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DEPUTY GENERAL COUNSEL

April 10, 2026

VIA ELECTRONIC FILING

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

Re: *Petition for Approval of Amended Standard Offer Contract (Schedule COG-2);*
Docket No. 20260048-EQ

Dear Mr. Teitzman:

Please find enclosed for electronic filing Duke Energy Florida, LLC's Response to Staff's First Data Request.

Thank you for your assistance in this matter. Should have any questions, please feel free to contact me at (727) 820-4692.

Sincerely,

/s/ Dianne M. Triplett

Dianne M. Triplett

DMT/mh

Enclosures

cc: L. Connor Willis, Division of Engineering, FPSC, cwillis@psc.state.fl.us and discovery-gcl@psc.state.fl.us

**DUKE ENERGY FLORIDA, LLC'S (DEF), RESPONSE TO
STAFF'S FIRST DATA REQUEST REGARDING DEF'S PETITION FOR APPROVAL OF
AMENDED STANDARD OFFER CONTRACT (SCHEDULE COG-2)**

Docket No. 20260048-EQ

1. For each component of the avoided unit's capital or O&M cost(s) that is higher than the prior year's standard offer, explain why. As part of this explanation, describe the impacts of any changes in financial assumptions, unit type or capabilities, unit timing, or general industry trends.

RESPONSE:

The increase in the avoided unit capital costs and fixed O&M costs reflect an improved heat rate and current financial and electric market trends driven by inflation, labor costs, supply chain, material commodity markets and overall supply and demand. DEF made these cost adjustments based on recent industry bid results seen across the company's total service area.

2. Identify the necessary minimum capacity factor required to receive full capacity payments under the proposed tariff and how it was determined and/or calculated.

RESPONSE:

The minimum capacity factor required to receive full capacity payments under this proposed Standard Offer Contract tariff is 95% as outlined in Appendix A. This capacity factor is set to the equivalent availability factor of the avoided unit to help ensure the non-dispatchable QF therein is generating firm capacity and energy when customers need power the most. The QF is then providing the same customer benefits that the avoided unit would have provided.

3. Please complete the following table for each year, 2027 through 2046, and in total (nominal and net present value (NPV)), describing estimated payments to a renewable provider based on the proposed tariffs included in the Utility's revised standard offer contract for each of the five scenarios listed below. For the calculations, assume the renewable generator is (i) a 50 MW facility capable of providing firm capacity, (ii) has an in-service date of January 1, 2027, (iii) operates at the minimum capacity factor required to receive full capacity payments under the tariff, and (iv) has a contract duration of 20 years.
 - a. As-Available Energy Rate (Energy Only Payments – No Firm Capacity)
 - b. Normal Capacity Payments
 - c. Levelized Capacity Payments
 - d. Early Capacity Payments
 - e. Early Levelized Capacity Payments

RESPONSE:

Year	Energy Sold (MWh)	Energy Rate (\$/MWh)	Energy Payments (\$)	Capacity (MW)	Capacity Rate (\$/MW)	Capacity Payments (\$)	Total Payments (\$)
2027							
2028							
2029							
2030							
2031							
2032							
2033							
2034							
2035							
2036							
2037							
2038							
2039							
2040							
2041							
2042							
2043							
2044							
2045							
2046							
Sum							
NPV Sum							

When forecasting QF as available rates, DEF uses its system marginal costs adjusted for a reasonable volume of potential solar QF projects in DEF’s generator interconnection queues and consistent with rule 25-17.0825(2)(a). It is important to note that current estimates are only valid and effective as of December 31, 2025 due to the volume of potential QF activity. It is also important to note that with large amounts of QF generators contributing to DEF’s as-available block size, it is anticipated DEF will have increasing amounts of time when required DEF system resources along with potential QF generation may exceed DEF load levels and that excess energy is not fully captured in the estimates herein. Finally, please see the attached Excel spreadsheet for the table values. The NPV values were calculated using monthly values and the discount rate used 7.55% and an assumed capacity factor of 95%.