

DEF's Response to OPC's First Set of
Interrogatories, Nos. 1-8.

INTERROGATORIES

Please reference the February 26, 2021 GPIF Actual Unit Performance data schedules for January 2021 in responding to Interrogatories 1-8:

1. On page 1 of 14 (Bartow CC), please state if the EAF % of 82.10 for the month of January 2021 is attributable fully or in part to the seven Full Forced Outage (FFO) or Partial Forced Outage (PFO) events with hours totaling 497.85, 139.63, 0.42, 161.23, 0.62, 113.47 and 497.85 for 195 MW, 195 MW, 195 MW, 195 MW, 195 MW, 389 MW and 63 MW, respectively, beginning on dates January 11, 1, 11, 1, 16, 5, and 11, 2021, respectively as shown on page 8 of 14.
2. If the answer to Interrogatory No. 1 is yes, please identify the amount of replacement power cost attributable to the unit unavailability below an EAF of 100%. Please also identify the workpapers calculating such replacement power costs.
3. Please state whether Duke Energy Florida, LLC intends to seek, or has already sought, recovery of the replacement power costs identified in response to Interrogatory No. 2.
4. Please identify all documents related to any and all root cause analyses (or the functional equivalent, regardless of title), including drafts and related commentary correspondence, involving the forced outages occurring at Bartow CC in January 2021.
5. On page 2 of 14 (Crystal River 4), please state if the EAF % of 0.00 for the month of January 2021 is attributable fully or in part to the Full Forced Outage (FFO) hours totaling 744 for 712 MW, beginning January 1, 2021 as shown on page 9 of 14.
6. If the answer to Interrogatory No. 5 is yes, please identify the amount of replacement power cost attributable to the unit unavailability below an EAF of 100%. Please also identify the workpapers calculating such replacement power costs.
7. Please state whether Duke Energy Florida, LLC intends to seek, or has already sought, recovery of the replacement power costs identified in response to Interrogatory No. 6.

8. Please identify all documents related to any and all root cause analyses (or the functional equivalent, regardless of title), including drafts and related commentary correspondence, involving the forced outages occurring at Crystal River 4 in January 2021.

Respectfully Submitted,

Richard Gentry
Public Counsel

s/Anastacia Pirrello
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Attorneys for the Citizens
of the State of Florida

AFFIDAVIT

STATE OF FLORIDA)

COUNTY OF _____)

I hereby certify that on this _____ day of _____, 2021, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared _____, who is personally known to me, and he/she acknowledged before me that he/she provided the answers to interrogatory number(s) _____ from in CITIZENS' FIRST SET OF INTERROGATORIES TO DUKE ENERGY FLORIDA, LLC COMPANY (NOS. 1-8 in Docket No. 20210001, and that the responses are true and correct based on his/her personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this _____ day of _____, 2021.

Notary Public
State of Florida, at Large

My Commission Expires:
