

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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In re: Application for limited proceeding for recovery of incremental storm restoration costs related to Hurricanes Irma and Nate by Duke Energy Florida, LLC

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Docket No. 20170272-EI

Dated: March 13, 2019

**DUKE ENERGY FLORIDA, LLC'S RESPONSE TO  
CITIZENS' FIFTH REQUEST TO PRODUCE DOCUMENTS (NOS. 27-40)**

Duke Energy Florida, LLC ("DEF"), responds to the Citizens of the State of Florida, through the Office of the Public Counsel's ("Citizens" or "OPC") Fifth Request to Produce Documents (Nos. 27-40) as follows:

**PRODUCTION OF DOCUMENTS**

27. Please provide copies of all contracts, agreement, purchase orders, work orders, and all other agreements or documents that show the rates for any embedded vendor's crew that worked for you at any time or in any capacity during 2014, 2015, 2016, 2017, and 2018. The term "embedded vendor" means a vendor providing storm restoration services using distribution line restoration and repair crews, transmission repair, restoration and construction crews, and vegetation management crews, and which vendor also performs similar or additional types of services for you in non-storm-restoration (non-emergency) conditions on a year-round basis.

**Response:**

Subject to and without waiving the foregoing objection, please see DEF's Response to OPC's Third Request for Production of Documents numbers 16 and 17 and DEF's Response to OPC's Eighth Set of Interrogatories number 124.

28. Please provide a copy of all documents that you rely on to support your answers to Interrogatory 119.

**Response:**

Please see documents provided in response to Interrogatory number 124.

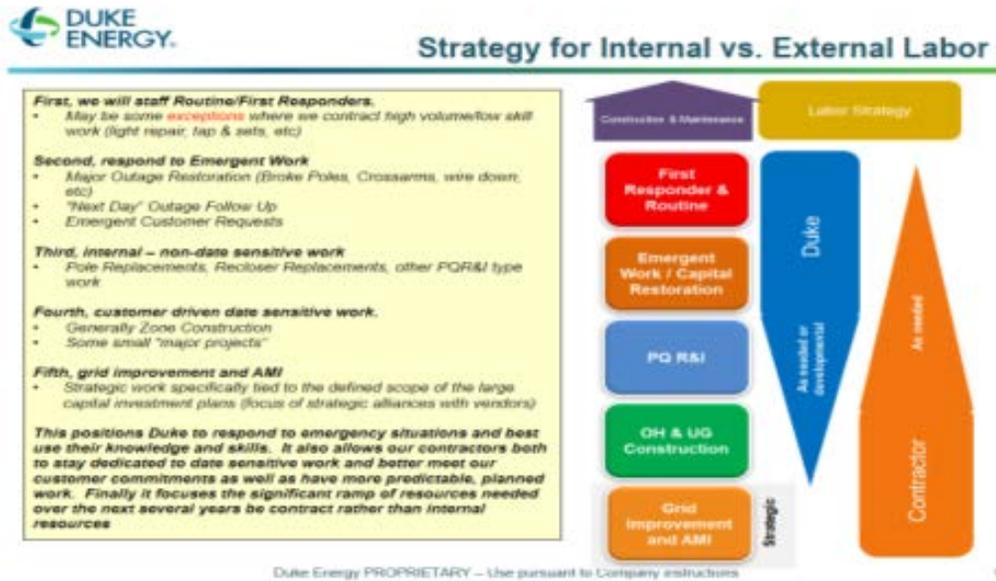
29. Please provide a copy of all documents that you rely on to support your answers to Interrogatory 120.

**Response:**

Please see documents provided in response to Interrogatory number 124.

30. Please provide a copy of all documents that you rely on to support your answers to Interrogatory 121.

**Response:**



Work types (outages, routine customer work, Etc.)	Internal Duke Energy workforce
Capex projects, Grid Investment Plan, Customer Additions, ug, etc.	Strategic Contract Partners (Strategic Alliance) These are the major outsourced labor providers, who will scale workforce and participate in joint planning, training, reporting, etc. Performance-based relationships, long term, stable.  Shared risk and benefit
Specialists (lighting, etc.)	Niche Contractors These suppliers provide niche services that are specialized, ie lighting, locates, ug replacement, traffic control, engineering  Move these contractors to alliances wherever possible
Define scope	Regional Contractors These are gap providers which operate locally and are not needed across 1DF

31. Please provide a copy of all documents that you rely on to support your answers to Interrogatory 122.

**Response:**

DEF does not have any documents responsive to this request.

32. Please provide a copy of all documents that you rely on to support your answers to Interrogatory 123.

**Response:**

DEF does not have any documents responsive to this request.

33. Please provide a copy of all documents that you rely on to support your answers to Interrogatory 124.

**Response:**

Please see documents provided in response to Interrogatory number 124.

34. Please provide a copy of all documents that you rely on to support your answers to Interrogatory 125.

**Response:**

DEF does not have any documents responsive to this request.

35. Please provide a copy of all documents that you rely on to support your answers to Interrogatory 126.

**Response:**

DEF does not have any documents responsive to this request.

36. Please provide a copy of all documents that you rely on to support your answers to Interrogatory 127.

**Response:**

Please see documents provided in response to interrogatory numbers 119, 120 and text response for 121.

37. Please provide a copy of all documents that you rely on to support your answers to Interrogatory 128.

**Response:**

Please see the attached documents bearing bates numbers 20170272-DEF-OPC-POD 5-37-000001 through 20170272-DEF-OPC-POD 5-37-000005.

38. Please provide a copy of all documents that you rely on to support your answers to Interrogatory 129.

**Response:**

Please see documents provided in response to Request for Production number 37.

39. Please provide a copy of all documents that you rely on to support your answers to Interrogatory 130.

**Response:**

Please see documents provided in response to Request for Production number 37

40. Please provide a copy of all documents that you rely on to support your answers to Interrogatory 131.

**Response:**

Please see documents provided in response to Request for Production number 37

Respectfully submitted,

*/s/ Matthew R. Bernier*

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DEF Storm Docket no. 20170272  
 Summary of Payroll Dollars in Discovery

Payroll (\$1,000's)	2016		2017		2018
	FF1		FF1		FF1
O&M - Base	208,149	(b)	205,616	(b)	211,598 (f)
O&M - OT	29,645	(b)	29,415	(b)	27,744 (g)
O&M - Other	56,763	(c)	29,160	(c)	45,047 (c)
O&M - Total	<u>294,557</u>	(a)	<u>264,192</u>	(a)	<u>284,389</u>
Capital - Base	132,443		155,660		173,086
Capital - OT	19,247		29,100		25,749
Capital - Other	16,858	(c)	17,264	(c)	18,258 (c)
Capital - Total	<u>168,548</u>	(a)	<u>202,024</u>	(a)	<u>217,093</u>
Total - Base	340,593		361,276		384,684
Total - OT	48,892		58,515		53,493
Total - Other	73,621		46,424		63,305
Total Payroll	<u>463,105</u>	(a)	<u>466,216</u>	(a)	<u>501,482</u>
OT - O&M Total (Incl Storm)	48,892	(g)	58,515	(g)	53,493 (g)
OT - O&M Storm	<u>4,820</u>		<u>13,357</u>		<u>3,277</u>
OT - O&M Total less Storm	<u>44,072</u>	(g)	<u>45,158</u>	(g)	<u>50,216</u> (g)
O&M - Base	208,149	(b)	205,616	(b)	211,598
Capital - Base	132,443		155,660		173,086
Total - Base	340,593		361,276		384,684

- (a) ROG 28 response
- (b) ROG 76 response
- (c) Includes primarily incentives and severance
- (d) ROG 74 response
- (e) ROG 105 response
- (f) ROG 128 response
- (g) ROG 130 response

20170272-DEF-OPC-POD 5-37-000001

DEF Storm Docket no. 20170272

Summary of Payroll Dollars in Discovery

Payroll (\$1,000's)	2016	2017	2018
	FF1	FF1	FF1
Total - Base	340,593	361,276	384,684

20170272-DEF-OPC-POD 5-37-000002

DEF Storm Docket no. 20170272  
Summary of Payroll Dollars in Discovery

Payroll (\$1,000's)	Average 2016-2018
Total - Base	362,184

DEF Storm Docket no. 20170272  
Summary of Payroll Dollars in Discovery

Payroll (\$1,000's)	2016	2017	2018
	FF1	FF1	FF1
OT - O&M (Not Including Storm)	44,072	45,158	50,216
OT - O&M (Storm)	4,820	13,357	3,277
OT - O&M Total (Incl Storm)	48,892	58,515	53,493

DEF Storm Docket no. 20170272  
Summary of Payroll Dollars in Discovery

Payroll (\$1,000's)	Average 2016-2018
O&M - OT	28,935
Capital - OT	24,699
<hr/> Total - OT	<hr/> 53,633