

Matthew R. Bernier ASSOCIATE GENERAL COUNSEL

March 25, 2021

VIA ELECTRONIC FILING

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

Re: Notice Pursuant to Rule 25-6.0424(2), Florida Administrative Code; Docket No.

20210001-EI

Dear Mr. Teitzman:

Pursuant to Rule 25-6.0424(2), Fla. Admin. Code, I write to inform the Commission that Duke Energy Florida ("DEF" or the "Company") has calculated a 2021 projected fuel clause under-recovery in excess of 10%. Nonetheless, for the reasons explained below, DEF does not believe a mid-course correction is warranted or practical at this time but believes it is more appropriate for the Company to continue to monitor the under-recovery balance.

Based on fuel prices at the close of business on February 26, 2021, based primarily on increase in natural gas prices, DEF calculated a projected fuel clause under-recovery of 10.6% for the period ending December 31, 2021. At the time this analysis was complete, DEF looked at then-current natural gas prices and observed that since February 26th prices have decreased by ~5.7%; based on our analysis this brings the estimated under-recovery below 8%, well below the 10% threshold provided in the Rule.

DEF believes that the increase in natural gas prices that drove the projected under-recovery to rise above the 10% threshold was a short-term increase driven by increased demand during the winter months coupled with a short-term decrease in supply resulting from the winter storm that impacted Texas and the mid-west in February. In the aftermath of that unprecedented event, natural gas prices have decreased as discussed above.

DEF believes that the coincidence of two unprecedented events, the historic winter storm disrupting natural gas markets and the continuing effects of the COVID-19 pandemic, warrant the maintaining the current fuel clause recovery factors as established by the Commission in Order No. PSC-2021-0024-FOF-EI. As mentioned above, DEF will continue to monitor fuel prices and reserves the right to seek appropriate relief should prices increase resulting in the projected underrecovery again rising above the 10% trigger.

Please feel free to call me at (850) 521-1428 should you have any questions concerning this filing.

Respectfully,

s/Matthew R. Bernier

Matthew R. Bernier

MRB/mw

CERTIFICATE OF SERVICE

Docket No. 20210001-EL

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic mail to the following this 24th day of March, 2021.

s/ Matthew R. Bernier
Attorney

Suzanne Brownless
Office of General Counsel
FL Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
sbrownle@psc.state.fl.us

J. Beasley / J. Wahlen / M. Means Ausley McMullen P.O. Box 391 Tallahassee, FL 32302 jbeasley@ausley.com jwahlen@ausley.com mmeans@ausley.com

Russell A. Badders
Gulf Power Company
One Energy Place, Bin 100
Pensacola, FL 32520-0100
russell.badders@nexteraenergy.com

Kenneth A. Hoffman Florida Power & Light Company 134 W. Jefferson Street Tallahassee, FL 32301-1713 ken hoffman@fpl.com

Jon C. Moyle, Jr. Moyle Law Firm, P.A. 118 North Gadsden Street Tallahassee, FL 32301 jmoyle@moylelaw.com mqualls@moylelaw.com Anastacia Pirrello Office of Public Counsel 111 W. Madison St., Room 812 Tallahassee, FL 32399-1400 pirrello.anastacia@leg.state.fl.us

Paula K. Brown
Regulatory Affairs
Tampa Electric Company
P.O. Box 111
Tampa, FL 33601-0111
regdept@tecoenergy.com

Maria Moncada Florida Power & Light Company 700 Universe Blvd. (LAW/JB) Juno Beach, FL 33408-0420 maria moncada@fpl.com

James Brew / Laura W. Baker Stone Law Firm 1025 Thomas Jefferson St., N.W. Suite 800 West Washington, DC 20007 jbrew@smxblaw.com lwb@smxblaw.com

Mike Cassel Florida Public Utilities Company 208 Wildlight Avenue Yulee, FL 32097 mcassel@fpuc.com

Beth Keating Gunster, Yoakley & Stewart, P.A. 215 South Monroe Street, Suite 601 Tallahassee, FL 32301 <u>bkeating@gunster.com</u>