

Exhibit No.: 4C

Proffered by: Public Counsel

Short title: DEF's Confidential Response to OPC's Sixth Set of
Interrogatories (43-51)

Witness(s): Gary P. Dean
Joseph Simpson

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchased Power Cost
Recovery Clause and Generating
Performance Incentive Factor

Docket No. 20210001-EI

Filed: October 21, 2021

**DUKE ENERGY FLORIDA, LLC'S RESPONSE TO
CITIZENS' SIXTH SET OF INTERROGATORIES (NOS. 43-51)**

Duke Energy Florida, LLC ("DEF") responds to the Citizens of the State of Florida, through the Office of Public Counsel's ("Citizens" or "OPC") Sixth Set of Interrogatories to DEF (Nos. 43-51) as follows:

INTERROGATORIES

For questions 43-51 please refer to your response to Citizens' Third Request to Produce Documents:

43. On bates 20210001-DEF-000062, the Bartow CC Event Report # 1141500 states under the cause code detail that there was a damaged, defective or failed part. Please state the name of the part referred to in this event report.

Response

DEF restates and incorporates its objection to this interrogatory submitted on September 28, 2021. Subject to and without waiving its objection to this interrogatory, the stator bar on the Unit 4C generator failed.

44. Please state the date on which the damage, defect or failure of the part identified in response to ROG 43 was discovered.

Response

DEF restates and incorporates its objection to this interrogatory submitted on September 28, 2021. Subject to and without waiving its objection to this interrogatory, DEF discovered the damage to the stator bar on May 2, 2021 when the protective relay sensed a ground fault and tripped the unit.

45. Please explain the steps that DEF takes prior to installation of a part (including as a part of the procurement process) to ensure that damaged, defective or potentially failing parts are not procured or installed.

Response

DEF restates and incorporates its objection to this interrogatory submitted on September 28, 2021. Subject to and without waiving its objection to this interrogatory, DEF generally purchases from Original Equipment Manufacturer (OEM), or a qualified approved vendor/supplier. Parts are generally purchased new, on occasion refurbished/remanufactured parts are used based on availability, timing, and pricing. Depending upon the component, DEF utilizes many tools to ensure quality including shop visits, factory acceptance tests, third party quality inspectors, oversight during installation, and post maintenance testing.

46. Is DEF aware of any industry experience (IE) related to the damage, defect or failure identified in Bartow CC Event Report # 1141500.

Response

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DEF restates and incorporates its objection to this interrogatory submitted on September 28, 2021. Subject to and without waiving its objection to this interrogatory, DEF has encountered similar issues on the Unit 4A, 4B and 4C generator stator bars, and took a planned outage on the 4D generator to correct the issue ahead of an in-service failure. As discussed in the RCAs produced in response to OPC's Request to Produce No. 1(Nos. 1-4), question 2, bearing bates numbers 20210001-DEF-000021 through 20210001-DEF-000046, the Root Cause of the damage was defective stator core seals, which was brought to DEF's attention by the OEM.

Please see DEF's response to OPC's Request to Produce, question 22, bearing bates numbers 20210001-DEF-000021 through 20210001-DEF-000046 and documents bearing 20210001-DEF-000236 through 20210001-DEF-000241.

The documents bearing bates numbers 20210001-DEF-000236 through 20210001-DEF-000241 are confidential, a redacted version has been provided in response to POD 22. An

unredacted copy has been filed with the Florida Public Service Commission along with DEF's Notice of Intent to Request for Confidential Classification dated October 21, 2021.

47. If the answer to ROG 46 is yes, what actions were taken by DEF based on the knowledge of IE (including your efforts to acquire the IE related to that component of the plant)?

Response

DEF restates and incorporates its objection to this interrogatory submitted on September 28, 2021. Subject to and without waiving its objection to this interrogatory, DEF input projects into its internal scheduling tool to complete generator rewinds, expecting DEF would have an opportunity to rewind the generators on a planned outage basis avoiding in-service failures. Due to the nature of the defect there was no non-destructive testing or inspections that could have been performed to predict when the Generators would fail.

48. On Bates 20210001-DEF-000063, under the heading "Action Plan Executive Summary," you reference an insurance claim related to the damaged, defective or failed part or outage. Please state the basis for the claim, the type of policy and the name of the insurer, the deductible, and any coverage limitations or exclusions related to this event as well as the current status of this insurance claim.

Response

DEF restates and incorporates its objection to this interrogatory submitted on September 28, 2021. Subject to and without waiving its objection to this interrogatory, please see the documents bearing bates numbers 20210001-DEF-000243 through 20210001-DEF-000306, provided in DEF's response to OPC's Request to Produce question 24.

The documents bearing bates numbers 20210001-DEF-000243 through 20210001-DEF-000306 are confidential, a redacted version has been provided in response to POD 24. An unredacted copy has been filed with the Florida Public Service Commission along with DEF's Notice of Intent to Request for Confidential Classification dated October 21, 2021.

49. If the insurer has not responded to the claim identified in ROG 48, based on DEF's current insurance policy, what types of risk(s) and losses does DEF reasonably expect that the insurance will cover and what, if any, are the limitations on those types of risks and losses as

they relate to this outage. (e.g., are consequential damages for replacement power reimbursed under the policy against which the claim was made)

Response

DEF restates and incorporates its objection to this interrogatory submitted on September 28, 2021. Subject to and without waiving its objection to this interrogatory, please see the attached documents bearing bates numbers 20210001-DEF-000243 through 20210001-DEF-000306.

The documents bearing bates numbers 20210001-DEF-000243 through 20210001-DEF-000306 are confidential, a redacted version has been provided in response to POD 24. An unredacted copy has been filed with the Florida Public Service Commission along with DEF's Request for Confidential Classification dated October 21, 2021

50. In your response to Citizens Fourth Set of Interrogatories, ROG 25, you state that DEF does not have any responsive documents. Please explain why a root cause analysis (RCA) was not conducted for the forced outages that occurred at Bartow CC in June 2021, including your criteria for performing an RCA when there is a forced outage at a generating station.

Response

DEF restates and incorporates its objection to this interrogatory submitted on September 28, 2021. Subject to and without waiving its objection to this interrogatory, DEF determined no RCA was necessary as the failure mode was the same as that identified in the RCA produced in response to OPC's Request to Produce (Nos. 1-4), question 2 bearing bates numbers 20210001-DEF-000021 through 20210001-DEF-000046.

51. Please identify all documents prepared by DEF which detail your forecasted planned outages for 2021 by unit and expected outage time.

Response

DEF restates and incorporates its objection to this interrogatory submitted on September 28, 2021. Subject to and without waiving its objection to this interrogatory, please see DEF's response to OPC's Request to Produce number 23.