Expense (Line 13 x tax rate)		74		80	4.458%
16b Income Tax - Deferred Interest Expense (Line 13 x tax rate)		331		360	20.064%
17 Total Income Tax		\$ 1,430		\$ 1,473	
18 Jurisdictional Net Operating Income (Line 14 + Line 17)		\$ (3,710)		\$ (3,782)	

Net Plant (13 month average):	Charlie Creek		Duette		Sandy Creek		Jurisd. Factor
	Total Company	FPSC Jurisd.	Total Company	FPSC Jurisd.	Total Company	FPSC Jurisd.	
1 Solar Production Plant	\$ 96,751	\$ 93,757	\$ 107,372	\$ 104,049	\$ 73,999	\$ 71,708	96.905%
2 Accumulated Reserve - Solar Production Plant	(1,613)	(1,563)	(1,790)	(1,734)	(1,233)	(1,195)	96.905%
3 Transmission GSU	1,200	1,163	1,200	1,163	907	879	96.905%
4 Accumulated Reserve - Transmission GSU	(11)	(11)	(11)	(11)	(8)	(8)	96.905%
5 Net Plant	\$ 96,328	\$ 93,346	\$ 106,772	\$ 103,467	\$ 73,664	\$ 71,384	
Operating Expenses:							
	Total Company	FPSC Jurisd.	Total Company	FPSC Jurisd.	Total Company	FPSC Jurisd.	
6 O&M	\$ 961	\$ 931	\$ 625	\$ 606	\$ 892	\$ 865	96.905%
7 Depreciation Expense - Solar Production Plant	3,225	3,125	3,579	3,468	2,467	2,390	96.905%
8 Depreciation Expense - Transmission GSU	22	21	22	21	16	16	96.905%
9 Dismantlement	261	253	253	245	199	193	96.905%
10 Property Insurance	119	116	132	128	91	88	96.905%
11 Property Tax	304	294	370	359	202	196	96.905%
12 Total Operating Expenses	\$ 4,891	\$ 4,740	\$ 4,981	\$ 4,827	\$ 3,868	\$ 3,748	
13 Jurisdictional Interest Expense		\$ 1,606		\$ 1,780		\$ 1,228	
14 Operating Expenses		<u>FPSC Jurisd.</u> \$ (4,740)		<u>FPSC Jurisd.</u> \$ (4,827)		<u>FPSC Jurisd.</u> \$ (3,748)	
15 Income Tax - Operating Expenses (Line 12 x tax rate)		\$ 1,083		\$ 1,092		\$ 859	Blend
16a Income Tax - Current Interest Expense (Line 13 x tax rate)		88		98		68	5.50%
16b Income Tax - Deferred Interest Expense (Line 13 x tax rate)		319		353		244	19.85%
17 Total Income Tax		\$ 1,490		\$ 1,543		\$ 1,170	
18 Jurisdictional Net Operating Income (Line 14 + Line 17)		<u>(3,250)</u>		<u>(3,284)</u>		<u>(2,577)</u>	

Projects: Twin Rivers and Santa Fe

	System Per Sys Per Book	Proration Adjustment	System Per Books Adj'd	Retail Per Books	Pro Rata Adj	Specific Adj	Adjusted Retail	Cap Ratio	Cost Rate	Weighted Cost
1 Common Equity	\$7,866,864	\$ 2,278	\$ 7,869,142	\$ 7,126,530	\$ (365,478)	\$ (13,612)	\$ 6,747,440	43.91%	10.50%	4.61%
2 Long Term Debt	\$7,009,924	2,030	7,011,954	6,350,235	(325,667)		6,024,568	39.20%	4.37%	1.71%
3 Short Term Debt	(\$80,997)	(23)	(81,021)	(73,375)	3,763		(69,612)	-0.45%	1.86%	-0.01%
4 Cust Dep Active	\$199,531	58	199,589	199,589	(10,236)		189,353	1.23%	2.37%	0.03%
5 Cust Dep InActive	\$1,680	0	1,680	1,680	(86)		1,594	0.01%		
6 Invest Tax Cr	\$215,903	63	215,966	195,585	(10,030)		185,555	1.21%	7.61%	0.09%
7 Deferred Inc Tax	\$2,958,651	(4,405)	2,954,246	2,675,453	(137,208)	(249,259)	2,288,986	14.89%		
8 Total	\$ 18,171,556	\$ -	\$ 18,171,556	\$ 16,475,698	\$ (844,943)	\$ (262,871)	\$ 15,367,884	100.00%		6.43%

ITC Cost Rate check

708,481	CE return
263,049	LTD interest
971,530	Total Cost
12,772,008	13 mo avg bal.
<u>7.61%</u>	Cost Rate

Proration Adjustment to Reflect Projected ADFIT Consistent with Projection Year

	Month	ADIT Bal.	Deprec-Related ADFIT Bal.	Deprec-Related ADFIT Activity	Days to Prorate	Future Days in Period	Prorated Deprec-Related ADFIT Activity	Prorated Deprec-Related ADFIT Bal.
9	Feb-21	\$ 2,973,506	\$ 2,139,487					\$ 2,139,487
10 projected	Mar-21	\$ 2,974,118	\$ 2,148,325	\$ 8,838	28	338	\$ 8,184	2,147,671
11 projected	Apr-21	\$ 2,972,864	\$ 2,153,124	4,800	31	307	4,037	2,151,708
12 projected	May-21	\$ 2,974,157	\$ 2,156,466	3,342	30	277	2,536	2,154,244
13 projected	Jun-21	\$ 2,972,297	\$ 2,160,839	4,373	31	246	2,947	2,157,191
14 projected	Jul-21	\$ 2,951,032	\$ 2,165,238	4,399	30	216	2,603	2,159,794
15 projected	Aug-21	\$ 2,948,494	\$ 2,171,830	6,593	31	185	3,341	2,163,136
16 projected	Sep-21	\$ 2,946,321	\$ 2,178,376	6,546	31	154	2,762	2,165,897
17 projected	Oct-21	\$ 2,945,125	\$ 2,187,052	8,676	30	124	2,947	2,168,845
18 projected	Nov-21	\$ 2,945,908	\$ 2,198,379	11,327	31	93	2,886	2,171,731
19 projected	Dec-21	\$ 2,948,510	\$ 2,214,850	16,471	30	63	2,843	2,174,574
20 projected	Jan-22	\$ 2,951,965	\$ 2,227,448	12,598	31	32	1,104	2,175,678
21 projected	Feb-22	\$ 2,958,165	\$ 2,240,124	12,676	31	1	35	2,175,713
22	13 Mo Avg Bal	\$ 2,958,651	\$ 2,180,118		<u>365</u>		\$ 36,226	\$ 2,175,713
23							13 Mo Avg Bal	<u>2,180,118</u>
24							Proration Adj.	<u>\$ (4,405)</u>

Projects: Charlie Creek and Duette

	System Per Sys Per Book	Proration Adjustment	System Per Books Adj'd	Retail Per Books	Pro Rata Adj	Specific Adj	Adjusted Retail	Cap Ratio	Cost Rate	Weighted Cost
1 Common Equity	\$8,325,711	\$ 2,183	\$ 8,327,894	\$ 7,528,413	\$ (320,188)	\$ (12,922)	\$ 7,195,304	44.21%	10.50%	4.64%
2 Long Term Debt	\$7,439,321	1,951	7,441,271	6,726,907	(286,099)		6,440,808	39.57%	4.31%	1.70%
3 Short Term Debt	(\$118,591)	(31)	(118,622)	(107,235)	4,561		(102,674)	-0.63%	1.82%	-0.01%
4 Cust Dep Active	\$199,531	52	199,584	199,584	(8,488)		191,095	1.17%	2.37%	0.03%
5 Cust Dep InActive	\$1,680	0	1,680	1,680	(71)		1,609	0.01%		
6 Invest Tax Cr	\$247,540	65	247,605	223,835	(9,520)		214,315	1.32%	7.57%	0.10%
7 Deferred Inc Tax	\$2,973,655	(4,220)	2,969,434	2,684,368	(114,168)	(234,409)	2,335,791	14.35%		
8 Total	\$ 19,068,846	\$ -	\$ 19,068,846	\$17,257,552	\$ (733,974)	\$ (247,331)	\$ 16,276,248	100.00%		6.46%

ITC Cost Rate check

755,507	CE return
277,354	LTD interest
<u>1,032,861</u>	Total Cost
13,636,112	13 mo avg bal.
<u>7.57%</u>	Cost Rate

Proration Adjustment to Reflect Projected ADFIT Consistent with Projection Year:

	Month	ADIT Bal.	Deprec-Related ADFIT Bal.	Deprec-Related ADFIT Activity	Days to Prorate	Future Days in Period	Prorated Deprec-Related ADFIT Activity	Prorated Deprec-Related ADFIT Bal
9	Jan-22	\$ 2,951,965	\$ 2,129,782					\$ 2,129,782
10 projected	Feb-22	\$ 2,958,165	\$ 2,139,487	\$ 9,705	31	335	\$ 8,907	2,138,689
11 projected	Mar-22	\$ 2,964,434	\$ 2,148,325	8,838	28	307	7,433	2,146,123
12 projected	Apr-22	\$ 2,969,779	\$ 2,153,124	4,800	31	276	3,629	2,149,752
13 projected	May-22	\$ 2,970,829	\$ 2,156,466	3,342	30	246	2,252	2,152,004
14 projected	Jun-22	\$ 2,970,328	\$ 2,160,839	4,373	31	215	2,576	2,154,580
15 projected	Jul-22	\$ 2,970,923	\$ 2,165,238	4,399	30	185	2,230	2,156,809
16 projected	Aug-22	\$ 2,971,547	\$ 2,171,830	6,593	31	154	2,782	2,159,591
17 projected	Sep-22	\$ 2,974,504	\$ 2,178,376	6,546	31	123	2,206	2,161,797
18 projected	Oct-22	\$ 2,977,550	\$ 2,187,052	8,676	30	93	2,211	2,164,007
19 projected	Nov-22	\$ 2,982,724	\$ 2,198,379	11,327	31	62	1,924	2,165,931
20 projected	Dec-22	\$ 2,990,717	\$ 2,214,850	16,471	30	32	1,444	2,167,376
21 projected	Jan-23	\$ 3,004,046	\$ 2,227,448	12,598	31	1	35	2,167,410
22 13 Mo Avg Bal		\$ 2,973,655	\$ 2,171,630		<u>365</u>		\$ 37,628	\$ 2,167,410
23							13 Mo Avg Bal	2,171,630
24							Proration Adj.	<u>\$ (4,220)</u>

Project: Sandy Creek

	System Per Sys Per Book	Proration Adjustment	System Per Books Adj'd	Retail Per Books	Pro Rata Adj	Specific Adj	Adjusted Retail	Cap Ratio	Cost Rate	Weighted Cost
1 Common Equity	\$8,534,593	\$ 2,788	\$ 8,537,381	\$ 7,822,990	\$ (337,264)	\$ (12,671)	\$ 7,473,056	44.32%	10.50%	4.65%
2 Long Term Debt	\$7,609,605	2,486	7,612,091	6,975,126	(300,711)		6,674,416	39.59%	4.32%	1.71%
3 Short Term Debt	(\$108,284)	(35)	(108,319)	(99,256)	4,279		(94,976)	-0.56%	2.10%	-0.01%
4 Cust Dep Active	\$199,531	65	199,596	199,596	(8,605)		190,991	1.13%	2.37%	0.03%
5 Cust Dep InActive	\$1,680	1	1,680	1,680	(72)		1,608	0.01%		
6 Invest Tax Cr	\$253,699	83	253,782	232,546	(10,025)		222,521	1.32%	7.58%	0.10%
7 Deferred Inc Tax	\$2,995,649	(5,388)	2,990,261	2,740,042	(118,128)	(229,009)	2,392,905	14.19%		
8 Total	\$ 19,486,472	\$ -	\$ 19,486,472	\$17,872,726	\$ (770,526)	\$ (241,680)	\$ 16,860,520	100.00%		6.48%

ITC Cost Rate check

784,671	CE return
288,021	LTD interest
<u>1,072,691</u>	Total Cost
<u>14,147,472</u>	13 mo avg bal.
<u>7.58%</u>	Cost Rate

Proration Adjustment to Reflect Projected ADFIT Consistent with Projection Year:

	Month	ADIT Bal.	Deprec-Related ADFIT Bal.	Deprec-Related ADFIT Activity	Days to Prorate	Future Days in Period	Prorated Deprec-Related ADFIT Activity	Prorated Deprec-Related ADFIT Bal
9	May-22	\$ 2,970,829	\$ 2,156,466					\$ 2,156,466
10 projected	Jun-22	\$ 2,970,328	\$ 2,160,839	\$ 4,373	31	335	\$ 4,013	2,160,479
11 projected	Jul-22	\$ 2,970,923	\$ 2,165,238	4,399	30	305	3,676	2,164,155
12 projected	Aug-22	\$ 2,971,547	\$ 2,171,830	6,593	31	274	4,949	2,169,104
13 projected	Sep-22	\$ 2,974,504	\$ 2,178,376	6,546	31	243	4,358	2,173,462
14 projected	Oct-22	\$ 2,977,550	\$ 2,187,052	8,676	30	213	5,063	2,178,525
15 projected	Nov-22	\$ 2,982,724	\$ 2,198,379	11,327	31	182	5,648	2,184,173
16 projected	Dec-22	\$ 2,990,717	\$ 2,214,850	16,471	30	152	6,859	2,191,032
17 projected	Jan-23	\$ 3,004,046	\$ 2,227,448	12,598	31	121	4,176	2,195,208
18 projected	Feb-23	\$ 3,016,148	\$ 2,240,124	12,676	31	90	3,125	2,198,334
19 projected	Mar-23	\$ 3,028,332	\$ 2,249,113	8,990	28	62	1,527	2,199,861
20 projected	Apr-23	\$ 3,036,595	\$ 2,262,173	13,060	31	31	1,109	2,200,970
21 projected	May-23	\$ 3,049,189	\$ 2,271,082	8,909	30	1	24	2,200,994
22 13 Mo Avg Bal		\$ 2,995,649	\$ 2,206,382		<u>365</u>		\$ 44,528	\$ 2,200,994
23							13 Mo Avg Bal	2,206,382
24							Proration Adj.	<u>\$ (5,388)</u>