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DEF's Response to OPC's First
Production of Documents Nos. 1-2, 6-13,
15-28

**(Nos. 1, 6, 9-13, 15, 17-22, and 24-28
have attachments)**

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of Storm Protection Plan
pursuant to Rule 25-6.030, F.A.C., Duke
Energy Florida, LLC.

DOCKET NO. 20220050-EI

Served: April 14, 2022

**DUKE ENERGY FLORIDA, LLC'S RESPONSE TO CITIZENS'
FIRST REQUEST TO PRODUCE DOCUMENTS (NOS. 1-28)**

Duke Energy Florida, LLC ("DEF"), responds to the Citizens of the State of Florida, through the Office of Public Counsel's ("Citizens" or "OPC") First Request to Produce Documents (Nos. 1-28), as follows:

DOCUMENTS REQUESTED

1. Please provide all analyses and source documents prepared in support of the Company's application, testimony, and expert reports in this proceeding before or contemporaneous with its filing, including all Excel workbooks in live format with all formulas intact in searchable and unlocked format.

Response:

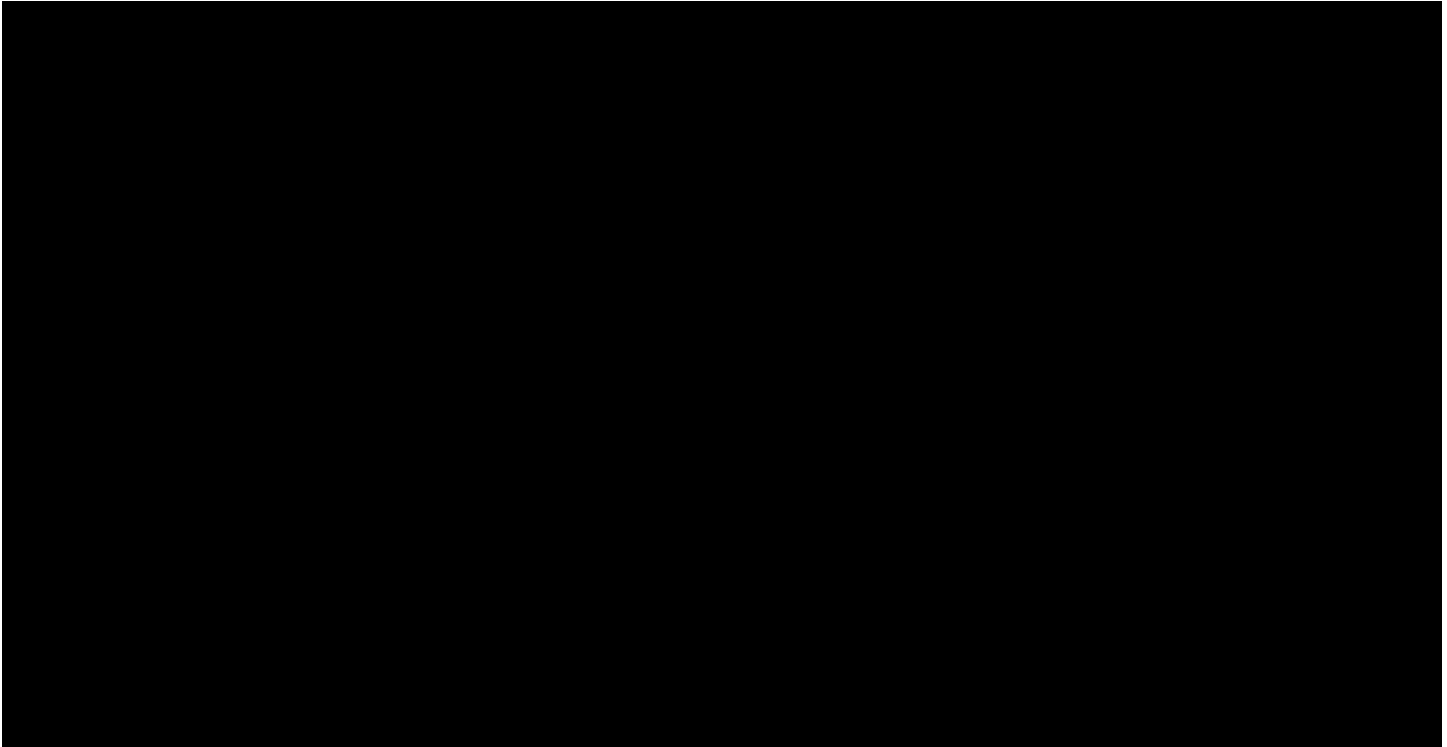
DEF restates and incorporates its objection to this interrogatory submitted on April 13, 2022. Subject to and without waiving its objection to this interrogatory, please see the attached documents bearing bates numbers 20220050-DEF-000001 through 20220050-DEF-000024.

2. Please provide all analyses and underlying support for all schedules, exhibits, tables, and graphs included in and/or attached to the Company's testimonies and expert reports in this proceeding prepared before or contemporaneous with its filing, including all Excel workbooks in live format with all formulas intact in searchable and unlocked format.

Response:

DEF restates and incorporates its objection to this interrogatory submitted on April 13, 2022.

Subject to and without waiving its objection to this interrogatory, please see documents provided in response to OPC POD 1-01.



6. Provide all documents identified in or related to your response to ROG 4.

Response:

Please see Exhibit No. BML-2 to the direct testimony of Brian Lloyd, filed on April 11, 2022 in Docket 20220050 as well as attached database reports for SOG and TUG described benefits. Please see the attached documents bearing bates numbers 20220050-DEF-000025 through 20220050-DEF-000026.

7. Provide any and all studies, memos, reports, and presentations related to DEF's study of the performance of the extreme wind standard at each site.

Response:

DEF Transmission does not conduct studies of performance of the extreme wind standards at individual sites. DEF Distribution does not conduct studies of performance of the extreme wind standards at individual sites.

8. Provide any and all studies, memos, reports, and presentations which address DEF testing of:

- a. Stainless steel equipment
- b. Submersible connectors
- c. Raised mounting boxes
- d. Cold shrink sealing tubes, and
- e. Submersible secondary blocks.

Response:

Duke Energy does not have any internal studies, memos, reports or presentations related to these topics.

9. Provide all documents identified in or related to your response to ROG 10.

Response:

Please see the attached document bearing bates number 20220050-DEF-000027.

10. Provide all documents identified in or related to your response to ROG 11.

Response:

Please see the attached documents bearing bates numbers 20220050-DEF-000028 through 20220050-DEF-000053.

11. Provide all documents identified in or related to your response to ROG 17.

Response:

Please see Section 5 of the provided DEF Distribution Standards Manual documents bearing bates numbers 20220050-DEF-000054 through 20220050-DEF-000091.

12. Provide all documents identified in or related to your response to ROG 19.

Response:

Please see the attached documents, bearing bates numbers 20220050-DEF-000092 through 20220050-DEF-000108:

- 2020 transformer retrofit
- 2021 transformer retrofit
- 2022 transformer retrofit

13. Provide all documents identified in or related to your response to ROG 21.

Response:

Please see the attached documents bearing bates numbers 20220050-DEF-000109 through 20220050-DEF-000120.

15. Provide a copy of DEF's current storm surge standards.

Response:

Transmission:

Transmission's storm surge standard approach follows a 3-fold process. The process is delineated below:

1. Pre-Landfall: Storm Planning & Communication, includes Rainfall/Storm Surge mitigation and notifications.
2. Preparations: Material/Equipment preparation and Resource Planning with engagement from our meteorology department.
3. Post Storm Evaluation: Flood Equipment Prioritization List

This standard approach is in the attached document, GLDP-EMG-TRM-00028 "Transmission System Storm Operation Plan (TSSOP) Planning Section" located in Section 5 of the documents, bearing bates numbers 20220050-DEF-000121 through 20220050-DEF-000146.

Distribution:

See Section 33 of the DEF Distribution Standards bearing bates numbers 20220050-DEF-000147 through 20220050-DEF-000149.

16. Provide a copy of the current Transmission Line Engineering Design Philosophy.

Response:

Transmission Line Engineering Design Philosophy is provided on page 3 of Attachment B "2019 – 2021 Storm Hardening Plan" located in the 2020 Storm Protection Plan Annual Status Report filed on June 1st, 2021. (available at [2020 Duke Energy Florida, Inc. SPP Annual Status Report.pdf \(state.fl.us\)](#)).

17. Provide inspection reports for any concrete or steel pole which failed inspection.

Response:

DEF restates and incorporates its objection to this interrogatory submitted on April 13, 2022. Subject to and without waiving its objection to this interrogatory, 2020 Transmission concrete and steel inspection reports are available in Attachment M "Florida Pole Inspection Data" of the 2020 DEF Annual Service Reliability Report filed on March 1st, 2021, bearing bates numbers 20220050-DEF-003134 through 20220050-DEF-004872.

2021 Transmission concrete and steel poles that failed inspection are provided in documents bearing bates numbers 20220050-DEF-000150 through 20220050-DEF-003133.

All 2022 transmission pole inspections are scheduled for the second Quarter of 2022. Distribution does not have inspection reports for concrete or steel poles as the Distribution pole inspection program is for wood poles.

18. Provide all documents identified in or related to your response to ROG 25.

Response:

Please see the documents below, bearing bates numbers 20220050-DEF-004873 through 20220050-DEF-004875.

- A. 12- December 2020 Capital Maintain -Pivots
- B. 12- December 2021 Capital Maintain-Integrity_2
- C. 2- February 2022 Capital Maintain

19. Provide all documents identified in or related to your response to ROG 28.

Response:

Please see the attached document bearing bates number 20220050-DEF-004876.

20. Provide all documents identified in or related to your response to ROG 30.

Response:

Please see the attached documents, “Deteriorated Conductor 2020”, “Deteriorated Conductor 2021” and “Deteriorated Conductor 2022” bearing bates numbers 20220050-DEF-004877 through 20220050-DEF-004889.

21. Provide all documents identified in or related to your response to ROG 32.

Response:

Please see the attached documents bearing bates numbers 20220050-DEF-004890.

22. Provide all documents identified in or related to your response to ROG 34.

Response:

Please see attached data pull files “ROG 33 and 34 _ Feeder Ties for SOG 2020_2021_2022” and “Feeder ties 20 and 21” bearing bates numbers 20220050-DEF-004891 through 20220050-DEF-004894.

23. Provide all documents identified in or related to your response to ROG 36.

Response:

DEF's Storm Protection Plan 2023 – 2032 does not have any rebuild projects identified. See 2023-2032 Storm Protection Plan exhibit BML-1 filing for program description.

24. Provide all documents identified in or related to your response to ROG 38.

Response:

See 2020 DEF Storm Protection Plan Annual Status Report filed on June 1st, 2021, for 2020 actual expenditures. (*available at [2020 Duke Energy Florida, Inc. SPP Annual Status Report.pdf \(state.fl.us\)](#)*). See DEF's attached 2021 true-up filing 'Docket No. 20220010-EI' for the 2021 actual expenditures.

See DEF's attached 2022 projection filing 'Docket No.20210010-EI' in Exhibit CAM-2 page 37 of 84 for 2022 projected expenditures, bearing bates numbers 20220050-DEF-004895 through 20220050-DEF-005153.

25. Provide all documents identified in or related to your response to ROG 40.

Response:

Please see the attached documents: "2020 Pole Replacements", "2021 Pole Replacements", "2022 Pole Replacements" bearing bates numbers 20220050-DEF-005154 through 20220050-DEF-005164.

26. Provide all documents identified in or related to your response to ROG 42.

Response:

Please see the attached documents: "2020 Pole Reinforcements", "2021 Pole Reinforcements", "2022 Pole Reinforcements" bearing bates numbers 20220050-DEF-005165 through 20220050-DEF-005167.

27. Provide all documents identified in or related to your response to ROG 43.

Response:

Please see the attached documents below bearing bates numbers 20220050-DEF-005168 through 20220050-DEF-005170, titled:

- 2020 Pole Inspections
- 2021 Pole Inspections
- 2022 Pole Inspections

Additionally, please refer to DEF's previously filed Annual Service Reliability Reports for 2020 and 2021 for pole inspection numbers by year.

28. Provide all documents identified in or related to your response to ROG 44.

Response:

See 2020 DEF Storm Protection Plan Annual Status Report Section V (page 71) for 2020 actual expenditures.

See attachment labeled 'POD-28 - Actuals 2021 - Inspections' for the 2021 actual expenditures, bearing bates numbers 20220050-DEF-005171.

See SPP CRC Filing Docket No.20210010-EI in Exhibit CAM-2 page 23 of 84 for the 2022 projected annual expenditures.

The 2022 transmission pole inspections are scheduled for second Quarter of 2022.