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**DEF's Responses to Staff's Fourth Set of
Interrogatories, Nos. 10-12.**

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and purchased power cost recovery
clause with generating performance incentive
factor

Docket No. 20220001-EI

Dated: May 13, 2022

**DUKE ENERGY FLORIDA, LLC'S RESPONSE TO
STAFF'S FOURTH SET OF INTERROGATORIES (NOS. 10-12)**

Duke Energy Florida, LLC ("DEF") responds to the Staff of the Florida Public Service Commission's ("Staff") Fourth Set of Interrogatories to DEF (Nos. 10-12) as follows:

INTERROGATORIES

The following questions are with respect to the Direct Testimony of Duke Energy Florida (DEF or Company) witness Gary P. Dean, filed with *DEF's Petition for Approval of Fuel Cost Recovery and Capacity Cost Recovery Actual True-Ups for the Period of January 2021 through December 2021* (Petition).¹

10. Please refer to witness Dean's testimony, page 6, lines 4-17 for the following questions.
- a. In which month or months were the replacement power costs incurred with respect to the outages of Plant Crystal River Unit No. 4 (CR4) as contemplated by Order No. PSC-2021-0466-FOF-EI?²
 - b. In what month did DEF record the refund to its customers associated with CR4's replacement power cost as contemplated by Order No. PSC-2021-0466-FOF-EI?

¹Document No. 02229-2022, filed April 1, 2022.

²Order No. PSC-2021-0466-FOF-EI, Issued December 21, 2021, in Docket No. 20210001-EI, *In re: Fuel and purchased power cost recovery clause with generating performance incentive factor*.

- c. Does the CR4-related replacement power cost refund of \$7,207,280 (retail) include interest?
- d. If the approximate dates identified in responses a. and b. are different, please explain why the Company did not record the refund in the same timeframe of when replacement power costs were incurred.

Response:

- a. The replacement power costs were incurred during the January 2021 – April 2021 period.
 - b. DEF recorded the refund in November 2021.
 - c. As per Order No. PSC-2021-0466-FOF-EI in Docket No. 20210001-EI, the Commission Ordered that the replacement power costs for the Crystal River Unit No. 4 outage shall be credited to DEF's retail ratepayers in the amount of \$7.2 million through its 2021 True-Up filing. Consistent with the Order the refund does not include interest. As the refund is flowed through rates, the remaining balance accrues interest until fully refunded.
 - d. DEF believed that its actions leading up to the CR4 outage were prudent and reasonable and requested recovery of the replacement power costs associated with the CR4 outage, and therefore booked the refund based on the Commission's order.
11. Are there any costs/credits associated with DEF's Clean Energy Connection contained in the Petition?³ If so, please identify the total amount of bill credits for 2021.

Response:

There are no CEC bill credits for 2021. Please see the response to Staff Interrogatory 3-9 filed in Docket No. 20220001-EI.

³Order No. PSC-2021-0059-S-EI, Issued January 26, 2021, in Docket No. 20200176-EI, *In re: Petition for a limited proceeding to approve clean energy connection program and tariff and stipulation, by Duke Energy Florida, LLC.*

12. Please provide a workpaper showing the complete derivation of the adjustment related to the Florida Power Development, LLC in the amount of \$13.13 million (retail).⁴

Response:

Please see the attached document bearing bates numbers 20220007-DEF-002424 and 20220007-DEF-002425. The Excel version is also being provided.

⁴Order No. PSC-2018-0240-PAA-EQ, Issued May 8, 2018, in Docket No. 20170274-EQ, *In re: Petition for approval to terminate qualifying facility power purchase agreement with Florida Power Development, LLC, by Duke Energy Florida, LLC.*

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DEF's Response to Staff's Rog 4 (10-12)

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Florida Power Development - Amortization Schedule

Jul 2018 - Dec 2021

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WACC	
Jul 18 - Dec 18	0.68308513%
Jan 19 - Jun 19	0.64823248%
Jul 19 - Jun 20	0.63937238%
Jul 20 - Dec-20	0.63846026%
Jan 21 - Feb 21	0.66200000%
Mar 21 - Dec 21	0.65000000%
Update Feb-2022	0.64800000%

	Beginning Balance (System)	Jurisdictional Factor	Beginning Balance (Retail)	Monthly Amortization	Return	Return TU	Recovered in Fuel	Ending Balance	Current	Long-Term	Current Months	Long-Term Months
Jul-18	\$ 105,000,000	99.31%	\$ 104,275,500	\$ 545,945	\$ 710,426		\$ 1,256,371	\$ 103,729,555	\$ 6,551,340	\$ 97,178,215	12	178
Aug-18			\$ 103,729,555	\$ 545,945	\$ 706,697		\$ 1,252,642	\$ 103,183,610	\$ 6,551,340	\$ 96,632,270	12	177
Sep-18			\$ 103,183,610	\$ 545,945	\$ 702,967		\$ 1,248,912	\$ 102,637,665	\$ 6,551,340	\$ 96,086,325	12	176
Oct-18			\$ 102,637,665	\$ 545,945	\$ 699,238		\$ 1,245,183	\$ 102,091,720	\$ 6,551,340	\$ 95,540,380	12	175
Nov-18			\$ 102,091,720	\$ 545,945	\$ 695,509		\$ 1,241,454	\$ 101,545,775	\$ 6,551,340	\$ 94,994,435	12	174
Dec-18			\$ 101,545,775	\$ 545,945	\$ 691,779		\$ 1,237,724	\$ 100,999,830	\$ 6,551,340	\$ 94,448,490	12	173
Jan-19			\$ 100,999,830	\$ 545,945	\$ 652,944		\$ 1,198,889	\$ 100,453,885	\$ 6,551,340	\$ 93,902,545	12	172
Feb-19			\$ 100,453,885	\$ 545,945	\$ 649,405		\$ 1,195,350	\$ 99,907,940	\$ 6,551,340	\$ 93,356,600	12	171
Mar-19			\$ 99,907,940	\$ 545,945	\$ 645,866		\$ 1,191,811	\$ 99,361,995	\$ 6,551,340	\$ 92,810,655	12	170
Apr-19			\$ 99,361,995	\$ 545,945	\$ 642,327		\$ 1,188,272	\$ 98,816,050	\$ 6,551,340	\$ 92,264,710	12	169
May-19			\$ 98,816,050	\$ 545,945	\$ 638,788		\$ 1,184,733	\$ 98,270,105	\$ 6,551,340	\$ 91,718,765	12	168
Jun-19			\$ 98,270,105	\$ 545,945	\$ 635,249		\$ 1,181,194	\$ 97,724,160	\$ 6,551,340	\$ 91,172,820	12	167
Jul-19			\$ 97,724,160	\$ 545,945	\$ 623,076		\$ 1,169,021	\$ 97,178,215	\$ 6,551,340	\$ 90,626,875	12	166
Aug-19			\$ 97,178,215	\$ 545,945	\$ 619,585		\$ 1,165,530	\$ 96,632,270	\$ 6,551,340	\$ 90,080,930	12	165
Sep-19			\$ 96,632,270	\$ 545,945	\$ 616,095		\$ 1,162,040	\$ 96,086,325	\$ 6,551,340	\$ 89,534,985	12	164
Oct-19			\$ 96,086,325	\$ 545,945	\$ 612,604		\$ 1,158,549	\$ 95,540,380	\$ 6,551,340	\$ 88,989,040	12	163
Nov-19			\$ 95,540,380	\$ 545,945	\$ 609,113		\$ 1,155,059	\$ 94,994,435	\$ 6,551,340	\$ 88,443,095	12	162
Dec-19			\$ 94,994,435	\$ 545,945	\$ 605,623		\$ 1,151,568	\$ 94,448,490	\$ 6,551,340	\$ 87,897,150	12	161
Jan-20			\$ 94,448,490	\$ 545,945	\$ 602,132		\$ 1,148,077	\$ 93,902,545	\$ 6,551,340	\$ 87,351,205	12	160
Feb-20			\$ 93,902,545	\$ 545,945	\$ 598,642		\$ 1,144,587	\$ 93,356,599	\$ 6,551,340	\$ 86,805,259	12	159
Mar-20			\$ 93,356,599	\$ 545,945	\$ 595,151		\$ 1,141,096	\$ 92,810,654	\$ 6,551,340	\$ 86,259,314	12	158
Apr-20			\$ 92,810,654	\$ 545,945	\$ 591,660		\$ 1,137,605	\$ 92,264,709	\$ 6,551,340	\$ 85,713,369	12	157
May-20			\$ 92,264,709	\$ 545,945	\$ 588,170		\$ 1,134,115	\$ 91,718,764	\$ 6,551,340	\$ 85,167,424	12	156
Jun-20			\$ 91,718,764	\$ 545,945	\$ 584,679		\$ 1,130,624	\$ 91,172,819	\$ 6,551,340	\$ 84,621,479	12	155
Jul-20			\$ 91,172,819	\$ 545,945	\$ 580,359		\$ 1,126,304	\$ 90,626,874	\$ 6,551,340	\$ 84,075,534	12	154
Aug-20			\$ 90,626,874	\$ 545,945	\$ 576,874		\$ 1,122,819	\$ 90,080,929	\$ 6,551,340	\$ 83,529,589	12	153
Sep-20			\$ 90,080,929	\$ 545,945	\$ 573,388		\$ 1,119,333	\$ 89,534,984	\$ 6,551,340	\$ 82,983,644	12	152
Oct-20			\$ 89,534,984	\$ 545,945	\$ 569,902		\$ 1,115,848	\$ 88,989,039	\$ 6,551,340	\$ 82,437,699	12	151
Nov-20			\$ 88,989,039	\$ 545,945	\$ 566,417		\$ 1,112,362	\$ 88,443,094	\$ 6,551,340	\$ 81,891,754	12	150
Dec-20			\$ 88,443,094	\$ 545,945	\$ 562,931		\$ 1,108,876	\$ 87,897,149	\$ 6,551,340	\$ 81,345,809	12	149
Jan-21			\$ 87,897,149	\$ 545,945	\$ 580,072		\$ 1,126,017	\$ 87,351,204	\$ 6,551,340	\$ 80,799,864	12	148
Feb-21			\$ 87,351,204	\$ 545,945	\$ 576,458		\$ 1,122,403	\$ 86,805,259	\$ 6,551,340	\$ 80,253,919	12	147
Mar-21			\$ 86,805,259	\$ 545,945	\$ 562,460	\$ (20,964)	\$ 1,087,441	\$ 86,259,314	\$ 6,551,340	\$ 79,707,974	12	146
Apr-21			\$ 86,259,314	\$ 545,945	\$ 558,911		\$ 1,104,856	\$ 85,713,369	\$ 6,551,340	\$ 79,162,029	12	145
May-21			\$ 85,713,369	\$ 545,945	\$ 555,363		\$ 1,101,308	\$ 85,167,424	\$ 6,551,340	\$ 78,616,084	12	144
Jun-21			\$ 85,167,424	\$ 545,945	\$ 551,814		\$ 1,097,759	\$ 84,621,479	\$ 6,551,340	\$ 78,070,139	12	143
Jul-21			\$ 84,621,479	\$ 545,945	\$ 548,265		\$ 1,094,210	\$ 84,075,534	\$ 6,551,340	\$ 77,524,194	12	142
Aug-21			\$ 84,075,534	\$ 545,945	\$ 544,717		\$ 1,090,662	\$ 83,529,589	\$ 6,551,340	\$ 76,978,249	12	141
Sep-21			\$ 83,529,589	\$ 545,945	\$ 541,168		\$ 1,087,113	\$ 82,983,644	\$ 6,551,340	\$ 76,432,304	12	140
Oct-21			\$ 82,983,644	\$ 545,945	\$ 537,619		\$ 1,083,564	\$ 82,437,699	\$ 6,551,340	\$ 75,886,359	12	139
Nov-21			\$ 82,437,699	\$ 545,945	\$ 534,071		\$ 1,080,016	\$ 81,891,754	\$ 6,551,340	\$ 75,340,414	12	138
Dec-21			\$ 81,891,754	\$ 545,945	\$ 530,522	\$ (20,309)	\$ 1,056,158	\$ 81,345,809	\$ 6,551,340	\$ 74,794,469	12	137

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	System Amount	Jurisdictional Splt	Retail Amt Recovered in FAC	Retail Difference vs Page 1 Retail
Jan-21	1,126,017	100.00%	1,126,017	0
Feb-21	1,128,497	99.46%	1,122,403	0
Mar-21	1,088,094	99.94%	1,087,441	0
Apr-21	1,105,298	99.96%	1,104,856	0
May-21	1,101,969	99.94%	1,101,308	0
Jun-21	1,103,497	99.48%	1,097,759	0
Jul-21	1,108,397	98.72%	1,094,210	0
Aug-21	1,118,513	97.51%	1,090,662	0
Sep-21	1,097,872	99.02%	1,087,113	0
Oct-21	1,083,781	99.98%	1,083,564	0
Nov-21	1,081,097	99.90%	1,080,016	0
Dec-21	1,056,369	99.98%	1,056,158	0
TOTAL	<u>\$ 13,199,402</u>		<u>\$ 13,131,507</u>	<u>\$ 0</u>

AFFIDAVIT

STATE OF FLORIDA

COUNTY OF PINELLAS

I hereby certify that on this 6th day of May, 2022, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared **GARY DEAN**, who is personally known to me, and he acknowledged before me that he provided the answers to interrogatory numbers 10, 11, and 12 from STAFF'S FOURTH SET OF INTERROGATORIES TO DUKE ENERGY FLORIDA, LLC DBA DUKE ENERGY (NOS. 10-12) in Docket No(s). 20220001-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 6th day of May, 2022.



Gary Dean
Gary Dean

Monique West
Notary Public
State of Florida, at Large

My Commission Expires:
