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**DEF's Responses to OPC's Fifth Set of
Interrogatories, Nos. 74-77 and
Supplemental Response No. 77.**

**(Including Attachment for Supplemental
No. 77)**

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: June 17, 2022

**DUKE ENERGY FLORIDA, LLC'S RESPONSE TO
CITIZENS' FIFTH SET OF INTERROGATORIES (NOS. 70-77)**

Duke Energy Florida, LLC ("DEF") responds to the Citizens of the State of Florida, through the Office of Public Counsel's ("Citizens" or "OPC") Fifth Set of Interrogatories to DEF (Nos. 70-77) as follows:

INTERROGATORIES

Please reference the April 28, 2022 GPIF Actual Unit Performance Data Report for March 2022 in responding to Interrogatories 70-77:

■ [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

74. On page 7 of 14 (Hines Power Block 4), please state if the EAF % of 62.13 for the month of March 2022 is attributable fully or in part to the one Full Forced Outage (FFO) and one (PFO) event with hours totaling 728.40 and 728.40, for 171 MW and 84 MW, respectively, beginning on March 1, 2022, as shown on page 14 of 14.

Response:

The Hines Power Plock 4 EAF of 62.13% for the month of March 2022 is fully attributed to the Full Forced Outage (FFO) and PFO events beginning on March 1.

75. If the answer to Interrogatory No. 74 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 system and retail replacement power costs for this outage(Hines Power Block 4), during the month of March 2022, is approximately \$1.1 million (system and retail).

Replacement power costs associated with planned outages, if applicable, are not included in the calculations as DEF does not calculate replacement power costs for planned outages. To calculate the replacement power cost assuming Hines PB4 had not experienced the outage, DEF ran a production cost simulation model beginning March 1, 2022 through March 31, 2022; 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 Hines PB4 was fully available. DEF then compared the resulting "with Hines PB4" system cost to the system cost calculated based on actual unit loadings (i.e., without Hines PB4). The difference between the "with Hines PB4" cost and the "without Hines PB4" cost represents the system replacement power costs during the Hines PB4 Outage.

Please see DEF's documents and response to OPC's Fifth Request for Production of Documents, question 42.

76. 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 75.

Response:

These replacement power costs were not included in the 2022 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 Interrogatory No. 75 in its 2022 Actual/Estimated true-up calculation and seek recovery of those costs in its 2023 fuel factors.

77. 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 Hines Power Block 4 in March 2022.

Response:

Upon unit being forced offline there are two documents pertaining to the event and are summarized here.

1. GE the original manufacturer was called immediately, and they prepared "ER-20220301-1057 HINES174.

2. Duke Energy Engineering Services then performed borescope inspection completed on 3/3/22 and report issued on 3/4/22 entitled “298388 Hines 4B Borescope Outbrief 030422.pdf”.
3. The failed components were subsequently removed and sent to an internal root cause investigation team. The investigation is ongoing A timeline as of 6.3.2022, is provided in DEF’s Response to OPC Request number 43.

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: October 20, 2022

**DUKE ENERGY FLORIDA, LLC'S SUPPLEMENTAL RESPONSE TO
CITIZENS' FIFTH SET OF INTERROGATORIES (NOS. 70-77)**

Duke Energy Florida, LLC ("DEF") supplements its response to the Citizens of the State of Florida, through the Office of Public Counsel's ("Citizens" or "OPC") Fifth Set of Interrogatories to DEF (Nos. 70-77), specifically question 77, as follows:

INTERROGATORIES

Please reference the April 28, 2022 GPIF Actual Unit Performance Data Report for March 2022 in responding to Interrogatories 70-77:

77. 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 Hines Power Block 4 in March 2022.

Response:

Please see the attached documents bearing bates numbers 20220001-DEF-002580 through 20220001-DEF-002615.

The documents are confidential, a redacted version has been provided. An unredacted copy has been filed with the Florida Public Service Commission along with DEF's Notice of Intent to Request for Confidential Classification dated October 20, 2022.

Duke Energy Florida
Docket No. 20220001
DEF's Supplemental Response to OPC's ROG 5 (70-77)
Q77

Documents bearing
Bates Numbers 20220001-DEF-002580
through 20220001-DEF-002615
are confidential in their entirety

AFFIDAVIT

STATE OF NORTH CAROLINA

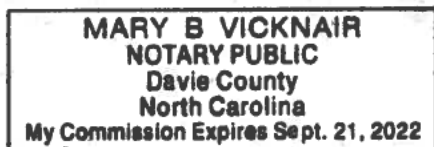
COUNTY OF MECKLENBURG

I hereby certify that on this 16th day of June, 2022,
before me, an officer duly authorized in the State and County aforesaid to take acknowledgments,
personally appeared M. Ingle Jenkins, who is personally known to me, and she acknowledged
before me that she provided the answers to interrogatory numbers 70 and 74 from the
CITIZENS' FIFTH SET OF INTERROGATORIES TO DUKE ENERGY FLORIDA, LLC
COMPANY (NOS. 70-77) in Docket No. 20220001, and that the responses are true and correct based
on her personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid
as of this 16th day of June, 2022.

M. Ingle Jenkins
M. Ingle Jenkins

Mary B Vicknair
Notary Public
State of North Carolina



My Commission Expires:

09/21/2022

AFFIDAVIT

STATE OF FLORIDA

COUNTY OF PINELLAS

I hereby certify that on this 16th day of June, 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 71, 72, 75 and 76, from the CITIZENS' FIFTH SET OF INTERROGATORIES TO DUKE ENERGY FLORIDA, LLC COMPANY (NOS. 70-77) in Docket No. 20220001, 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 16th day of June, 2022.





Gary Dean



Notary Public
State of Florida, at Large My Commission

Expires:

AFFIDAVIT

STATE OF FLORIDA

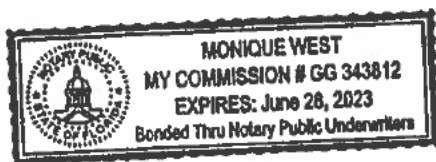
COUNTY OF PINELLAS


I hereby certify that on this 16th day of June, 2022,

before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared ANTHONY SALVAREZZA, who is personally known to me, and he acknowledged before me that he provided the answers to interrogatory number 77, from the CITIZENS' FIFTH SET OF INTERROGATORIES TO DUKE ENERGY FLORIDA, LLC (NOS. 70-77) in Docket No. 20220001, and that the responses are true and correct based on his/her personal knowledge.

THE FOREGOING INSTRUMENT was sworn to and subscribed before me by means of
☐ physical presence or ☒ online (video) notarization by ANTHONY SALVAREZZA, 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 16th day of June, 2022.




Anthony Salvarezza


Notary Public
State of Florida, at Large

My Commission Expires:
