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DEPUTY GENERAL COUNSEL

April 2, 2024

VIA ELECTRONIC FILING

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

Re: Docket 20240025-EI, Petition for Rate Increase by Duke Energy Florida, LLC

Dear Mr. Teitzman,

Attached for filing on behalf of Duke Energy Florida, LLC's ("DEF") in the above-referenced docket is the Direct Testimony of Marcia Olivier and Exhibit Nos. MJO-1 through MJO-8.

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.

(Document 19 of 40)

Respectfully,

/s/ Dianne M. Triplett

Dianne M. Triplett

DMT/mw

Attachments

CERTIFICATE OF SERVICE

Docket No. 20240025-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail this 2nd day of April, 2024, to the following:

/s/ Dianne M. Triplett
Dianne M. Triplett

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

**In re: Petition for rate increase by
Duke Energy Florida, LLC**

**DOCKET NO. 20240025-EI
Submitted for filing: April 2, 2024**

DIRECT TESTIMONY

OF

MARCIA J. OLIVIER

On Behalf of Duke Energy Florida, LLC

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1 **I. INTRODUCTION**

2 **Q. Please state your name and business address.**

3 A. My name is Marcia J. Olivier. My business address is 299 1st Avenue North, St. Petersburg,
4 Florida 33701.

5
6 **Q. By whom are you employed, and what is your position?**

7 A. I am employed by Duke Energy Florida, LLC (“DEF” or the “Company”) as the Director
8 of Rates and Regulatory Planning.

9
10 **Q. Please describe your duties and responsibilities in that position.**

11 A. I am responsible for the preparation of jurisdictional separation studies and class cost of
12 service studies, overseeing rate case activities, reporting actual and forecasted earnings
13 surveillance results, and supporting various regulatory filings and initiatives.

14
15 **Q. Please describe your educational background and professional experience.**

16 A. I hold a Bachelor of Science degree in Accounting and a Bachelor of Science degree in
17 Finance from the University of South Florida and have over 25 years of utility experience,
18 primarily in the regulatory area.

19
20 **Q. What is the purpose of your testimony?**

21 A. The purpose of my testimony is to:

- 1) Provide the revenue requirements for each of the three projected test periods, 2025, 2026, and 2027, and explain how they were derived;
- 2) Present the Florida Public Service Commission (“FPSC” or “Commission”) and Company-proposed adjustments to rate base, net operating income, and capital structure;
- 3) Present a jurisdictional separation study for each of the projected test year periods;
- 4) Present six retail allocated class cost of service studies, two for each of the projected test period years, differing only in the weighting of demand and energy responsibilities in the allocator for fixed production capacity costs;
- 5) Explain the derivation of the retail revenue forecast by retail rate class;
- 6) Discuss DEF’s proposal for addressing any changes in tax law that might become effective during the test periods; and
- 7) Discuss DEF’s proposal to true-up changes in solar production tax credits.

Q. Have you prepared any exhibits to your testimony?

A. Yes. I have prepared or supervised the preparation of several exhibits, as follows:

- Exhibit MJO-1: Minimum Filing Requirement (“MFR”) Schedules Sponsored or Co-sponsored by Marcia Olivier;
- Exhibit MJO-2: Depreciation Study Company Adjustment;
- Exhibit MJO-3: Dismantlement Study Company Adjustment;
- Exhibit MJO-4: Electric Vehicle (“EV”) Make Ready Credit Program Company Adjustment;
- Exhibit MJO-5: Clean Energy Connection Cumulative Revenue Requirements;

- 1 • Exhibit MJO-6: Clean Energy Connection Subscription Revenue Company
2 Adjustment;
- 3 • Exhibit MJO-7: Functionalization, Classification, and Allocation of Plant; and
- 4 • Exhibit MJO-8: Delivery Voltage Credit Calculation.

5 These exhibits are true and accurate.

6

7 **Q. Which MFR schedules do you sponsor?**

8 A. I sponsor all or portions of the MFR schedules identified in Exhibit MJO-1. I have reviewed
9 these schedules, and they are true and accurate, subject to being updated during the course
10 of this proceeding. The MFRs include historical data for 2023, budgeted data for 2024, and
11 forecasted data for 2025, 2026, and 2027.

12

13 **Q. Please provide a brief summary of your testimony.**

14 A. DEF is currently operating under the 2021 Settlement Agreement¹ (“2021 Settlement”) which provides for annual base rate increases in January of each year for 2022, 2023, and
15 2024. As the 2021 Settlement is set to expire at the end of 2024, DEF is requesting three
16 test periods in this rate case proceeding: 2025, 2026, and 2027, with incremental revenue
17 requirements of \$593 million, \$98 million, and \$129 million in each year, respectively, for
18 a total increase of \$820 million by 2027. To support this request, we are providing MFRs
19 for each of these years based on our five-year forecast for the years 2023-2027, as further
20 explained in the direct testimony of Company witness Mr. Michael O’Hara. We include
21 both FPSC and Company adjustments to rate base, net operating income, and capital
22

¹ Order No. PSC-2021-0202-AS-EI

1 structure, and we apply jurisdictional separation factors based on projected retail sales (to
2 ultimate customers) and wholesale sales (to other electric utilities or power marketers for
3 resale), as further explained in the direct testimony of Company witness Mr. Benjamin
4 Borsch, for each applicable year using the same allocation methodologies as approved in
5 previous Commission orders.

6 Both the required FPSC and proposed Company adjustments are provided on MFR
7 Schedules B-2 and C-3. The Company adjustments include incorporating the depreciation
8 study results as explained in the direct testimony of Company witness Mr. Ned Allis, the
9 dismantlement study results as explained in the direct testimony of Company witness Mr.
10 Jeffrey Kopp, the EV Make Ready Credit program as explained in the direct testimony of
11 Company witness Mr. Timothy Duff, and the following adjustments explained in my
12 testimony: amortization of the cost-of-removal (“COR”) regulatory asset, capital recovery
13 schedules, and rate case expenses, as well as the expansion of the Clean Energy Connection
14 program. My testimony will also explain that there are several FPSC adjustments that we
15 have been making consistent with past rate case decisions and settlement agreements that
16 we are proposing to stop making in our 2025-2027 test periods, as we believe they no
17 longer apply and/or the costs are appropriate for inclusion in cost of service. They include
18 the cost of the long-term incentive plan (“LTIP”), the supplemental executive retirement
19 plan (“SERP”), 50 percent of the directors’ and officers’ (“D&O”) insurance premiums,
20 Levy county land held for future use, and the parent debt tax adjustment.

21 We have completed a jurisdictional separation study for each of the three test periods, and
22 we have completed six class cost of service studies, two for each test period, differing only
23 in the allocation methodology for production demand costs. We are required by Rule 25-

1 6.043(1)(a), F.A.C. to file the 12 CP & 1/13 AD methodology. However, paragraph 10 in
2 our 2021 Settlement states that we will rely on the 12 CP & 25% AD methodology.
3 Therefore, we request that the Commission approve the 12 CP & 25% AD methodology.
4 As part of these studies, we have also calculated the projected base revenues under current
5 rates and under the assumption that revenues are equal to cost of service. These cost of
6 service studies support the proposed rate design that is further described in the direct
7 testimony of Company witness Mr. Matt Chatelain.

8 Further, both federal and state changes in tax laws have been enacted in recent years,
9 impacting income tax expense, and accumulated deferred income tax. DEF proposes a
10 mechanism to recover or flow back the impact of any changes in tax laws that become
11 effective during the 2025, 2026, or 2027 test years.

12 Finally, DEF has been recognizing the production tax credits under the 2022 Inflation
13 Reduction Act since 2022. However, there is uncertainty in forecasting the amount of
14 credits to be received. To avoid over-recovering and under-recovering these production tax
15 credits, DEF requests a mechanism to true-up the difference between the amount included
16 in base rates and the actual production tax credits received by DEF each year via the
17 Capacity Cost Recovery clause.

18 19 **II. TEST PERIOD REVENUE REQUIREMENTS**

20 **Q. Why is DEF filing three test periods?**

21 A. There was a time when annual increases in sales revenues generally kept up with annual
22 increases in costs and rate base (with the exception of placing large generating units in
23 service), resulting in less frequent rate cases. While the number of customers has increased,
24 the decline in kWh usage per customer has slowed the growth in sales. In addition, there is

1 less of a focus on large new generators and more investments in smaller renewable
2 generation that are spread out over time. There have also been increased investments in
3 transmission and distribution systems to be more resilient and accommodate an
4 increasingly cleaner system. These factors would lead DEF and other utilities to file
5 frequent rate cases. Both of DEFs last two settlements, the 2017 Settlement (term 2018-
6 2021) and the 2021 Settlement (term 2022-2024), have included multiple-year rate
7 increases. Other utilities in Florida have also reached similar multi-year rate agreements.
8 The benefit of setting the rates over three years is greater rate certainty for customers and
9 avoiding the cost of annual litigated rate cases for all parties involved. For these reasons,
10 DEF is requesting approval of three test periods which would allow for a three-year
11 reprieve from filing our next rate case, barring any unforeseen circumstances.

12
13 **Q. What guidance exists for filing multiple test periods?**

14 A. It is not uncommon for a Florida electric utility to file multi-year test period rate cases.
15 Section 25-6.0425, F.A.C. states: “The Commission may in a full revenue requirements
16 proceeding approve incremental adjustments in rates for periods subsequent to the initial
17 period in which new rates will be in effect.” The FPSC last approved a dual test period rate
18 case for DEF in Order No. PSC-1992-1197-FOF-EI. More recently, both Florida Power
19 and Light and Tampa Electric Company filed rate cases in 2021 (Docket Nos. 20210015
20 and 20210034, respectively) with multiple year rate increases.

21
22 **Q. Please explain how DEF’s revenue requirements were calculated.**

1 A. DEF's revenue requirements of \$593 million in 2025, \$98 million in 2026, and \$129
2 million in 2027 were calculated on MFR Schedule A-1 as well as in the jurisdictional
3 separation studies. The jurisdictional separation factors derived on MFR Schedule E-10
4 were applied to the various functional total system per-books costs to arrive at the retail
5 costs. After applying the FPSC and Company adjustments, jurisdictional adjusted rate base
6 calculated on MFR Schedule B-1 was multiplied by the weighted average cost of capital
7 calculated on MFR Schedule D-1a to arrive at DEF's jurisdictional net operating income
8 requested. DEF's jurisdictional net operating income earned was calculated on MFR
9 Schedule C-1. The difference between jurisdictional net operating income requested and
10 jurisdictional net operating income earned equals DEF's revenue requirements. The
11 requested rates of return on rate base calculated on MFR Schedule D-1a include an equity
12 cost rate of 11.15 percent. This cost rate is explained in the direct testimony of Company
13 witness Mr. Adrien McKenzie. Absent the requested rate increase, the earned return on
14 equity ("ROE") would be 6.43 percent in 2025, 5.90 percent in 2026, and 5.15 percent in
15 2027.

16 It is important to note that approximately \$99 million of the 2025 deficiency is driven by
17 the monetization of the award from the Department of Energy ("DOE") in accordance with
18 paragraph 3 of the 2021 Settlement. In that settlement, DEF's annual rate increases from
19 2022 through 2024 assumed amortization of the DOE award of approximately \$74 million
20 in 2023 and \$99 million in 2024, thus reducing the base rate increases by those amounts.
21 All else being equal from 2024 to 2025, DEF would still need to implement a rate increase
22 in 2025 to recover the non-recurring \$99 million from 2024.
23

1 **Q. What are the primary inputs in calculating DEF’s total retail cost of service?**

2 A. The primary inputs to DEF’s retail COS calculation are forecasted retail revenues and costs
3 for each of the test periods. Revenues are compared to costs to calculate a net surplus (if
4 revenues are higher than costs) or deficiency (if costs are higher than revenues). The net
5 surplus or deficiency is grossed-up for the effect of state and federal income taxes and bad
6 debt expense to determine the requested revenue requirement in each test year. Costs
7 include both operating expenses and a return on rate base. Revenues are forecasted for the
8 test period based on the Company’s sales forecast, as further explained in the direct
9 testimony of Company witness Mr. Borsch. System costs and revenues may be adjusted
10 for a variety of reasons, including, but not limited to: Commission-ordered adjustments,
11 costs associated with Company-proposed programs, and updated depreciation,
12 dismantlement, and storm reserve studies. The MFR schedules filed in this proceeding
13 support the detailed cost, revenue, and adjustments used to calculate DEF’s cost of service.

14
15 **III. FPSC AND PROPOSED COMPANY ADJUSTMENTS**

16 **A. Depreciation Study**

17 **Q. Did DEF perform a depreciation study for inclusion in this proceeding?**

18 A. Yes. Pursuant to Rule 25-6.0436, F.A.C., DEF must file a depreciation study at least once
19 every four years. DEF’s last study was filed in January 2021. Therefore, an updated study
20 is required to be filed no later than January 2025. The study performed for and included in
21 this proceeding (“2023 Depreciation Study”) is based on actual plant and reserve balances
22 through December 31, 2022 plus projected additions and retirements in 2023 and 2024 to
23 arrive at projected December 31, 2024 balances. Please refer to the direct testimony of
24 Company witness Mr. Allis for a detailed discussion of the 2023 Depreciation Study

1 process, cost drivers, and results, including Tables 1, 2, and 3, which present proposed
2 depreciation rates by plant account.

3
4 **Q. What is the impact of the 2023 Depreciation Study on depreciation rates?**

5 A. As a result of the 2023 Depreciation Study, the impact to DEF's depreciation rates is a net
6 increase overall. DEF has included the impact of the proposed change in depreciation rates
7 to depreciation expense in each of the three test years, with corresponding adjustments to
8 accumulated depreciation in Exhibit MJO-2.

9
10 **Q. How did the Company calculate its proposed adjustment to depreciation expense and**
11 **accumulated depreciation?**

12 A. DEF performed the following steps, as reflected on Exhibit MJO-2:

- 13 1. Calculated monthly depreciation expense during the test periods (for the months of
14 January 2025 through December 2027) based on current depreciation rates multiplied
15 by monthly base rate-recoverable ending plant balances.
- 16 2. Calculated monthly depreciation expense during the test periods based on proposed
17 depreciation rates multiplied by the monthly base rate-recoverable ending plant
18 balances. Both current and proposed rates are presented in Table 2 of the 2023
19 Depreciation Study.
- 20 3. Calculated the difference in monthly depreciation expense between the results from
21 steps 1 and 2, and sum to annual totals.

1 4. Calculated the difference in monthly accumulated depreciation based on the difference
2 in monthly depreciation expense calculated in step 3, sum the monthly accumulated
3 depreciation differences, and then divide by 13.
4

5 **Q. Why is DEF's proposed adjustment different from the impact in Table 2 of the 2023**
6 **Depreciation Study presented in the direct testimony of Company witness Mr. Allis?**

7 A. DEF's proposed adjustment is different for two reasons. First, the impact in Table 2 is
8 calculated based on the projected total gross plant balances as of December 31, 2024,
9 multiplied by the change in depreciation rates; whereas the depreciation expense
10 adjustment included in the MFRs is based on gross plant balances for each month during
11 the three test periods multiplied by the change in depreciation rates. Second, Table 2
12 includes all plant balances; whereas the depreciation expense adjustments in the MFRs are
13 based only on the plant balances that are recoverable through base rates (i.e., all clause-
14 recoverable depreciation expense impacts have been excluded).
15

16 **Q. Are there any additional considerations associated with the 2023 Depreciation Study?**

17 A. Yes. In paragraph 21.c. of the 2021 Settlement, DEF agreed to delay the start of
18 amortization of the COR regulatory asset, previously authorized for recovery by the
19 Commission² to January 1, 2025. The COR regulatory asset included in this proceeding is
20 \$478 million, amortized over the average remaining service life of all assets, 25.5 years,
21 for \$18.8 million in annual amortization expense. This proposed Company adjustment is
22 titled "COR Reg Asset" in the MFRs.

² Order Nos. PSC-2010-0398-S-EI, PSC-2012-0104-FOF-EI, PSC-2013-0598-FOF-EI, PSC-2017-0451-AS-EU,
and PSC-2021-0202-AS-EI.

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Q. Are you requesting to recover any capital recovery schedules for retired plant balances shown at the bottom of Tables 1 and 2 attached to the 2023 Depreciation Study in Company witness Mr. Allis’ direct testimony?

A. Yes. These tables show a net debit balance of \$17.6 million in accumulated depreciation remaining on our books after retiring and dismantling the plants on that list. The only plant on that list that is not entirely dismantled is Crystal River Units 1 and 2. Therefore, that final remaining balance will be proposed for recovery in a future rate case. We are requesting to move the balances for all of the other plants in that Capital Recovery Schedule section of Table 2 to a regulatory asset and amortize that regulatory asset over five years beginning in January 2025, for annual amortization of approximately \$3.5 million. This amortization is included for recovery as proposed Company adjustment “Capital Recovery Schedule.”

B. Dismantlement Study

Q. Did DEF perform a dismantlement study for inclusion in this proceeding?

A. Yes. Pursuant to Rule 25-6.04364, F.A.C., DEF must file a dismantlement study at least once every four years. Like the 2023 Depreciation Study, DEF’s last dismantlement study was filed in January 2021 (“2021 Dismantlement Study”); therefore, an updated study is required to be filed no later than January 2025. The updated dismantlement study included in this case (“2023 Dismantlement Study”) was performed by Company witness Mr. Jeffrey Kopp and is provided as Exhibit JTK-2 to his testimony. Please refer to the direct testimony of Company witness Mr. Jeffrey Kopp for a detailed discussion of the 2023 Dismantlement Study process, cost drivers, and results.

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Q. Was the current dismantlement accrual established in the 2021 Dismantlement Study?

A. Yes. The current annual dismantlement accrual of approximately \$20.6 million (\$20.0 million retail) was established in the 2021 Dismantlement Study, an increase of approximately \$16.8 million over the prior accrual.³ As a part of the 2021 Settlement, DEF agreed to defer collection of the retail portion (\$14.3 million in 2022 and \$15.0 million in 2023 and 2024) in incremental annual expense over the settlement period (2022-2024) to a regulatory asset to be included in this proceeding. DEF estimates this regulatory asset to be approximately \$47 million as of December 2024. Paragraph 23.c. of the 2021 Settlement provides that DEF shall offset the dismantlement regulatory asset by the \$29 million regulatory liability created by a tax savings surplus under Order No. PSC-2019-0268-PCO-EI. The net of the dismantlement regulatory asset and tax savings regulatory liability of approximately \$19 million is being amortized over five years beginning January 1, 2025, with approximately \$3.8 million annually included in the cost of service as amortization expense.

Q. Please provide the impact on revenue requirements of DEF’s 2023 Dismantlement Study accrual.

A. The 2023 Dismantlement Study projects a total dismantlement cost of \$546.0 million in 2025 dollars, or an annual accrual of \$34.1 million for plants in service as of December 2024. The total dismantlement cost is approximately \$131.5 million higher than the 2021

³ Order No. PSC-2010-0131-FOF-EI

1 Dismantlement Study, and the annual accrual included in this proceeding is an increase of
2 approximately \$14.2 million in 2025, \$17.3 million in 2026, and \$19.3 million in 2027.
3 Please refer to Exhibit MJO-3 “Dismantlement Study Company Adjustment” for the
4 calculation of the adjustment to depreciation expense and the depreciation reserve.
5

6 **C. Storm Reserve Study**

7 **Q. Did DEF perform a Storm Reserve Study for inclusion in this proceeding?**

8 A. No. Pursuant to Rule 25-6.0143(1)(I), F.A.C., DEF must file a Storm Damage Self-
9 Insurance Reserve Study (“Storm Reserve Study”) at least once every five years. DEF’s
10 current study was filed in January 2021; therefore, an updated study is required to be filed
11 by January 2026. DEF will file an updated study on or before that date.
12

13 **Q. Has DEF included an adjustment for a storm reserve study accrual?**

14 A. No. DEF has not recorded a storm reserve accrual since it was discontinued in 2010.⁴
15 However, as a part of the 2021 Settlement, the parties agreed that DEF’s storm reserve
16 shall remain at \$132 million. Since Rule 25-6.0143(1)(I), F.A.C. authorizes electric utilities
17 to petition for recovery of storm restoration costs and replenishment of the storm reserve,
18 in the event of a storm that occurs subsequent to the expiration of the 2021 Settlement,
19 DEF requests approval to implement a storm surcharge 60 days after filing a petition to
20 recover estimated storm costs and replenish the storm reserve to \$132 million over a 12-
21 month period. Once actual storm costs are recognized, DEF would then file a petition to
22 true up the difference between the amount collected and the actual costs incurred through

⁴ Per Order No. PSC-2010-0131-FOF-EI

1 the next Capacity Cost Recovery clause filing after the 12-month surcharge ends. With the
2 ability to expeditiously recover storm costs and replenish the storm reserve to \$132 million,
3 DEF would not need to increase the storm reserve balance beyond \$132 million at this
4 time.

5
6 **D. Rate Case Expenses**

7 **Q. Please provide the rate case expenses and the amortization period that DEF has**
8 **included in the test year revenue requirements.**

9 A. Total rate case expenses of approximately \$2.5 million are reflected in MFR Schedule C-
10 10. DEF proposes a three-year amortization period which covers the three test periods,
11 2025 through 2027. While the Commission approved a four-year amortization period in
12 DEF's 2009 rate case,⁵ and DEF agreed to a four-year amortization period for rate case
13 expenses in the 2021 Settlement, DEF is requesting a three-year amortization period in this
14 case to fully recover the rate case expenses by the end of 2027. DEF believes a three-year
15 amortization is more appropriate now that DEF is filing more frequent rate cases and/or
16 settlement agreements than when the Commission approved the four-year amortization
17 period almost 15 years ago.

18
19 **E. Regulatory Assessment Fees**

20 **Q. Are regulatory assessment fees included in the cost of service?**

21 A. No. DEF proposes to continue the current treatment of removing regulatory assessment
22 fees from both operating revenue and operations and maintenance ("O&M") expense as

⁵ Order No. 2010-0131-FOF-EI

1 they are reflected in a separate line on customer bills. Those amounts are included in the
2 “Revenue Tax” Commission adjustment in MFR Schedules C-2 and C-3.

3
4 **F. Executive Compensation**

5 **Q. Why has DEF removed the FPSC adjustment to O&M expense to eliminate the cost**
6 **of 50% of the D&O liability insurance premiums and 100% of the LTIP and SERP**
7 **costs in the test periods?**

8 A. While DEF has agreed to remove these expenses in its 2017 Settlement and 2021
9 Settlement, those agreements specifically state that they shall not set a precedent, and DEF
10 contends these are legitimate expenses incurred in the normal course of business. The direct
11 testimony of Company witness Ms. Shannon Caldwell further explains the Company’s
12 LTIP and SERP. Therefore, DEF has not adjusted O&M in the test periods to eliminate
13 these costs.

14
15 **G. Levy County Land Held for Future Use**

16 **Q. Why has DEF removed the adjustment to remove the land held for future use in Levy**
17 **county?**

18 A. DEF agreed to make that adjustment in both its 2017 Settlement and 2021 Settlement.
19 However, as explained in the direct testimony of Company witness Mr. Borsch, it is
20 probable that the land in Levy county will be used for a regulated project in the future.
21 Therefore, it is appropriate to include the cost of that land in Plant Held for Future Use.

22
23 **H. Parent Debt Tax Adjustment**

24 **Q. Why has DEF removed the Parent Debt Tax adjustment in the test periods?**

1 A. Please refer to the direct testimony of Company witness Mr. Karl Newlin for an explanation
2 as to why the parent debt tax adjustment is not appropriate and why DEF’s income tax
3 expense should be viewed on a stand-alone basis.

4
5 **I. Tax Proration Adjustment**

6 **Q. Has DEF made the tax normalization proration adjustment to accumulated deferred**
7 **income taxes (“ADIT”)?**

8 A. Yes, DEF has made the tax normalization proration adjustment in each of the years 2025
9 through 2027 as shown on MFR Schedule D-1a. Please refer to the direct testimony of
10 Company witness Mr. John Panizza for a detailed explanation of the proration adjustment.

11
12 **Q. Has DEF included any additional proposed Company adjustments in its cost of**
13 **service?**

14 A. Yes. DEF has included costs related to the following three programs:

- 15 • EV Make Ready Credit Program
- 16 • Expansion of the residential off-peak charging credit
- 17 • Clean Energy Connection 2.0 Program (“CEC 2.0 Program”), a continuation of
18 DEF’s current Clean Energy Connection program.⁶

19
20 **J. Proposed Electric Vehicle Make Ready Credit Program**

21 **Q. What is the Electric Vehicle Make Ready Credit Program?**

⁶ Authorized by the Commission in Order No. PSC-2021-0059-S-EI.

1 A. DEF is proposing the EV Make Ready Credit Program to replace the Commercial and
2 Industrial Rebate program authorized in the 2021 Settlement, as further explained in the
3 direct testimony of Company witness Mr. Duff. This program supports the adoption of EVs
4 by customers through a one-time, upfront credit that defrays a portion of the cost to install
5 EV charging infrastructure. Eligible costs include infrastructure such as wiring or electrical
6 upgrades but not the cost of the equipment and charging station. Residential and non-
7 residential customers may participate in the program.

8 Exhibit MJO-4 “EV Make Ready Credit Program Company Adjustment” provides
9 the following Company adjustments related to this program:

- 10 • Revenues – Additional incremental base revenues based on the expected level of
11 participation.
- 12 • Amortization Expense – amortization of the EV Make-Ready regulatory asset,
13 over four years based on four years of estimated monthly revenues (following the
14 CIAC calculation model) for the applicable EV charger segment using the RST-1
15 rate schedule for residential customers or GSD-1 rate schedule for non-residential
16 customers.
- 17 • O&M Expense – to account for administrative costs of the program.
- 18 • Working Capital – the EV Make-Ready regulatory asset for the deferral of the
19 upfront payment to customers based on the assumed level of participation, net of
20 amortization.

21
22 **K. Proposed EV Residential Off-Peak Charging Credit Expansion**

23 **Q. Are there any additional adjustments related to EVs?**

1 A. Yes. DEF is proposing to expand its Residential off-peak charging credit pilot, authorized
2 in the 2021 Settlement, by removing the 1,000 annual customer cap and making the pilot a
3 permanent program. DEF is also proposing to change the amount of the credit from \$10
4 per month to \$7.50 per month. Please refer to the direct testimony of Company witnesses
5 Mr. Chatelain and Mr. Duff for more information on this program. DEF has included a
6 Company adjustment to decrease revenues by \$0.266 million in 2025, \$0.571million in
7 2026, and \$1.247 million in 2027 to reflect the program expansion and revised credit
8 amounts.

9
10 **L. Proposed Clean Energy Connection Program Expansion**

11 **Q. Please briefly describe DEF's existing Clean Energy Connection (CEC) Program.**

12 A. DEF's existing CEC program is a solar program through which participating customers
13 can voluntarily subscribe to a share of solar energy sites. Participating customers pay a
14 subscription fee in exchange for receiving bill credits related to the solar generation
15 produced by the CEC solar sites. The current CEC program is made up of ten solar sites,
16 of which six were placed in service in 2022 and 2023, with the remaining four sites to be
17 placed in service in 2024.

18
19 **Q. Is DEF proposing to expand its existing CEC program?**

20 A. Yes. DEF is proposing to expand its existing CEC program. DEF's current CEC program
21 was approved by the Commission in Order Nos. PSC-2021-0059-S-EI, dated January 26,
22 2021, and PSC-2021-0059A-S-EI, dated September 23, 2022. In this current rate
23 proceeding, DEF is proposing to expand its CEC program to add five of the fourteen solar

1 sites projected to go in service during the test years, as discussed in the direct testimony of
2 Company witness Mr. Borsch. DEF currently projects that two sites will be placed in
3 service in March 2025, two additional sites in December 2025 and the fifth site in June
4 2026. Upon completion, the expanded CEC program would include a total of fifteen solar
5 sites.

6
7 **Q. Why is DEF proposing to expand its existing CEC program?**

8 A. As further described in the direct testimony of Company witness Mr. Borsch, DEF is
9 proposing the CEC program expansion to meet the substantial demand from DEF
10 customers who are seeking access to solar energy but do not have the ability or the desire
11 to construct it on their property.

12
13 **Q. Will the capacity associated with the five additional solar sites be allocated among
14 different customer groups?**

15 A. Yes, 8% of the expanded CEC program capacity will be allocated to residential and small
16 business customers, 64% will be allocated to commercial and industrial customers, 18%
17 will be allocated to local governments, and 10% to higher education.

18
19 **Q. What is the reason for the separate carveout for local government and higher
20 education customers?**

21 A. DEF wants to be responsive to local governments and higher education institutions who
22 wish to use the CEC program to meet their sustainability needs. Therefore, DEF has
23 reserved a portion of the CEC program for these customers. The carveout allows local

1 governments and higher education customers to follow their energy procurement processes
2 without the concern of large commercial and industrial customers taking all the available
3 capacity. This carveout was a suggestion from stakeholders in alignment with DEF's desire
4 to afford customers who had voiced interest in renewables the ability to participate.
5

6 **Q. Will a portion of the CEC program be available to low-income customers?**

7 A. Yes. Consistent with DEF's existing CEC program, DEF will allocate 3.5% of the
8 expanded CEC program capacity to low-income customers. Also consistent with the
9 existing CEC program, these customers will receive a bill credit rate that ensures that in no
10 year will their subscription charge increase their total bill.
11

12 **Q. Will DEF be allowed to re-allocate CEC program capacity amongst the customer
13 groups?**

14 A. Yes. DEF proposes to be able to re-allocate capacity from one customer segment to another
15 as needed to encourage full CEC program subscription.
16

17 **Q. What are the subscription and bill credit rates that DEF is proposing?**

18 A. DEF is proposing the same subscription rates and bill credit rates for the CEC program
19 expansion as in DEF's existing CEC program. In other words, DEF is not proposing any
20 changes to the rates shown in rate schedule CEC-1. DEF is not requesting a separate
21 program for the additional five solar facilities. Therefore, when calculating the bill credits,
22 all fifteen solar facilities will be considered.
23

1 **Q. How does DEF propose to recover the bill credits that will be provided to the CEC**
2 **program participants?**

3 A. Consistent with DEF's existing CEC program, DEF proposes to recover these credits
4 through the Fuel clause, allocated based on kWh sales.

5
6 **Q. How does DEF propose to recover the cost of the solar plants in the expanded CEC**
7 **program?**

8 A. DEF has included the investments and associated operating expenses of the five proposed
9 CEC solar sites in its revenue requirements. DEF has also included the subscription fee
10 revenues as a reduction to revenue requirements as a proposed Company adjustment
11 labeled "CEC 2.0" in the MFRs. Even though the expansion is labeled "CEC 2.0" in the
12 MFRs, there will be a single CEC program to include both the existing program and the
13 expansion. The monthly difference between the subscription fees and the revenue
14 requirements associated with the cost of the solar plants will continue to be allocated to the
15 general body of customers.

16
17 **Q. What are the net revenue requirements for DEF's CEC program expansion?**

18 A. Please refer to Exhibit MJO-5 "Clean Energy Connection Cumulative Revenue
19 Requirements". DEF calculated the total revenue requirements over a 30-year period for
20 each of the five projects. In addition to the traditional capital and operating costs, DEF
21 included certain administrative costs in the revenue requirements. DEF calculated the
22 benefits associated with the five projects from both a fixed and variable perspective. The
23 variable benefits more than offset the fixed revenue requirements and result in a projected

1 \$310.0 million cumulative present value revenue requirement (“CPVRR”) net benefit to
2 customers.

3
4 **Q. What is the amount of the CPVRR benefit for the general body of customers?**

5 A. The total CPVRR net benefit to the general body of customers is \$299.5 million.

6
7 **Q. What are the annual amounts of the proposed Company adjustments in DEFs MFRs?**

8 A. For 2025, 2026, and 2027, DEF has included a proposed Company adjustment for
9 estimated subscription fee revenues in sales of electricity of \$10.0 million, \$31.9 million,
10 and \$37.5 million, respectively, totaling \$79.4 million, as it relates to the expansion of the
11 program. DEF’s financial plan already includes \$225.1 million in CEC subscription
12 revenue related to its existing CEC program. Again, these subscription fees reduce DEF’s
13 revenue requirements, and absent this program, DEF’s revenue requirements would be
14 \$304.6 million higher. Please see Exhibit MJO-6 “Clean Energy Connection Subscription
15 Revenue Company Adjustment” for the calculation of these subscription fee revenues.

16
17 **IV. JURISDICTIONAL SEPARATION STUDY**

18 **Q. What is the purpose of a jurisdictional separation study?**

19 A. The purpose of a jurisdictional separation study (“JSS”) is to allocate rate base and net
20 operating income between a utility’s rate-regulated jurisdictions. In the case of DEF, those
21 jurisdictions include the Company’s retail jurisdiction (regulated by this Commission) and
22 wholesale jurisdiction (regulated by the Federal Energy Regulatory Commission). Most of
23 the costs incurred by an electric utility to serve its customers are of a joint or common use
24 nature. For example, a generating plant is ordinarily not constructed to serve any one

1 customer or even one class of customers but is part of a total generating system designed
2 to serve the aggregate load requirements of all customers on the system. The JSS allocates
3 those investments and costs to the retail and wholesale jurisdictions for the test periods.
4 The JSS also incorporates FPSC and proposed Company adjustments to arrive at the retail
5 jurisdictional cost of service recoverable through a utility's retail base rates (i.e., excluding
6 cost recovery clauses and other amounts not recoverable in base rates). The resulting JSS
7 retail jurisdictional cost of service is then allocated to the retail rate classes via the retail
8 cost of service study.

9 The results of the JSS can be found in a more summarized fashion in MFR Schedules A,
10 B, C and D. The revenue requirements in the JSS should tie to MFR Schedule A-1, the
11 FPSC-adjusted retail rate base should tie to MFR Schedule B-1, the FPSC-adjusted retail
12 net operating income should tie to MFR Schedule C-1, and the rate of return should tie to
13 the weighted average cost of capital in MFR Schedule D-1. The JSS is simply a different
14 and more detailed way of looking at the summarized data in the MFR schedules.

15
16 **Q. What sources of information have you used to prepare the Company's jurisdictional**
17 **separation study?**

18 A. The Company's forecasted income statement and balance sheet (including supporting
19 details), sponsored by Company witness Mr. O'Hara and presented in MFR Schedules B,
20 C, and D, are the basis for the system-per-books dollars in the JSS. System adjustments are
21 made to the system-per-books dollars for various reasons, including Commission-ordered
22 adjustments and proposed Company adjustments as described in the preceding section (III.

1 FPSC and Proposed Company Adjustments). The adjusted system rate base and net
2 operating income are then allocated between DEF's retail and wholesale jurisdictions.
3

4 **Q. How did DEF allocate costs to the retail and wholesale jurisdictions?**

5 A. Functionalization is the first step in a JSS and refers to the assignment of costs into one or
6 more of the major functions of an electric utility (e.g., production, transmission, or
7 distribution). All investments and other costs are recorded on the Company's books and
8 records in accordance with the Uniform System of Accounts ("USOA") as prescribed by
9 the FERC and this Commission. The USOA facilitates the functionalization of costs by
10 requiring utilities to record costs in specific FERC accounts that are grouped by function.
11 After functionalization, costs are classified according to one of three cost drivers: 1)
12 demand (i.e., kW load placed onto the system); 2) energy (i.e., kWh required by the
13 system); or 3) customer (i.e., the number of customers using the system). Once costs have
14 been functionalized and classified, an appropriate jurisdictional separation factor (between
15 zero and one hundred percent) is applied to each functionalized and classified group of
16 costs to arrive at the retail costs. A separation factor of zero indicates no retail
17 responsibility, and a separation factor of 100% indicates 100% retail responsibility. The
18 jurisdictional separation factors for each category of costs are either calculated on MFR
19 Schedule E-10 (along with the retail class allocators), or they are derived from the subtotals
20 in the JSS.

21
22 **Q. Please explain the calculation of the jurisdictional separation factors on MFR**
23 **Schedule E-10.**

1 A. MFR Schedule E-10 contains the calculation of certain jurisdictional separation factors
2 (also called “jurisdictional allocators”) and retail class allocators for all three test years.
3 For production plant, the jurisdictional energy allocators for 2027, 2026, and 2025 are
4 derived on pages 1, 18 and 35, respectively, and the jurisdictional demand allocators for
5 2027, 2026, and 2025 are derived on pages 2, 19, and 36, respectively. The energy
6 allocators are based on total projected annual retail and wholesale kWh sales, and the
7 demand allocators are based on the average of the projected 12 monthly retail and
8 wholesale kW coincident peaks (“CP”), which represent each jurisdiction’s peak demand
9 at the time of each monthly system peak. The projected kWh sales and kW CPs are from
10 the Company’s sales forecast as further explained in the direct testimony of Company
11 witness Mr. Borsch. The transmission and distribution separation factors are calculated at
12 the bottom of pages 2, 19, and 36. All calculated separation factors are compiled at the
13 bottom of JSS Schedule No. 1.

14
15 **Q. Please explain the different jurisdictional separation factors for production base,**
16 **intermediate, peaking, and solar?**

17 A. Rather than calculate single jurisdictional energy and demand allocators for production
18 plant, DEF has separate energy and demand allocators for base, intermediate, peaking, and
19 solar generation. These separate jurisdictional allocators are required, because certain
20 wholesale sales contracts are priced or could be priced to provide baseload, intermediate,
21 peaking, or solar generation depending on how that capacity will serve that customer’s
22 utility load. DEF refers to these wholesale sales as “stratified sales.” DEF’s wholesale load
23 has been declining over the years, and the only projected wholesale sales remaining in the

1 test years are stratified intermediate and peaking contracts apart from a very small 14 KW
2 contract priced at average system cost, all with Seminole Electric Cooperative, Inc. The
3 decline in wholesale sales results in higher jurisdictional separation factors, and therefore,
4 higher retail revenue requirements.

5 The calculation of the stratified energy separation factors on MFR Schedule E-10 pages 1,
6 18, and 35 starts with projected MWh generated to supply power under the wholesale
7 stratified base, intermediate, peaking, or solar contracts, with the remaining sales delivered
8 under wholesale non-stratified contracts (i.e., wholesale average rate sales) and to all retail
9 customers. Those projected sales are divided by projected total generated and purchased
10 MWh from all resources by stratum, net of MWh generated from solar plants under the
11 Clean Energy Connection program and non-class energy sales (i.e. short term non-
12 separated interchange sales). The result is the percentage assignment to wholesale
13 customers by stratum, and remaining percentage is the responsibility of the retail customers
14 and wholesale average-rate contracts. The final step is to multiply the percentage
15 responsibility of remaining average rate sales by the percentage of retail to total average
16 rate sales to arrive at the base, intermediate, peaking, and solar separation factors.

17 The calculation of the stratified demand separation factors on MFR Schedule E-10 pages
18 2, 19, and 36 is similar to the calculation of the stratified energy separation factors. The
19 main difference is that average projected 12 CP is used instead of MWh sales. For the
20 wholesale contracts, the projected contractual wholesale demands are assumed to be the
21 CP, and for the retail sales, the projected monthly peak-hour KW demands are used after
22 removing projected retail curtailable and interruptible loads. Further, the calculation

1 assumes a 20% reserve margin as further explained in the direct testimony of Company
2 witness Mr. Borsch.

3
4 **Q. Please explain how certain jurisdictional separation factors are derived from the**
5 **subtotals in the JSS.**

6 A. Outside of the calculated separation factors shown at the bottom on JSS Schedule No. 1,
7 all other separation factors in the JSS are derived from the subtotals within Schedule No.
8 1 itself. For example, rather than splitting out property tax expense into each function and
9 applying a calculated allocator to each function, property tax is allocated using a derived
10 “Net Total Plant” allocator as calculated in the JSS on Schedule 1, line 193. The type or
11 source of each jurisdictional separation factor applied to each category of cost can also be
12 seen at the top of Schedule Nos. 2 through 11.

13
14 **Q. Are there any costs that are directly assigned to the retail or wholesale jurisdiction?**

15 A. Yes. Occasionally, it is necessary to connect a group of retail customers to the transmission
16 system. The transmission lines connecting these customers are considered “radial lines”
17 and do not serve DEF’s broader transmission network. Therefore, this plant is not included
18 in the calculation of transmission network costs in DEF’s open access transmission tariff
19 (OATT) cost-of-service calculation and is recovered directly from DEF’s retail
20 jurisdiction. DEF has isolated the cost of transmission radials into a separate functional
21 category on Schedules 2, 3, 9, and 10, and has applied a 100% retail jurisdictional
22 separation factor to those costs.

1 **Q. Please explain how the results of the JSS are used in the cost-of-service study.**

2 A. The results of the JSS are the starting point for the class cost of service study. To recap,
3 the JSS starts with system-per-book rate base and net operating income, incorporates FPSC
4 and Company adjustments, and removes the portion of costs allocated to the wholesale
5 jurisdiction. The FPSC-adjusted retail cost of service in the JSS equals the sum of the retail
6 rate classes in the retail class cost of service study.

7
8 **V. RETAIL COST OF SERVICE STUDY**

9 **Q. What is a retail Cost of Service study?**

10 A. The retail Cost of Service (“COS”) study is an extension of the JSS, in which retail
11 jurisdictional adjusted rate base and net operating income are further allocated to the
12 various retail rate classes. Factors for allocating the retail jurisdictional costs to rate classes
13 include the number of customers and kWh sales derived from the Company’s sales forecast
14 and class load characteristics derived from the Company’s latest load research study. Costs
15 are first functionalized, then classified as either demand-related, energy-related, or
16 customer-related, and finally allocated to the retail rate classes. The COS study provides:
17 (i) class rates of return (i.e., net operating income divided by rate base) at present and
18 proposed rates, (ii) class revenue surpluses or deficiencies, and (iii) functional cost
19 information for rate design considerations.

20 One thing that is unique in the way DEF presents its COS studies is that it combines the
21 JSS with the COS study for a wholistic view. In other words, while most COS studies start
22 with retail jurisdictional rate base and net operating income (i.e., the results of the JSS),
23 DEF’s studies start with total system-per-books, then add system adjustments and remove

1 the wholesale amounts to arrive at the total retail-adjusted amounts, which are then
2 allocated or direct-assigned to the various retail rate classes.

3 Another unique aspect of DEF's COS studies is that they are presented by rate class, by
4 function, and then each rate class is presented by function. This last step is required to
5 facilitate calculating the delivery voltage credits for the customers who take delivery at
6 voltages higher than distribution secondary in the general service demand, interruptible,
7 and curtailable rate classes.

8
9 **Q. How did you establish the customer rate classes that were used as costing entities in**
10 **your COS studies?**

11 A. Each regular rate schedule in the Company's present tariff has been established as a rate
12 class in the COS studies, with the exception of a new class that has been added in the
13 current studies, the "EV Solution" class. The rate schedules for general service non-firm
14 service (i.e., the curtailable and interruptible rate schedules) are reported separately in the
15 COS studies, but they are treated as one rate class in the MFR E-Schedules since these
16 customers only differ as to Company or customer control of their non-firm load capability.
17 Each rate schedule serving either (i) optional time of use, (ii) load management service, or
18 (iii) standby service, has been combined with its corresponding or related rate class. The
19 resultant rate classes are described as:

- 20 (1) Residential Service (RS)
- 21 (2) General Service Non-Demand (GS-1)
- 22 (3) General Service 100% Load Factor (GS-2)
- 23 (4) General Service Demand (GSD)

- 1 (5) Curtailable/Interruptible General Service (CS/IS)
- 2 (6) Lighting Service (LS), consisting of sub-groups for the costs of
- 3 (a) Lighting Energy
- 4 (b) Lighting Facilities (Fixtures and Poles).
- 5 (7) EV Solution (EV)
- 6

7 **Q. Please explain the new “EV Solution” rate class.**

8 A. At the time DEF completed its financial forecast for this rate case filing, DEF expected to
9 file a request with this Commission for approval of a new EV Solution program. If
10 approved, DEF would install EV chargers in residential and commercial/industrial
11 customers’ premises and lease those chargers to those customers. Similar to the Lighting
12 Facilities class, a separate class has been created for the EV Solution program. Within that
13 class are estimated rental revenues as well as the net book value of the chargers,
14 depreciation expense, O&M expense, and property tax expense. DEF has since placed a
15 pause on requesting approval of this program. However, since the revenues and costs are
16 isolated in a separate rate class, regardless of whether DEF decides to pursue or not pursue
17 this program, there is no impact to the other rate classes.

18

19 **Q. How is the information from the load research study used in allocating costs to the**
20 **retail rate classes?**

21 A. Load research studies collect data that provide important information on customers’
22 electric load characteristics. As further explained in the direct testimony of Company
23 witness Mr. Chatelain, DEF’s load research study from January through December 2022

1 was used to develop the load factors reported in MFR Schedule E-17. Load factors are a
2 measure of how consistently energy is used over a specified period of time. Load factors
3 are ratios that are calculated by dividing kWh used in a period by the product of peak kW
4 demand and the number of hours in that period. For example, if a customer uses 1,080 kWh
5 in a 30-day month (720 hours) and has a peak demand during that month of 3 kW, then
6 that customer's load factor would be 50% [1,080 kWh / (3 kW x 720 hours)]. Said another
7 way, this customer consumed energy at a 50% efficiency rate. There are three types of load
8 factors that are used in the calculation of class allocation factors in MFR Schedule E-10 as
9 follows:

- 10 1) 12 CP: Each class's annual kWh consumed divided by the product of that class's
11 average of the 12 monthly kW demands at the time of the monthly system peaks and
12 the number of hours in that year;
- 13 2) Class non-coincident peak ("NCP"): Each class's annual kWh consumed divided by
14 the product of that class's annual peak kW and the number of hours in that year; and
- 15 3) Customer maximum demands: Each class's annual kWh consumed divided by the
16 product of the sum of the customer maximum demands and the number of hours in
17 that year.

18 As shown on MFR Schedule E-10, the 12 CP load factors are used to calculate the
19 production demand allocators as well as the transmission demand allocators, the NCP load
20 factors are used to calculate the distribution-primary allocators, and the customer
21 maximum demand load factors are used to calculate the distribution-secondary allocators.

22
23 **Q. What is the delivery efficiency factor?**

1 A. The delivery efficiency factor accounts for line losses, or the amount of energy that is
 2 produced but is not sold or used by the Company. The delivery efficiency factor is applied
 3 based on delivery voltage level and serves to gross-up delivered sales to source-level sales.
 4 Increasing losses occur as electricity is stepped up from the generators and flows through
 5 the transmission system, is stepped down to distribution primary voltages, flows through
 6 the distribution primary system, is further stepped down to distribution secondary voltages,
 7 and finally flows through the distribution secondary lines. Since customers take delivery
 8 at varying voltage levels, the delivery efficiency factor adjusts all sales back to the source
 9 generation levels, thereby providing an equal measure by which all rate classes can be
 10 evaluated.

11
 12 **Q. You indicated that a retail COS study functionalizes, classifies, and allocates costs.
 13 What functional components are provided in the COS studies and how are they
 14 classified and allocated?**

15 A. The COS for each of the Company’s rate classes, which ultimately translates into each
 16 class’s revenue requirement for rate design purposes, is functionalized, classified, and
 17 allocated according to the following table:

Function	Classification	Allocation
Production Capacity	Demand	12 CP & 25% AD
Production Energy	Energy	kWh
Transmission	Demand	12 CP
Distribution – Primary	Demand	Class NCP at Primary
Distribution - Secondary	Demand	Cust. Max Demand at Secondary
Distribution - Services	Customer	# Customers at Secondary
Metering	Customer	Meter cost
Interruptible General Service Equip.	Direct	Direct to CS/IS Class
Lighting Facilities (fixtures & poles)	Direct	Direct to Lighting Class
Customer Billing, Information, etc.	Customer	# Customers

18

1 Please also refer to Exhibit MJO-7 “Functionalization, Classification, and Allocation of
2 Plant” for a detailed schedule of function, classification, and allocation by plant primary
3 account.

4
5 **Q. You mentioned that you prepared six COS studies for this filing, differing only in the**
6 **weighting of demand and energy responsibilities. Please explain those differences.**

7 A. DEF prepared two COS studies for each of the three test periods, differing only in the
8 weighting of demand and energy responsibilities in the allocator for fixed production
9 capacity costs. Paragraph 10 of the 2021 Settlement states: “...in DEF’s next general base
10 rate case, DEF intends to file both the 12 CP and 1/13 AD and the 12 CP and 25 AD
11 methods but rely upon only the 12 CP and 25 AD method to meet its initial burden of
12 proof.” Therefore, while DEF is providing COS studies based on the 12 CP and 1/13 AD
13 methodology for informational purposes, the rate design MFR E-Schedules rely on the 12
14 CP and 25% AD methodology for fixed production capacity costs.

15
16 **Q. Please describe these two production capacity cost allocation methods.**

17 A. The 12 CP and 1/13 AD methodology calculates allocation factors by rate class based on
18 12/13 (or about 92%) multiplied by the average of the twelve monthly coincident peaks
19 and 1/13 (or about 8%) multiplied by the class average hourly demands, thus the term
20 “AD.” It should be noted that average demand and annual energy usage result
21 mathematically in the same class allocation percentages since average demand is simply
22 total energy use divided by number of hours of use. Under the 12 CP and 25% AD
23 methodology, 75% of the allocator is based on the average 12 CP, and 25% is based on

1 energy. The 12 CP and 25% AD methodology increases the weighting of energy usage
2 from about 8 percent to 25 percent.

3
4 **Q. Does DEF maintain that a 12 CP and 25% AD methodology is appropriate for**
5 **allocating production capacity costs?**

6 A. Yes. DEF believes that an energy weighted allocation of only 8 percent under the 12 CP
7 and 1/13 AD method gives too little recognition to the role energy is given in generation
8 facility planning. DEF continues to emphasize providing clean and efficient generation, as
9 well as satisfying reliability criteria. DEF will have 23 utility scale solar plants in service
10 by December 2024 and plans to install fourteen additional solar facilities in the 2025-2027
11 test periods. These plants will continue to provide clean, low-cost generation and will
12 continue to reduce our dependence on fossil fuel. These investments have a higher up-front
13 capital cost, but the benefits to customers are primarily related to the costs of fuel, which
14 is apportioned on an energy basis. Therefore, a larger portion of the Company's production
15 capacity costs should be apportioned in the same manner as the customer realizes the
16 benefits, i.e., on an energy basis.

17 Further, DEF's power plants are planned and operated in response to both customer
18 demand and energy needs, and the decision on how much to allocate to each rate class is
19 based on how much of the fixed production plant cost is incurred to meet system peak
20 demand and how much is incurred to reduce variable operating costs, primarily fuel, by
21 running a plant beyond peak demand periods. The higher the weighting on an energy basis,
22 the more cost responsibility is allocated to higher load factor customers, such as General
23 Service Demand and Curtailable/Interruptible customers. DEF has a significant amount of

1 baseload generation, which is more expensive to install than peaking generation but less
2 expensive to operate over time, mainly due to lower fuel costs. Investment in more
3 expensive generating units to provide more efficient fuel conversion for the generation of
4 electricity supports the need to use the 12 CP and 25% AD allocator.

5
6 **Q. Please explain the functionalization, classification, and allocation of transmission**
7 **plant.**

8 A. Except for transmission generator step-up transformers, which connect the generating
9 facilities to the transmission network and are functionalized as production plant, and
10 transmission radials that are directly assigned to the retail jurisdiction, transmission plant
11 is functionalized into plant primary accounts 350-359 and O&M accounts 560-574 per the
12 USOA, and is classified as demand and allocated to the individual rate classes based on 12
13 CP.

14
15 **Q. Please explain the functionalization, classification, and allocation of distribution**
16 **plant.**

17 A. The functionalization of distribution plant is somewhat unique as compared to production
18 and transmission plant in that distribution plant is further sub-functionalized into primary,
19 secondary, services, meters, lighting facilities, and interruptible equipment. Distribution
20 costs are driven by both demands placed on the system and the number of customers using
21 the system; therefore, distribution subfunctions are classified as either demand or customer.
22 Several distribution plant accounts must be split between the primary and secondary
23 subfunctions. To accomplish this, DEF has calculated the proportion of primary and

1 secondary line miles or pole counts for various type of assets. For FERC account 362-
2 station equipment, a portion is direct assigned to the CS/IS classes and the remainder is
3 direct assigned to the primary function. For FERC account 364-poles, towers, and fixtures,
4 DEF first direct assigns a portion to the Lighting class, and 73% of the remaining amount
5 is assigned to the primary function and 27% to the secondary function, based on pole
6 counts. For FERC account 365-overhead conductors and devices, a specific amount is
7 direct assigned to the CS/IS classes and 69% of the remaining amount is assigned to the
8 primary function and 31% to the secondary function, based on overhead circuit miles. For
9 FERC account 367-underground conductors and devices, 63% is assigned to the primary
10 function and 37% is assigned to the secondary function, based on underground circuit
11 miles.

12 Distribution primary costs are allocated based on each rate class's NCP only for customers
13 taking delivery at primary or secondary voltage levels. Distribution secondary costs are
14 allocated based on the sum of customer maximum demands only for customers taking
15 service at secondary voltages. Distribution services costs are allocated based on the average
16 number of customer bills only for customers taking delivery at the distribution secondary
17 voltages. Distribution metering costs are allocated based on meter investment at the class
18 level. Distribution lighting and interruptible equipment costs are directly assigned to the
19 lighting and interruptible rate classes.

20
21 **Q. How does the COS study account for customers that take delivery at higher voltage**
22 **levels than the distribution secondary system?**

1 A. While most of DEF's retail customers take power from the distribution secondary voltages,
2 there is a small subset who take power at one of the transmission or distribution primary
3 voltages. The principle of cost causation suggests that customers taking power at higher
4 voltages should not pay for system costs below the voltage level at which they take service,
5 since they do not cause those costs to be incurred. DEF offers a delivery voltage credit
6 (DVC) as a reduction to the base demand charge, applicable to all rate schedules with a
7 demand charge, for customers taking power at higher voltage levels. The credit is currently
8 offered at three levels at which customers may take power:

9 1) Distribution primary delivery voltage: Customers taking power at the distribution
10 primary level are credited for the cost of the distribution secondary system.

11 2) Transmission delivery voltage below 230 kV ("subtransmission"): Customers taking
12 power at the subtransmission level are credited for the cost of the distribution secondary
13 and primary systems.

14 3) Transmission delivery voltage at or above 230 kV: Customers taking power at or above
15 230 kV are credited for all three: the subtransmission and the distribution primary and
16 secondary systems.

17
18 **Q. How are the delivery voltage credits calculated?**

19 A. The DVCs are calculated by dividing the functional cost of service for distribution
20 secondary, distribution primary, and sub-transmission allocated to the rate classes with
21 demand rates by the billed kW for those rate classes for each of the three functions. DVCs
22 are applied on a cumulative basis. For example, a customer taking delivery at a sub-

1 transmission voltage will receive a cumulative DVC that includes both the distribution
2 primary and distribution secondary credits.

3 Please refer to Exhibit MJO-8, Delivery Voltage Credit Calculation for the calculation of
4 DEF's proposed DVCs for each of the three test years. Again, DEF has calculated the
5 credits based upon functional cost of service; however, if the Commission approves a
6 different level of revenue requirements for DEF than what was requested, the DVCs should
7 be recalculated and incorporated in the final rates 1) to reflect DEF's final approved cost
8 of service, and 2) to adjust for any disparity between the final approved cost of service and
9 the final revenues authorized by this Commission for those rate classes to which the DVCs
10 apply, thereby ensuring that the DVCs reflect the proportion of costs being collected from
11 the demand rate classes. The issue of rate disparity is discussed in detail in the results
12 section below.

13
14 **Q. What costing treatment is utilized in the COS studies for those rate groups that**
15 **contain non-firm service provisions?**

16 A. DEF's residential service and general service rate groups include optional load
17 management provisions that permit the interruption of certain specified customer
18 equipment, while the interruptible service and curtailable service rate groups require that
19 all, or a significant portion of the customer's load, be subject to interruption or curtailment
20 as a condition for service. However, the development of costs for these rate groups is based
21 on the premise that all the groups' load requirements are firm. This is because the
22 Company's various forms of non-firm service are elements of its demand side management
23 ("DSM") program and, therefore, the value of each rate group's load subject to interruption

1 or curtailment is not a consideration in setting base rates, but instead is recognized
2 separately by the payment of billing credits that are established in and recovered through
3 DEF's Energy Conservation Cost Recovery clause.
4

5 **Q. What are the results of the COS studies?**

6 A. The results of the COS studies using the 12 CP and 25% AD production demand allocation
7 methodology are presented on MFR Schedule E-1. This MFR shows the rate of return
8 ("ROR") index for each class at both present and proposed rates. The ROR index provides
9 the ratio of each class's ROR (i.e., net operating income divided by rate base) to the total
10 retail ROR. Rate parity exists when the ROR earned from each of the rate classes is equal
11 to the total retail ROR. ROR indexes greater than one indicate a class's ROR is greater than
12 the total retail ROR. Conversely, indexes less than one indicate a class's ROR is less than
13 the total retail ROR. The class revenue requirement index represents the percentage of each
14 class's current or proposed revenue to its COS (i.e., revenue requirement). Indexes greater
15 than one indicate a class's revenues are greater than its COS. Conversely, indexes less than
16 one indicate a class's revenues are less than its COS.

17 At present rates, DEF's COS study calculates a projected retail jurisdictional ROR of 4.85
18 percent for the 2025, 4.62 percent for the 2026, and 4.32 percent for the 2027 test periods.

19 The COS study shows that at present rates, certain rate classes, such as RS and GS-1, are
20 above rate parity, while other classes, such as GSD and CS/IS, are below parity. Again,
21 MFR E-1 lists the ROR and associated ROR index for each rate class.

22 At proposed rates, DEF's COS study calculates a projected retail jurisdictional ROR of
23 7.01 percent for the 2025, 7.02 percent for the 2026, and 7.07 percent for the 2027 test

1 periods. The GS, CS/IS, and LS rate class revenue increases are limited by the
2 Commission's practice of gradualism, which limits the increase of each rate class to no
3 more than 1.5 times the average system increase, and not allowing any class to receive a
4 decrease when there is an overall increase. As a result of the practice of gradualism, these
5 three rate classes will still be below parity at proposed rates, but they will be moving closer
6 to parity. Company witness Mr. Chatelain's exhibit MJC-2 presents the revenue
7 requirement necessary to achieve full parity in each of the 2025 – 2027 test periods.
8

9 **Q. What is the next step once you have calculated the COS by rate class?**

10 A. The COS study under present rates is summarized on MFR Schedules E-6a, and the COS
11 study under proposed rates is summarized on MFR Schedule E-6b. Unit costs are
12 developed in MFR Schedules E-6a and E-6b by dividing each class's COS components by
13 the appropriate billing units (i.e., the number of customer bills, energy sales, or billing
14 demands). This type of information is then used as a consideration in rate design when
15 establishing the level of customer charges, demand charges, energy charges, etc. This is
16 further explained by Company witness Mr. Chatelain.
17

18 **VI. REVENUE FORECAST**

19 **Q. How were base revenues forecasted in the test periods?**

20 A. The revenue forecast starts with the sales forecast which includes the forecasted number of
21 customers and kWh sales by revenue class (i.e. residential, commercial, industrial, lighting,
22 and sales to public authorities), as further explained in the direct testimony of Company
23 witness Mr. Borsch. DEF performs a multi-step process to calculate the forecasted
24 revenues by rate class. DEF uses historical billing determinants (i.e., the various units to

1 which tariffed rates are applied as presented on MFR Schedule E-13c) to calculate the
2 forecasted kW and allocate the kWh and number of customers from the sales forecast to
3 retail rate class and rate schedule. Next, currently authorized base rates are applied to the
4 billing determinants to produce the base revenue forecast at present rates by rate class. The
5 results are presented on MFR Schedule E-13c under current and proposed rates as further
6 discussed in the direct testimony of Company witness Mr. Chatelain. The results are also
7 summarized on MFR Schedule E-5.

8
9 **Q. Are there any other revenues included in forecasted base rate revenues?**

10 A. Yes. There are several additional types of base rate revenues. DEF has included estimates
11 for minimum bill revenues, additional revenues expected from the EV Make Ready Credit
12 program, and subscription fees associated with the current and proposed expansion to the
13 Clean Energy Connection program. DEF has also reduced revenue for expansion of the EV
14 residential off-peak charging credits, as further explained in the direct testimony of
15 Company witness Mr. Chatelain.

16 It is important to note that for the CEC program, the revenues presented by rate class are
17 not the actual subscription revenues forecasted from each rate class. Rather, DEF has
18 allocated the revenues to the rate classes on the same basis as the associated solar plant
19 costs, which is the production demand 12 CP and 25% AD method. This accurately aligns
20 the revenues with the allocated costs of the solar plants for each rate class, thereby
21 providing a more precise COS calculation by rate class.

22
23 **Q. What additional adjustments were made to base revenues in the test period?**

1 A. There is one additional adjustment made to base revenues in the test year, “Synchronize
2 Revenue to E-Schedules.” The adjustment is required to reconcile forecasted revenues in
3 DEF’s regulatory modeling program and the forecasted revenue results produced in MFR
4 E-13C. The process described above produces the results presented in MFR E-13c.
5 Revenues are input into DEF’s regulatory modeling program relatively early in the rate
6 case preparation process, and as the revenue forecast is refined, small adjustments are made
7 via the synchronization adjustment.
8

9 **IMPACT OF POTENTIAL TAX LAW CHANGES**

10 **Q. Which tax law changes have impacted DEF in recent years?**

11 A. The 2017 Tax Cuts and Jobs Act (“TCJA”) reduced the top corporate income tax rate from
12 35 percent to 21 percent effective in January 2018.⁷ This was followed by a temporary
13 reduction in the Florida corporate income tax rate from 5.5% to 4.458% in 2019 and 2020⁸
14 and a further reduction to 3.535% in 2021.⁹ Finally, the 2022 Inflation Reduction Act
15 (“IRA”) provided for production tax credits instead of investment tax credits for solar
16 projects placed in service after December 31, 2021, and it imposed a 15% corporate
17 alternative minimum tax for corporations with profits in excess of \$1 billion.¹⁰ These tax
18 law changes have all reduced income tax expense, and DEF’s 2017 and 2021 settlement
19 agreements have provided a mechanism to expeditiously flow those tax savings back to
20 customers. These settlement agreements have also provided a mechanism to recover any

⁷ Docket No. 20180047

⁸ Approved in Order No. PSC-2021-0024-FOF-EI

⁹ Approved in Order No. PSC-2022-0147-PAA-EI

¹⁰ Approved in Order No. PSC-2022-0425-TRF-EI

1 increases in income tax expense resulting from tax law changes, but thus far the tax law
2 changes have not resulted in the need to recover costs from customers.

3
4 **Q. Are there any future changes in tax laws that DEF anticipates?**

5 A. No one can predict with certainty what changes in tax laws might take effect. For that
6 reason, DEF is proposing a mechanism to expeditiously adjust base rates to flow back or
7 recover the impact of any changes in tax laws that become effective in the 2025, 2026, or
8 2027 test years. This is especially important since DEF is requesting three test periods,
9 thereby mitigating the need to file another rate case for several years.

10
11 **Q. Please describe DEF's proposed mechanism to address a change in tax law.**

12 A. DEF proposes that if a change in tax law becomes effective for any of the test years 2025,
13 2026 or 2027, DEF shall submit a petition for approval of DEF's calculation of the impact
14 on base rate revenue requirements along with the tariffs to implement a change in base
15 rates. DEF proposes to use the same methodology to calculate the impact of tax law
16 changes as it has used for previous tax law changes. That is, DEF will quantify the impact
17 on its Florida jurisdictional base rate revenue requirement as projected in DEF's forecasted
18 earnings surveillance report for the calendar year that includes the period in which the tax
19 law change becomes effective.

20 Further, excess, or deficient accumulated deferred income taxes shall be deferred to a
21 regulatory asset or liability included in the FPSC-adjusted capital structure and flowed back
22 to customers over a term consistent with law. DEF shall follow tax normalization laws with
23 respect to the period over which it flows back or recovers excess or deficient deferred tax

1 balances. For any deferred excess or deficient tax balances that are not subject to tax
2 normalization laws, if the cumulative balance is less than or equal to \$200 million, the
3 flow-back or collection period shall be five years, and if the cumulative balance is greater
4 than \$200 million, the flow-back or collection period shall be ten years.

5 Upon approval by this Commission, base rates shall be adjusted through a one-time
6 uniform percentage decrease or increase to customer, demand, and energy base rate
7 charges, excluding delivery voltage credits, for all retail customer classes. Any effects of
8 tax law change on retail revenue requirements from the date the tax law becomes effective
9 through the date of the base rate adjustment shall be flowed back or collected from
10 customers through the Capacity Cost Recovery clause.

11 12 **VII. SOLAR PRODUCTION TAX CREDIT TRUE-UP PROPOSAL**

13 **Q. Why is DEF proposing a true-up mechanism for solar production tax credits?**

14 A. DEF has been flowing back the benefits of the production tax credits (“PTC”) under the
15 2022 Inflation Reduction Act since 2022. However, there is a fair amount of uncertainty in
16 forecasting the credits to be received. For example, as further explained in the direct
17 testimony of Company witness Mr. Panizza, DEF has had to make certain forecast
18 assumptions, i.e., the projects would meet the prevailing wage and apprenticeship guidance
19 and would be transferred at 90 cents on the dollar. DEF also assumed a certain amount of
20 kWh would be generated from the applicable solar plants to achieve those PTCs, which
21 can vary due to weather and other circumstances. Finally, fees and administrative costs, as
22 further explained by witness Mr. Panizza, could vary with each transaction. To avoid over-
23 recovering or under-recovering these PTCs, net of their associated costs, DEF requests to

1 true-up the difference between the actual PTC net amounts received and the amounts in
2 base rates each year.

3
4 **Q. How much has DEF included in the test years for PTCs?**

5 A. DEF has included \$65 million in 2025, \$96 million in 2026, and \$117 million in 2027, as
6 further explained in the direct testimony of Company witness Mr. Panizza.

7
8 **Q. DEF does not have a true-up mechanism for any other component of DEF's cost of
9 service, so why is DEF proposing a true-up mechanism solely for PTCs?**

10 A. PTCs are very isolated and measurable amounts. To true-up all costs would be time
11 intensive, as it would require additional submissions to the Commission for review, and
12 essentially result in formula rates. DEF is not proposing to adjust any other costs or
13 revenues. The true-up of PTCs will be a very formulistic calculation, comparing actual
14 PTCs received to the amounts in the MFR schedules by year, allowing for expeditious
15 review and approval.

16
17 **Q. Please explain DEF's proposed true-up mechanism for PTCs.**

18 A. DEF proposes to calculate the difference between the dollars in DEF's MFR schedule C-
19 22 and the amount actually received from either including the PTCs on a Company tax
20 return or from transferring them. This calculation would take place annually for each year
21 2025, 2026 and 2027. The difference would be included for recovery or refund in DEF's
22 next Capacity Cost Recovery clause filing.

23

1 **VIII. CONCLUSION**

2 **Q. Does this conclude your direct testimony?**

3 **A. Yes.**

MFR Schedules Sponsored or Co-Sponsored by Marcia Olivier

MFR	TITLE
A-1	Full Revenue Requirements Increase Requested
B-1	Adjusted Rate Base
B-2	Rate Base Adjustments
B-6	Jurisdictional Separation Factors-Rate Base
B-14	Earnings Test
B-15	Property Held For Future Use - 13 Month Average
B-17	Working Capital - 13 Month Average
C-1	Adjusted Jurisdictional Net Operating Income Calculation
C-2	Net Operating Income Adjustments
C-3	Jurisdictional Net Operating Income Adjustments
C-4	Jurisdictional Separation Factors - Net Operating Income
C-5	Operating Revenues Detail
C-10	Detail Of Rate Case Expenses For Outside Consultants
C-12	Administrative Expenses
C-14	Advertising Expenses
C-15	Industry Association Dues
C-38	O&M Adjustments By Function
C-39	Benchmark Year Recoverable O&M Expenses By Function
C-42	Hedging Costs
C-44	Revenue Expansion Factor
D-1a	Cost Of Capital - 13 Month Average
D-1b	Cost Of Capital - Adjustments
E-1	Cost Of Service Studies
E-2	Explanation Of Variations From Cost Of Service Study Approved In Last Rate Case
E-3a	Cost Of Service Study-Allocation Of Rate Base Components To Rate Schedule
E-3b	Cost Of Service Study-Allocation Of Expense Components To Rate Schedule
E-4a	Cost Of Service Study-Functionalization And Classification Of Rate Base
E-4b	Cost Of Service Study-Functionalization And Classification Of Expenses
E-5	Source And Amount Of Revenues - At Present And Proposed Rates
E-6a	Cost Of Service Study - Unit Costs, Present Rates
E-6b	Cost Of Service Study - Unit Costs, Proposed Rates
E-7	Development Of Service Charges
E-8	Company-Proposed Allocation Of The Rate Increase (Decrease) By Rate Class
E-9	Cost Of Service - Load Data
E-10	Cost Of Service Study - Development Of Allocation Factors
E-11	Development Of Coincident And Non-Coincident Demand For Cost Study
E-12	Adjustment To Test Year Unbilled Revenue
E-13a	Revenue From Sale Of Electricity By Rate Schedule
E-15	Projected Billing Determinants - Derivation
E-16	Customers By Voltage Level
E-19a	Demand And Energy Losses
E-19b	Energy Losses
E-19c	Demand Losses
F-4	NRC Safety Citations

Clean Energy Connection Cumulative Revenue Requirements

(\$ millions)	CPVRR	Nominal															
		Total	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036-2056	
Discount Factor			1.00	0.94	0.88	0.82	0.77	0.72	0.67	0.63	0.59	0.55	0.52	0.48	0.45		
Fixed Revenue Requirements																	
CEC Capital, O&M		\$716.0	\$1,660.4	\$1.5	\$10.8	\$47.8	\$76.0	\$76.4	\$72.6	\$69.5	\$66.8	\$64.7	\$63.2	\$61.8	\$60.3	\$58.9	\$930.1
Program Administrative Costs		\$2.0	\$5.1	\$0.0	\$0.0	\$0.3	\$0.3	\$0.2	\$0.1	\$0.1	\$0.1	\$0.1	\$0.1	\$0.1	\$0.1	\$0.1	\$3.2
Total DEF CEC Costs		\$718.0	\$1,665.6	\$1.5	\$10.8	\$48.1	\$76.3	\$76.7	\$72.7	\$69.6	\$66.9	\$64.9	\$63.3	\$61.9	\$60.5	\$59.1	\$933.3
System Benefits (1)		(\$287.3)	(\$990.3)	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	(\$23.2)	(\$2.6)	(\$22.3)	(\$7.1)	(\$41.7)	(\$57.5)	(\$31.2)	(\$26.7)	(\$777.9)
Total Fixed Revenue Requirements (fav) unfav		\$430.8	\$675.3	\$1.5	\$10.8	\$48.1	\$76.3	\$76.7	\$49.5	\$67.0	\$44.6	\$57.8	\$21.6	\$4.4	\$29.3	\$32.4	\$155.4
Variable Revenue Requirements																	
System Net Fuel		(\$456.4)	(\$1,384.0)	(\$0.0)	(\$0.1)	(\$13.6)	(\$32.7)	(\$35.5)	(\$35.9)	(\$35.3)	(\$33.3)	(\$32.7)	(\$31.9)	(\$31.8)	(\$35.4)	(\$37.4)	(\$1,028.4)
Variable O&M		(\$59.5)	(\$303.4)	(\$0.0)	\$0.0	(\$1.1)	(\$1.6)	(\$2.5)	(\$1.6)	(\$1.5)	(\$1.9)	(\$0.2)	(\$1.4)	(\$0.4)	(\$1.5)	(\$2.4)	(\$287.2)
Emissions		(\$0.7)	(\$1.4)	\$0.0	(\$0.0)	(\$0.0)	(\$0.1)	(\$0.2)	(\$0.1)	(\$0.3)	(\$0.0)	(\$0.0)	(\$0.0)	(\$0.0)	(\$0.0)	(\$0.0)	(\$0.5)
Production Tax Credits		(\$224.2)	(\$364.6)	\$0.0	\$0.0	(\$8.4)	(\$26.0)	(\$29.8)	(\$36.5)	(\$37.4)	(\$37.2)	(\$38.2)	(\$39.3)	(\$39.0)	(\$39.9)	(\$28.2)	(\$4.6)
Total Variable Revenue Requirements (fav) unfav		(\$740.8)	(\$2,053.3)	(\$0.0)	(\$0.0)	(\$23.2)	(\$60.3)	(\$68.0)	(\$74.1)	(\$74.4)	(\$72.4)	(\$71.2)	(\$72.6)	(\$71.2)	(\$76.8)	(\$68.1)	(\$1,320.8)
Net Revenue Requirements (fav) unfav		(\$310.0)	(\$1,378.0)	\$1.5	\$10.8	\$25.0	\$16.0	\$8.6	(\$24.6)	(\$7.4)	(\$27.8)	(\$13.4)	(\$51.0)	(\$66.8)	(\$47.6)	(\$35.8)	(\$1,165.5)
Participant Subscription Fees and Bill Credits																	
Subscription Fees (Revenue)	% of Total	(\$418.7)	(\$1,125.7)	\$0.0	\$0.0	(\$10.0)	(\$31.9)	(\$37.5)	(\$37.5)	(\$37.5)	(\$37.5)	(\$37.5)	(\$37.5)	(\$37.5)	(\$37.5)	(\$37.5)	(\$746.1)
Bill Credits		\$429.2	\$1,183.5	\$0.0	\$0.0	\$10.3	\$30.9	\$35.8	\$36.1	\$36.3	\$36.7	\$37.0	\$37.5	\$37.7	\$38.1	\$38.4	\$808.7
Participant Net Distribution (Payment)	3.4%	\$10.5	\$57.7	\$0.0	\$0.0	\$0.3	(\$1.0)	(\$1.7)	(\$1.5)	(\$1.2)	(\$0.9)	(\$0.5)	(\$0.1)	\$0.2	\$0.6	\$0.9	\$62.6
General Body of Customers Revenue Requirement																	
Fixed																	
Total Fixed Revenue Requirements	% of Total	\$430.8	\$675.3	\$1.5	\$10.8	\$48.1	\$76.3	\$76.7	\$49.5	\$67.0	\$44.6	\$57.8	\$21.6	\$4.4	\$29.3	\$32.4	\$155.4
Participant Subscription Fees (Revenue)	97.2%	(\$418.7)	(\$1,125.7)	\$0.0	\$0.0	(\$10.0)	(\$31.9)	(\$37.5)	(\$37.5)	(\$37.5)	(\$37.5)	(\$37.5)	(\$37.5)	(\$37.5)	(\$37.5)	(\$37.5)	(\$746.1)
Net Fixed Revenue Requirements (fav) unfav	2.8%	\$12.1	(\$450.5)	\$1.5	\$10.8	\$38.1	\$44.4	\$39.1	\$12.0	\$29.5	\$7.0	\$20.3	(\$15.9)	(\$33.2)	(\$8.3)	(\$5.2)	(\$590.7)
Variable																	
Total Variable Revenue Requirements (fav) unfav	% of Total	(\$740.8)	(\$2,053.3)	(\$0.0)	(\$0.0)	(\$23.2)	(\$60.3)	(\$68.0)	(\$74.1)	(\$74.4)	(\$72.4)	(\$71.2)	(\$72.6)	(\$71.2)	(\$76.8)	(\$68.1)	(\$1,320.8)
Participant Bill Credits	57.9%	\$429.2	\$1,183.5	\$0.0	\$0.0	\$10.3	\$30.9	\$35.8	\$36.1	\$36.3	\$36.7	\$37.0	\$37.5	\$37.7	\$38.1	\$38.4	\$808.7
Net Variable Revenue Requirements (fav) unfav	42.1%	(\$311.6)	(\$869.8)	(\$0.0)	(\$0.0)	(\$12.8)	(\$29.4)	(\$32.2)	(\$38.1)	(\$38.1)	(\$35.7)	(\$34.2)	(\$35.2)	(\$33.4)	(\$38.8)	(\$29.7)	(\$512.1)
Total Gen. Body of Customers Net RevReqs (fav) unfav	96.6%	(\$299.5)	(\$1,320.3)	\$1.5	\$10.8	\$25.3	\$15.0	\$6.9	(\$26.1)	(\$8.6)	(\$28.7)	(\$13.9)	(\$51.1)	(\$66.6)	(\$47.0)	(\$34.8)	(\$1,102.9)

(1) System Impacts - Include avoided generation capital, transmission capital and fixed O&M

**Clean Energy Connection Subscription Revenue Company Adjustment
2025 - 2027 Calendar Years**

Line	Calendar Year	Month	Subscription Rate (\$/kW-Month)	Included in Financial Plan 10 CEC Sites - Original		Proposed Company Adjustment 5 CEC Sites - Expansion		Total Subscription Revenue Total 15 CEC Sites	
				Total KW	Projected Subscription Revenue	Total KW	Projected Subscription Revenue	Total KW	Projected Subscription Revenue
1	2025	Jan	\$8.35	749,000	\$6,254,150	n/a	n/a	749,000	\$6,254,150
2	2025	Feb	\$8.35	749,000	6,254,150	n/a	n/a	749,000	6,254,150
3	2025	Mar	\$8.35	749,000	6,254,150	n/a	n/a	749,000	6,254,150
4	2025	Apr	\$8.35	749,000	6,254,150	n/a	n/a	749,000	6,254,150
5	2025	May	\$8.35	749,000	6,254,150	149,800	\$1,250,830	898,800	7,504,980
6	2025	Jun	\$8.35	749,000	6,254,150	149,800	1,250,830	898,800	7,504,980
7	2025	Jul	\$8.35	749,000	6,254,150	149,800	1,250,830	898,800	7,504,980
8	2025	Aug	\$8.35	749,000	6,254,150	149,800	1,250,830	898,800	7,504,980
9	2025	Sep	\$8.35	749,000	6,254,150	149,800	1,250,830	898,800	7,504,980
10	2025	Oct	\$8.35	749,000	6,254,150	149,800	1,250,830	898,800	7,504,980
11	2025	Nov	\$8.35	749,000	6,254,150	149,800	1,250,830	898,800	7,504,980
12	2025	Dec	\$8.35	749,000	6,254,150	149,800	1,250,830	898,800	7,504,980
13					75,049,800		10,006,640		85,056,440
14									
15	2026	Jan	\$8.35	749,000	6,254,150	149,800	1,250,830	898,800	7,504,980
16	2026	Feb	\$8.35	749,000	6,254,150	299,600	2,501,660	1,048,600	8,755,810
17	2026	Mar	\$8.35	749,000	6,254,150	299,600	2,501,660	1,048,600	8,755,810
18	2026	Apr	\$8.35	749,000	6,254,150	299,600	2,501,660	1,048,600	8,755,810
19	2026	May	\$8.35	749,000	6,254,150	299,600	2,501,660	1,048,600	8,755,810
20	2026	Jun	\$8.35	749,000	6,254,150	299,600	2,501,660	1,048,600	8,755,810
21	2026	Jul	\$8.35	749,000	6,254,150	299,600	2,501,660	1,048,600	8,755,810
22	2026	Aug	\$8.35	749,000	6,254,150	374,500	3,127,075	1,123,500	9,381,225
23	2026	Sep	\$8.35	749,000	6,254,150	374,500	3,127,075	1,123,500	9,381,225
24	2026	Oct	\$8.35	749,000	6,254,150	374,500	3,127,075	1,123,500	9,381,225
25	2026	Nov	\$8.35	749,000	6,254,150	374,500	3,127,075	1,123,500	9,381,225
26	2026	Dec	\$8.35	749,000	6,254,150	374,500	3,127,075	1,123,500	9,381,225
27					75,049,800		31,896,165		106,945,965
28									
29	2027	Jan	\$8.35	749,000	6,254,150	374,500	3,127,075	1,123,500	9,381,225
30	2027	Feb	\$8.35	749,000	6,254,150	374,500	3,127,075	1,123,500	9,381,225
31	2027	Mar	\$8.35	749,000	6,254,150	374,500	3,127,075	1,123,500	9,381,225
32	2027	Apr	\$8.35	749,000	6,254,150	374,500	3,127,075	1,123,500	9,381,225
33	2027	May	\$8.35	749,000	6,254,150	374,500	3,127,075	1,123,500	9,381,225
34	2027	Jun	\$8.35	749,000	6,254,150	374,500	3,127,075	1,123,500	9,381,225
35	2027	Jul	\$8.35	749,000	6,254,150	374,500	3,127,075	1,123,500	9,381,225
36	2027	Aug	\$8.35	749,000	6,254,150	374,500	3,127,075	1,123,500	9,381,225
37	2027	Sep	\$8.35	749,000	6,254,150	374,500	3,127,075	1,123,500	9,381,225
38	2027	Oct	\$8.35	749,000	6,254,150	374,500	3,127,075	1,123,500	9,381,225
39	2027	Nov	\$8.35	749,000	6,254,150	374,500	3,127,075	1,123,500	9,381,225
40	2027	Dec	\$8.35	749,000	6,254,150	374,500	3,127,075	1,123,500	9,381,225
41					75,049,800		37,524,900		112,574,700
42									
43					\$225,149,400		\$79,427,705		\$304,577,105

Functionalization, Classification, and Allocation of Plant

Plant/FERC Account	Function	Stratification/ Sub-Function	Classification	Jurisdictional Allocation	Class Allocation
341-346 Bartow CC	Production	Base	Demand	Stratified - 12CP	12CP & 25% AD
341-346 Citrus CC	Production	Base	Demand	Stratified - 12CP	12CP & 25% AD
311-316 Crystal River Units 4&5 Coal	Production	Base	Demand	Stratified - 12CP	12CP & 25% AD
341-346 Hines CC	Production	Base	Demand	Stratified - 12CP	12CP & 25% AD
341-346 Osprey CT	Production	Base	Demand	Stratified - 12CP	12CP & 25% AD
340, 346 Other Production Miscellaneous	Production	Base	Demand	Stratified - 12CP	12CP & 25% AD
310, 316 Steam Miscellaneous	Production	Base	Demand	Stratified - 12CP	12CP & 25% AD
341-346 Univ of Florida CC	Production	Base	Demand	Stratified - 12CP	12CP & 25% AD
311-316 Anclote Steam	Production	Intermediate	Demand	Stratified - 12CP	12CP & 25% AD
341-346 Tiger Bay CC	Production	Intermediate	Demand	Stratified - 12CP	12CP & 25% AD
341-346 Avon Park CT	Production	Peaking	Demand	Stratified - 12CP	12CP & 25% AD
341-346 Bartow CT	Production	Peaking	Demand	Stratified - 12CP	12CP & 25% AD
341-346 Bayboro CT	Production	Peaking	Demand	Stratified - 12CP	12CP & 25% AD
341-346 Debarry CT	Production	Peaking	Demand	Stratified - 12CP	12CP & 25% AD
341, 346 Higgins CT	Production	Peaking	Demand	Stratified - 12CP	12CP & 25% AD
341-346 Intercession City CT	Production	Peaking	Demand	Stratified - 12CP	12CP & 25% AD
341-346 Suwannee CT	Production	Peaking	Demand	Stratified - 12CP	12CP & 25% AD
341, 344, 345 Bay Trail Solar	Production	Solar	Demand	Stratified - 12CP	12CP & 25% AD
341, 344, 345 Charlie Creek Solar	Production	Solar	Demand	Stratified - 12CP	12CP & 25% AD
341, 344, 345 Clean Energy Connect Solar	Production	Solar	Demand	Stratified - 12CP	12CP & 25% AD
341, 344, 345, 346 Columbia Solar	Production	Solar	Demand	Stratified - 12CP	12CP & 25% AD
341, 344, 345 Debarry Solar	Production	Solar	Demand	Stratified - 12CP	12CP & 25% AD
341, 344, 345 Duette Solar	Production	Solar	Demand	Stratified - 12CP	12CP & 25% AD
341, 344, 345 Fort Green Solar	Production	Solar	Demand	Stratified - 12CP	12CP & 25% AD
341, 344, 345, 346 Hamilton Solar	Production	Solar	Demand	Stratified - 12CP	12CP & 25% AD
341, 344, 345 Lake Placid Solar	Production	Solar	Demand	Stratified - 12CP	12CP & 25% AD
341, 344, 345 Osceola Solar	Production	Solar	Demand	Stratified - 12CP	12CP & 25% AD
341, 344, 345, 346 Perry Solar	Production	Solar	Demand	Stratified - 12CP	12CP & 25% AD
341, 344, 345 Sandy Creek Solar	Production	Solar	Demand	Stratified - 12CP	12CP & 25% AD
340, 341, 344, 345 Santa Fe Solar	Production	Solar	Demand	Stratified - 12CP	12CP & 25% AD
344, 345 St. Pete Pier Solar	Production	Solar	Demand	Stratified - 12CP	12CP & 25% AD
341, 344, 345 Suwannee Solar	Production	Solar	Demand	Stratified - 12CP	12CP & 25% AD
341, 344, 345, 346 Trenton Solar	Production	Solar	Demand	Stratified - 12CP	12CP & 25% AD
341, 344, 345 Twin Rivers Solar	Production	Solar	Demand	Stratified - 12CP	12CP & 25% AD
348 Energy Storage Equipment - Production	Production	N/A	Demand	Stratified - 12CP	12CP & 25% AD
350 Trans Land & Land Rights	Transmission	N/A	Demand	12CP	12CP
352 Trans Structures & Improvements	Transmission	N/A	Demand	12CP	12CP
353 Trans Station Equip	Production	Base	Demand	Stratified - 12CP	12CP
	Production	Intermediate	Demand	Stratified - 12CP	12CP
	Production	Peaking	Demand	Stratified - 12CP	12CP
	Production	Solar	Demand	Stratified - 12CP	12CP
	Transmission	N/A	Demand	12CP	12CP
353.2 Trans Energy Control Center	Transmission	N/A	Demand	12CP	12CP
354 Trans Towers & Fixtures	Transmission	N/A	Demand	12CP	12CP
355 Trans Poles & Fixtures	Transmission	N/A	Demand	12CP	12CP
356 Trans OH Conduct & Devices	Transmission	N/A	Demand	12CP	12CP
	Distribution	Primary	Demand	Retail	12CP
357 Trans Underground Conduit	Transmission	N/A	Demand	12CP	12CP
358 Trans Underground Conductors & Devices	Transmission	N/A	Demand	12CP	12CP
359 Trans Roads & Trails	Transmission	N/A	Demand	12CP	12CP
360 Distribution Land and land rights	Distribution	Primary	Demand	Retail	Class NCP at Primary
361 Distribution Structures & improvements	Distribution	Primary	Demand	Retail	Class NCP at Primary
362 Distribution Station equipment	Distribution	Primary	Demand	Retail	Class NCP at Primary
		IS Equipment	Direct Assign	Retail	IS/CS Class
		Primary	Demand	Retail	Class NCP at Primary
363 Distribution Energy Storage Equipment	Distribution	Primary	Demand	Retail	Class NCP at Primary
364 Distribution Poles, towers, and fixtures	Distribution	Primary 73%	Demand	Retail	Class NCP at Primary
		Secondary 27%	Demand	Retail	Customer Max Demand at Secondary
		Lighting	Direct Assign	Retail	Lighting
365 Distribution Overhead conductors and devices	Distribution	Primary 69%	Demand	Retail	Class NCP at Primary
		Secondary 31%	Demand	Retail	Customer Max Demand at Secondary
		IS Equipment	Direct Assign	Retail	IS/CS Class
366 Distribution Underground conduit	Distribution	Primary	Demand	Retail	Class NCP at Primary
367 Distribution Underground conductors and devices	Distribution	Primary 63%	Demand	Retail	Class NCP at Primary
		Secondary 37%	Demand	Retail	Customer Max Demand at Secondary
368 Distribution Line transformers	Distribution	Secondary	Demand	Retail	Customer Max Demand at Secondary
369 Distribution Services	Distribution	Services	Customer	Retail	Number of Customers at Secondary
370 Distribution Meters	Distribution	Meter	Customer	Retail	Meter Investment
371 Distribution Installations on customers' premises	Distribution	Meter	Customer	Retail	Meter Investment
373 Distribution Street lighting and signal systems	Distribution	Lighting	Direct Assign	Retail	Lighting Class
387 Energy Storage	Storage	N/A	Energy	kWh	kWh
389 General Land & Land Rights	General & Intangible	N/A	Combination	Labor	Labor
390 General Structures & Improvements	General & Intangible	N/A	Combination	Labor	Labor
391 General Office Furn & Equip	General & Intangible	N/A	Combination	Labor	Labor
392 General Transportation Equipment	General & Intangible	N/A	Combination	Labor	Labor
393 General Stores Equipment	General & Intangible	N/A	Combination	Labor	Labor
394 General Tools Shop & Garage Equip	General & Intangible	N/A	Combination	Labor	Labor
395 General Laboratory Equip	General & Intangible	N/A	Combination	Labor	Labor
396 General Power Operating Equip	General & Intangible	N/A	Combination	Labor	Labor
397 General Communication Equip	General & Intangible	N/A	Combination	Labor	Labor
398 General Misc Equip	General & Intangible	N/A	Combination	Labor	Labor
301-303 Intangible Plant - Franchise & Other	General & Intangible	N/A	Customer	Retail	Number of Customers
301-303 Intangible Plant - Customer Connect	General & Intangible	N/A	Customer	Retail	Number of Customers
301-303 Intangible Plant - Software	General & Intangible	N/A	Combination	Labor	Labor

Delivery Voltage Credit Calculation

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Line No.	Cost of Service E-6b ⁽¹⁾	Function	E-6b Ref.	Billed kW at Effective Secondary E-6b (1)	E-6b (1) Ref.	Unit Cost \$/kW (1)/(2)	Cumulative Unit Cost \$/kW
1	2025						
2	\$41,863,004	Distribution Secondary	line 9, col. 5 & 6	32,279,185	line 32, col. 5 & 6	\$1.30	\$1.30
3	\$200,838,215	Distribution Primary	line 7, col. 5 & 6	41,150,725	line 31, col. 5 & 6	\$4.88	\$6.18
4	\$108,854,003	Transmission < 230 kV	line 6, col. 5 & 6 x 65.36% ⁽²⁾	44,836,933	line 30, col. 5 & 6	\$2.43	\$8.61
5							
6	2026						
7	\$43,510,897	Distribution Secondary	line 9, col. 5 & 6	32,446,481	line 32, col. 5 & 6	\$1.34	\$1.34
8	\$212,436,198	Distribution Primary	line 7, col. 5 & 6	41,387,055	line 31, col. 5 & 6	\$5.13	\$6.47
9	\$115,699,581	Transmission < 230 kV	line 6, col. 5 & 6 x 65.36% ⁽²⁾	45,124,842	line 30, col. 5 & 6	\$2.56	\$9.04
10							
11	2027						
12	\$44,538,825	Distribution Secondary	line 9, col. 5 & 6	32,638,120	line 32, col. 5 & 6	\$1.36	\$1.36
13	\$219,495,376	Distribution Primary	line 7, col. 5 & 6	41,612,889	line 31, col. 5 & 6	\$5.27	\$6.64
14	\$117,750,259	Transmission < 230 kV	line 6, col. 5 & 6 x 65.36% ⁽²⁾	45,362,629	line 30, col. 5 & 6	\$2.60	\$9.24

Note 1: Credits are calculated based on Cost of Service for rates classes with demand rates: GSD, CS, IS, SS-1, SS-2 and SS-3.

Note 2: Percentage of Transmission System Assets less than 230kV