



Stephanie A. Cuello  
SENIOR COUNSEL

March 30, 2026

**VIA ELECTRONIC FILING**

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

Re: *Environmental Cost Recovery Clause; Docket No. 20260007-EI*

Dear Mr. Teitzman:

On behalf of Duke Energy Florida, LLC (“DEF”), please find enclosed for electronic filing in the above-referenced docket, DEF’s 2025 Final True-Up Report. The filing includes the following:

- DEF’s Petition for Approval of Environmental Cost Recovery Final True-Up for the period January 2025 to December 2025 and Approval of New Project for Recovery;
- Direct Testimony of Gary P. Dean and Exhibit No. (GPD-1);
- Direct Testimony of Eric Szkolnyj;
- Direct Testimony of Reggie Anderson; and
- Direct Testimony of Wyatt Grant and Exhibit No. (WG-1).

Thank you for your assistance in this matter and if you have any questions, please feel free to contact me at (850) 521-1425.

Sincerely,

*/s/ Stephanie A. Cuello*

Stephanie A. Cuello

SAC/mh  
Enclosures

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Environmental Cost Recovery Clause

Docket No. 20260007-EI

Filed: March 30, 2026

**DUKE ENERGY FLORIDA’S PETITION FOR APPROVAL OF  
ENVIRONMENTAL COST RECOVERY CLAUSE FINAL TRUE-UP FOR  
THE PERIOD JANUARY 2025 - DECEMBER 2025**

Duke Energy Florida, LLC (“DEF” or “the Company”), hereby petitions for approval of DEF’s final end-of-the period Environmental Cost Recovery Clause (“ECRC”) True-Up amount of an over-recovery of \$ 730,777 and an over-recovery of \$2,110,646 as the adjusted net true-up for the period January 2025 through December 2025. In support of this Petition, DEF states:

1. The actual end-of-period ECRC true-up over-recovery amount of \$ 730,777 for the period January 2025 through December 2025 was calculated in accordance with the methodology set forth in Form 42-2A of Exhibit No. (GPD-1) accompanying the direct testimony of DEF witness Gary P. Dean, which is being filed together with this Petition and incorporated herein. Additional cost information for specific ECRC programs for the period January 2025 through December 2025 are presented in the direct testimonies of Reginald Anderson, Eric Szkolnyj, and Wyatt Grant filed with this Petition and incorporated herein.

2. In Order No. PSC-2025-0437-FOF-EI, the Commission approved an under-recovery of \$1,379,869 as the actual/estimated ECRC true-up for the period January 2025 through December 2025.

3. As reflected on Form 42-1A, Line 3, of Exhibit No. (GPD-1) to Mr. Dean’s testimony, the adjusted net true-up for the period January 2025 through December 2025 is an over-

recovery of \$ 2,110,646, which is the difference between the actual true-up over-recovery of \$730,777 and the actual/estimate true-up under-recovery of \$1,379,869.

WHEREFORE, DEF respectfully requests that the Commission approve the Company's final 2025 end-of-period Environmental Cost Recovery True-Up amount of an over-recovery amount of \$ 730,777, and an over-recovery of \$ 2,110,646 as the adjusted net true-up for the period January 2025 through December 2025.

RESPECTFULLY SUBMITTED this 30<sup>th</sup> day of March 2026.

/s/ Stephanie Cuello

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Attorneys for Duke Energy Florida, LLC

**CERTIFICATE OF SERVICE**

*Docket No. 20260007-EI*

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic mail to the following this 30<sup>th</sup> day of March, 2026.

/s/ Stephanie Cuello

Attorney

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DIRECT TESTIMONY OF

GARY P. DEAN

ON BEHALF OF

DUKE ENERGY FLORIDA, LLC

DOCKET NO. 20260007-EI

March 30, 2026

1 **Q. Please state your name and business address.**

2 A. My name is Gary P. Dean. My business address is 299 First Avenue North, St.  
3 Petersburg, FL 33701.

4

5 **Q. By whom are you employed and in what capacity?**

6 A. I am employed by Duke Energy Florida, LLC (“DEF” or the “Company”), as Rates  
7 and Regulatory Strategy Manager.

8

9 **Q. What are your responsibilities in that position?**

10 A. I am responsible for regulatory planning and cost recovery for DEF. In this capacity,  
11 I am responsible for DEF’s Final True-Up, Actual/Estimated Projection and  
12 Projection Filings in the Fuel Adjustment, Capacity Cost Recovery, Environmental  
13 Cost Recovery, and Storm Protection Plan Cost Recovery clauses.

14

15 **Q. Please describe your educational background and professional experience.**

16 A. I joined DEF on April 27, 2020 as the Rates and Regulatory Strategy Manager. Prior

1 to working at DEF, I was the Senior Manager, Optimization for Chesapeake Utilities  
2 Corporation (“CUC”). In this role, I was responsible for all pricing related to the  
3 company’s natural gas retail business. Prior to working at CUC, I was the General  
4 Manager, Electric Operations for South Jersey Energy Company (“SJEC”). In that  
5 capacity I held P&L and strategic development responsibility for the company’s  
6 electric retail book. Prior to working at SJEC I had various positions associated with  
7 rates and regulatory affairs. In these positions I was responsible for all rate and  
8 regulatory matters, including tariff and rate design, financial modeling and analysis,  
9 and ensuring accurate rates for billing. I received a Master of Business Administration  
10 from Rutgers University and a Bachelor of Science degree in Commerce and  
11 Engineering, majoring in Finance, from Drexel University.

12

13 **Q. Have you previously filed testimony before this Commission in connection with**  
14 **DEF’s Environmental Cost Recovery Clause (“ECRC”)?**

15 A. Yes.

16

17 **Q. What is the purpose of your testimony?**

18 A. The purpose of my testimony is to present for Commission review and approval  
19 DEF’s actual true-up costs associated with environmental compliance activities for  
20 the period January 2025 - December 2025.

21

22 **Q. Are you sponsoring any exhibits in support of your testimony?**

23 A. Yes. I am sponsoring Exhibit No. (GPD-1), that consists of nine forms.

24 Exhibit No. (GPD-1) consists of the following:

- 1           • Form 42-1A: Final true-up for the period January 2025 - December 2025;
- 2           • Form 42-2A: Final true-up calculation for the period;
- 3           • Form 42-3A: Calculation of the interest provision for the period;
- 4           • Form 42-4A: Calculation of variances between actual and actual/estimated
- 5           costs for O&M Activities;
- 6           • Form 42-5A: Summary of actual monthly costs for the period for O&M
- 7           Activities;
- 8           • Form 42-6A: Calculation of variances between actual and actual/estimated
- 9           costs for Capital Investment Projects;
- 10          • Form 42-7A: Summary of actual monthly costs for the period for Capital
- 11          Investment Projects;
- 12          • Form 42-8A, pages 1-11: Calculation of return on capital investment,
- 13          depreciation expense and property tax expense for each project recovered
- 14          through the ECRC; and
- 15          • Form 42-9A: DEF's capital structure and cost rates.

16

17           These exhibits were developed under my supervision, and they are true and accurate  
18           to the best of my knowledge and belief.

19

20   **Q.    What is the source of the data that you will present in testimony and exhibits in**  
21   **this proceeding?**

22    A.    Unless otherwise indicated, the actual data is taken from the books and records of  
23           the Company. The books and records are kept in the regular course of DEF's business  
24           in accordance with generally accepted accounting principles and practices, and

1 provisions of the Uniform System of Accounts as prescribed by the Federal Energy  
2 Regulatory Commission, and any accounting rules and orders established by this  
3 Commission. The Company relies on the information included in this testimony and  
4 exhibits in the conduct of its affairs.

5

6 **Q. What is the final true-up amount DEF is requesting for the period January 2025**  
7 **- December 2025?**

8 A. DEF requests approval of an actual over-recovery amount of \$730,777 for the year  
9 ending December 31, 2025. This amount is shown on Form 42-1A, Line 1.

10

11 **Q. What is the net true-up amount DEF is requesting for the period January 2025**  
12 **- December 2025 to be applied in the calculation of the environmental cost**  
13 **recovery factors to be refunded/recovered in the next projection period?**

14 A. DEF requests approval of an adjusted net true-up over-recovery amount of  
15 \$2,110,646 for the period January 2025 - December 2025 reflected on Line 3 of Form  
16 42-1A. This amount is the difference between an actual over-recovery amount of  
17 \$730,777 reflected on Line 1 and an actual/estimated under-recovery of \$1,379,869  
18 reflected on Line 2 for the period January 2025 - December 2025, as approved in  
19 Order PSC-2025-0437-FOF-EI.

20

21 **Q. Are all costs listed on Forms 42-1A through 42-8A attributable to**  
22 **environmental compliance projects approved by the Commission?**

23 A. Yes.

24

1 **Q. How did actual O&M expenditures for January 2025 - December 2025 compare**  
2 **with DEF's actual/estimated projections as presented in previous testimony and**  
3 **exhibits?**

4 A. Form 42-4A shows a total O&M project variance of \$2,188,706 or 18% lower than  
5 projected. Individual O&M project variances are on Form 42-4A.

6

7 **Q. How did actual capital recoverable expenditures for January 2025 - December**  
8 **2025 compare with DEF's estimated/actual projections as presented in previous**  
9 **testimony and exhibits?**

10 A. Form 42-6A shows a total capital investment recoverable cost variance of \$66,215  
11 or 1% lower than projected. Individual project variances are on Form 42-6A. Return  
12 on capital investment, depreciation, and property taxes for each project for the period  
13 are provided on Form 42-8A, pages 1-11.

14

15 **Q. Please explain the variance between actual project expenditures and the**  
16 **Actual/Estimated projections for the SO<sub>2</sub>/NO<sub>x</sub> Emissions Allowance (Project 5).**

17 A. The O&M variance is \$1,431 or 34% higher than projected. This is due to higher  
18 than expected SO<sub>2</sub> Allowance expense.

19

20 **Q. Does this conclude your testimony?**

21 A. Yes.

Docket No. 20260007-EI

Duke Energy Florida

Witness: G. P. Dean

Exhibit No. GPD-1

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**DUKE ENERGY FLORIDA, LLC  
Environmental Cost Recovery Clause  
Commission Forms 42-1A Through 42-9A**

**January 2025 - December 2025  
Final True-Up  
Docket No. 20260007-EI**

**DUKE ENERGY FLORIDA, LLC**  
**Environmental Cost Recovery Clause**  
**Final True-Up**  
**January 2025 - December 2025**  
**(in Dollars)**

Form 42-1A

Docket No. 20260007-EI  
Duke Energy Florida  
Witness: G. P. Dean  
Exhibit No. GPD-1  
Page 2 of 20

<u>Line</u>	<u>Period Amount</u>
1 Over/(Under) Recovery for the Period January 2025 - December 2025 (Form 42-2A, Line 5 + 6 + 10)	\$ 730,777
2 Actual/Estimated True-Up Amount Approved for the Period January 2025 - December 2025 (Order No. PSC-2025-0437-FOF-EI)	<u>(1,379,869)</u>
3 Final True-Up Amount to be Refunded/(Recovered) in the Projection Period January 2027 to December 2027 (Lines 1 - 2)	<u>\$ 2,110,646</u>

**DUKE ENERGY FLORIDA, LLC**  
**Environmental Cost Recovery Clause**  
**Final True-Up**  
**January 2025 - December 2025**

Form 42-2A

Docket No. 20260007-EI  
Duke Energy Florida  
Witness: G. P. Dean  
Exhibit No. GPD-1  
Page 3 of 20

**End-of-Period True-Up Amount**  
**(in Dollars)**

Line	Description	Actual Jan-25	Actual Feb-25	Actual Mar-25	Actual Apr-25	Actual May-25	Actual Jun-25	Actual Jul-25	Actual Aug-25	Actual Sep-25	Actual Oct-25	Actual Nov-25	Actual Dec-25	End of Period Total
1	ECRC Revenues (net of Revenue Taxes)	\$922,974	\$835,592	\$749,992	\$850,988	\$957,511	\$1,163,052	\$1,189,690	\$1,274,722	\$1,140,840	\$1,043,148	\$812,534	\$769,037	11,710,080
2	True-Up Provision (Order No. PSC-2025-0437-FOF-EI)	3,484,622	290,385	290,385	290,385	290,385	290,385	290,385	290,385	290,385	290,385	290,385	290,385	3,484,622
3	ECRC Revenues Applicable to Period (Lines 1 + 2)	\$1,213,360	1,125,977	1,040,377	1,141,373	1,247,896	1,453,437	1,480,075	1,565,107	1,431,225	1,333,533	1,102,919	1,059,422	15,194,702
4	Jurisdictional ECRC Costs													
	a. O & M Activities (Form 42-5A, Line 9)	\$846,040	(\$82,397)	\$146,544	\$893,314	\$1,391,439	\$1,012,478	\$503,526	\$873,115	\$1,583,757	\$1,110,764	\$912,702	\$560,497	\$9,751,779
	b. Capital Investment Projects (Form 42-7A, Line 9)	407,675	408,738	406,563	405,886	406,839	408,026	408,152	412,359	415,239	416,334	423,305	428,124	4,947,238
	c. Other (A)	0	0	0	0	0	0	0	0	0	0	0	0	0
	d. Total Jurisdictional ECRC Costs	\$1,253,715	\$326,341	\$553,107	\$1,299,200	\$1,798,278	\$1,420,504	\$911,678	\$1,285,474	\$1,998,996	\$1,527,098	\$1,336,007	\$988,621	\$14,699,017
5	Over/(Under) Recovery (Line 3 - Line 4d)	(\$40,355)	\$799,636	\$487,270	(\$157,827)	(\$550,383)	\$32,934	\$568,397	\$279,633	(\$567,771)	(\$193,564)	(\$233,088)	\$70,802	\$495,685
6	Interest Provision (Form 42-3A, Line 10)	22,734	23,141	24,371	23,806	21,705	19,861	19,915	20,354	18,344	15,472	13,506	11,883	235,092
7	Beginning Balance True-Up & Interest Provision	3,484,622	3,176,615	3,709,007	3,930,263	3,505,857	2,686,794	2,449,204	2,747,131	2,756,733	1,916,921	1,448,444	938,477	3,484,622
	a. Deferred True-Up - January 2024 - December 2024 (2024 TU filing dated March 31, 2025)	2,943,654	2,943,654	2,943,654	2,943,654	2,943,654	2,943,654	2,943,654	2,943,654	2,943,654	2,943,654	2,943,654	2,943,654	2,943,654
8	True-Up Collected/(Refunded) (see Line 2)	(290,385)	(290,385)	(290,385)	(290,385)	(290,385)	(290,385)	(290,385)	(290,385)	(290,385)	(290,385)	(290,385)	(290,385)	(3,484,622)
9	End of Period Total True-Up (Lines 5+6+7a+8)	\$6,120,269	\$6,652,661	\$6,873,917	\$6,449,511	\$5,630,448	\$5,392,857	\$5,690,785	\$5,700,387	\$4,860,575	\$4,392,098	\$3,882,131	\$3,674,430	\$3,674,430
10	Adjustments to Period Total True-Up Including Interest	0	0	0	0	0	0	0	0	0	0	0	0	0
11	End of Period Total True-Up Over/(Under) (Lines 9 + 10)	\$6,120,269	\$6,652,661	\$6,873,917	\$6,449,511	\$5,630,448	\$5,392,857	5,690,785	\$5,700,387	\$4,860,575	\$4,392,098	\$3,882,131	\$3,674,430	\$3,674,430

Notes:  
(A) N/A

**DUKE ENERGY FLORIDA, LLC**  
**Environmental Cost Recovery Clause**  
**Final True-Up**  
**January 2025 - December 2025**

Form 42-3A

Docket No. 20260007-EI  
Duke Energy Florida  
Witness: G. P. Dean  
Exhibit No. GPD-1  
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**Interest Provision**  
**(in Dollars)**

Line	Description	Actual Jan-25	Actual Feb-25	Actual Mar-25	Actual Apr-25	Actual May-25	Actual Jun-25	Actual Jul-25	Actual Aug-25	Actual Sep-25	Actual Oct-25	Actual Nov-25	Actual Dec-25	End of Period Total
1	Beginning True-Up Amount (Form 42-2A, Line 7 + 7a + 10)	\$6,428,276	\$6,120,269	\$6,652,661	\$6,873,917	\$6,449,511	\$5,630,448	\$5,392,857	\$5,690,785	\$5,700,387	\$4,860,575	\$4,392,098	\$3,882,131	
2	Ending True-Up Amount Before Interest (Line 1 + Form 42-2A, Lines 5 + 8)	6,097,535	6,629,520	6,849,546	6,425,705	5,608,743	5,372,996	5,670,870	5,680,033	4,842,231	4,376,626	3,868,625	3,662,547	
3	Total of Beginning & Ending True-Up (Lines 1 + 2)	12,525,811	12,749,789	13,502,207	13,299,621	12,058,254	11,003,444	11,063,727	11,370,818	10,542,618	9,237,201	8,260,723	7,544,678	
4	Average True-Up Amount (Line 3 x 1/2)	6,262,906	6,374,895	6,751,104	6,649,811	6,029,127	5,501,722	5,531,864	5,685,409	5,271,309	4,618,601	4,130,362	3,772,339	
5	Interest Rate (First Business Day of Current Month)	4.36%	4.35%	4.35%	4.32%	4.28%	4.35%	4.31%	4.32%	4.26%	4.08%	3.96%	3.89%	
6	Interest Rate (First Business Day of Subsequent Month)	4.35%	4.35%	4.32%	4.28%	4.35%	4.31%	4.32%	4.26%	4.08%	3.96%	3.89%	3.66%	
7	Total of Beginning & Ending Interest Rates (Lines 5 + 6)	8.71%	8.70%	8.67%	8.60%	8.63%	8.66%	8.63%	8.58%	8.34%	8.04%	7.85%	7.55%	
8	Average Interest Rate (Line 7 x 1/2)	4.355%	4.350%	4.335%	4.300%	4.315%	4.330%	4.315%	4.290%	4.170%	4.020%	3.925%	3.775%	
9	Monthly Average Interest Rate (Line 8 x 1/12)	0.363%	0.363%	0.361%	0.358%	0.360%	0.361%	0.360%	0.358%	0.348%	0.335%	0.327%	0.315%	
10	Interest Provision for the Month (Line 4 x Line 9)	\$22,734	\$23,141	\$24,371	\$23,806	\$21,705	\$19,861	\$19,915	\$20,354	\$18,344	\$15,472	\$13,506	\$11,883	\$235,092



**DUKE ENERGY FLORIDA, LLC**  
**Environmental Cost Recovery Clause**  
**Final True-Up**  
**January 2025 - December 2025**

Form 42-5A

Docket No. 20260007-EI  
 Duke Energy Florida  
 Witness: G. P. Dean  
 Exhibit No. GPD-1  
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**O&M Activities**  
**(in Dollars)**

Line	Description	Actual Jan-25	Actual Feb-25	Actual Mar-25	Actual Apr-25	Actual May-25	Actual Jun-25	Actual Jul-25	Actual Aug-25	Actual Sep-25	Actual Oct-25	Actual Nov-25	Actual Dec-25	End of Period Total
1	Description of O&M Activities													
1	Transmission Substation Environmental Investigation, Remediation, and Pollution Prevention	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
1a	Distribution Substation Environmental Investigation, Remediation, and Pollution Prevention	0	0	0	0	0	0	0	0	0	0	0	0	0
2	Distribution System Environmental Investigation, Remediation, and Pollution Prevention	0	0	0	0	0	0	0	0	0	0	0	0	0
3	Pipeline Integrity Management - Bartow/Anclote Pipeline - Intm	0	0	0	0	0	0	0	0	0	0	0	0	0
4	Above Ground Tank Secondary Containment - Peaking	0	0	0	0	0	0	0	0	0	0	0	0	0
5	SO <sub>2</sub> /NO <sub>x</sub> Emissions Allowances - Energy	0	(48)	306	336	445	445	720	0	1,877	669	270	562	5,582
6	Phase II Cooling Water Intake 316(b) - Base	20,804	11,525	7,460	12,112	13,849	27,615	25,622	32,163	20,929	18,436	12,026	21,246	223,786
6a	Phase II Cooling Water Intake 316(b) - Intm	3,716	1,260	1,170	102	11,562	38,863	29,834	0	58,999	0	29,834	89,502	264,843
7.2	CAIR/CAMR - Peaking	0	0	0	0	0	0	0	0	0	0	0	0	0
7.4	CAIR/CAMR Crystal River - Base	0	0	0	0	0	0	0	0	0	0	0	0	0
7.4	CAIR/CAMR Crystal River - Energy	762,496	(180,343)	(10,580)	749,150	1,317,242	891,867	356,230	721,083	1,361,778	984,888	751,020	319,600	8,024,430
7.4	CAIR/CAMR Crystal River - A&G	0	0	0	0	0	0	0	0	0	0	0	0	0
7.4	CAIR/CAMR Crystal River - Conditions of Certification - Energy	0	0	0	0	0	0	0	0	0	0	0	0	0
7.5	Best Available Retrofit Technology (BART) - Energy	0	0	0	0	0	0	0	0	0	0	0	0	0
7.6	National Emission Standards for Hazardous Air Pollutants (NESHAP) - Base	0	0	0	23,034	0	0	0	0	0	0	0	0	23,034
8	Arsenic Groundwater Standard - Base	0	3,507	0	1,979	1,576	(3,507)	797	750	1,070	750	0	1,335	8,258
9	Sea Turtle - Coastal Street Lighting - Distrib	0	0	0	0	0	0	0	0	0	0	0	0	0
11	Modular Cooling Towers - Base	0	0	0	0	0	0	0	0	0	0	0	0	0
12	Greenhouse Gas Inventory and Reporting - Energy	0	0	0	0	0	0	0	0	0	0	0	0	0
13	Mercury Total Daily Maximum Loads Monitoring - Energy	0	0	0	0	0	0	0	0	0	0	0	0	0
14	Hazardous Air Pollutants (HAPs) ICR Program - Energy	0	0	0	0	0	0	0	0	0	0	0	0	0
15	Effluent Limitation Guidelines ICR Program - Energy	0	0	0	0	0	0	0	0	0	0	0	0	0
15.1	Effluent Limitation Guidelines ICR Program CRN - Energy	0	0	0	0	0	0	0	0	0	0	0	0	0
16	National Pollutant Discharge Elimination System (NPDES) - Energy	(2,654)	6,625	0	1,066	5,146	(1,084)	27,799	0	12,400	42,835	0	39,974	132,107
17	Mercury & Air Toxic Standards (MATS) CR4 & CR5 - Energy	27,167	38,828	67,202	67,033	16,062	0	0	(29)	0	0	0	0	216,264
17.1	Mercury & Air Toxic Standards (MATS) Anclote Gas Conversion - Energy	0	0	0	0	0	0	0	0	0	0	0	0	0
17.2	Mercury & Air Toxic Standards (MATS) CR1 & CR2 - Energy	0	0	0	0	0	0	0	0	0	0	0	0	0
18	Coal Combustion Residual (CCR) Rule - Energy	49,580	35,010	85,500	76,133	92,829	107,373	88,115	139,367	147,045	79,921	123,781	93,788	1,118,441
19	Reclaimed Water Interconnection - Energy	0	0	0	0	0	0	0	0	0	0	0	0	0
20	Lead and Copper Rule - Base	0	0	0	0	0	0	0	0	0	0	0	0	0
21	CCC Water Treatment System - Base	0	0	0	0	0	0	0	0	0	0	0	0	0
2	Total of O&M Activities	\$861,109	(\$83,636)	\$151,058	\$930,945	\$1,458,711	\$1,061,572	\$529,118	\$893,334	\$1,604,098	\$1,127,499	\$916,930	\$566,008	\$10,016,744
3	Recoverable Costs Allocated to Energy	836,589	(99,928)	142,428	893,718	1,431,723	998,600	472,865	860,422	1,523,100	1,108,313	875,070	453,924	9,496,824
4	Recoverable Costs Allocated to Demand - Transm	0	0	0	0	0	0	0	0	0	0	0	0	0
	Recoverable Costs Allocated to Demand - Distrib	0	0	0	0	0	0	0	0	0	0	0	0	0
	Recoverable Costs Allocated to Demand - Prod-Base	20,804	15,032	7,460	37,125	15,425	24,108	26,419	32,913	21,999	19,186	12,026	22,581	255,078
	Recoverable Costs Allocated to Demand - Prod-Intm	3,716	1,260	1,170	102	11,562	38,863	29,834	0	58,999	0	29,834	89,502	264,843
	Recoverable Costs Allocated to Demand - Prod-Peaking	0	0	0	0	0	0	0	0	0	0	0	0	0
	Recoverable Costs Allocated to Demand - A&G	0	0	0	0	0	0	0	0	0	0	0	0	0
5	Retail Energy Jurisdictional Factor	0.98220	0.98700	0.96870	0.95790	0.95340	0.95270	0.94890	0.97650	0.98850	0.98490	0.99680	0.99730	
6	Retail Transmission Demand Jurisdictional Factor	0.70369	0.70369	0.70369	0.70369	0.70369	0.70369	0.70369	0.70369	0.70369	0.70369	0.70369	0.70369	
	Retail Distribution Demand Jurisdictional Factor	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	
	Retail Production Demand Jurisdictional Factor - Base	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	
	Retail Production Demand Jurisdictional Factor - Intm	0.95212	0.95212	0.95212	0.95212	0.95212	0.95212	0.95212	0.95212	0.95212	0.95212	0.95212	0.95212	
	Retail Production Demand Jurisdictional Factor - Peaking	0.97632	0.97632	0.97632	0.97632	0.97632	0.97632	0.97632	0.97632	0.97632	0.97632	0.97632	0.97632	
	Retail Production Demand Jurisdictional Factor - A&G	0.97366	0.97366	0.97366	0.97366	0.97366	0.97366	0.97366	0.97366	0.97366	0.97366	0.97366	0.97366	
7	Jurisdictional Energy Recoverable Costs (A)	821,698	(98,629)	137,970	856,092	1,365,005	951,367	448,701	840,202	1,505,584	1,091,578	872,270	452,699	9,244,537
8	Jurisdictional Demand Recoverable Costs - Transm (B)	0	0	0	0	0	0	0	0	0	0	0	0	0
	Jurisdictional Demand Recoverable Costs - Distrib (B)	0	0	0	0	0	0	0	0	0	0	0	0	0
	Jurisdictional Demand Recoverable Costs - Prod-Base (B)	20,804	15,032	7,460	37,125	15,425	24,108	26,419	32,913	21,999	19,186	12,026	22,581	255,078
	Jurisdictional Demand Recoverable Costs - Prod-Intm (B)	3,538	1,200	1,114	97	11,009	37,003	28,406	0	56,174	0	28,406	85,217	252,164
	Jurisdictional Demand Recoverable Costs - Prod-Peaking (B)	0	0	0	0	0	0	0	0	0	0	0	0	0
	Jurisdictional Demand Recoverable Costs - A&G (B)	0	0	0	0	0	0	0	0	0	0	0	0	0
9	Total Jurisdictional Recoverable Costs for O&M Activities (Lines 7 + 8)	\$846,040	(\$82,397)	\$146,544	\$893,314	\$1,391,439	\$1,012,478	\$503,526	\$873,115	\$1,583,757	\$1,110,764	\$912,702	\$560,497	\$9,751,779

Notes:  
 (A) Line 3 x Line 5  
 (B) Line 4 x Line 6

**DUKE ENERGY FLORIDA, LLC**  
**Environmental Cost Recovery Clause**  
**Final True-Up**  
**January 2025 - December 2025**

Form 42-6A

Docket No. 20260007-EI

Duke Energy Florida

Witness: G. P. Dean

Exhibit No. GPD-1

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**Variance Report of Capital Investment Activities**  
**(In Dollars)**

Line	(1) Total Year Actual	(2) Actual/ Estimated	(3) Variance Amount	(4) Percent
1	Description of Capital Investment Activities			
3.1	\$0	\$0	\$0	0%
4.x	0	0	0	0%
5	260,476	260,829	(353)	0%
6	1,673,526	1,713,666	(40,140)	-2%
7.x	561,747	\$553,068	8,679	2%
9	0	0	0	0%
10.x	0	0	0	0%
11	0	0	0	0%
11.1	0	0	0	0%
15.1	296,214	296,422	(208)	0%
16	1,220,593	1,217,278	3,315	0%
17x	388,973	389,231	(258)	0%
18	498,260	498,610	(350)	0%
19	33,446	38,506	(5,060)	-13%
20	0	0	0	0%
21	104,039	\$135,879	(31,840)	-23%
2	\$5,037,274	\$5,103,489	(\$66,215)	-1%
3	1,211,196	1,203,128	8,068	1%
4	\$3,826,078	\$3,900,361	(\$74,283)	-2%

Notes:

Column (1) End of Period Totals on Form 42-7A

Column (2) 2025 Actual/Estimated Filing (7/28/2025)

Column (3) = Column (1) - Column (2)

Column (4) = Column (3) / Column (2)

**DUKE ENERGY FLORIDA, LLC**  
**Environmental Cost Recovery Clause**  
**Final True-Up**  
**January 2025 - December 2025**

Form 42-7A

Docket No. 20260007-EI  
Duke Energy Florida  
Witness: G. P. Dean  
Exhibit No. GPD-1  
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**Capital Investment Projects-Recoverable Costs**  
**(in Dollars)**

Line	Description	Actual Jan-25	Actual Feb-25	Actual Mar-25	Actual Apr-25	Actual May-25	Actual Jun-25	Actual Jul-25	Actual Aug-25	Actual Sep-25	Actual Oct-25	Actual Nov-25	Actual Dec-25	End of Period Total
1	Description of Investment Projects (A)													
3.1	Pipeline Integrity Management - Bartow/Anclote Pipeline - Intermediate	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
4.1	Above Ground Tank Secondary Containment - Peaking	0	0	0	0	0	0	0	0	0	0	0	0	0
4.2	Above Ground Tank Secondary Containment - Base	0	0	0	0	0	0	0	0	0	0	0	0	0
4.3	Above Ground Tank Secondary Containment - Intermediate	0	0	0	0	0	0	0	0	0	0	0	0	0
5	SO2/NOX Emissions Allowances - Energy	21,720	21,721	21,719	21,717	21,714	21,712	21,708	21,705	21,699	21,690	21,687	21,684	260,476
6	Phase II Cooling Water Intake 316(b) - Base	136,735	136,350	135,966	135,580	135,195	134,811	134,425	134,041	133,655	133,270	132,886	132,500	1,615,414
6.1	Phase II Cooling Water Intake 316(b) - Base - Bartow	1,910	1,954	2,000	2,034	2,273	2,684	3,027	3,857	5,230	6,085	10,916	16,142	58,112
6.2	Phase II Cooling Water Intake 316(b) - Intermediate - Anclote	0	0	0	0	0	0	0	0	0	0	0	0	0
7.1	CAIR/CAMR Anclote- Intermediate	0	0	0	0	0	0	0	0	0	0	0	0	0
7.2	CAIR/CAMR - Peaking	0	0	0	0	0	0	0	0	0	0	0	0	0
7.3	CAMR Crystal River - Base	0	0	0	0	0	0	0	0	0	0	0	0	0
7.4	CAIR/CAMR Crystal River AFUDC - Base	0	0	0	0	0	0	0	0	0	0	0	0	0
7.4	CAIR/CAMR Crystal River AFUDC - Energy	45,277	45,336	45,540	45,717	46,344	47,127	47,761	48,034	47,600	47,736	48,015	47,260	561,747
7.5	Best Available Retrofit Technology (BART) - Energy	0	0	0	0	0	0	0	0	0	0	0	0	0
9	Sea Turtle - Coastal Street Lighting - Distribution	0	0	0	0	0	0	0	0	0	0	0	0	0
10.1	Underground Storage Tanks - Base	0	0	0	0	0	0	0	0	0	0	0	0	0
10.2	Underground Storage Tanks - Intermediate	0	0	0	0	0	0	0	0	0	0	0	0	0
11	Modular Cooling Towers - Base	0	0	0	0	0	0	0	0	0	0	0	0	0
15.1	Effluent Limitation Guidelines CRN (RLG) - Base	25,085	25,012	24,939	24,866	24,794	24,721	24,648	24,575	24,503	24,430	24,357	24,284	296,214
16	National Pollutant Discharge Elimination System (NPDES) - Intermediate	103,175	102,910	102,645	102,379	102,114	101,849	101,584	101,318	101,053	100,787	100,522	100,257	1,220,593
17	Mercury & Air Toxic Standards (MATS) CR4 & CR5 - Energy	32,979	32,876	32,774	32,671	32,568	32,466	32,363	32,260	32,158	32,055	31,953	31,850	388,973
17.1	Mercury & Air Toxic Standards (MATS) Anclote Gas Conversion - Energy	0	0	0	0	0	0	0	0	0	0	0	0	0
17.2	Mercury & Air Toxic Standards (MATS) CR1 & CR2 - Energy	0	0	0	0	0	0	0	0	0	0	0	0	0
18	Coal Combustion Residual (CCR) Rule - Demand	42,183	42,062	41,943	41,822	41,702	41,582	41,461	41,341	41,221	41,101	40,980	40,861	498,260
19	Reclaimed Water Interconnection - Peaking	1,716	1,969	1,951	2,097	2,254	2,371	2,450	2,554	2,716	3,441	4,613	5,314	33,446
20	Lead and Copper Rule - Base	0	0	0	0	0	0	0	0	0	0	0	0	0
21	CCC Water Treatment System - Base	3,655	4,821	5,178	6,169	7,513	8,427	8,850	9,982	11,473	12,178	12,623	13,170	104,039
2	Total Investment Projects - Recoverable Costs	\$414,435	\$415,011	\$414,655	\$415,052	\$416,471	\$417,750	\$418,277	\$419,667	\$421,308	\$422,773	\$428,552	\$433,322	\$5,037,274
3	Recoverable Costs Allocated to Energy	99,976	99,933	100,033	100,105	100,626	101,305	101,832	101,999	101,457	101,481	101,655	100,794	1,211,196
	Recoverable Costs Allocated to Distribution Demand	0	0	0	0	0	0	0	0	0	0	0	0	0
4	Recoverable Costs Allocated to Demand - Production - Base	209,568	210,199	210,026	210,471	211,477	212,225	212,411	213,796	216,082	217,064	221,762	226,957	2,572,039
	Recoverable Costs Allocated to Demand - Production - Intermediate	103,175	102,910	102,645	102,379	102,114	101,849	101,584	101,318	101,053	100,787	100,522	100,257	1,220,593
	Recoverable Costs Allocated to Demand - Production - Peaking	1,716	1,969	1,951	2,097	2,254	2,371	2,450	2,554	2,716	3,441	4,613	5,314	33,446
5	Retail Energy Jurisdictional Factor	0.98220	0.98700	0.96870	0.95790	0.95340	0.95270	0.94890	0.97650	0.98850	0.98490	0.99680	0.99730	
	Retail Distribution Demand Jurisdictional Factor	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	
6	Retail Demand Jurisdictional Factor - Production - Base	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	
	Retail Demand Jurisdictional Factor - Production - Intermediate	0.95212	0.95212	0.95212	0.95212	0.95212	0.95212	0.95212	0.95212	0.95212	0.95212	0.95212	0.95212	
	Retail Demand Jurisdictional Factor - Production - Peaking	0.97632	0.97632	0.97632	0.97632	0.97632	0.97632	0.97632	0.97632	0.97632	0.97632	0.97632	0.97632	
7	Jurisdictional Energy Recoverable Costs (B)	98,196	98,634	96,902	95,891	95,937	96,513	96,628	99,602	100,290	99,949	101,330	100,522	1,180,394
	Jurisdictional Demand Recoverable Costs - Distribution (B)	0	0	0	0	0	0	0	0	0	0	0	0	0
8	Jurisdictional Demand Recoverable Costs - Production - Base (C)	209,568	210,199	210,026	210,471	211,477	212,225	212,411	213,796	216,082	217,064	221,762	226,957	2,572,039
	Jurisdictional Demand Recoverable Costs - Production - Intermediate (C)	98,235	97,983	97,730	97,477	97,225	96,972	96,720	96,467	96,215	95,961	95,709	95,457	1,162,151
	Jurisdictional Demand Recoverable Costs - Production - Peaking (C)	1,675	1,922	1,905	2,047	2,201	2,315	2,392	2,494	2,652	3,360	4,504	5,188	32,654
9	Total Jurisdictional Recoverable Costs for Investment Projects (Lines 7 + 8)	\$407,675	\$408,738	\$406,563	\$405,886	\$406,839	\$408,026	\$408,152	\$412,359	\$415,239	\$416,334	\$423,305	\$428,124	\$4,947,238

Notes:  
(A) Each project's Total System Recoverable Expenses on Form 42-8A, Line 9; Form 42-8A, Line 5 for Projects 5 - Emission Allowances and Project 7.4 - Reagents  
(B) Line 3 x Line 5  
(C) Line 4 x Line 6

**DUKE ENERGY FLORIDA, LLC**  
**Environmental Cost Recovery Clause**  
**Final True-Up**  
**January 2025 - December 2025**

**SO2 and NOx EMISSIONS ALLOWANCES - Energy (Project 5)**  
**(in Dollars)**

Line	Description	Beginning of Period Amount	Actual Jan-25	Actual Feb-25	Actual Mar-25	Actual Apr-25	Actual May-25	Actual Jun-25	Actual Jul-25	Actual Aug-25	Actual Sep-25	Actual Oct-25	Actual Nov-25	Actual Dec-25	End of Period Total
1	Working Capital Dr (Cr)														
	a. 0158150 SO2 Emission Allowance Inventory	\$3,191,267	\$3,191,267	\$3,191,315	\$3,191,009	\$3,190,673	\$3,190,228	\$3,189,783	\$3,189,063	\$3,189,063	\$3,187,186	\$3,186,517	\$3,186,248	\$3,185,685	\$3,185,685
	b. 0254020 Auctioned SO2 Allowance	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	c. 0158170 NOx Emission Allowance Inventory	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	d. Other (A)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2	Total Working Capital	<u>\$3,191,267</u>	<u>\$3,191,267</u>	<u>\$3,191,315</u>	<u>\$3,191,009</u>	<u>\$3,190,673</u>	<u>\$3,190,228</u>	<u>\$3,189,783</u>	<u>\$3,189,063</u>	<u>\$3,189,063</u>	<u>\$3,187,186</u>	<u>\$3,186,517</u>	<u>\$3,186,248</u>	<u>\$3,185,685</u>	<u>\$3,185,685</u>
3	Average Net Investment		\$3,191,267	\$3,191,291	\$3,191,162	\$3,190,841	\$3,190,450	\$3,190,006	\$3,189,423	\$3,189,063	\$3,188,125	\$3,186,852	\$3,186,382	\$3,185,966	
4	Return on Average Net Working Capital Balance (B)														
	a. Debt Component		1.88%												
	b. Equity Component Grossed Up For Taxes		6.29%												
5	Total Return Component (C)														
			\$21,720	\$21,721	\$21,719	\$21,717	\$21,714	\$21,712	\$21,708	\$21,705	\$21,699	\$21,690	\$21,687	\$21,684	260,476
6	Expense Dr (Cr)														
	a. 0509030 SO <sub>2</sub> Allowance Expense		\$0	(\$48)	\$306	\$336	\$445	\$445	\$720	\$0	\$1,877	\$669	\$270	\$562	\$5,582
	b. 0407426 Amortization Expense		0	0	0	0	0	0	0	0	0	0	0	0	0
	c. 0509212 NOx Allowance Expense		0	0	0	0	0	0	0	0	0	0	0	0	0
	d. Other		0	0	0	0	0	0	0	0	0	0	0	0	0
7	Net Expense (D)		0	(48)	306	336	445	445	720	0	1,877	669	270	562	5,582
8	Total System Recoverable Expenses (Lines 5 + 7 + 8)		\$21,720	\$21,673	\$22,025	\$22,053	\$22,159	\$22,157	\$22,428	\$21,705	\$23,576	\$22,359	\$21,957	\$22,246	266,058
	a. Recoverable Costs Allocated to Energy		21,720	21,673	22,025	22,053	22,159	22,157	22,428	21,705	23,576	22,359	21,957	22,246	266,058
	b. Recoverable Costs Allocated to Demand		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	0
9	Energy Jurisdictional Factor		0.98220	0.98700	0.96870	0.95790	0.95340	0.95270	0.94890	0.97650	0.98850	0.98490	0.99680	0.99730	
10	Demand Jurisdictional Factor		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
11	Retail Energy-Related Recoverable Costs (E)		\$21,333	\$21,391	\$21,336	\$21,125	\$21,126	\$21,109	\$21,282	\$21,195	\$23,305	\$22,021	\$21,887	\$22,186	259,296
12	Retail Demand-Related Recoverable Costs (F)		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	0
13	Total Jurisdictional Recoverable Costs (Lines 12 + 13)		<u>\$21,333</u>	<u>\$21,391</u>	<u>\$21,336</u>	<u>\$21,125</u>	<u>\$21,126</u>	<u>\$21,109</u>	<u>\$21,282</u>	<u>\$21,195</u>	<u>\$23,305</u>	<u>\$22,021</u>	<u>\$21,887</u>	<u>\$22,186</u>	<u>\$259,296</u>

**Notes:**

- (A) N/A
- (B) See Form 42 9A
- (C) Line 5 is reported on Capital Schedule
- (D) Line 7 is reported on O&M Schedule
- (E) Line 8a x Line 9
- (F) Line 8b x Line 10

**DUKE ENERGY FLORIDA, LLC**  
**Environmental Cost Recovery Clause**  
**Final True-Up**  
**January 2025 - December 2025**

**Return on Capital Investments, Depreciation and Taxes**  
**For Project: Phase II Cooling Water Intake 316(b) - Base (Project 6)**  
**(in Dollars)**

Line	Description	Beginning of Period Amount	Actual Jan-25	Actual Feb-25	Actual Mar-25	Actual Apr-25	Actual May-25	Actual Jun-25	Actual Jul-25	Actual Aug-25	Actual Sep-25	Actual Oct-25	Actual Nov-25	Actual Dec-25	End of Period Total
1	Investments														
	a. Expenditures/Additions		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
	b. Clearings to Plant		0	0	0	0	0	0	0	0	0	0	0	0	0
	c. Retirements		0	0	0	0	0	0	0	0	0	0	0	0	0
	d. Other (A)		0	0	0	0	0	0	0	0	0	0	0	0	0
2	Plant-in-Service/Depreciation Base	\$13,196,239	13,196,239	13,196,239	13,196,239	13,196,239	13,196,239	13,196,239	13,196,239	13,196,239	13,196,239	13,196,239	13,196,239	13,196,239	13,196,239
3	Less: Accumulated Depreciation	(1,390,819)	(1,447,383)	(1,503,947)	(1,560,511)	(1,617,075)	(1,673,639)	(1,730,203)	(1,786,767)	(1,843,331)	(1,899,895)	(1,956,459)	(2,013,023)	(2,069,587)	
4	CWIP - Non-Interest Bearing	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5	Net Investment (Lines 2 + 3 + 4)	\$11,805,420	\$11,748,856	\$11,692,292	\$11,635,728	\$11,579,164	\$11,522,600	\$11,466,036	\$11,409,472	\$11,352,908	\$11,296,344	\$11,239,780	\$11,183,216	\$11,126,652	
6	Average Net Investment		\$11,777,138	\$11,720,574	\$11,664,010	\$11,607,446	\$11,550,882	\$11,494,318	\$11,437,754	\$11,381,190	\$11,324,626	\$11,268,062	\$11,211,498	\$11,154,934	
7	Return on Average Net Investment (B)														
	a. Debt Component	1.88%	18,451	18,362	18,274	18,185	18,096	18,008	17,919	17,831	17,742	17,653	17,565	17,476	215,562
	b. Equity Component Grossed Up For Taxes	6.29%	61,705	61,409	61,113	60,816	60,520	60,224	59,927	59,631	59,334	59,038	58,742	58,445	720,904
	c. Other		0	0	0	0	0	0	0	0	0	0	0	0	0
8	Investment Expenses														
	a. Depreciation (C)	5.1437%	56,564	56,564	56,564	56,564	56,564	56,564	56,564	56,564	56,564	56,564	56,564	56,564	678,768
	b. Amortization		0	0	0	0	0	0	0	0	0	0	0	0	0
	c. Dismantlement		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	d. Property Taxes (D)	0.0014%	15	15	15	15	15	15	15	15	15	15	15	15	180
	e. Other		0	0	0	0	0	0	0	0	0	0	0	0	0
9	Total System Recoverable Expenses (Lines 7 + 8)		\$136,735	\$136,350	\$135,966	\$135,580	\$135,195	\$134,811	\$134,425	\$134,041	\$133,655	\$133,270	\$132,886	\$132,500	1,615,414
	a. Recoverable Costs Allocated to Energy		0	0	0	0	0	0	0	0	0	0	0	0	0
	b. Recoverable Costs Allocated to Demand		\$136,735	\$136,350	\$135,966	\$135,580	\$135,195	\$134,811	\$134,425	\$134,041	\$133,655	\$133,270	\$132,886	\$132,500	1,615,414
10	Energy Jurisdictional Factor		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
11	Demand Jurisdictional Factor - Production (Base)		1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000
12	Retail Energy-Related Recoverable Costs (E)		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
13	Retail Demand-Related Recoverable Costs (F)		136,735	136,350	135,966	135,580	135,195	134,811	134,425	134,041	133,655	133,270	132,886	132,500	1,615,414
14	Total Jurisdictional Recoverable Costs (Lines 12 + 13)		\$136,735	\$136,350	\$135,966	\$135,580	\$135,195	\$134,811	\$134,425	\$134,041	\$133,655	\$133,270	\$132,886	\$132,500	\$1,615,414

**Notes:**

- (A) N/A
- (B) See Form 42 9A
- (C) Line 2 x rate x 1/12. Depreciation rate based on approved rates in Order PSC-2024-0472-AS-EI.
- (D) Line 2 x rate x 1/12. Based on 2025 Effective Tax Rate on original cost.
- (E) Line 9a x Line 10
- (F) Line 9b x Line 11

**DUKE ENERGY FLORIDA, LLC**  
**Environmental Cost Recovery Clause**  
**Final True-Up**  
**January 2025 - December 2025**

**Return on Capital Investments, Depreciation and Taxes**  
**For Project: Phase II Cooling Water Intake 316(b) - Base - Bartow (Project 6.1)**  
**(in Dollars)**

Line	Description	Beginning of Period Amount	Actual Jan-25	Actual Feb-25	Actual Mar-25	Actual Apr-25	Actual May-25	Actual Jun-25	Actual Jul-25	Actual Aug-25	Actual Sep-25	Actual Oct-25	Actual Nov-25	Actual Dec-25	End of Period Total
1	Investments														
	a. Expenditures/Additions		\$7,088	\$5,737	\$8,145	\$1,761	\$68,383	\$52,434	\$48,343	\$195,510	\$207,791	\$43,459	\$1,376,206	\$159,519	\$2,174,376
	b. Clearings to Plant		0	0	0	0	0	0	0	0	0	0	0	0	
	c. Retirements		0	0	0	0	0	0	0	0	0	0	0	0	
	d. Other (A)		0	0	0	0	0	0	0	0	0	0	0	0	
2	Plant-in-Service/Depreciation Base	\$0	0	0	0	0	0	0	0	0	0	0	0	0	
3	Less: Accumulated Depreciation	0	0	0	0	0	0	0	0	0	0	0	0	0	
4	CWIP - Non-Interest Bearing	277,021	284,109	289,846	297,991	299,752	368,135	420,569	468,912	664,421	872,212	915,671	2,291,877	2,451,396	
5	Net Investment (Lines 2 + 3 + 4)	<u>\$277,021</u>	<u>\$284,109</u>	<u>\$289,846</u>	<u>\$297,991</u>	<u>\$299,752</u>	<u>\$368,135</u>	<u>\$420,569</u>	<u>\$468,912</u>	<u>\$664,421</u>	<u>\$872,212</u>	<u>\$915,671</u>	<u>\$2,291,877</u>	<u>\$2,451,396</u>	
6	Average Net Investment		\$280,565	\$286,977	\$293,919	\$298,872	\$333,944	\$394,352	\$444,740	\$566,667	\$768,317	\$893,942	\$1,603,774	\$2,371,637	
7	Return on Average Net Investment (B)														
	a. Debt Component	1.88%	440	450	460	468	523	618	697	888	1,204	1,401	2,513	3,716	13,378
	b. Equity Component Grossed Up For Taxes	6.29%	1,470	1,504	1,540	1,566	1,750	2,066	2,330	2,969	4,026	4,684	8,403	12,426	44,734
	c. Other		0	0	0	0	0	0	0	0	0	0	0	0	
8	Investment Expenses														
	a. Depreciation (C)	1.7361%	0	0	0	0	0	0	0	0	0	0	0	0	
	b. Amortization		0	0	0	0	0	0	0	0	0	0	0	0	
	c. Dismantlement		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
	d. Property Taxes (D)	0.0014%	0	0	0	0	0	0	0	0	0	0	0	0	
	e. Other		0	0	0	0	0	0	0	0	0	0	0	0	
9	Total System Recoverable Expenses (Lines 7 + 8)		\$1,910	\$1,954	\$2,000	\$2,034	\$2,273	\$2,684	\$3,027	\$3,857	\$5,230	\$6,085	\$10,916	\$16,142	58,112
	a. Recoverable Costs Allocated to Energy		0	0	0	0	0	0	0	0	0	0	0	0	
	b. Recoverable Costs Allocated to Demand		\$1,910	\$1,954	\$2,000	\$2,034	\$2,273	\$2,684	\$3,027	\$3,857	\$5,230	\$6,085	\$10,916	\$16,142	58,112
10	Energy Jurisdictional Factor		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
11	Demand Jurisdictional Factor - Production (Base)		1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	
12	Retail Energy-Related Recoverable Costs (E)		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
13	Retail Demand-Related Recoverable Costs (F)		1,910	1,954	2,000	2,034	2,273	2,684	3,027	3,857	5,230	6,085	10,916	16,142	58,112
14	Total Jurisdictional Recoverable Costs (Lines 12 + 13)		<u>\$1,910</u>	<u>\$1,954</u>	<u>\$2,000</u>	<u>\$2,034</u>	<u>\$2,273</u>	<u>\$2,684</u>	<u>\$3,027</u>	<u>\$3,857</u>	<u>\$5,230</u>	<u>\$6,085</u>	<u>\$10,916</u>	<u>\$16,142</u>	<u>\$58,112</u>

**Notes:**

- (A) N/A
- (B) See Form 42 9A
- (C) Line 2 x rate x 1/12. Depreciation rate based on approved rates in Order PSC-2024-0472-AS-EI.
- (D) Line 2 x rate x 1/12. Based on 2025 Effective Tax Rate on original cost.
- (E) Line 9a x Line 10
- (F) Line 9b x Line 11

DUKE ENERGY FLORIDA, LLC  
Environmental Cost Recovery Clause  
Final True-Up  
January 2025 - December 2025

Return on Capital Investments, Depreciation and Taxes  
For Project: Phase II Cooling Water Intake 316(b) - Intermediate - Anclote (Project 6.2)  
(in Dollars)

Line	Description	Beginning of Period Amount	Actual Jan-25	Actual Feb-25	Actual Mar-25	Actual Apr-25	Actual May-25	Actual Jun-25	Actual Jul-25	Actual Aug-25	Actual Sep-25	Actual Oct-25	Actual Nov-25	Actual Dec-25	End of Period Total
1	Investments														
	a. Expenditures/Additions		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
	b. Clearings to Plant		0	0	0	0	0	0	0	0	0	0	0	0	0
	c. Retirements		0	0	0	0	0	0	0	0	0	0	0	0	0
	d. Other (A)		0	0	0	0	0	0	0	0	0	0	0	0	0
2	Plant-in-Service/Depreciation Base	\$0	0	0	0	0	0	0	0	0	0	0	0	0	0
3	Less: Accumulated Depreciation	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4	CWIP - Non-Interest Bearing	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5	Net Investment (Lines 2+ 3 + 4)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
6	Average Net Investment		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
7	Return on Average Net Investment (B)														
	a. Debt Component		0	0	0	0	0	0	0	0	0	0	0	0	0
	b. Equity Component Grossed Up For Taxes		0	0	0	0	0	0	0	0	0	0	0	0	0
	c. Other		0	0	0	0	0	0	0	0	0	0	0	0	0
8	Investment Expenses														
	a. Depreciation (C)		0	0	0	0	0	0	0	0	0	0	0	0	0
	b. Amortization		0	0	0	0	0	0	0	0	0	0	0	0	0
	c. Dismantlement		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	d. Property Taxes (D)		0	0	0	0	0	0	0	0	0	0	0	0	0
	e. Other		0	0	0	0	0	0	0	0	0	0	0	0	0
9	Total System Recoverable Expenses (Lines 7 + 8)		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	0
	a. Recoverable Costs Allocated to Energy		0	0	0	0	0	0	0	0	0	0	0	0	0
	b. Recoverable Costs Allocated to Demand		0	0	0	0	0	0	0	0	0	0	0	0	0
10	Energy Jurisdictional Factor		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
11	Demand Jurisdictional Factor - Production (Intermediate)		0.95212	0.95212	0.95212	0.95212	0.95212	0.95212	0.95212	0.95212	0.95212	0.95212	0.95212	0.95212	
12	Retail Energy-Related Recoverable Costs (E)		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
13	Retail Demand-Related Recoverable Costs (F)		0	0	0	0	0	0	0	0	0	0	0	0	0
14	Total Jurisdictional Recoverable Costs (Lines 12 + 13)		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0

Notes:

- (A) N/A
- (B) See Form 42 9A
- (C) Line 2 x rate x 1/12. Depreciation rate based on approved rates in Order PSC-2024-0472-AS-EI.
- (D) Line 2 x rate x 1/12. Based on 2025 Effective Tax Rate on original cost.
- (E) Line 9a x Line 10
- (F) Line 9b x Line 11

DUKE ENERGY FLORIDA, LLC  
Environmental Cost Recovery Clause  
Final True-Up  
January 2025 - December 2025

Form 42-8A  
Page 5 of 11

Docket No. 20260007-EI  
Duke Energy Florida  
Witness: G. P. Dean  
Exhibit No. GPD-1  
Page 13 of 20

Schedule of Amortization and Return  
For Project: CAIR/CAMR - Energy (Project 7.4 - Reagents and By-Products)  
(in Dollars)

Line	Description	Beginning of Period Amount	Actual Jan-25	Actual Feb-25	Actual Mar-25	Actual Apr-25	Actual May-25	Actual Jun-25	Actual Jul-25	Actual Aug-25	Actual Sep-25	Actual Oct-25	Actual Nov-25	Actual Dec-25	End of Period Total
1	Working Capital Dr (Cr)														
	a. 0154401 Ammonia Inventory	\$4,863,722	\$4,928,537	\$4,999,448	\$4,996,400	\$4,980,697	\$5,098,482	\$5,165,980	\$5,215,391	\$5,263,525	\$5,278,140	\$5,401,887	\$5,477,767	\$5,445,806	5,445,806
	b. 0154200 Limestone Inventory (F)	1,806,657	1,705,965	1,688,169	1,698,118	1,759,033	1,780,070	1,803,945	1,849,273	1,786,683	1,658,920	1,688,577	1,541,241	1,422,773	1,422,773
2	Total Working Capital	\$6,670,380	6,634,502	6,687,617	6,694,518	6,739,730	6,878,552	6,969,925	7,064,664	7,050,208	6,937,059	7,090,464	7,019,009	6,868,580	6,868,580
3	Average Net Investment		6,652,441	6,661,060	6,691,068	6,717,124	6,809,141	6,924,238	7,017,295	7,057,436	6,993,634	7,013,762	7,054,736	6,943,794	
4	Return on Average Net Working Capital Balance (A)														
	a. Debt Component (F)		1.88%												
	b. Equity Component Grossed Up For Taxes		6.29%												
5	Total Return Component (B)		45,277	45,336	45,540	45,717	46,344	47,127	47,761	48,034	47,600	47,736	48,015	47,260	561,747
6	Expense Dr (Cr)														
	a. 502030 Ammonia Expense		264,950	22,355	3,048	186,062	243,918	259,859	209,063	176,723	264,671	270,562	164,976	99,089	2,165,277
	b. 502040 Limestone Expense		459,781	24,755	21	360,773	492,967	598,787	491,265	388,989	550,029	612,479	596,415	221,485	4,797,746
	c. 502050 Dibasic Acid Expense		0	0	0	0	0	0	0	0	0	0	0	0	0
	d. 502070 Gypsum Disposal/Sale		(235,715)	(251,934)	(15,482)	(14,303)	150,652	(347,517)	(643,384)	(92,857)	(245,598)	(540,851)	(359,276)	(393,066)	(2,989,331)
	e. 502040 Hydrated Lime Expense		273,479	24,481	1,832	216,618	293,110	380,737	299,286	248,229	360,395	369,631	214,500	118,781	2,801,078
	f. 502300 Caustic Expense (F)		0	0	0	0	136,595	0	0	0	432,281	273,068	134,404	273,311	1,249,660
7	Net Expense (C)		762,496	(180,343)	(10,580)	749,150	1,317,242	891,867	356,230	721,083	1,361,778	984,888	751,020	319,600	8,024,430
8	Total System Recoverable Expenses (Lines 5 + 7)		\$807,773	(\$135,007)	\$34,960	\$794,867	\$1,363,586	\$938,994	\$403,991	\$769,117	\$1,409,378	\$1,032,624	\$799,035	\$366,860	\$8,586,177
	a. Recoverable Costs Allocated to Energy		807,773	(135,007)	34,960	794,867	1,363,586	938,994	403,991	769,117	1,409,378	1,032,624	799,035	366,860	\$8,586,177
	b. Recoverable Costs Allocated to Demand		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
9	Energy Jurisdictional Factor		0.98220	0.98700	0.96870	0.95790	0.95340	0.95270	0.94890	0.97650	0.98850	0.98490	0.99680	0.99730	
10	Demand Jurisdictional Factor		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
11	Retail Energy-Related Recoverable Costs (D)		\$793,395	(\$133,252)	\$33,866	\$761,403	\$1,300,043	\$894,580	\$383,347	\$751,043	\$1,393,170	\$1,017,032	\$796,478	\$365,869	\$8,356,972
12	Retail Demand-Related Recoverable Costs (E)		0	0	0	0	0	0	0	0	0	0	0	0	0
13	Total Jurisdictional Recoverable Costs (Lines 11 + 12)		\$793,395	(\$133,252)	\$33,866	\$761,403	\$1,300,043	\$894,580	\$383,347	\$751,043	\$1,393,170	\$1,017,032	\$796,478	\$365,869	\$8,356,972

Notes:

- (A) See Form 42 9A
- (B) Line 5 is reported on Capital Schedule
- (C) Line 7 is reported on O&M Schedule
- (D) Line 8a x Line 9
- (E) Line 8b x Line 10

DUKE ENERGY FLORIDA, LLC  
Environmental Cost Recovery Clause  
Final True-Up  
January 2025 - December 2025

Return on Capital Investments, Depreciation and Taxes  
For Project: Effluent Limitation Guidelines CRN - Base (Project 15.1)  
(in Dollars)

Line	Description	Beginning of Period Amount	Actual Jan-25	Actual Feb-25	Actual Mar-25	Actual Apr-25	Actual May-25	Actual Jun-25	Actual Jul-25	Actual Aug-25	Actual Sep-25	Actual Oct-25	Actual Nov-25	Actual Dec-25	End of Period Total
1	Investments														
	a. Expenditures/Additions		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
	b. Clearings to Plant		0	0	0	0	0	0	0	0	0	0	0	0	0
	c. Retirements		0	0	0	0	0	0	0	0	0	0	0	0	0
	d. Other (A)		0	0	0	0	0	0	0	0	0	0	0	0	0
2	Plant-in-Service/Depreciation Base	\$2,612,979	\$2,612,979	\$2,612,979	\$2,612,979	\$2,612,979	\$2,612,979	\$2,612,979	\$2,612,979	\$2,612,979	\$2,612,979	\$2,612,979	\$2,612,979	\$2,612,979	\$2,612,979
3	Less: Accumulated Depreciation	(491,963)	(502,645)	(513,327)	(524,009)	(534,691)	(545,373)	(556,055)	(566,737)	(577,419)	(588,101)	(598,783)	(609,465)	(620,147)	
4	CWIP - Non-Interest Bearing	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5	Net Investment (Lines 2 + 3 + 4)	\$2,121,016	\$2,110,334	\$2,099,652	\$2,088,970	\$2,078,288	\$2,067,606	\$2,056,924	\$2,046,242	\$2,035,560	\$2,024,878	\$2,014,196	\$2,003,514	\$1,992,832	
6	Average Net Investment		\$2,115,675	\$2,104,993	\$2,094,311	\$2,083,629	\$2,072,947	\$2,062,265	\$2,051,583	\$2,040,901	\$2,030,219	\$2,019,537	\$2,008,855	\$1,998,173	
7	Return on Average Net Investment (B)														
	a. Debt Component	1.88%	3,315	3,298	3,281	3,264	3,248	3,231	3,214	3,197	3,181	3,164	3,147	3,130	38,670
	b. Equity Component Grossed Up For Taxes	6.29%	11,085	11,029	10,973	10,917	10,861	10,805	10,749	10,693	10,637	10,581	10,525	10,469	129,324
	c. Other		0	0	0	0	0	0	0	0	0	0	0	0	0
8	Investment Expenses														
	a. Depreciation (C)	4.9058%	10,682	10,682	10,682	10,682	10,682	10,682	10,682	10,682	10,682	10,682	10,682	10,682	128,184
	b. Amortization		0	0	0	0	0	0	0	0	0	0	0	0	0
	c. Dismantlement		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	d. Property Taxes (D)	0.0014%	3	3	3	3	3	3	3	3	3	3	3	3	36
	e. Other		0	0	0	0	0	0	0	0	0	0	0	0	0
9	Total System Recoverable Expenses (Lines 7 + 8)		\$25,085	\$25,012	\$24,939	\$24,866	\$24,794	\$24,721	\$24,648	\$24,575	\$24,503	\$24,430	\$24,357	\$24,284	296,214
	a. Recoverable Costs Allocated to Energy		0	0	0	0	0	0	0	0	0	0	0	0	0
	b. Recoverable Costs Allocated to Demand		\$25,085	\$25,012	\$24,939	\$24,866	\$24,794	\$24,721	\$24,648	\$24,575	\$24,503	\$24,430	\$24,357	\$24,284	296,214
10	Energy Jurisdictional Factor		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
11	Demand Jurisdictional Factor - Production (Base)		1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	
12	Retail Energy-Related Recoverable Costs (E)		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	0
13	Retail Demand-Related Recoverable Costs (F)		25,085	25,012	24,939	24,866	24,794	24,721	24,648	24,575	24,503	24,430	24,357	24,284	296,214
14	Total Jurisdictional Recoverable Costs (Lines 12 + 13)		\$25,085	\$25,012	\$24,939	\$24,866	\$24,794	\$24,721	\$24,648	\$24,575	\$24,503	\$24,430	\$24,357	\$24,284	\$296,214

Notes:

- (A) N/A
- (B) See Form 42 9A
- (C) Line 2 x rate x 1/12. Depreciation rate based on approved rates in Order PSC-2024-0472-AS-EI.
- (D) Line 2 x rate x 1/12. Based on 2025 Effective Tax Rate on original cost.
- (E) Line 9a x Line 10
- (F) Line 9b x Line 11

**DUKE ENERGY FLORIDA, LLC**  
**Environmental Cost Recovery Clause**  
**Final True-Up**  
**January 2025 - December 2025**

**Return on Capital Investments, Depreciation and Taxes**  
**For Project: NPDES - Intermediate (Project 16)**  
**(in Dollars)**

Line	Description	Beginning of Period Amount	Actual Jan-25	Actual Feb-25	Actual Mar-25	Actual Apr-25	Actual May-25	Actual Jun-25	Actual Jul-25	Actual Aug-25	Actual Sep-25	Actual Oct-25	Actual Nov-25	Actual Dec-25	End of Period Total
1	Investments														
	a. Expenditures/Additions		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
	b. Clearings to Plant		0	0	0	0	0	0	0	0	0	0	0	0	0
	c. Retirements		0	0	0	0	0	0	0	0	0	0	0	0	0
	d. Other (A)		0	0	0	0	0	0	0	0	0	0	0	0	0
2	Plant-in-Service/Depreciation Base	\$12,841,870	\$12,841,870	\$12,841,870	\$12,841,870	\$12,841,870	\$12,841,870	\$12,841,870	\$12,841,870	\$12,841,870	\$12,841,870	\$12,841,870	\$12,841,870	\$12,841,870	\$12,841,870
3	Less: Accumulated Depreciation	(4,248,714)	(4,287,693)	(4,326,672)	(4,365,651)	(4,404,630)	(4,443,609)	(4,482,588)	(4,521,567)	(4,560,546)	(4,599,525)	(4,638,504)	(4,677,483)	(4,716,462)	
4	CWIP - Non-Interest Bearing	\$0	0	0	0	0	0	0	0	0	0	0	0	0	0
5	Net Investment (Lines 2 + 3 + 4)	\$8,593,156	\$8,554,177	\$8,515,198	\$8,476,219	\$8,437,240	\$8,398,261	\$8,359,282	\$8,320,303	\$8,281,324	\$8,242,345	\$8,203,366	\$8,164,387	\$8,125,408	
6	Average Net Investment		\$8,573,667	\$8,534,688	\$8,495,709	\$8,456,730	\$8,417,751	\$8,378,772	\$8,339,793	\$8,300,814	\$8,261,835	\$8,222,856	\$8,183,877	\$8,144,898	
7	Return on Average Net Investment (B)														
	a. Debt Component	1.88%	13,432	13,371	13,310	13,249	13,188	13,127	13,066	13,005	12,944	12,882	12,821	12,760	157,155
	b. Equity Component Grossed Up For Taxes	6.29%	44,921	44,717	44,513	44,308	44,104	43,900	43,696	43,491	43,287	43,083	42,879	42,675	525,574
	c. Other		0	0	0	0	0	0	0	0	0	0	0	0	0
8	Investment Expenses														
	a. Depreciation (C)	3.6423%	38,979	38,979	38,979	38,979	38,979	38,979	38,979	38,979	38,979	38,979	38,979	38,979	467,748
	b. Amortization		0	0	0	0	0	0	0	0	0	0	0	0	0
	c. Dismantlement		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	d. Property Taxes (D)	0.5460%	5,843	5,843	5,843	5,843	5,843	5,843	5,843	5,843	5,843	5,843	5,843	5,843	70,116
	e. Other		0	0	0	0	0	0	0	0	0	0	0	0	0
9	Total System Recoverable Expenses (Lines 7 + 8)		\$103,175	\$102,910	\$102,645	\$102,379	\$102,114	\$101,849	\$101,584	\$101,318	\$101,053	\$100,787	\$100,522	\$100,257	1,220,593
	a. Recoverable Costs Allocated to Energy		0	0	0	0	0	0	0	0	0	0	0	0	0
	b. Recoverable Costs Allocated to Demand		\$103,175	\$102,910	\$102,645	\$102,379	\$102,114	\$101,849	\$101,584	\$101,318	\$101,053	\$100,787	\$100,522	\$100,257	1,220,593
10	Energy Jurisdictional Factor		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
11	Demand Jurisdictional Factor - Production (Intermediate)		0.95212	0.95212	0.95212	0.95212	0.95212	0.95212	0.95212	0.95212	0.95212	0.95212	0.95212	0.95212	0.95212
12	Retail Energy-Related Recoverable Costs (E)		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	0
13	Retail Demand-Related Recoverable Costs (F)		98,235	97,983	97,730	97,477	97,225	96,972	96,720	96,467	96,215	95,961	95,709	95,457	1,162,151
14	Total Jurisdictional Recoverable Costs (Lines 12 + 13)		\$98,235	\$97,983	\$97,730	\$97,477	\$97,225	\$96,972	\$96,720	\$96,467	\$96,215	\$95,961	\$95,709	\$95,457	\$1,162,151

**Notes:**

- (A) N/A
- (B) See Form 42 9A
- (C) Line 2 x rate x 1/12. Depreciation rate based on approved rates in Order PSC-2024-0472-AS-El.
- (D) Line 2 x rate x 1/12. Based on 2025 Effective Tax Rate on original cost.
- (E) Line 9a x Line 10
- (F) Line 9b x Line 11

**DUKE ENERGY FLORIDA, LLC**  
**Environmental Cost Recovery Clause**  
**Final True-Up**  
**January 2025 - December 2025**

**Return on Capital Investments, Depreciation and Taxes**  
**For Project: MERCURY & AIR TOXIC STANDARDS (MATS) - CRYSTAL RIVER UNITS 4 & 5 - Energy (Project 17)**  
**(in Dollars)**

Line	Description	Beginning of Period Amount	Actual Jan-25	Actual Feb-25	Actual Mar-25	Actual Apr-25	Actual May-25	Actual Jun-25	Actual Jul-25	Actual Aug-25	Actual Sep-25	Actual Oct-25	Actual Nov-25	Actual Dec-25	End of Period Total
1	Investments														
	a. Expenditures/Additions		0	0	0	0	0	0	0	0	0	0	0	0	\$0
	b. Clearings to Plant		0	0	0	0	0	0	0	0	0	0	0	0	0
	c. Retirements		0	0	0	0	0	0	0	0	0	0	0	0	0
	d. Other (A)		0	0	0	0	0	0	0	0	0	0	0	0	0
2	Plant-in-Service/Depreciation Base	\$3,690,187	\$3,690,187	\$3,690,187	\$3,690,187	\$3,690,187	\$3,690,187	\$3,690,187	\$3,690,187	\$3,690,187	\$3,690,187	\$3,690,187	\$3,690,187	\$3,690,187	
3	Less: Accumulated Depreciation	(1,054,207)	(1,069,293)	(1,084,379)	(1,099,465)	(1,114,551)	(1,129,637)	(1,144,723)	(1,159,809)	(1,174,895)	(1,189,981)	(1,205,067)	(1,220,153)	(1,235,239)	
4	CWIP - Non-Interest Bearing	\$0	0	0	0	0	0	0	0	0	0	0	0	0	0
5	Net Investment (Lines 2 + 3 + 4)	\$2,635,980	\$2,620,894	\$2,605,808	\$2,590,722	\$2,575,636	\$2,560,550	\$2,545,464	\$2,530,378	\$2,515,292	\$2,500,206	\$2,485,120	\$2,470,034	\$2,454,948	
6	Average Net Investment		\$2,628,437	\$2,613,351	\$2,598,265	\$2,583,179	\$2,568,093	\$2,553,007	\$2,537,921	\$2,522,835	\$2,507,749	\$2,492,663	\$2,477,577	\$2,462,491	
7	Return on Average Net Investment (B)														
	a. Debt Component	1.88%	4,118	4,094	4,071	4,047	4,023	4,000	3,976	3,952	3,929	3,905	3,882	3,858	47,855
	b. Equity Component Grossed Up For Taxes	6.29%	13,771	13,692	13,613	13,534	13,455	13,376	13,297	13,218	13,139	13,060	12,981	12,902	160,038
	c. Other		0	0	0	0	0	0	0	0	0	0	0	0	0
8	Investment Expenses														
	a. Depreciation (C)	4.9058%	15,086	15,086	15,086	15,086	15,086	15,086	15,086	15,086	15,086	15,086	15,086	15,086	181,032
	b. Amortization		0	0	0	0	0	0	0	0	0	0	0	0	0
	c. Dismantlement		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	d. Property Taxes (D)	0.0014%	4	4	4	4	4	4	4	4	4	4	4	4	48
	e. Other		0	0	0	0	0	0	0	0	0	0	0	0	0
9	Total System Recoverable Expenses (Lines 7 + 8)		\$32,979	\$32,876	\$32,774	\$32,671	\$32,568	\$32,466	\$32,363	\$32,260	\$32,158	\$32,055	\$31,953	\$31,850	388,973
	a. Recoverable Costs Allocated to Energy		32,979	32,876	32,774	32,671	32,568	32,466	32,363	32,260	32,158	32,055	31,953	31,850	388,973
	b. Recoverable Costs Allocated to Demand		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	0
10	Energy Jurisdictional Factor		0.98220	0.98700	0.96870	0.95790	0.95340	0.95270	0.94890	0.97650	0.98850	0.98490	0.99680	0.99730	
11	Demand Jurisdictional Factor		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
12	Retail Energy-Related Recoverable Costs (E)		\$32,392	\$32,449	\$31,748	\$31,296	\$31,050	\$30,930	\$30,709	\$31,502	\$31,788	\$31,571	\$31,851	\$31,764	379,050
13	Retail Demand-Related Recoverable Costs (F)		0	0	0	0	0	0	0	0	0	0	0	0	0
14	Total Jurisdictional Recoverable Costs (Lines 12 + 13)		\$32,392	\$32,449	\$31,748	\$31,296	\$31,050	\$30,930	\$30,709	\$31,502	\$31,788	\$31,571	\$31,851	\$31,764	\$379,050

**Notes:**

- (A) N/A
- (B) See Form 42 9A
- (C) Line 2 x rate x 1/12. Depreciation rate based on approved rates in Order PSC-2024-0472-AS-EI.
- (D) Line 2 x rate x 1/12. Based on 2025 Effective Tax Rate on original cost.
- (E) Line 9a x Line 10
- (F) Line 9b x Line 11

DUKE ENERGY FLORIDA, LLC  
Environmental Cost Recovery Clause  
Final True-Up  
January 2025 - December 2025

Return on Capital Investments, Depreciation and Taxes  
For Project: COAL COMBUSTION RESIDUAL (CCR) RULE - Base (Project 18)  
(in Dollars)

Line	Description	Beginning of Period Amount	Actual Jan-25	Actual Feb-25	Actual Mar-25	Actual Apr-25	Actual May-25	Actual Jun-25	Actual Jul-25	Actual Aug-25	Actual Sep-25	Actual Oct-25	Actual Nov-25	Actual Dec-25	End of Period Total
1	Investments														
	a. Expenditures/Additions		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
	b. Clearings to Plant		0	0	0	0	0	0	0	0	0	0	0	0	0
	c. Retirements		0	0	0	0	0	0	0	0	0	0	0	0	0
	d. Other (A)		0	0	0	0	0	0	0	0	0	0	0	0	0
2	Plant-in-Service/Depreciation Base	\$4,321,533	4,321,533	4,321,533	4,321,533	4,321,533	4,321,533	4,321,533	4,321,533	4,321,533	4,321,533	4,321,533	4,321,533	4,321,533	
3	Less: Accumulated Depreciation	(711,390)	(729,057)	(746,724)	(764,391)	(782,058)	(799,725)	(817,393)	(835,060)	(852,727)	(870,394)	(888,061)	(905,728)	(923,395)	
4	CWIP - Non-Interest Bearing	0	0	0	0	0	0	0	0	0	0	0	0	0	
5	Net Investment (Lines 2 + 3 + 4)	\$3,610,143	\$3,592,476	\$3,574,809	\$3,557,142	\$3,539,475	\$3,521,808	\$3,504,140	\$3,486,473	\$3,468,806	\$3,451,139	\$3,433,472	\$3,415,805	\$3,398,138	
6	Average Net Investment		\$3,601,310	\$3,583,642	\$3,565,975	\$3,548,308	\$3,530,641	\$3,512,974	\$3,495,307	\$3,477,640	\$3,459,973	\$3,442,306	\$3,424,638	\$3,406,971	
7	Return on Average Net Investment (B)														
	a. Debt Component	1.88%	5,642	5,614	5,587	5,559	5,531	5,504	5,476	5,448	5,421	5,393	5,365	5,338	65,878
	b. Equity Component Grossed Up For Taxes	6.29%	18,869	18,776	18,684	18,591	18,499	18,406	18,313	18,221	18,128	18,036	17,943	17,851	220,317
	c. Other		0	0	0	0	0	0	0	0	0	0	0	0	0
8	Investment Expenses														
	a. Depreciation (C)	4.9058%	17,667	17,667	17,667	17,667	17,667	17,667	17,667	17,667	17,667	17,667	17,667	17,667	212,005
	b. Amortization		0	0	0	0	0	0	0	0	0	0	0	0	0
	c. Dismantlement		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	d. Property Taxes (D)	0.0014%	5	5	5	5	5	5	5	5	5	5	5	5	60
	e. Other		0	0	0	0	0	0	0	0	0	0	0	0	0
9	Total System Recoverable Expenses (Lines 7 + 8)		\$42,183	\$42,062	\$41,943	\$41,822	\$41,702	\$41,582	\$41,461	\$41,341	\$41,221	\$41,101	\$40,980	\$40,861	498,260
	a. Recoverable Costs Allocated to Energy		0	0	0	0	0	0	0	0	0	0	0	0	0
	b. Recoverable Costs Allocated to Demand		\$42,183	\$42,062	\$41,943	\$41,822	\$41,702	\$41,582	\$41,461	\$41,341	\$41,221	\$41,101	\$40,980	\$40,861	498,260
10	Energy Jurisdictional Factor		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
11	Demand Jurisdictional Factor		1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	
12	Retail Energy-Related Recoverable Costs (E)		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
13	Retail Demand-Related Recoverable Costs (F)		42,183	42,062	41,943	41,822	41,702	41,582	41,461	41,341	41,221	41,101	40,980	40,861	498,260
14	Total Jurisdictional Recoverable Costs (Lines 12 + 13)		\$42,183	\$42,062	\$41,943	\$41,822	\$41,702	\$41,582	\$41,461	\$41,341	\$41,221	\$41,101	\$40,980	\$40,861	\$498,260

Notes:

- (A) N/A
- (B) See Form 42 9A
- (C) Line 2 x rate x 1/12. Depreciation rate based on approved rates in Order PSC-2024-0472-AS-EI.
- (D) Line 2 x rate x 1/12. Based on 2025 Effective Tax Rate on original cost.
- (E) Line 9a x Line 10
- (F) Line 9b x Line 11

**DUKE ENERGY FLORIDA, LLC**  
**Environmental Cost Recovery Clause**  
**Final True-Up**  
**January 2025 - December 2025**

Form 42-8A  
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Docket No. 20260007-EI  
Duke Energy Florida  
Witness: G. P. Dean  
Exhibit No. GFD-1  
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**Return on Capital Investments, Depreciation and Taxes**  
**For Project: RECLAIMED WATER INTERCONNECTION - Peaking (Project 19)**  
**(in Dollars)**

Line	Description	Beginning of Period Amount	Actual Jan-25	Actual Feb-25	Actual Mar-25	Actual Apr-25	Actual May-25	Actual Jun-25	Actual Jul-25	Actual Aug-25	Actual Sep-25	Actual Oct-25	Actual Nov-25	Actual Dec-25	End of Period Total
1	Investments														
	a. Expenditures/Additions		\$95,866	(\$21,545)	\$16,133	\$26,699	\$19,384	\$15,159	\$7,884	\$22,856	\$24,641	\$188,661	\$155,575	\$50,409	\$601,722
	b. Clearings to Plant		0	0	0	0	0	0	0	0	0	0	0	0	0
	c. Retirements		0	0	0	0	0	0	0	0	0	0	0	0	0
	d. Other (A)		0	0	0	0	0	0	0	0	0	0	0	0	0
2	Plant-in-Service/Depreciation Base	\$0	0	0	0	0	0	0	0	0	0	0	0	0	0
3	Less: Accumulated Depreciation	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4	CWIP - Non-Interest Bearing	204,245	300,110	278,565	294,698	321,397	340,782	355,941	363,825	386,680	411,322	599,983	755,558	805,967	
5	Net Investment (Lines 2 + 3 + 4)	\$204,245	\$300,110	\$278,565	\$294,698	\$321,397	\$340,782	\$355,941	\$363,825	\$386,680	\$411,322	\$599,983	\$755,558	\$805,967	
6	Average Net Investment		\$252,177	\$289,338	\$286,632	\$308,048	\$331,090	\$348,361	\$359,883	\$375,253	\$399,001	\$505,652	\$677,770	\$780,762	
7	Return on Average Net Investment (B)														
	a. Debt Component	1.88%	395	453	449	483	519	546	564	588	625	792	1,062	1,223	7,699
	b. Equity Component Grossed Up For Taxes	6.29%	1,321	1,516	1,502	1,614	1,735	1,825	1,886	1,966	2,091	2,649	3,551	4,091	25,747
	c. Other		0	0	0	0	0	0	0	0	0	0	0	0	0
8	Investment Expenses														
	a. Depreciation (C)	4.3678%	0	0	0	0	0	0	0	0	0	0	0	0	0
	b. Amortization		0	0	0	0	0	0	0	0	0	0	0	0	0
	c. Dismantlement		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	d. Property Taxes (D)	0.6001%	0	0	0	0	0	0	0	0	0	0	0	0	0
	e. Other		0	0	0	0	0	0	0	0	0	0	0	0	0
9	Total System Recoverable Expenses (Lines 7 + 8)		\$1,716	\$1,969	\$1,951	\$2,097	\$2,254	\$2,371	\$2,450	\$2,554	\$2,716	\$3,441	\$4,613	\$5,314	33,446
	a. Recoverable Costs Allocated to Energy		0	0	0	0	0	0	0	0	0	0	0	0	0
	b. Recoverable Costs Allocated to Demand		\$1,716	\$1,969	\$1,951	\$2,097	\$2,254	\$2,371	\$2,450	\$2,554	\$2,716	\$3,441	\$4,613	\$5,314	33,446
10	Energy Jurisdictional Factor		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
11	Demand Jurisdictional Factor - Production (Peaking)		0.97632	0.97632	0.97632	0.97632	0.97632	0.97632	0.97632	0.97632	0.97632	0.97632	0.97632	0.97632	
12	Retail Energy-Related Recoverable Costs (E)		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
13	Retail Demand-Related Recoverable Costs (F)		1,675	1,922	1,905	2,047	2,201	2,315	2,392	2,494	2,652	3,360	4,504	5,188	32,654
14	Total Jurisdictional Recoverable Costs (Lines 12 + 13)		\$1,675	\$1,922	\$1,905	\$2,047	\$2,201	\$2,315	\$2,392	\$2,494	\$2,652	\$3,360	\$4,504	\$5,188	\$32,654

**Notes:**

- (A) N/A
- (B) See Form 42 9A
- (C) Line 2 x rate x 1/12. Depreciation rate based on approved rates in Order PSC-2024-0472-AS-EI.
- (D) Line 2 x rate x 1/12. Based on 2025 Effective Tax Rate on original cost.
- (E) Line 9a x Line 10
- (F) Line 9b x Line 11

DUKE ENERGY FLORIDA, LLC  
Environmental Cost Recovery Clause  
Final True-Up  
January 2025 - December 2025

Form 42-8A  
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Return on Capital Investments, Depreciation and Taxes  
For Project: CCC Water Treatment System - Base (Project 21)  
(in Dollars)

Line	Description	Beginning of Period Amount	Actual Jan-25	Actual Feb-25	Actual Mar-25	Actual Apr-25	Actual May-25	Actual Jun-25	Actual Jul-25	Actual Aug-25	Actual Sep-25	Actual Oct-25	Actual Nov-25	Actual Dec-25	End of Period Total
1	Investments														
	a. Expenditures/Additions		\$335,552	\$6,807	\$98,351	\$192,624	\$202,455	\$65,972	\$58,612	\$273,857	\$164,297	\$42,883	\$87,885	\$72,896	\$1,602,190
	b. Clearings to Plant		0	0	0	0	0	0	0	0	0	0	0	0	0
	c. Retirements		0	0	0	0	0	0	0	0	0	0	0	0	0
	d. Other (A)		0	0	0	0	0	0	0	0	0	0	0	0	0
2	Plant-in-Service/Depreciation Base	\$0	0	0	0	0	0	0	0	0	0	0	0	0	0
3	Less: Accumulated Depreciation	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4	CWIP - Non-Interest Bearing	369,299	704,851	711,658	810,009	1,002,633	1,205,088	1,271,060	1,329,672	1,603,529	1,767,826	1,810,709	1,898,594	1,971,489	
5	Net Investment (Lines 2 + 3 + 4)	\$369,299	\$704,851	\$711,658	\$810,009	\$1,002,633	\$1,205,088	\$1,271,060	\$1,329,672	\$1,603,529	\$1,767,826	\$1,810,709	\$1,898,594	\$1,971,489	
6	Average Net Investment		\$537,075	\$708,255	\$760,834	\$906,321	\$1,103,861	\$1,238,074	\$1,300,366	\$1,466,600	\$1,685,677	\$1,789,268	\$1,854,651	\$1,935,042	
7	Return on Average Net Investment (B)														
	a. Debt Component	1.88%	841	1,110	1,192	1,420	1,729	1,940	2,037	2,298	2,641	2,803	2,906	3,032	23,949
	b. Equity Component Grossed Up For Taxes	6.29%	2,814	3,711	3,986	4,749	5,784	6,487	6,813	7,684	8,832	9,375	9,717	10,138	80,090
	c. Other		0	0	0	0	0	0	0	0	0	0	0	0	0
8	Investment Expenses														
	a. Depreciation (C)	5.1437%	0	0	0	0	0	0	0	0	0	0	0	0	0
	b. Amortization		0	0	0	0	0	0	0	0	0	0	0	0	0
	c. Dismantlement		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	d. Property Taxes (D)	0.0014%	0	0	0	0	0	0	0	0	0	0	0	0	0
	e. Other		0	0	0	0	0	0	0	0	0	0	0	0	0
9	Total System Recoverable Expenses (Lines 7 + 8)		\$3,655	\$4,821	\$5,178	\$6,169	\$7,513	\$8,427	\$8,850	\$9,982	\$11,473	\$12,178	\$12,623	\$13,170	104,039
	a. Recoverable Costs Allocated to Energy		0	0	0	0	0	0	0	0	0	0	0	0	0
	b. Recoverable Costs Allocated to Demand		\$3,655	\$4,821	\$5,178	\$6,169	\$7,513	\$8,427	\$8,850	\$9,982	\$11,473	\$12,178	\$12,623	\$13,170	104,039
10	Energy Jurisdictional Factor		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
11	Demand Jurisdictional Factor		1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000
12	Retail Energy-Related Recoverable Costs (E)		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
13	Retail Demand-Related Recoverable Costs (F)		3,655	4,821	5,178	6,169	7,513	8,427	8,850	9,982	11,473	12,178	12,623	13,170	104,039
14	Total Jurisdictional Recoverable Costs (Lines 12 + 13)		\$3,655	\$4,821	\$5,178	\$6,169	\$7,513	\$8,427	\$8,850	\$9,982	\$11,473	\$12,178	\$12,623	\$13,170	\$104,039

Notes:

- (A) N/A
- (B) See Form 42 9A
- (C) Line 2 x rate x 1/12. Depreciation rate based on approved rates in Order PSC-2024-0472-AS-EI.
- (D) Line 2 x rate x 1/12. Based on 2025 Effective Tax Rate on original cost.
- (E) Line 9a x Line 10
- (F) Line 9b x Line 11

DUKE ENERGY FLORIDA, LLC  
Environmental Cost Recovery Clause  
Final True-Up  
January 2025 - December 2025  
Capital Structure and Cost Rates

Form 42 9A

Docket No. 20260007-EI  
Duke Energy Florida  
Witness: G. P. Dean  
Exhibit No. GPD-1  
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	(1)	(2)	(3)	(4)	(5)	(6)
	Jurisdictional Rate Base Adjusted Retail (\$000s)	Cap Ratio	Cost Rate	Weighted Cost	Revenue Requirement Rate	Monthly Revenue Requirement Rate
1 Common Equity	\$ 9,133,245	45.09%	10.30%	4.64%	6.22%	0.5183%
2 Long Term Debt	8,091,364	39.94%	4.57%	1.83%	1.83%	0.1525%
3 Short Term Debt	41,336	0.20%	4.25%	0.01%	0.01%	0.0008%
4 Cust Dep Active	147,072	0.73%	2.19%	0.02%	0.02%	0.0017%
5 Cust Dep Inactive	-	0.00%			0.00%	0.0000%
6 Invest Tax Cr	192,671	0.95%	7.61%	0.07%	0.09%	0.0075%
7 Deferred Inc Tax	2,651,749	13.09%			0.00%	0.0000%
8 <b>Total</b>	<b>\$ 20,257,436</b>	<b>100.00%</b>		<b>6.57%</b>	<b>8.17%</b>	<b>0.6808%</b>

	ITC split between Debt and Equity**:	Ratio	Cost Rate	Ratio	Ratio	Deferred Inc Tax	Weighted ITC	After Gross-up	
9	Common Equity	9,133,245	53%	10.30%	5.46%	71.8%	0.07%	0.050%	0.067%
10	Preferred Equity	-	0%				0.07%	0.000%	0.000%
11	Long Term Debt	8,091,364	47%	4.57%	2.15%	28.2%	0.07%	0.020%	0.020%
12		17,224,609	100%		7.61%			0.070%	0.087%

<u>Breakdown of Revenue Requirement Rate of Return between Debt and Equity:</u>	
13	Total Equity Component (Lines 1 and 9 ) <b>6.287%</b>
14	Total Debt Component (Lines 2, 3, 4, and 11 ) <b>1.880%</b>
15	<b>Total Revenue Requirement Rate of Return 8.167%</b>

Notes:

Effective Tax Rate: 25.345%

Column:

- (1) Per Order No. PSC-2020-0165-PAA-EU, issued May 20, 2020, approving amended joint motion modifying WACC methodology
- (2) Column (1) / Total Column (1)
- (3) Per Order No. PSC-2024-0472-AS-EI, Final Order Approving 2024 Settlement Agreement  
Line 6 and Line 12, the cost rate of ITC's is determined under Treasury Regulation section 1.46-6(b)(3)(ii).
- (4) Column (2) x Column (3)
- (5) For equity components: Column (4) / (1-effective income tax rate/100)
- \* For debt components: Column (4)
- \*\* Line 6 is the pre-tax ITC components from Lines 9 and 11
- (6) Column (5) / 12

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DIRECT TESTIMONY OF

ERIC SZKOLNYJ

ON BEHALF OF

DUKE ENERGY FLORIDA, LLC.

DOCKET NO. 20260007-EI

March 30, 2026

1 **Q. Please state your name and business address.**

2 A. My name is Eric Szkolnyj. My business address is 525 South Tryon Street,  
3 Charlotte, NC 28202.

4

5 **Q: By whom are you employed and in what capacity?**

6 A: I am employed by Duke Energy Corporation (“Duke Energy”) as General  
7 Manager for the Coal Combustion Products (“CCP”) Group - Operations &  
8 Maintenance. Duke Energy Florida, LLC (“DEF” or the “Company”) is a fully  
9 owned subsidiary of Duke Energy.

10

11 **Q: What are your responsibilities in that position?**

12 A: I am responsible for oversight of the operation and maintenance of the majority  
13 of CCP facilities in the Carolinas and Florida, including the CCP facility at the  
14 Crystal River Energy Center. This includes operating and maintaining all CCP  
15 facilities in compliance with state and federal regulations. The Operations and  
16 Maintenance group at each station maintains accountability for overall CCP

1 facility performance which requires close collaboration with other Duke Energy  
2 CCP organizations such as Project Implementation, Engineering, and Facility  
3 Closure. The Company relies on my opinions and information I provide when  
4 making decisions regarding the CCP facilities under my supervision.

5  
6 **Q: Please describe your educational background and professional experience.**

7 A: I have a Bachelor of Science degree in Mechanical Engineering from North  
8 Carolina State University. I have 20 years of experience in the power generation  
9 industry including positions as a Nuclear Control Room Supervisor, Lead  
10 Engineer, and Nuclear Oversight Lead Assessor within Duke Energy's Nuclear  
11 fleet at Harris Nuclear Plant, and as the Director of Operational Excellence  
12 Assessments & Oversight for Duke Energy's Enterprise. Prior to joining Duke  
13 Energy, I was employed by the Department of Defense as a civilian Shift Test  
14 Engineer for the U.S. Navy. In June of 2021, I began my current role as CCP  
15 Regional General Manager.

16  
17 **Q. What is the purpose of your testimony?**

18 A. The purpose of my testimony is to explain material variances between actual and  
19 actual/estimated project expenditures for environmental compliance costs  
20 associated with DEF's Coal Combustion Residual ("CCR") Rule for the period  
21 January 2025 - December 2025.

22

1 **Q. How did actual O&M project expenditures for the period January 2025 –**  
2 **December 2025 compare to actual/estimated O&M projections for the CCR**  
3 **Rule (Project 18)?**

4 A. The CCR Rule O&M variance is \$103,207 or 8% lower than projected. This  
5 variance is due to the following factors. A second surface water and sediment  
6 sampling event was cancelled due to dry conditions in the fall, saving  
7 approximately \$36k. Equipment rental costs were reduced by \$40k. Temporary  
8 cover application area was reduced, saving \$38k. The reduced spending was  
9 slightly offset by an \$11k increase in incremental landfill operations and  
10 maintenance.

11

12 **Q. Does this conclude your testimony?**

13 A. Yes.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DIRECT TESTIMONY OF

REGINALD ANDERSON

ON BEHALF OF

DUKE ENERGY FLORIDA, LLC

DOCKET NO. 20260007-EI

March 30, 2026

1 **Q. Please state your name and business address.**

2 A. My name is Reginald Anderson. My business address is 299 First Avenue North,  
3 St. Petersburg, FL 33701.

4

5 **Q. By whom are you employed and in what capacity?**

6 A. I am employed by Duke Energy Florida, LLC (“DEF” or the “Company”) as Vice  
7 President–Florida Generation.

8

9 **Q. What are your responsibilities in that position?**

10 A. As Vice President of DEF’s Generation organization, my responsibilities include  
11 overall leadership and strategic direction of DEF’s power generation fleet. My  
12 responsibilities include strategic and tactical planning to operate and maintain  
13 DEF’s non-nuclear generation fleet; generation fleet project and addition  
14 recommendations; major maintenance programs; outage and project  
15 management; generation facilities retirement; asset allocation; workforce

1 planning and staffing; organizational alignment and design; continuous business  
2 improvement; retention and inclusion; succession planning; and oversight of  
3 numerous employees and hundreds of millions of dollars in assets and capital and  
4 O&M budgets.

5  
6 **Q. Please describe your educational background and professional experience.**

7 A. I earned a Bachelor of Science degree in Electrical Engineering Technology and  
8 Master of Business from the University of Central Florida in 1996 and 2008  
9 respectively. I have 27 years of power plant production experience at DEF in  
10 various operational, managerial and leadership positions in fossil steam and  
11 combustion turbine plant operations. I also managed the new construction and  
12 O&M projects team. I have contract negotiation and management experience. My  
13 prior experience includes leadership roles in municipal utilities, manufacturing,  
14 and the United States Marine Corps.

15  
16 **Q. Have you previously filed testimony before this Commission in connection  
17 with DEF's Environmental Cost Recovery Clause ("ECRC")?**

18 A. Yes.

19  
20 **Q. What is the purpose of your testimony?**

21 A. The purpose of my testimony is to explain material variances between actual and  
22 actual/estimated project expenditures for environmental compliance costs  
23 associated with DEF's Integrated Clean Air Compliance Program (Project 7.4),

1 Mercury and Air Toxics Standards (MATS) – Crystal River (CR) 4&5 (Project  
2 17), Mercury and Air Toxics Standards (“MATS”) - Anclote Gas Conversion  
3 Project (Project 17.1), and Mercury & Air Toxics Standards (MATS) – CR 1&2  
4 (Project 17.2) for the period January 2025 - December 2025.

5  
6 **Q. Please explain the O&M variance between actual project expenditures and**  
7 **actual/estimated projections for the CAIR Crystal River Project – Energy**  
8 **(Reagents) (Project 7.4) for January 2025 - December 2025?**

9 A. O&M costs for CAIR Crystal River Project – Energy (Reagents) were \$2,112,491  
10 or 21% lower than projected. The lower expenses were due to a Gypsum Sales  
11 credit of \$713k (31%) greater than forecasted, \$415k (16%) lower for Ammonia  
12 expense, \$949k (17%) lower for Limestone Expense, \$289K (9%) lower for  
13 Hydrated Lime Expense, and \$253k (25%) higher for Caustic Expense.

14

15 **Q. Does this conclude your testimony?**

16 A. Yes.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DIRECT TESTIMONY OF

WYATT GRANT

ON BEHALF OF

DUKE ENERGY FLORIDA, LLC

DOCKET NO. 20260007-EI

March 30, 2026

1 **Q. Please state your name and business address.**

2 A. My name is Wyatt Grant. My business address is 299 First Avenue North, St.  
3 Petersburg, FL 33701.

4

5 **Q. By whom are you employed and in what capacity?**

6 A. I am employed by Duke Energy Florida, LLC (“DEF” or the “Company”) as  
7 Director Environmental Field Support – Florida.

8

9 **Q. What are your responsibilities in that position?**

10 A. My responsibilities include managing the work of environmental field  
11 professionals who are responsible for environmental, technical, and regulatory  
12 support during the development and implementation of environmental  
13 compliance strategies for regulated power generation facilities and electrical  
14 transmission and distribution facilities in Florida. This includes daily compliance  
15 activities in support of operations.

1 **Q. Please describe your educational background and professional experience.**

2 A. I obtained my Bachelor of Arts degree in Chemical Engineering from the Florida  
3 Institute of Technology in 2003. I am a Florida Professional Engineer. I have over  
4 20 years of environmental experience working in environmental consulting and  
5 environmental construction in Florida. I joined Duke Energy in 2015 as an  
6 Environmental Remediation Project Manager, promoted to Remediation Manager  
7 in 2018, and promoted in 2025 to my currently role as Director Environmental  
8 Field Support – FL.

9

10 **Q. What is the purpose of your testimony?**

11 A. The purpose of my testimony is to explain material variances between actual and  
12 actual/estimated project expenditures for environmental compliance costs  
13 associated with FPSC-approved programs under my responsibility. These  
14 programs include the T&D Substation Environmental Investigation, Remediation  
15 and Pollution Prevention Program (Projects 1 & 1a), Distribution Environmental  
16 Investigation, Remediation and Pollution Prevention Program (Project 2),  
17 Pipeline Integrity Management (“PIM”) Program (Project 3), Above Ground  
18 Storage Tanks (“AST”) Program (Project 4), Phase II Cooling Water Intake  
19 316(b) Program (Project 6), CAIR/CAMR Continuous Mercury Monitoring  
20 System (“CMMS”) Program (Projects 7.2 & 7.3), Best Available Retrofit  
21 Technology (“BART”) Program (Project 7.5), National Emission Standards for  
22 Hazardous Air Pollutants (“NESHAP”) – Base (Project 7.6), Arsenic  
23 Groundwater Standard Program (Project 8), Sea Turtle – Coastal Street Lighting

1 Program (Project 9), Underground Storage Tanks (“UST”) Program (Project 10),  
2 Modular Cooling Towers (Project 11), Thermal Discharge Permanent  
3 Compliance (Project 11.1), Greenhouse Gas Inventory and Reporting (Project  
4 12), Mercury Total Maximum Loads Monitoring (“TMDL”) (Project 13),  
5 Hazardous Air Pollutants (“HAPs”) Information Collection Request (“ICR”)  
6 (Project 14), Effluent Limitation Guidelines CRN (Project 15.1), National  
7 Pollutant Discharge Elimination System (“NPDES”) Program (Project 16),  
8 Reclaimed Water Interconnection (Project 19), Lead and Copper Rule (Project  
9 20), and Citrus Combined Cycle Water Treatment System (Project 21).

10

11 **Q. How did actual Capital expenditures for January 2025 - December 2025**  
12 **compare with DEF’s actual/estimated projections for the Cooling Water**  
13 **Intake - 316(b) Bartow Project (Project 6.1)?**

14 A. The Cooling Water Intake - 316(b) (Bartow) capital variance is 28% or \$863,373  
15 lower than projected. This variance is predominantly due to design changes which  
16 impacted the finalization of engineering drawings and delayed milestone  
17 payments. Contract payments are based on specific milestones, including  
18 finalization of design drawings.

19

20 **Q. How did actual Capital expenditures for January 2025 - December 2025**  
21 **compare with DEF’s actual/estimated projections for the CCC Water**  
22 **Treatment System (Project 21)?**

1 A. The CCC Water Treatment System capital variance is 41% or \$1,105,555 lower  
2 than projected. This variance is a timing issue predominantly due to delivery  
3 delays of mechanical components.

4  
5 **Q. In Order No. PSC-2010-0683-FOF-EI issued in Docket No. 20100007-EI on**  
6 **November 15, 2010, the Commission directed DEF to file as part of its ECRC**  
7 **true-up testimony a yearly review of the efficacy of its Plan D and the cost-**  
8 **effectiveness of DEF’s retrofit options for each generating unit in relation to**  
9 **expected changes in environmental regulations. Has DEF conducted such a**  
10 **review?**

11 A. Yes. DEF’s yearly review of the Integrated Clean Air Compliance Plan is  
12 provided as Exhibit No. \_\_ (WG-1).

13  
14 **Q. What is the status of the Clean Water Rule?**

15 A. On June 29, 2015, the Environmental Protection Agency (“EPA”) and the Army  
16 Corps of Engineers (“Corps”) published the final Clean Water Rule that  
17 significantly expanded the definition of the Waters of the United States  
18 (“WOTUS”). On October 9, 2015, the U.S. Court of Appeals for the Sixth Circuit  
19 granted a nationwide stay of the rule effective through the conclusion of the  
20 judicial review process. On February 22, 2016 the Sixth Circuit issued an opinion  
21 that it has jurisdiction and is the appropriate venue to hear the merits of legal  
22 challenges to the rule; however, that decision was contested, and on January 22,  
23 2018, the U.S. Supreme Court issued its decision stating federal district courts,

1           instead of federal appellate courts, have jurisdiction over challenges to the rule  
2           defining waters of the United States Consistent with the U.S. Supreme Court  
3           decision, the U.S. Court of Appeals for the Sixth Circuit lifted its nationwide stay  
4           on February 28, 2018. The stay issued by the North Dakota District Court remains  
5           in effect, but only within the thirteen counties within the North Dakota  
6           District. On February 28, 2017, President Trump signed an executive order laying  
7           out a new policy direction for how “Waters of the United States” should be  
8           defined and directing the EPA and the Corps to initiate a rulemaking to either  
9           rescind or revise the 2015 Clean Water Rule developed by the Obama  
10          administration. Subsequently, the EPA Administrator signed a pre-publication  
11          notice reflecting the intent to move forward with rulemaking in response to this  
12          directive. In addition, the executive order seeks to have the Department of Justice  
13          determine the path forward on the Clean Water Rule litigation as a result of the  
14          new policy direction.

15  
16          On January 31, 2018, the EPA and Corps announced a final rule adding an  
17          applicability date to the 2015 rule defining “Waters of the United States,” thereby  
18          deferring implementation of the 2015 WOTUS Rule until early 2020. This rule  
19          has no immediate impact to Duke Energy, and the agencies will continue to apply  
20          the pre-existing WOTUS definition in place prior to the 2015 rule until 2020.

21  
22          On February 14, 2019, the EPA and the Corps published in the Federal Register,  
23          the “Revised Definition of ‘Waters of the United States,’” which proposed to

1 narrow the extent of the Clean Water Act jurisdiction as compared to the 2015  
2 definition adopted by the Obama Administration (Proposed Rule). On January  
3 23, 2020, the EPA and the Corps released a pre-publication version of *The*  
4 *Navigable Waters Protection Rule: Definition of “Waters of the United States.”*  
5 (*NWPR Rule*). On April 21, 2020, the EPA and the Corps published the modified  
6 definition of the WOTUS in the Federal Register. DEF has reviewed the final  
7 rule and determined there are no impacts associated with the 2020 WOTUS Rule  
8 with respect to the operation of our existing generation facilities.

9 On January 20, 2021, through Executive Order 13990, the Biden Administration  
10 directed the EPA and the Corps to review the NWPR Rule. The US District Court  
11 for the District of Arizona vacated and remanded the NWPR Rule on August 30,  
12 2021, which vacated and remanded the rule nationwide. The EPA and the Corps  
13 announced on September 3, 2021, that efforts to implement the NWPR Rule had  
14 ceased and on December 7, 2021, the EPA published a proposed rule to officially  
15 repeal the NWPR Rule and replace it with the 1986 WOTUS rule. The public  
16 comment period for this proposed rule closed on February 7, 2022. On January  
17 18, 2023, the EPA and Corps published in the Federal Register the final rule  
18 revising the definition of “Waters of the United States” (the “WOTUS Final  
19 Rule”). The WOTUS Final Rule sets forth which surface waters and wetlands are  
20 jurisdictional for section 404 wetland permitting, NPDES, and other Clean Water  
21 Act (“CWA”) regulatory programs. The WOTUS Final Rule became effective on  
22 March 20, 2023.

23

1 On May 25, 2023, the U.S. Supreme Court (the Court) unanimously rejected the  
2 significant nexus test as a basis for determining whether “adjacent” wetlands are  
3 considered waters of the United States (WOTUS). On June 26, 2023, EPA  
4 announced that they and the Corps would promulgate a new WOTUS rule based  
5 on the Court’s decision. This final rule was published on September 8, 2023, was  
6 effective immediately and amended the previous 2023 definition of WOTUS. As  
7 a result of ongoing litigation on the January 2023 rule, the agencies are  
8 implementing the January 2023 rule. In Florida the agencies are interpreting  
9 WOTUS consistent with the pre-2015 definition and the Court's decision until  
10 further notice. The Corps reconfirmed this interpretation on their official website  
11 on September 24, 2024.

12  
13 On November 17, 2025, the EPA and the Corps issued a proposed rule that would  
14 clarify the definition of WOTUS and fully implement the U.S. Supreme court  
15 decision. The public comment period ended on January 5, 2026.

16  
17 DEF will continue to monitor the status of the rule and any proposed changes to  
18 ascertain any further compliance steps that may be required.

19  
20 **Q. Does this conclude your testimony?**

21 **A. Yes.**

# **Duke Energy Florida, LLC**

## **Review of Integrated Clean Air Compliance Plan**

**Submitted to the  
Florida Public Service Commission**

March 30, 2026



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## Acronyms

BART – Best Available Retrofit Technology

CAIR – Clean Air Interstate Rule

CAVR – Clean Air Visibility Rule

CCR - Coal Combustion Residuals

CO<sub>2</sub> – Carbon Dioxide

CPP – Clean Power Plan

CSAPR – Cross-State Air Pollution Rule

DEF – Duke Energy Florida

ECRC – Environmental Cost Recovery Clause

EPA – Environmental Protection Agency

EGU – Electric Generating Unit

ELG - Effluent Limitation Guidelines

ESP – Electrostatic Precipitator

FDEP – Florida Department of Environmental Protection

FGD – Flue Gas Desulfurization

GHG – Greenhouse Gas

MATS – Mercury and Air Toxic Standards

MWh – Megawatt Hour

NO<sub>x</sub> – Nitrogen Oxides

NPDES – National Pollutant Discharge Elimination System

NSPS - New Source Performance Standards

PAC – Powdered Activated Carbon

Plan D – DEF Integrated Clean Air Compliance Plan

ppb – Parts per billion

SCR – Selective Catalytic Reduction

SO<sub>2</sub> – Sulfur Dioxide

## Executive Summary

In the 2007 Environmental Cost Recovery Clause (“ECRC”) Docket No. 20070007-EI, the Florida Public Service Commission (“FPSC” or “the Commission”) approved Duke Energy Florida’s (“DEF”) updated Integrated Clean Air Compliance Plan (“Plan D” or “the Plan”) as a reasonable and prudent means to comply with the requirements of the Clean Air Interstate Rule (“CAIR”) (subsequently replaced by the Cross-State Air Pollution Rule (“CSAPR”), Clean Air Mercury Rule (“CAMR”) (subsequently replaced by the Mercury and Air Toxics Standards (“MATS” rule), Clean Air Visibility Rule (“CAVR”), and related regulatory requirements<sup>1</sup>. In its 2007 Final Order, the Commission also directed DEF to file as part of its ECRC true-up testimony “a yearly review of the efficacy of its Plan D and the cost-effectiveness of DEF’s retrofit options for each generating unit in relation to expected changes in environmental regulations.” This report provides the required review for 2025.

The primary original components of DEF’s 2006 Compliance Plan D included:

### Sulfur Dioxide (“SO<sub>2</sub>”)

- Installation of flue gas desulfurization (“FGD”) systems on Crystal River (“CR”) Units 4 and 5
- Fuel switching at CR Units 1 and 2 to burn low sulfur coal
- Fuel switching at Anclote Units 1 and 2 to burn low sulfur oil and natural gas
- Purchases of SO<sub>2</sub> allowances

### Nitrogen Oxides (“NO<sub>x</sub>”)

- Installation of low NO<sub>x</sub> burners (“LNBS”) and selective catalytic reduction (“SCR”) systems on CR Units 4 and 5
- Installation of LNBS and separated over-fire air (“SOFA”) or alternative NO<sub>x</sub> controls at Anclote Units 1 and 2
- Purchase of annual and ozone season NO<sub>x</sub> allowances

### Mercury

- Installation of FGD and SCR systems at CR Units 4 and 5

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<sup>1</sup> Order No. PSC-2007-0922-FOF-EI (“Final Order” or “2007 Final Order”)

- Installation of powdered activated carbon (“PAC”) injection on CR Unit 2

As detailed in Docket No. 20070007-EI, DEF decided on Plan D based on a quantitative and qualitative evaluation of the ability of alternative plans to meet environmental requirements, while managing risks and controlling costs. That evaluation demonstrated that Plan D is DEF’s most cost-effective alternative to meet applicable regulatory requirements. The Plan was designed to strike a balance between reducing emissions, primarily through the installation of controls on DEF’s largest and newest coal units (CR Units 4 and 5) and making strategic use of emission allowance markets.

In accordance with the Commission’s Final Order in Docket No. 20070007-EI, DEF has continued to review the efficacy of Plan D and the cost-effectiveness of retrofit options in relation to expected changes in environmental regulations. With regard to efficacy, Plan D remains the cornerstone of DEF’s efforts to comply with applicable air quality regulations in a cost-effective manner.

As indicated in previous ECRC filings, the U.S. Court of Appeals for the District of Columbia (“D.C. Circuit”) stayed the effect of CSAPR (proposed by the U.S. Environmental Protection Agency (“EPA”) to replace CAIR) leaving CAIR in effect until the court completed its review of CSAPR. In August 2012, the D.C. Circuit vacated CSAPR in its entirety, and in January 2013, the court denied the EPA’s petition for rehearing. On April 29, 2014, the U.S. Supreme Court reversed the D.C. Circuit’s decision and upheld the CSAPR. The EPA subsequently petitioned the D.C. Circuit to reinstate CSAPR, making it effective January 1, 2015. The court agreed with the EPA and approved its petition. On September 7, 2016, the EPA finalized its CSAPR update rule and eliminated Florida, South Carolina, and North Carolina from the CSAPR ozone season program based on modeling which shows that NO<sub>x</sub> emissions from these states do not significantly contribute to ozone nonattainment in any downwind state. Duke Energy sources in Florida are no longer subject to any CSAPR NO<sub>x</sub> emission limitations, as of the beginning of 2017.

Additionally, on February 16, 2012, the EPA issued MATS to replace the vacated CAMR for emissions from coal- and oil-fired electric generating units (“EGUs”), including, DEF’s

Anclote Units 1 and 2, Suwannee Units 1, 2, and 3, and CR Units 1, 2, 4, and 5. The following summarizes the results of DEF's MATS compliance analyses for these units:

Anclote Units 1 & 2: DEF determined that the most cost-effective option for Anclote Units 1 and 2 was conversion to fire 100% natural gas rather than installation of emission controls to comply with MATS. The Commission approved DEF's petition for ECRC recovery of costs associated with the Anclote Conversion Project in Docket No. 20120103-EI.

Suwannee Units 1, 2 & 3: DEF determined that no further modifications were needed on Suwannee Units 1, 2 and 3 as these units were already capable of operating on 100% natural gas.

CR Units 4 & 5: DEF determined that the existing electrostatic precipitators ("ESPs"), FGDs, and SCRs at CR Units 4 and 5 would provide sufficient control for MATS compliance under typical conditions. DEF also determined that chemical injection systems would be required to mitigate mercury re-emissions from the FGDs. On December 15, 2014, DEF requested a one-year extension to allow time for installation of additional mercury control systems. On March 12, 2015, the Florida Department of Environmental Protection ("FDEP") authorized a one-year extension (to April 16, 2016) for all mercury-related MATS requirements on CR Units 4 and 5; the units have operated in compliance with the Standards since that time.

CR Units 1 & 2: DEF determined that the use of alternative coals (along with dry sorbent injection, PAC injection, and ESP enhancements) was a feasible and cost-effective strategy to allow these units to continue running for a limited period of time in compliance with MATS and Best Available Retrofit Technology ("BART") requirements until new generation could be built. This plan was approved by the Commission in Order No. PSC-2014-0173-PAA-EI (April 17, 2014). On February 6, 2014, the FDEP granted a one-year extension (to April 16, 2016) for all MATS requirements on CR Units 1 and 2; the units were operated in compliance with the Standards since that time. CR Units 1 and 2 were retired from service on December 31, 2018.

DEF is confident that the emission controls installed pursuant to Plan D, along with compliance strategies discussed further in this Plan, continue to enable the Company to achieve and maintain compliance with all applicable environmental regulations in a cost-effective manner.

## **I. Introduction**

In its Final Order in the 2007 ECRC Docket, the Commission approved DEF's updated Integrated Clean Air Compliance Plan (Plan D) as a reasonable and prudent means to comply with the requirements of CAIR, CAMR, CAVR and related regulatory requirements. In the 2007 Final Order, p. 8, the Commission specifically found that "PEF's [now DEF's] updated Integrated Clean Air Compliance Plan represents the most cost-effective alternative for achieving and maintaining compliance with CAIR, CAMR, and CAVR, and related regulatory requirements, and it is reasonable and prudent for DEF to recover prudently incurred costs to implement the plan." *Id.* The Commission also directed DEF to file as part of its ECRC true-up testimony "a yearly review of the efficacy of its Plan D and the cost-effectiveness of [DEF's] retrofit options for each generating unit in relation to expected changes in environmental regulations." *Id.* The purpose of this report is to provide the required review for 2025.

## **II. Regulatory Background**

No changes have occurred since previous filing of the Integrated Clean Air Compliance Plan, Docket No. 20250007.

### ***A. Status of CAIR and CSAPR***

No changes have occurred since previous filing of the Integrated Clean Air Compliance Plan, Docket No. 20250007.

### ***B. Mercury Air Toxics Standards (MATS)***

On February 16, 2012, the EPA published the final MATS rule which established limits for emissions of hazardous air pollutants ("HAP"), including various metals, such as mercury, and acid gases from both coal- and oil-fired EGUs. Compliance generally was required to be achieved within three years of the EPA's adoption of MATS (i.e., April 16, 2015), although the Clean Air Act authorizes permitting authorities to grant one-year compliance extensions in certain circumstances.

In *Michigan v. EPA*, (June 29, 2015), the U.S. Supreme Court remanded the MATS rule to the D.C. Circuit, finding that the EPA insufficiently considered costs in determining that it is

“appropriate and necessary” to regulate mercury from power plants. On December 15, 2015, the D.C. Circuit remanded the MATS rule to the EPA without vacatur, and the EPA committed to completing its consideration of cost by April 16, 2016. On April 14, 2016, the EPA issued a final finding that it is appropriate and necessary to set standards for emissions of air toxics from coal and oil-fired power plants.

On May 22, 2020, in response to the U.S. Supreme Court decision in *Michigan v. EPA*, the EPA published a reconsideration of the appropriate and necessary finding for the MATS, correcting flaws in the 2016 supplemental cost finding. However, the EPA did not remove coal- and oil-fired EGUs from the list of affected source categories for regulation under section 112 of the Clean Air Act (“CAA”), so the MATS rule remains in effect.

On March 20, 2023, the EPA revoked the 2020 finding that it is not appropriate and necessary to regulate coal- and oil-fired power plants under CAA section 112 and affirmed the previous appropriate and necessary finding reaffirming the determination that it is appropriate and necessary to regulate hazardous air pollutants HAP, including mercury, from power plants after considering cost. Additionally, on May 7, 2024, EPA published in the *Federal Register* a final rule amending the MATS rule, which included a significant reduction of the surrogate filterable particulate matter standard from current levels, among other revisions. The final rule became effective on July 8, 2024. The reduction in the limit for filterable matter standard will reduce the effective limit on Crystal River Units 4 and 5, reducing it to from 0.030 lbs/MMBtu to 0.010 lbs/MMBtu, beginning July 2027. On February 20, 2025, the U.S. Court of Appeals for the D.C. Circuit granted EPA’s unopposed request for a 90-day abeyance of challenges to EPA’s final rule to revise the MATS to allow new EPA leadership to reevaluate the rule, since “prior positions taken by the Agency with respect to the 2024 Rule may not necessarily reflect its ultimate conclusions after that review is complete.” On February 24, 2026, EPA published a rule repealing the 2024 MATS amendments, which will become effective on April 27, 2026

In the 2011 ECRC docket, the Commission recognized that the EPA’s adoption of MATS for EGUs would require the Company to modify its Integrated Clean Air Compliance Plan. See Order No. PSC-2011-0553-FOF-EI, at 11. Accordingly, consistent with the Commission’s expectation that utilities “take steps to control the level of costs that must be incurred for

environmental compliance,” Order No. PSC-2008-0775-FOF-EI, at 7, the Commission approved the Company’s request to recover costs incurred to assess the EPA’s proposed rule, prepare comments to the EPA, and develop compliance strategies within the aggressive regulatory timeframes proposed by the EPA.

### ***C. Greenhouse Gas Regulation***

In 2007, then-Governor Crist issued Executive Order 07-127 directing the FDEP to promulgate regulations requiring reductions in utility CO<sub>2</sub> emissions. In addition, the 2008 Florida Legislature enacted legislation authorizing the FDEP to adopt rules establishing a cap-and-trade program and requiring the FDEP to submit any such rules for legislative review and ratification. However, the FDEP did not adopt any cap-and-trade rules, and the Legislature subsequently repealed the 2008 law. Likewise, although a number of bills that would regulate GHG emissions have been introduced to Congress over the past several years, none have become law. In the meantime, the EPA began implementing a regulatory approach to reducing GHG emissions through the Clean Air Act. At this time, however, there are no GHG emission standards applicable to DEF’s existing generating units.

On August 3, 2015, the EPA released the final new source performance standards for CO<sub>2</sub> emissions from new, modified and reconstructed fossil fuel-fired EGUs. The rule included emission limits of 1,400 lb. CO<sub>2</sub>/MWh for new coal-fired units and 1,000 lb. CO<sub>2</sub>/MWh for new natural gas combined-cycle units. Approximately nine years later, on May 9, 2024, EPA published final rules in the *Federal Register* to regulate greenhouse gas emissions from new natural gas-fired and existing coal-fired power plants under Section 111 of the CAA, which are applicable to several DEF coal and natural gas combustion turbine units. On July 19, 2024, the U.S. Court of Appeals for the D.C. Circuit (D.C. Circuit) unanimously denied petitioners’ attempt to stay the rules and ordered an expedited briefing schedule. Subsequently, on October 16, 2024, the U.S. Supreme Court rejected a request to stay the rules, recognizing that the D.C. Circuit’s final decision was pending but noting that the lower court should proceed “with dispatch.” On December 6, 2024, the D.C. Circuit heard oral argument from EPA and the petitioners. There is no specific date set for the court to issue its decision; however, on February 5, 2025, EPA filed a motion requesting

the D.C. Circuit to withhold issuing an opinion and place the case in a 60-day abeyance to allow time for new EPA leadership to review the issues and underlying rules and determine how they wish to proceed. The D.C. Circuit granted EPA's motion on February 19, 2025. Importantly, putting the case in abeyance does not stay the effectiveness of the rules. On June, 17, 2025 EPA proposed a rule repealing Greenhouse gas standards was published. DEF will continue to monitor the status of the rules and associated litigation and any applicable requirements to the DEF emission units.

***D. Status of BART Requirements under CAVR***

No changes have occurred since previous filing of the Integrated Clean Air Compliance Plan, Docket No. 20250007.

***E. Status of National Ambient Air Quality Standards (NAAQS)***

No changes have occurred since previous filing of the Integrated Clean Air Compliance Plan, Docket No. 20250007.

***F. Status of Combustion Turbine MACT***

In March of 2004, the Environmental Protection Agency ("EPA") promulgated National Emission Standards for Hazardous Air Pollutants ("NESHAP") for stationary combustion turbines ("CTs") that are located at major sources of hazardous air pollutants ("HAPs") and are constructed after January 14, 2003. The NESHAP, subpart YYYYY, implements section 112(d) of the Clean Air Act ("CAA") by requiring all major combustion turbine sources to meet HAP emission standards reflecting the application of the maximum achievable control technology ("MACT"). In April 2004, the EPA stayed the effectiveness of the rule for the lean premix and diffusion flame gas-fired sub-categories of stationary combustion turbines. The EPA concluded that a stay was necessary to avoid unnecessary expenditures on compliance as they evaluated a delisting petition for these two sub-categories of turbines.

On March 9, 2022, the EPA published in the *Federal Register*, at 87 Fed. Reg.13,183, a final rule to remove the stay for natural gas-fired stationary CTs. As a result of the final rule, lean premix and diffusion flame gas-fired turbines that were constructed or reconstructed at major

sources of HAP emissions after January 14, 2003, must comply with emission and operating limitations beginning March 9, 2022, or upon startup of future affected units. Owners/operators will then have 180 days to demonstrate compliance with the formaldehyde standard, i.e., September 5, 2022. *See* 40 C.F.R. §63.6110(a).

Under the EPA's definition of major source, DEF's Citrus County Combined Cycle units (Units 1A, 1B, 2A, 2B) are subject to the rule and associated compliance requirements. Hines Energy Complex and Bartow Combined Cycle were successfully reclassified as area sources and are therefore no longer subject to the rule.

In response to a petition for reconsideration filed by Earthjustice regarding the EPA's decision not to set limits for unregulated HAPs, the agency announced it would issue a proposed rule that will (1) review existing emission standards for formaldehyde and other HAPs from stationary combustion turbines and (2) propose to establish emission standards for stationary combustion turbines that are not located at a major source for HAPs. The EPA's Fall 2024 Unified Agenda of Federal Regulatory and Deregulatory Actions released on December 13, 2024, indicates the agency anticipates issuing a proposed rule in May 2025; however, in light of the change in administration, no further related regulatory changes are expected at this time.

### **III. DEF's Integrated Clean Air Compliance Plan**

No changes have occurred since previous filing of the Integrated Clean Air Compliance Plan, Docket No. 20250007.

#### ***A. Visibility Requirements***

No changes have occurred since previous filing of the Integrated Clean Air Compliance Plan, Docket No. 20250007.

#### **IV. Efficacy of DEF's Plan**

##### ***A. Project Milestones***

No changes have occurred since previous filing of the Integrated Clean Air Compliance Plan, Docket No. 20250007.

##### ***B. Projects***

No changes have occurred since previous filing of the Integrated Clean Air Compliance Plan, Docket No. 20250007.

#### **V. Conclusion**

DEF has completed installation of the emission controls contemplated in its approved Plan D on time and within budget. The FGD and SCR systems at CR Units 4 and 5 have enabled DEF to comply with CAIR, and subsequently the CSAPR requirements and will continue to be the cornerstone of DEF's integrated air quality compliance strategy for years to come. DEF is confident that Plan D, along with the other compliance strategies discussed in the document, has enabled the Company to achieve and maintain compliance with applicable regulations, including MATS, in a cost-effective manner.