

42

DEF's response to Staff's Fourth Set of  
Interrogatories Nos. 7-8

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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In re: Environmental Cost Recovery Clause

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Docket No. 20210007-EI

Dated: October 05, 2021

**DUKE ENERGY FLORIDA, LLC'S RESPONSE TO  
STAFF'S FOURTH SET OF INTERROGATORIES (NOS. 7-9)**

Duke Energy Florida, LLC ("DEF"), responds to Staff's Fourth Set of Interrogatories to DEF (Nos. 7-9), as follows:

**INTERROGATORIES**

7. For the following questions, please refer to DEF witness McDaniel's direct testimony filed on August 27, 2021, page 4, lines 14-17.
- a. Please explain how the \$20,000 estimate (which witness McDaniel stated would support consultations in the event the Florida Department of Environmental Protection requests additional information) was established.

**RESPONSE:**

The \$20k estimate was based on a previous estimate from a consulting firm for similar work at another station. Due to the fact that the NPDES permit is not final and still under review by the Florida Department of Environmental Protection (FDEP) and permit requirements are therefore not yet established, it is unclear whether FDEP will request additional information or studies to supplement the source waterbody data, impingement or entrainment data, and/or any threatened or endangered species provided by DEF.

**Duke Energy Florida, LLC  
Docket No. 20210007-EI  
Staff's Third Set of ROGs  
Interrogatory No. 7(b)**

- b. Please identify the operation and maintenance costs that were incurred in 2021 specific to Crystal River North and the work the costs supported.

**RESPONSE:**

In the August 27, 2021 Filing (2022 Projection), there were no 2021 costs included for the 316(b) projects. This filing represented only the 2022 projected costs, which did not anticipate any 2021 costs being carried over. However, as reflected in DEF's 2021 Actual/Estimated Filing, on July 30, 2021, there are no 2021 O&M costs specific to the Crystal River North 316(b) project.

**Duke Energy Florida, LLC  
Docket No. 20210007-EI  
Staff's Third Set of ROGs  
Interrogatory No. 8**

8. Please refer to DEF witness McDaniel's direct testimony filed on August 27, 2021, page 7, lines 9-14. Please explain if the \$75,000 projected for Project 8 - Arsenic Groundwater Standard Program will be solely for the continued implementation of the Natural Attenuation Monitoring Plan.

a. If not, please list the other activities for Project 8 that the \$75,000 will support.

**RESPONSE:**

As stated in Ms. McDaniel's August 27, 2021, testimony filed in Docket No. 20210007-EI, the \$74k O&M expenditures projected for 2022 are associated with post-remediation, groundwater monitoring, implementation of a deed restriction and restrictive covenant for the affected area, final analysis and reporting of results to the agency, and monitoring well abandonment. Implementation of the Natural Attenuation Monitoring Plan is a portion of the post-remediation, groundwater monitoring.

9. Please refer to the July 2021 Solar Report filed on August 30, 2021, Document No. 09827-2021 for the following question. Please explain in detail the unusually low performance of the Lake Placid solar project for the month of July 2021.

**RESPONSE:**

DEF's Lake Placid Solar Power Plant is in a planned outage. The outage work scope includes coupling an advanced 17.275 MW / 34 MWh lithium-ion battery to the existing 45 MW solar photovoltaic facility.

This pilot project is described in DEF's 2021 Ten-Year Site Plan starting on pages 3 through 50 and shown in Table 3.3 on pages 3 through 51. This project is piloting how solar energy may be dispatched by the DEF grid operators. It is testing the technology's energy capture and peak load shaving capability. The outage is expected to continue into early 2022.