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# **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:	June 26, 2023
TO:	Adam J. Teitzman, Commission Clerk, Office of Commission Clerk
FROM:	Todd M. Brown, Chief of Auditing, Office of Auditing and Performance Analysis
RE:	Docket No.: 20230010-EI Company Name: Duke Energy Florida, LLC Company Code: EI801 Audit Purpose: A3g: Storm Protection Plan Cost Recovery Clause Audit Control No.: 2023-011-2-1

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 and Performance Analysis File.



## **Public Service Commission**

Office of Auditing and Performance Analysis Bureau of Auditing

#### **Auditor's Report**

Duke Energy Florida, LLC Storm Protection Plan Cost Recovery Clause

#### As of December 31, 2022

Docket No. 20230010-EI Audit Control No. 2023-011-2-1 May 31, 2023

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Hymavathi Vedula -Audit Manager

Todd M. Brown 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 Office of Industry Development & Market Analysis in its audit service request dated January 9, 2023. We have applied these procedures to the attached schedules prepared by Duke Energy Florida, LLC in support of its filing for Storm Protection Plan Cost Recovery in Docket No. 20230010-EI.

The report is intended only for internal Commission use.

#### **Objectives and Procedures**

#### General

#### **Definitions**

Utility refers to Duke Energy Florida, LLC. SPPCRC refers to the Storm Protection Plan Cost Recovery Clause. SPP refers to the Storm Protection Plan.

#### Background

On April 3, 2023, Duke Energy Florida, LLC filed support for its actual Storm Protection Cost Recovery factor for the period of January 2022 through December 2022.

**Objectives:** The objectives were to reconcile the Implementation SPPCRC Overhead Hardening Operation and Maintenance Expenses to the general ledger, and to review a statistical or judgmental sample of expenses.

**Procedures:** We reconciled the operation and maintenance (O&M) expenses to the general ledger. We initially selected the 20 largest invoices for SPP Operation and Maintenance expenses for testing, and performed statistical sampling for the remaining O&M expenses. We tested for proper account, proper amount, proper period, and proper project. No exceptions were noted.

**Objectives:** The objectives were to audit the following capital investments: Feeder Hardening Program, Distribution Lateral Undergrounding Program, and Transmission Pole Replacement. In addition, our objectives were to: 1) Verify the investment amounts are recorded in the correct plant accounts; 2) Reconcile the corresponding plant-in-service/depreciation base; 3) Verify the calculation of non-interest bearing construction-work-in-progress (CWIP); 4) Verify the most recent Commission-approved depreciation and amortization periods are used in calculating depreciation expense; and 5) Reconcile depreciation savings for retired assets that have depreciation recovered through base rates.

**Procedures:** Audit staff reconciled the capital investments to the Utility's general ledger. We verified that the most recent Commission-approved depreciation and amortization periods were used in calculating depreciation expense. We audited a statistical sample of SPPCRC program-related additions, retirements, and adjustments for the period January 1, 2022, through December 31, 2022, by reviewing documentation for the Feeder Hardening Program, the Distribution Lateral Undergrounding Program, and Transmission Pole Replacement. In addition, there were no depreciation savings for retired assets recovered through base rates. No exceptions were noted.

**Objective:** The objective was to verify the SPPCRC program-related plant additions, retirements, and adjustments for the period January 1, 2022, through December 31, 2022.

**Procedure:** We reconciled the SPPCRC program-related plant additions, retirements, and adjustments to the general ledger. No exceptions were noted.

**Objective:** The objective was to reconcile the operation and maintenance expenses of the projects listed on Form 5A of the filing, to the general ledger.

**Procedures:** We reconciled the operation and maintenance expenses to the general ledger. We initially selected the five largest invoices/vouchers of the four largest projects listed on Form 5A for review, and performed statistical sampling for the remaining operation and maintenance expenses. No exceptions were noted.

#### Other

**Objectives:** The objectives were to: 1) Substantiate if the Utility changed any of its accounting practices, procedures, or guidelines for purposes of implementing cost recovery through the Storm Cost Recovery Clause, and 2) Verify if the Utility changed any of its allocation practices, procedures, or guidelines for purposes of implementing cost recovery through the Storm Cost Recovery Clause.

**Procedures:** We requested and reviewed the accounting practices, procedures, or guidelines for purposes of implementing cost recovery through the Storm Cost Recovery Clause. We reviewed whether the Utility changed any of its allocation practices, procedures, or guidelines for purposes of implementing cost recovery through the Storm Cost Recovery Clause. No exceptions were noted.

#### True-up

**Objective:** The objective was to determine if the True-Up and Interest Provision, as filed, was properly calculated.

**Procedures:** We verified the True-Up and Interest Provision amounts as of December 31, 2022, using the Financial Commercial Paper rates and 2022 revenues and costs. No exceptions were noted.

## Audit Findings

None

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## **Exhibits**

## Exhibit 1: True-Up Calculation

<u>Dute Energy Florida</u> Storm Protection Plan Cost Recovery Clause Tros-Up Fiting Actual Period: January Inrough December 2022														Dockel No. 20230010-El Duke Energy Florida, LLC Witness: C.A.Menendez Extt. No (CAM-1) Form 2A	
Calculation of True-Up Amount (In Dollars)														Page 2 of 121	
Line		Actual January	Actual February	Actual March	Actual April	Actual May	Actual June	Actual July	Actual August	Actual September	Actual October	Actual November	Actual December	End of Period Total	
Clause Revenues (net of Revenue Taxes)     True-Up Provision     Clause Revenues AppRcable to Period (Lines 1 + 2)	966,652	\$ 6,198,123 3 80,554 6,278,677	7,018,257 80,554 7,098,811	\$ 6,919,590 \$0,554 7,000,145	5,650,976 80,554 6,731,530	\$ 7,672,044 80,554 7,752,599	\$ 9,138,104 80,554 9,215,659	\$ 9,589,070 80,554 9,669,624	\$ 10,003,891 80,554 10,084,445	\$ 9,327,574 80,554 9,408,128	\$ 7,584,788 80,554 7,565,343	\$ 6,554,018 80,554 6,534,573	\$ 6,874,288 \$ 80,554 6,954,842	93,530,723 965,552 94,497,375	
Clobe Revenue Applicative to Pends (clines 1 + 2)     Jurisdictional Rev. Req. (Form SA and Form 7A)	8	0,210,017	7,090,011	1,000,140	6,731,330	1,102,033	2.4 10,003	2 00 7 064	10,004,445	9,400,120	1,000,040	6,634,273	0,934,042	94,497,375	
a. Overhead Hardening Distribution		1,115,877	1,128,339	1,184,882	1,025,414	1,419,410	1,250,845	1,493,616	2,158,384	3,294,443	3,004,497	1,031,930	(1,507,566)	16,603,071	
b. Overhead Haldening Transmission		258,644	532,275	437,441	492,539	641,066	736,705	756,349	1,010,767	892,547	849,407	857,273	972,387	8,437,401	
c. Undergrounding		16,965	16,390	23,913	33,990	50,764	72,156	109,080	106,384	212,779	2,100,971	1,122,085	(2,456,492)	1,408,983	
d. Vegelation Management		3,221,239	4,434,741	5,243,191	3,763,910	3,781,661	4,823,230	3,333,408	4,317,842	3,326,355	4,601,413	6,815,052	4,819,446	52,481,488	
e. Legal, Accounting, and Administrative (O&M only) 1. Total Judistictional Revenue Requirements	- 89 29	4,615,725	6,111,744	0 6,889,428	0 5,315,852	0 5,892,901	0 6,882,937	5,692,453	7,593,377	7,726,124	10,556,288	9,826,339	1,827,775	78,930,944	
5. Over/(Under) Recovery (Line 3 - Line 4f)		1,662,952	987,067	110,716	1,415,678	1,859,698	2,335,721	3,977,171	2,491,068	1,582,004	(2,690,945)	(3,191,767)	5,127,067	15,566,430	
6. Interest Provision (Form 3A Line 10)		393	885	1,789	3,457	6,403	12,279	23,045	32,830	43, 190	49,031	45,650	\$4,963	273,935	
7. Beginning Balance True-Up & Interest Provision		955,652	2,549,443	3,456,842	3,488,793	4,827,375	5,612,922	8,880,368	12,800,030	15.243.374	16.888.014	13,965,545	10,738,874	966,652	
a. Deterned True-Up from January to December 2021		2,492,172	2,492,172	2,492,172	2,492,172	2,492,172	2,492,172	2,492,172	2,492,172	2,492,172	2,492,172	2,492,172	2,492,172	2,492,172	
8. True-Up Collected/(Refunded) (see Line 2)	8	(60,554)	(80,554)	(80,554)	(80,554)	(80,554)	(90,554)	(80,554)	(80,554)	(80,554)	(80,554)	(80,554)	(80,554)	(965,648)	
9. End of Period Total True-Up (Lines 5+6+7+7a+8)	0	5,041,615	5,949,014	5,980,965	7,319,547	9,105,094	11,372,540	15,292,202	17,735,545	19,380,185	15,457,717	13,231,046	18,332,542	18,332,542	
10. Adjustment to Period True-Up Including Interest	63	0	0	0	0	0	0	0	D	0	0	0	0	0	
11. End of Period Total True-Up (Lines 9 + 10)	12	\$ 5,041,615	5,949,014	\$ 5,980,965	\$ 7,319,547	\$ 9,105,094	\$ 11,372,540	\$ 15,292,202	\$ 17.735,546	\$ 19,380,185	\$ 16,457,717	5 13,231,046	\$ 18,332,542 \$	18,332,542	

Duke Enviroy Florida Storm Protection Plan Coal Recovery Clause True-Up Filing Actual Period: January through December 2022 Catcatation of Intervel Provision for True-Up Amount (in Dotare)													Docket No. 202300 10-Ei Duke Energy Florida, LLC Witness: C.A.Menendez Extr. No(CAM-1) Form 3A Page 3 of 121
<u>Une</u>	Actual January	Actual February	Actual March	Actual April	Actual May	Actual June	Actual July	Actual August	Actual September	Actual October	Actual November	Actual December	End of Petiod Total
1. Beginning True-Up Amount (Form 2A, Line 7+7a+10)	\$ 3,458,823 \$	5,041,514 \$	5,949,013 \$	5,980,965 \$	7,319,546	\$ 9,105,093 \$	11,372,540 \$	15,292,202	\$ 17,735,546 \$	19,380,185	\$ 16,457,716 \$	13,231,046	
2. Ending True-Up Amount Before Interest	5,041,221	5,948,127	5,979,175	7,316,089	9,095,690	11,360,261	15,269,157	17,702,716	19,336,995	16,408,685	13,185,396	18,277,558	
3. Total of Beginning & Ending True-Up (Lines 1 + 2)	8,500,044	10,989,741	11,928,189	13,297,054	16,418,236	20,465,354	25,641,696	32,994,918	37,072,541	35,788,871	29,643,112	31,508,604	
4. Average True-Up Amount (Line 3 x 1/2)	4,287,287	5,597,716	5,964,095	6,645,527	8,209,118	10,232,677	13,320,848	16,497,459	18,536,271	17,894,436	14,621,556	15,754,302	
5. Interest Rate (First Day of Reporting Business Month)	0.05%	0.14%	0.24%	0.49%	0.76%	1,12%	1.76%	2.40%	2.38%	3.20%	3.37%	4.01%	
6. Interest Rate (First Day of Subsequent Business Month)	0.14%	0.24%	0.49%	0.76%	1.12%	1.76%	2.40%	2.38%	3.20%	3.37%	4.01%	4.37%	
7. Total of Beginning & Ending Interest Rates (Lines 5 + 6)	0.22%	0.38%	0.73%	1.25%	1.86%	2.88%	4.15%	4.78%	5,58%	6.57%	7.38%	8,38%	
8. Average Interest Rate (Line 7 x 1/2)	0.110%	0.190%	0.365%	0.625%	0.940%	1,440%	2.080%	2.390%	2.790%	3,285%	3.690%	4.190%	
9. Monthly Average Interest Rate (Line 8 x 1/12)	0.009%	0.015%	0.030%	0.052%	0.078%	0.120%	0.173%	0.199%	0.233%	0.274%	0.308%	0,349%	
10. Interest Provision for the Month (Line 4 x Line 9)	\$ 393 \$	586 \$	1,789 \$	3,457 \$	6,403	\$ 12,279 \$	23,045 \$	32,830	\$ 43,190 \$	49.031	\$ 45,650	54,983	\$ 273,936