**DUKE
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FLORIDA**

Dianne M. Triplett
DEPUTY GENERAL COUNSEL

September 24, 2025

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 Load Research Sampling Plan; Undocketed*

Dear Mr. Teitzman:

 Please find attached Duke Energy Florida, LLC's ("DEF"), response to Staff's First Data Request regarding DEF's 2025 Load Research Sampling Plan, dated July 23, 2025.

 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 filing.

    Respectfully,

    /s/ Dianne M. Triplett

    Dianne M. Triplett

DMT/mh

cc: Michael Barrett (MBarrett@psc.state.fl.us) and William McNulty bmcnulty@psc.state.fl.us)

1. Please refer to page 1, the "Sample Plan" paragraph of Duke's 2025 Load Research Sampling Plan, dated July 23, 2025. The utility stated, in part, that "Approximately 2,200 meters do not provide interval data, largely due to customers that have opted out of AMI metering."

    A. Please provide a breakdown, by rate class, of the 2,200 meters that do not provide interval data through AMI metering.

    Response:
    Customers opting out of AMI metering:
    - 27 – GS non-demand
    - 5 – GS demand
    - 2,119– RS

    B. What assumptions does the utility make regarding the customer opt-outs? How are the assumptions going to be incorporated into the January – December 2025 study?

    Response:
    Opt-out accounts are considered missing accounts and are handled in the analysis process as missing data. Usage will be estimated based on a mean per unit methodology for the rate class.

2. Please describe the process the utility intends to use to validate the data it will collect pursuant to its proposed 2025 Load Research Sampling Plan.

    Response:
    Duke Energy Florida ("DEF"), continues to leverage AMI metering to support the Load Research program. Having interval data available for nearly all meters reduces estimation of usage. This eliminates any sampling error, which will provide more accurate results. With the samples, billing population and kwh sales were used to expand the estimates to the population level. The newer method avoids the need to align billing cycle data with a calendar month period. The sample methodology was designed to achieve the desired confidence level and precision at the monthly system peak hour. The newer methodology uses all available interval data and achieves better results for all hours.

3. Please describe any data collection challenges the utility encountered when conducting its last Load Research Sampling Plan (in 2022). If applicable, also describe any new practices and/or procedures the company will use in this plan cycle to address or mitigate such challenges.

    Response:
    Load Research adapted from utilizing industry standard software to an internal platform that DEF's Regulated Solutions Analytics (RSA) organization developed. The platform brings together customer interval data and additional characteristics, enabling advanced analytics like

full population analysis. The new platform helps modernize analysis processes for Load Research. There are no anticipated challenges for generating the necessary analytics for this plan cycle.

4. In the 2025 Load Research Sampling Plan, the utility plans again (as it did in 2022) to use interval data, and not sampled data. Does collecting interval data offer a higher level of accuracy in measuring demand by rate class than would be available under any available sampling method? Please explain your response.

<u>Response:</u>
The results will be based on actual metered data for the whole population, instead of a small sample, providing more precise results. With the newer methodology, approximately 99% of the data will be available for every hour of the year. The approximate 1% of unavailable interval metered data is estimated by applying the mean per unit methodology for the rate class to capture the demands for the full population. Therefore, the results will be more accurate than the 90% confidence level at system peak hour, which was achieved with the sample methodology. Since the full population analysis is not based on a sample, confidence intervals and error rates do not apply, so they will not be included in the upcoming study.

5. Pursuant to Rule 25-60437, Florida Administrative Code, the utility collects data that is used to support cost of service studies used in rate making proceedings. Other than for this purpose, are there any other ways that DEF uses the interval data it collects?

<u>Response:</u>
The data from Load Research samples have been used by Cost of Service, Rate Design, and Load Forecasting. The DEF demand statistics and hourly load profiles have also been used to support numerous data requests from other internal departments.

6. Does DEF maintain that all the advantages listed in DEF's Response to Staff's First Data Request Regarding DEF's 2022 Load Research Sampling Plan, No. 2.A, are accurate and what was expected? If not, please explain any other advantages or disadvantages found in the 2022 Plan compared to previous plans.

<u>Response:</u>
Yes.