

DEF's Response to OPC's Fourth Set of
Interrogatories, Nos. 19-32.

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: September 20, 2021

**DUKE ENERGY FLORIDA, LLC'S RESPONSE TO
CITIZENS' FOURTH SET OF INTERROGATORIES (NOS. 19-32)**

Duke Energy Florida, LLC ("DEF") responds to the Citizens of the State of Florida, through the Office of Public Counsel's ("Citizens" or "OPC") Fourth Set of Interrogatories to DEF (Nos. 19-32) as follows:

INTERROGATORIES

Please reference the July 28, 2021 GPIF Actual Unit Performance Data schedules for June 2021 in responding to interrogatories 19-25:

19. Describe in detail the nature of the planned outages for general gas turbine unit inspections and inspection at Hines Power Block 3 which began on February 13, 2021, occurring in units HEP 3A, HEP 3B, and HEP ST3 respectively.

Response

DEF restates and incorporates its objection to this interrogatory submitted on August 24, 2021.

20. Identify any deficiencies or needed repairs found during the inspections described in Interrogatory 19.

Response

DEF restates and incorporates its objection to this interrogatory submitted on August 24, 2021.

21. Describe the corrective actions necessary, if any, to remedy the deficiencies or needed repairs identified in Interrogatory 20.

Response

DEF restates and incorporates its objection to this interrogatory submitted on August 24, 2021.

22. On page 1 of 14 (Bartow CC), please state if the EAF % of 74.93 for the month of June 2021 is attributable fully or in part to the two Full Forced Outage (FFO) events with hours totaling 1,997.98 and 1,437.08 for 185 MW and 187 MW, respectively, beginning on January 11 and May 2, 2021 respectively, as shown on page 8 of 14.

Response

Bartow CC's EAF of 74.93% in June 2021 is partly attributed to the Full Forced Outage (FFO) occurring on May 2, for 1,437.08 hours and 187 MW. The FFO occurring on January 11, for 1,997.98 hours did not affect the unit's EAF performance in June.

23. If the answer to Interrogatory No. 22 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

Bartow CC's EAF of 74.93% in June 2021 is also partly attributed to a Planned Outage on the 4D unit that began on June 18th. DEF does not calculate replacement power costs for planned outages.

The replacement power cost for Bartow during the month of June 2021 (excluding the Planned Outage that began on June 18th), is approximately \$1.9 million. To calculate the replacement power cost assuming Bartow CC had not experienced other outage events, DEF ran a production cost simulation model beginning June 1, 2021 through June 30, 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, with the exception of the Planned Outage on 4D. DEF then compared the resulting "with Bartow CC" system cost to the system cost calculated based on actual unit loadings (i.e., without Bartow 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 outages.

Please see DEF's response to OPC's Third Request for Production of Documents, question 11.

24. 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. 23.

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 included the replacement power costs identified in DEF's response to OPC's Interrogatory No. 23 in its 2021 Actual/Estimated true-up calculation and plans to seek recovery of those costs in its 2022 fuel factors.

25. 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 June 2021.

Response

DEF restates and incorporates its objection to this interrogatory submitted on August 24, 2021. Subject to and without waiving its objection to this interrogatory, DEF does not have any documents responsive to this request at this time.

Please reference the June 28, 2021 GPIF Actual Unit Performance Data schedules for May 2021 in responding to interrogatories 26-32:

26. On page 1 of 14 (Bartow CC), please state if the EAF % of 78.63 for the month of May 2021 is attributable fully or in part to the six Full Forced Outage (FFO) and one Partial Forced Outage (PFO) events with hours totaling 5.38, 61.48, 10.02, 113.42, 15.25, 2.00 and 717.08 for 183 MW, 183 MW, 183 MW, 183 MW, 183 MW, 186 MW and 13 MW respectively, beginning on dates May 1, 1, 4, 5, 9, 29 and 2, 2021 respectively as shown on page 8 of 14.

Response

Bartow CC's EAF of 78.63% in May 2021 is partly attributed to the six Full Forced Outages (FFO) occurring on May 1, 4, 5, 9, 29, and one Partial Forced Outage (PFO) occurring on May 2.

27. If the answer to Interrogatory No. 26 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 this outage, during the month of May 2021, is approximately \$2.2 million. To calculate the replacement power cost assuming Bartow CC had not experienced the outage, DEF ran a production cost simulation model beginning May 1, 2021 through May 31, 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 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 DEF's response to OPC's Third Request for Production of Documents, question 13.

28. 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. 27.

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 included the replacement power costs identified in DEF's response to OPC's Interrogatory No. 27 in its 2021 Actual/Estimated true-up calculation and plans to seek recovery of those costs in its 2022 fuel factors.

29. 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 May 2021.

Response

DEF restates and incorporates its objection to this interrogatory submitted on August 24, 2021. Subject to and without waiving its objection to this interrogatory, please see DEF's response to OPC's Third Request for Production of Documents, question 14.

30. Describe in detail the nature of the planned outages for general gas turbine unit inspections at Hines Power Block 1 which began on April 10, 2021, occurring in units HEP 1A, HEP 1B, and HEP ST1 respectively.

Response

DEF restates and incorporates its objection to this interrogatory submitted on August 24, 2021.

31. Identify any deficiencies or needed repairs found during the inspections described in Interrogatory 30.

Response

DEF restates and incorporates its objection to this interrogatory submitted on August 24, 2021.

32. Describe the corrective actions necessary, if any, to remedy the deficiencies or needed repairs identified in Interrogatory 31.

Response

DEF restates and incorporates its objection to this interrogatory submitted on August 24, 2021.

AFFIDAVIT

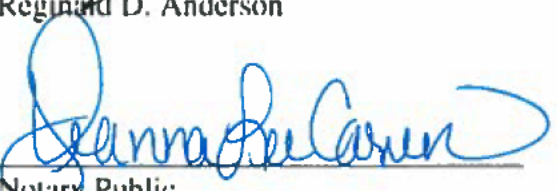
STATE OF FLORIDA

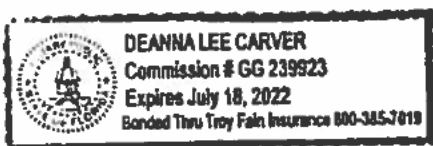
COUNTY OF PINELLAS

I hereby certify that on this 30th day of Aug, 2021, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared REGINALD D. ANDERSON, who is personally known to me, and has acknowledged before me that he provided the answers to interrogatory numbers 19, 20, 21, 22, 25, 26, 29, 30, 31, and 32 of CITIZENS' FOURTH SET OF INTERROGATORIES TO DUKE ENERGY FLORIDA, LLC (NOS. 19-32) 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 30th day of August, 2021.


Reginald D. Anderson


Notary Public
State of Florida, at Large



My Commission Expires July 18, 2022

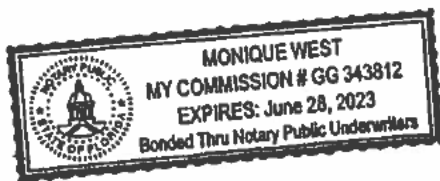
AFFIDAVIT

STATE OF FLORIDA

COUNTY OF PINELLAS

I hereby certify that on this 24th day of August, 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 23, 24, 27, and 28 of CITIZENS' FOURTH SET OF INTERROGATORIES TO DUKE ENERGY FLORIDA, LLC (NOS. 19-32) 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 24th day of August, 2021.



[Signature]
Gary P. Dean

[Signature]
Notary Public
State of Florida, at Large

My Commission Expires: 6/28/2023