



Dianne M. Triplett  
DEPUTY GENERAL COUNSEL

December 4, 2025

**VIA ELECTRONIC FILING**

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

Re: Petition For Limited Proceeding to Approve Large Load Tariff by Duke Energy  
Florida, LLC; Docket 20250113-EI

Dear Mr. Teitzman:

Please see attached the presentation Duke Energy Florida presented during the December 2 informal meeting. DEF is not requesting any action on this item, it is simply filing for informational purposes.

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

Sincerely,

/s/ Dianne M. Triplett

Dianne M. Triplett

DMT/clg  
Enclosures

**CERTIFICATE OF SERVICE**

Docket No. 20250113-EI

**I HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic mail this 4<sup>th</sup> day of December, 2025, to the following:

/s/ Dianne M. Triplett

Dianne M. Triplett

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# FPSC Informal Meeting

**Docket No. 20250113-EI  
Large Load Tariff Provisions**

Duke Energy Florida, LLC

December 2, 2025



*BUILDING A **SMARTER** ENERGY FUTURE®*



# Introduction and Presenters

## *Introduction*



**Chris Menendez**

*Director, Rates and  
Regulatory Strategy*

*LLC Policy  
LLC Agreement  
Pricing*



**Matt Chatelain**

*Rates and Regulatory  
Strategy Director*

## *Cost Allocation*



**Kourtni Yager**

*Rates and Regulatory  
Strategy Director*

# Purpose of DEF's Filing

**DEF's filing is a forward-looking response to anticipated growth, designed to accommodate new large loads while establishing new protections for all customers.**

## **Significant expansion of large load demand**

- **United States Department of Energy**
  - Data centers consumed approximately 176 terawatt-hours (TWh) of electricity in 2023, accounting for about 4.4% of total U.S. electricity use.
  - That figure is projected to rise to between 325 and 580 TWh by 2028, representing 6.7% to 12% of national consumption
- **S&P Global**
  - Data centers will require an additional 150 to 250 TWh of electricity annually between 2024 and 2030
  - Increase is expected to drive approximately 50 gigawatts of new generation investment

# Filing Overview

## Filing objectives:

- Strike the appropriate balance between meeting our obligation to serve all retail customers while protecting general body of customers
- Proactively respond to industry trends and plan for the addition of large load customers

## Key components:

- Large Load Customer Policy
- Large Load Customer Agreement
- Optional Large Load Customer Rate Schedule
- Retail Class COS modification

# Key Components

- **Large Load Customer Policy (LLCP)**
  - Establishes a Policy in Rules & Regulations
  - Details protections for existing retail customers from the risks from stranded or underutilized assets
- **Large Load Customer Agreement (LLCA)**
  - Form tariff agreement for customers subject to the LLCP
  - Provides standardized terms and conditions framework and clarifies the Company's expectations of interested large load customers
- **Large Load Customer Rate Schedule**
  - LLC-1 – Optional high load factor design
  - New rate offering and rate class
  - Load greater than or equal to 1 MW
  - Delivery at transmission voltage (230 kV or higher)
- **Cost of Service Application**
  - Addition of new rate class – Large Load Customer Class
  - Separation of transmission cost of service into transmission and subtransmission components



# Large Load Customer Policy

- Addition of Part XIII to Section IV of DEF's Tariff
- Applicability
  - New or expanded load from individual customers, regardless of rate class
  - Demand forecast greater than or equal to 100 MW firm load any time during service agreement term
- Requirements
  - Execution of Large Load Customer Agreement (LLCA)
  - System impact study fee to determine investments and upgrades necessary to serve proposed load
- Specifications
  - Minimum term of 15-20 years
  - Minimum monthly bill
  - Security requirements
  - Early termination obligations
  - Service shall not commence until DEF has sufficient capacity to meet Customer's capacity requirements
  - CIAC – includes modification to Part III
    - Up to 100% of the total estimated costs to extend service
    - Refunded over five years as revenues are collected



# Large Load Customer Policy, cont'd

## Minimum Monthly Bill Calculation

- Billing Demand determinant shall be the highest of:
  - Monthly Max Demand – monthly, highest 30-min interval
  - Grid Demand – 90% of highest Monthly Max Demand in the last 12 months
  - Minimum Demand – between 75% and 85% of the annual Contract Capacity
- Minimum Billing Energy Volume is also applicable for customers not on LLC-1
  - Based on Minimum Demand and projected Load Factor, as agreed upon
- Also includes Customer charge and BA-1 for actual demand and energy, and taxes and fees

## Early Termination

- Dependent upon the timing of termination (ISD)
- Requires two to five years of written notice, dependent upon the contract term
  - Triggers a termination fee:
    - 3 yrs of minimum bills, if termination in first 12 years
    - 2 yrs of minimum bills, if after 12 years

# How does LLCP protect customers?

Customer Protections	Current Environment	DEF LLC Environment	Benefit
Minimum Bill	None other than customer charge	75% of contract demand	Certainty of payments for service provided
Minimum Term	None	15-20 years	Certainty of customer longevity
Termination Notice	None	2-5 years written notice	Time to incorporate customer termination into planning
Termination Payment	None	Termination Fees required	Fixed cost mitigation
Security Requirements	May be required (special provision)	Formalized	Clarity in process and customer requirement

# Large Load Customer Agreement

- Form Tariff Contract Agreement form for DEF customers subject to LLCP
- Contract provisions
  - Point of delivery
  - Contracted load and ramp schedule
  - Minimum term
  - Termination notice requirements
  - Early termination obligations
  - Security requirements
  - Minimum billing demand
- Allows for additional provisions
- Required for customers with 100 MW or greater load
- Not required for customers with 99 MW load or less

# Large Load Customer Rate Schedule

## Large Load Customer General Service – LLC-1

- Available January 1, 2028
- Billing demand – 1 MW or higher
- Delivery at transmission voltage – 230kV or higher
- Customer, Demand, and Energy charges (to be updated)
- Not eligible for Economic Development Rider or Commercial and Industrial Service Rider
- For Customers not subject to LLCP:
  - Minimum bill highest of:
    - 90% of Monthly Max Demand
    - 75% of Contract Demand
    - 1 MW
  - Minimum 36-month contract term
  - Additional security requirements for load 50 MW or greater

# Class Cost of Service Study Application

## New Large Load Customer (LLC) Rate Class

- Customers are consolidated into Rate Class based on their similar characteristics, primarily demand and energy usage
- LLC customers have unique demand and energy requirements
  - High demand
  - High average usage (high load factor)
- LLC class added to class cost of service study
- Aids in rate design

# Class Cost of Service Study Application, cont'd

## Separate Transmission and Subtransmission cost of service

- Similar to our existing Delivery Voltage Credits (DVC)
- DVCs enable us to provide delivery-level pricing within a single rate class for demand customers
- Only Transmission costs at 230kV or above are allocated to the LLC class
  - Transmission: 230kV or higher
  - Subtransmission: 69kV to 230kV
- Separation allows for transmission costs to be appropriately allocated to the LLC class
- Maintain the DVCs for all other classes





# Questions?