

DEF's Response to OPC's Third Set of
Interrogatories, Nos. 11-18.

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: May 28, 2021

**DUKE ENERGY FLORIDA, LLC'S RESPONSE TO
CITIZENS' THIRD SET OF INTERROGATORIES (NOS. 11-18)**

Duke Energy Florida, LLC ("DEF") responds to the Citizens of the State of Florida, through the Office of Public Counsel's ("Citizens" or "OPC") Third Set of Interrogatories to DEF (Nos. 11-18) as follows:

INTERROGATORIES

Please reference the April 28, 2021 GPIF Actual Unit Performance Data Report for February 2021 (corrected) in responding to Interrogatories 11-18:

11. On page 1 of 14 (Bartow CC), please state if the EAF % of 75.31 for the month of February 2021 is attributable fully or in part to the Forced Maintenance Outage (FMO) event with hours totaling 142.85 for 339 MW, beginning on February 22, 2021 as shown on page 8 of 14.

Response:

To avoid a misinterpretation of terms, DEF is seeking to clarify any terms in this response. In the GPIF Manual, FMO stands for Full Maintenance Outage, and PO stands for planned outage. The EAF is partly due to the full maintenance outage that began on February 22. It is also attributable to the full forced outage (FFO) of the 4A combustion turbine generator. With the 4A combustion turbine not available, it cannot contribute steam to the steam turbine and thus the overall power block EAF is reduced.

12. If the answer to Interrogatory No. 11 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.

Response:

The replacement power cost for the outages identified in response to Interrogatory No. 11, during the month of February 2021, is approximately \$1.4 million. To calculate the replacement power cost assuming Bartow CC had not experienced the outages, DEF ran a production cost simulation model beginning February 1, 2021 through February 28, 2021; this process is consistent with DEF's prior replacement power calculations. DEF ran this simulation model, applying the actual load conditions and replacement fuel costs, which produced the total system cost assuming Bartow CC was fully available. DEF then

compared the resulting “with Bartow CC” system cost to the system cost calculated based on actual unit loadings (i.e., without Bartow 2 CC). The difference between the “with Bartow CC” cost and the “without Bartow CC” cost represents the system replacement power costs during the Bartow CC Outage.

Please see the response to OPC’s Second Request for Production of Documents, question 5.

13. 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. 11.

Response:

These replacement costs were not included in the 2021 projection filing and therefore are not included in the current fuel cost recovery factor. DEF intends to include the replacement power costs identified in DEF’s response to OPC’s Interrogatory No. 12 in its 2021 Actual/Estimated true-up calculation and seek recovery of those costs in its 2022 fuel factors.

14. 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 outage occurring at Bartow CC in February 2021.

Response:

Please see the documents provided in DEF’s Response to OPC POD 2, question 6, bearing bates numbers 20210001-DEF-000057 through 20210001-DEF-0000XX.

15. On page 6 of 14 (Hines Power Block 3), please state if the EAF % of 42.86 for the month of February 2021 is attributable fully or in part to the three Partial Outage (PO) events each with hours totaling 384 for 173.3 MW, 173.3 MW and 169.3 MW, all beginning on February 13, 2021 as shown on page 13 of 14.

Response:

The EAF of 42.86% is due to the spring planned outage (PO) discussed in response to Interrogatory 16, below.

16. If the answer to Interrogatory No. 15 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.

Response:

On February 13th, 2021 at 00:00, the unit entered its spring planned outage (PO), where it remained through the remainder of February. DEF does not calculate “replacement power” costs for planned outages.

17. 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. 15.

Response:

There are no replacement power costs. Please see the response to Interrogatory No. 16.

18. 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 partial outage occurring at Hines Power Block 3 in February 2021.

Response:

The Hines Power Block 3 outage was a planned outage; please see DEF's response to Interrogatory 16.

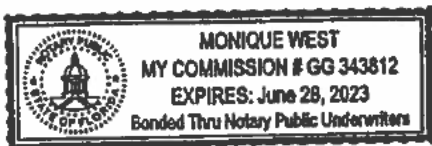
AFFIDAVIT

STATE OF FLORIDA

COUNTY OF PINELLAS

I hereby certify that on this 7th day of May, 2021, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared GARY P. DEAN, who is personally known to me, and has acknowledged before me that he provided the answers to interrogatory numbers 12, 13, 16, and 17 of CITIZENS' THIRD SET OF INTERROGATORIES TO DUKE ENERGY FLORIDA, LLC (NOS. 11-18) in Docket No. 20210001-EI, and that the responses are true and correct based on his personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this 7th day of May, 2021.



[Signature]
Gary P. Dean

[Signature]
Notary Public
State of Florida, at Large

My Commission Expires: 6/28/2023

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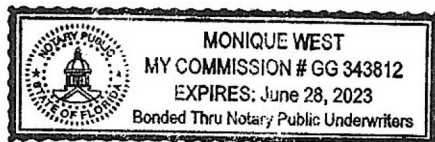
STATE OF FLORIDA

COUNTY OF PINELLAS

I hereby certify that on this 19th day of May, 2021, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared INGLE LEWTER, who is personally known to me, and has acknowledged before me that she provided the answers to interrogatory number 15, of CITIZENS' THIRD SET OF INTERROGATORIES TO DUKE ENERGY FLORIDA, LLC (NOS. 11-18) in Docket No. 20210001-EI, and that the responses are true and correct based on her personal knowledge.

THE FOREGOING INSTRUMENT was sworn to and subscribed before me by means of
☐ physical presence or ☒ online (video) notarization by Ingle Lewter, who is personally known to me.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this 19th day of May, 2021.



Ingle Lewter
Ingle Lewter
[Signature]
Notary Public
State of Florida

My Commission Expires: 6/28/2023

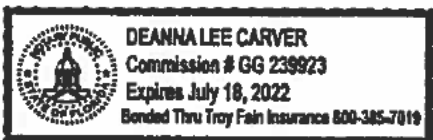
AFFIDAVIT

STATE OF FLORIDA

COUNTY OF PINELLAS

I hereby certify that on this 19th day of MAY, 2021, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared JEFFREY SWARTZ, who is personally known to me, and has acknowledged before me that he provided the answers to interrogatory numbers 11, 14, and 18, of CITIZENS' THIRD SET OF INTERROGATORIES TO DUKE ENERGY FLORIDA, LLC (NOS. 11-18) in Docket No. 20210001-EI, and that the responses are true and correct based on his personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this 19th day of May, 2021.



Jeffrey Swartz
Jeffrey Swartz

Deanna Lee Carver
Notary Public
State of Florida, at Large

My Commission Expires: July 18, 2022