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February 12, 2021

**VIA ELECTRONIC FILING**

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

Re: *Proposed Revisions to Rule 25-6.0143, F.A.C. – Statement of Estimated  
Regulatory Costs; Undocketed*

Dear Mr. Teitzman:

Please find enclosed for filing under Undocketed Matters on behalf of Duke Energy Florida, LLC, its response to Staff's SERC Data Request (Nos. 1-6).

Thank you for your assistance in this matter. Please feel free to contact me should you have any questions concerning this matter.

Respectfully,

*/s/ Matthew R. Bernier*

Matthew R. Bernier

MRB/cmK  
Enclosure

cc: Sevini Guffey, Public Utility Analyst

**Duke Energy Florida, LLC's Response to  
SERC Data Request to Electric Investor-Owned Utilities (Nos. 1-6)  
re. Rule 25-6.0143 Use of Accumulated provision Accounts 228.1, 228.2, and 228.4, F.A.C.**

- 1) Proposed revision to Section (1)(e)1 states that the utility may adjust historical monthly contract labor costs charged to operation and maintenance expenses and that each adjustment shall be accompanied by a detailed explanation of the nature and derivation of the adjustment. What are the types of transactional costs involved and what would be the estimated annual incremental regulatory costs including transactional costs to your utility to prepare the detailed contract labor costs adjustments?

**Response:**

The types of transactional costs that would need to be reviewed relate to the contractors used in the company's normal maintenance and restoration activities. The annual incremental regulatory costs would be immaterial.

- 2) Proposed revision to Section (1)(e)8 states that the utility may adjust historical monthly payroll and payroll related costs charged to operation and maintenance expenses and that each adjustment shall be accompanied by a detailed explanation of the nature and derivation of the adjustment. What are the annual incremental regulatory, including transactional costs to your utility to prepare the detailed payroll and payroll related cost adjustments?

**Response:**

The annual incremental regulatory costs would be immaterial.

- 3) Proposed revision to (1)(e)9 states that the utility may adjust historical monthly fuel costs charged to operation and maintenance expenses and that each adjustment shall be accompanied by a detailed explanation of the nature and derivation of the adjustment. What are the annual incremental regulatory, including transactional expenses to your utility to prepare the detailed fuel costs adjustments?

**Response:**

The annual incremental regulatory costs would be immaterial.

- 4) Proposed new language in Section (1)(e)11 states that the utility may adjust historical monthly vegetation management costs specifically related to storm restoration activities, charged to operation and maintenance expenses and that each adjustment shall be accompanied by a detailed explanation of the nature and derivation of the adjustment. What are the annual incremental regulatory, including transactional costs to your utility to prepare the detailed vegetation management cost adjustments?

**Response:**

The annual incremental regulatory costs would be immaterial.

- 5) Proposed new language in Section (1)(e)12 requires the utility to report other costs and expenses not specifically identified in 1 through 11, that are directly and solely attributable to a storm restoration event. What are the estimated annual regulatory, including transactional costs and expenses to your utility to collect and report this information to the Commission?

**Response:**

The annual incremental regulatory costs would be immaterial.

- 6) Please discuss any potential benefits to your utility from the proposed rule revisions for the accounting of electric utilities' costs that result from storm-related damage.

**Response:**

The change to use three-year averages simplifies the methodology in calculating incremental versus non-incremental costs and provides a uniform methodology for all utilities to follow.