



Dianne M. Triplett
DEPUTY GENERAL COUNSEL

October 13, 2022

VIA ELECTRONIC FILING

Adam J. Teitzman, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: *Duke Energy Florida, LLC's Revised Load Research Sampling Plan; Undocketed*

Dear Mr. Teitzman:

Please find attached Duke Energy Florida, LLC's ("DEF"), response to Staff's Second Data Request (Nos. 1-5) regarding DEF's 2022 Revised Load Research Sampling Plan.

Thank you for your assistance in this matter. Please feel free to call me at (727) 820-4692 should you have any questions concerning this filing.

Respectfully,

s/ Dianne M. Triplett

Dianne M. Triplett

DMT/ts

cc: William McNulty, FPSC
Michael Barrett, FPSC

**DUKE ENERGY FLORIDA, LLC'S RESPONSE TO STAFF'S
SECOND DATA REQUEST (Nos. 1-5) REGARDING DEF'S 2022
REVISED LOAD RESEARCH SAMPLING PLAN**

Please refer to the September 22, 2022 filing (Duke Energy Florida, LLC's Revised Load Research Sample Plan) to answer the following questions.

1. Please explain what precipitated DEF's review of its originally-requested research sampling period filed on July 25, 2022, resulting in its decision to update the requested research sampling period from April 2023-March 2024 to January 2022-December 2022 as reflected in DEF's September 22, 2022 revised Load Research Sample Plan.

Response:

DEF's 2021 Settlement Agreement approved in Order No. 2021-0202-AS-EI is effective through December 2024. Therefore, DEF may file its next rate case as early as March 2024. The requested change in sampling period is being made in preparation for that potential filing because an April 2023-March 2024 Load Research Study (LRS) would not be approved in time for a March 2024 rate case filing. In addition, a January-December 2022 LRS would be more current and more reflective of future load than the last LRS, because the last LRS took place during a period that was heavily influenced by COVID, and it was conducted before DEF made rate design changes pursuant to its 2021 Settlement Agreement. Finally, a January-December 2022 LRS is expected to be more accurate than the last study as it would contain almost full population data utilizing the AMI meters rather than a small sample.

2. DEF's transmittal letter dated September 22, 2022 accompanying the company's Revised Load Research Sampling Plan states, "DEF determined that a different load research sampling period, specifically January 1, 2022 through December 31, 2022, will better reflect DEF's customers' load to support future filings."

- A. Please explain how DEF made this determination, and provide any supporting data and information.

Response:

Please see DEF's response to Question 1.

- B. Please explain how it is possible that an earlier period used to estimate future customer load, as opposed to a later period, is a better reflection of future customer load.

Response:

The earlier period is not necessarily a better or worse reflection of future customer load. The earlier period merely allows the results of the Load Research Study to be used in DEF's next potential rate case filing.

- C. Please identify DEF's expected future Commission filings and associated filing dates that would be impacted by 1. DEF's original implementation dates and 2. DEF's revised implementation dates. Please explain all differences.

Response:

DEF currently expects that its next rate case filing in 2024 (if filed), the clause projections for 2024 to be filed in 2023, and the Asset Securitization true-up filing in December 2023 would be impacted by the January-December 2022 Load Research Study results. Otherwise, those filings would use the April 2020-March 2021 Load Research Study results.

3. Please explain the advantages of using the partially-retroactive study period proposed in the Company's revised Load Research Sample Plan filed on September 22, 2022.

Response:

The requested study period will have the advantage of being approved by the Commission in time to be used in a potential 2024 rate filing. Because the study will use the data that is currently being captured by the AMI, none of the data will be hindered by using a partially-retroactive study period. In fact, all of the data will be historical data when it is captured for January-December 2022.

4. Please explain the disadvantages of using the partially-retroactive study period proposed in the Company's revised Load Research Sample Plan filed on September 22, 2022.

Response:

There are no disadvantages to using the requested study period.

5. On what date (month and year) did the Company first have the capability to implement a load research study, including collection of nearly all interval data as proposed in the Company's revised Load Research Sample Plan filed on September 22, 2022? Please explain your response.

Response:

DEF completed deployment of AMI meters for 1.9 million customers in the spring of 2021. This gives us access to interval data for nearly all customers. Interval data for all AMI meters is being captured and is retained in the company's meter data management system. The infrastructure and analytical platform were put into place in February 2022 to support the methodology proposed in the filed sample plan. Development for the DEF analysis has begun and is scheduled to be completed by February 2023.