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STATE OF FLORIDA



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Public Service Commission

December 9, 2025

Matthew R. Bernier
Stephanie A. Cuello
Duke Energy Florida, LLC
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STAFF'S FIRST DATA REQUEST *via email*

Re: Docket No. 20250134-EI – Petition for a limited proceeding to approve second solar base rate adjustment, by Duke Energy Florida, LLC.

Dear Mr. Bernier and Ms. Cuello:

By this letter, the Commission staff requests that Duke Energy Florida, LLC (DEF) provide responses to the following data requests:

1. Please refer to Witness Borsch's Exhibits BMHB-4 and BMHB-5. Provide the annual nominal value and net present value for each of the categories listed for the Base Case, the Change Case, and the difference between these values with the following modifications:
 - a. If applicable, separate CO2 related costs from the other categories as a separate line item. If no CO2 related costs are included, provide a statement confirming this.
 - b. Provide separate values for the incremental generation capital and the incremental transmission capital. If possible, provide the incremental generation capital by each new unit included in the analysis.
 - c. Provide a separate line item for leasing associated with the solar facilities.
 - d. If possible, separate the added solar categories (fixed O&M, generation capital, and transmission capital) by each generating unit.
2. Please refer to Witness Borsch's Exhibits BMHB-4 and BMHB-5.

- a. For each of the cost categories identified, explain any assumptions used in the Utility's analysis.
 - b. For both the Base Case and the Change Case, provide the annual seasonal reserve margin analysis for the duration of the economic analysis. As part of your response, provide the total available firm generation, the seasonal net firm peak demand, and reserve margin (in MW and percent).
 - c. For both the Base Case and the Change Case, please provide the annual list of unit additions, modifications, or retirements, (including their nameplate and seasonal peak contribution capacity values in MW) for the duration of the economic analysis.
 - d. Explain how the Utility's Effective Load Carrying Capacity methodology was utilized to evaluate the firm capacity contribution of the proposed solar projects.
3. Please refer to Witness Olivier's Exhibit MJO-1, page 2, lines 2 through 5. Reconcile the differences between the amounts presented in Witness Goff's testimony and exhibits and those reflected in Exhibit MJO-1.
4. Please provide the Excel files, with formulas and calculations intact, for Witness Olivier's Exhibit MJO-1.
5. Please refer to Witness Olivier's testimony, page 4. Provide the revenue requirement associated with the Jumper Creek project without the inclusion of the Clean Energy Connection expansion revenues.
6. Please refer to Witness Goff's testimony and exhibits. State what activities are included in the Network Upgrades category for each proposed solar project. If possible, provide the estimated cost associated with each upgrade.
7. Regarding the land use for each of the proposed project sites, please answer the following questions.
 - a. Provide the acreage and percent of the project land site taken up by the respective solar plant available for other utility use, and land that is unavailable for use. If land is unavailable for use, explain why?
 - b. Provide a comparison of the lease duration to the estimated life of the plant. If the lease does not match the estimated plant life, please explain.
 - c. If any factors would cause the lease payment to change, such as the completion of the unit, terms allowing extensions of the lease, or annual escalation, please identify those factors, what the new lease payments would be, and explain their inclusion.

8. Explain how the solar projects will be used to serve the Utility's retail load consistent with the requirements of Paragraph 16 of the 2024 Stipulation and Settlement Agreement.
9. For each of the Utility's solar facilities with an in-service date between 2018 and 2024, provide the projected capacity factor used in the Commission's approval of the project(s), the actual annual capacity factors, and the variance between the projected capacity factor and the average actual capacity factors.
 - a. Provide the average variance for all solar facilities with an in-service date between 2018 and 2024, and then explain how a variance of that value for the Second SoBRA Tranche would impact its cost-effectiveness, including an estimate of the impact on the production tax credits.
10. Provide any anticipated delays to the in-service date for the proposed solar sites. If there are delays, please specify the reason for delay and time extension.
11. Please refer to witness Olivier's Exhibit No. MJO-1 page one, line three. Explain the difference between Jumper Creek's Rate of Return on Rate Base, 6.67 percent, and the rest of the solar projects Rate of Return on Rate Base at 6.70 percent.
12. Please provide the calculation used to determine the carrying charge applied to each of the solar projects.

Please file all responses electronically no later than December 22, 2025, through the Commission's website at www.floridapsc.com, by selecting the Clerk's Office tab and Electronic Filing Web Form. *In addition, please email the filed response to discovery-gcl@psc.state.fl.us.*

Please feel free to call me at (850) 413-6199 if you have any questions.

Sincerely,

/s/ Zachary Bloom
Zachary Bloom
Attorney

ZB/crv

cc: Office of Commission Clerk