



Matthew R. Bernier
ASSOCIATE GENERAL COUNSEL

January 7, 2026

VIA ELECTRONIC FILING

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

Re: *Duke Energy Florida, LLC's Fuel Emergency Plan; Undocketed*

Dear Mr. Teitzman:

Pursuant to Rule 25-6.0185, F.A.C., Duke Energy Florida, LLC, hereby submits for filing its revised Fuel Emergency Plan in both clean copy format and redline format.

Thank you for your assistance in this matter. Please feel free to call me at (850) 521-1428 should you have any questions concerning this filing.

Sincerely,

/s/ Matthew R. Bernier

Matthew R. Bernier

MRB/mh
Enclosures

**ENERGY CONTROL CENTER
TRANSMISSION SYSTEM OPERATIONS DEPARTMENT
DUKE ENERGY FLORIDA**

Duke Energy Florida

Fuel Emergency Plan

Rev. 12

Applicability	DEF ECC
Document Owner	Taylor Smith
Date Approved	See Signature Page
Effective Date	11/01/2025
Review Cycle	Each 3 Calendar Years
Document Classification	Public
Region	FRCC – Duke Energy Florida, Inc. - NCR00063

Purpose:

This document outlines the procedure to be used in the event of an extended fuel emergency involving Duke Energy Florida (DEF). Should an extended fuel emergency or the threat of an extended fuel emergency occur, one in which the energy supply in the entire service territory is subject to jeopardy, then this plan applies.

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1.0 Purpose and Scope

The Duke Energy Fuels and Systems Optimization (FSO) Department is responsible for the preparation and maintenance of the Fuel Emergency Plan. The DEF Energy Control Center (ECC), in conjunction with the Duke Energy FSO Department, is the primary contact for the plan document. The DEF ECC will take the lead in initiating and coordinating the periodic review and update of this Fuel Emergency Plan.

Beginning in January 1999 and every three years thereafter, Duke Energy Florida (DEF) is required to notify the Florida Public Service Commission (PSC) that we have reviewed our Fuel Emergency Plan (FPSC Rule 25-6.0185). Whenever the Fuel Emergency Plan is updated with material changes, the new plan document must be filed with the PSC. Matthew Bernier in Legal is the contact for filing notices or updates. The Fuel Emergency Plan also supports compliance with NERC standard EOP-011.

2.0 Introduction

This plan outlines the procedure to be used in the event of an extended fuel emergency involving Duke Energy Florida (DEF). Should an extended fuel emergency or the threat of an extended fuel emergency occur, one in which the energy supply in the entire DEF service territory is in jeopardy, then this plan applies.

A Fuel Supply Committee is established and will consist of one representative from each of the following sections: Power Trading, System Operations (Florida Energy Control Center), System Optimization, Fuel Procurement, Regulatory Affairs and Corporate Communications. Other representatives may be identified by the Fuel Supply Committee. The General Manager of System Operations, Florida, or designated representative will serve as Chair. The Senior Vice President Fuels and Systems Optimization, or designated representative, will closely monitor fuel supplies, deliveries, and anticipated usage rates. When fuel inventory levels reach or are at risk of reaching levels that could adversely impact the dispatch and operation of DEF's generation fleet, as determined by the VP of FSO, the Chairman will activate the Fuel Supply Committee. The Committee will abide by all applicable state and federal standards and codes of conduct.

The Committee has authority and responsibility to decide when the levels or availability of fuel supplies, or the rate of change in fuel inventory levels is such that declaration of an ALERT is required. The Chairman will inform the Executive Vice President, Regulated Generation, when an ALERT is declared so that he or she may implement the appropriate portions of this plan.

3.0 Definitions

Fuel inventory levels are defined for the following fuel emergency situations. These situations could occur at any individual site or at multiple sites where generation and fuel storage facilities exist, thus causing a site emergency.

ALERT: An ALERT condition exists when the potential for a FUEL EMERGENCY arises, and specific Company actions are deemed prudent.

FUEL EMERGENCY: When fuel inventory levels are such that current or projected usage will result in the supply reaching the following levels before deliveries can be made and a downward trend is anticipated to continue:

- Light Oil – 50 hours (at a 50% burn rate based on system average inventory)
- Coal – 10 days
- Natural Gas – Loss of major pipeline supply source that cannot be mitigated

4.0 Alert

When an ALERT condition is declared, the following actions will be taken under the direction of the Fuel Supply Committee to minimize the potential for the situation to progress to a fuel emergency condition. These actions may include, but are not limited to, the following (actions may be performed in any order depending on the nature of the fuel supply shortfall):

1. Notify the Executive Vice President & President, Regulated Generation and Transmission, that a fuel supply ALERT is declared and in progress.
2. Assess existing and projected weather conditions for potential reliability impacts. If any cold weather conditions or extreme weather conditions are expected or exist implement a mitigation plan to address those impacts. Review fuel availability and extreme weather preparations to ensure fuel supply, delivery, inventories and planned use throughout the duration of the event. Review and evaluate dual fuel options and ability to switch fuels if necessary, during the event.
3. Conduct periodic (at least daily) conference calls with the Fuel Supply Committee to review current status and operational changes. Such calls (if applicable) shall be posted on OASIS pursuant to FERC standards of conduct requirements.
4. Defer or reschedule, to the extent practicable, maintenance on oil, natural gas or coal-fired units.
5. Operate oil, natural gas, and coal-fired generation consistent with conserving the primary fuel(s) in short supply while minimizing a potential secondary fuel shortage.
6. Engage the power market to effectively maximize conservation of constrained fuel(s) via market purchases, including consideration of long-term capacity and energy purchases.
7. Request 24-hour fuel unloading capabilities at oil and coal-fired generation sites.
8. Utilize load management procedures and voltage reductions to control demand and energy consumption consistent with conserving the fuel(s) in short supply.
9. Shut down low inventory and/or high heat rate units and/or natural gas units, over weekends and overnight, if practicable, to conserve fuel(s) in short supply.
10. Place maximum allowable Operating Reserve in the non-synchronized quick-start category to minimize fuel consumption.
11. Request the Fuel Supply Committee to implement fuel transfers to eliminate geographical shortages and locate fuel where it can most efficiently be utilized.
12. Request the Environmental Service Department to remove environmentally initiated constraints for generating units that inhibit the most efficient use of available fuel.
13. ECC to evaluate the use of DSM and industrial curtailment to minimize fuel consumption.
14. The Chairman will notify the Chairman of the FRCC Operating Committee, FRCC Director of Operations, FRCC Staff, FRCC State Capacity Emergency Coordinator (SCEC) and the FRCC Reliability Coordinator and apprise them of our alert status and will request daily conference calls to apprise them of our fuel inventory status.

5.0 Fuel Emergency

5.1 Granting Authority in Fuel Supply Emergency

After the Fuel Supply Committee has determined that a specific fuel emergency exists, they will inform the Executive Vice President, Regulated Generation, who will implement the associated corrective actions for the specific FUEL EMERGENCY condition in effect consistent with system security constraints. The Fuel Supply Committee will have the authority to implement and cancel steps within the specific FUEL EMERGENCY condition as system conditions permit.

5.2 Declaration of Fuel Emergency

When a FUEL EMERGENCY is declared, the Chairman, Fuel Supply Committee, shall ensure all actions normally anticipated to occur during an ALERT have taken place and then will invoke the following actions to minimize fuel consumption. These actions may include, but are not limited to, the following (actions may be performed in any order depending on the nature of the fuel supply shortfall):

1. Notify appropriate DEF personnel that a FUEL EMERGENCY is in effect. The Corporate Communications Department will have responsibility for notification of employees, customers, and the general public. News media representatives will be contacted to assist.
2. Conduct periodic (at least daily) conference calls with the Fuel Supply Committee to review current status and operational changes. Such calls shall be posted on OASIS pursuant to FERC standards of conduct requirements.
3. Implement twenty-four-hour fuel unloading capabilities at critical oil and coal-fired generation sites.
4. Curtail Company use wherever possible.
5. ECC to limit transmission line equipment outages to emergency outages if the outages would reduce delivery of energy into the system.
6. Engage the power market to review interchange transactions to effectively maximize conservation of constrained fuel(s) via market purchases, including potential energy repurchases of firm wholesale transactions.
7. The Chairman will contact the Chairman of the FRCC Operating Committee, FRCC Director of Operations, FRCC Staff, FRCC State Capacity Emergency Coordinator and the FRCC Reliability Coordinator and apprise them of our fuel emergency status.
8. ECC to implement the use of DSM and industrial curtailment to minimize fuel consumption.
9. Advise the Corporate Communications Department to make radio and television appeals for conservation to the public to minimize electrical energy consumption.
10. Contact municipal systems and cooperative systems and request that their customers voluntarily reduce their load.
11. Declare force majeure and discontinue firm energy sales to neighboring systems as permitted under the power sales agreement, or as directed by Governor's orders during the emergency. (Except under extreme conditions, assistance could be provided if fuel inventory levels are above the 12-hour emergency minimum.)

5.3 Customer Priorities for Load Interruption

In the early stages of a capacity emergency, DEF will curtail recallable interchange sales and all interchange sales declining a buy-through option. The DEF General Load Reduction Plan (GLRP) contains different status and action levels dependent on the nature of the capacity emergency.

At various points during a developing capacity emergency several other actions are undertaken to mitigate the severity of the emergency, including maximizing available generation, utilizing load management, activating voltage reduction, reduction of DEF internal energy consumption and public appeals for conservation.

Firm load curtailment occurs during a declared EEA 3. Firm loads are interrupted on a rotating basis to maintain a balance between available generation and system load. The load interruptions will be rotated in order such that no single customer or area is without electricity for an extended period of time.

The priority for interruption of individual customers and feeders is determined and reviewed on an annual basis as part of the DEF under-frequency relay program update. Each year, each feeder on the DEF system is reviewed and classified for purposes of potential firm load interruption. Feeders serving critical customers or loads are classified as 'no trip' and are exempt from interruption providing that resources exist to continue serving this critical group of customers. The types of customers and loads designated as no trip are as follows:

- Critical DEF facilities
- Hospitals and nursing homes
- Customers on life-sustaining medical equipment
- Airports and FAA facilities
- Police and fire stations
- Telephone and satellite communication facilities
- Water treatment and pumping facilities
- Critical government facilities
- Newspaper, radio, and TV stations
- Malls and large public arenas
- Major commercial and industrial customers

Whenever possible during a capacity emergency, DEF will sustain uninterrupted service to critical loads and customers.

5.4 Statewide Fuel Supply Emergency

In the event that a Fuel Supply Emergency is declared by the Governor of Florida due to conditions either within DEF or in another utility, DEF will take the actions listed within this plan consistent with the actions directed by the Governor's order and the FRCC, specifically:

1. The Fuel Supply Committee will be responsible for fuel calculations and communication with the FRCC Fuel Supply Shortage Task Force, upon request, DEF's remaining days of fuel supply by fuel type as described below (reference FRCC Fuel Shortage Plan, Attachment B). They will also supply any additional data relating to fuel supply conditions requested by the FRCC Fuel Supply Shortage Task Force or FRCC staff.
 - a. Each participant will provide an estimate of its energy source requirement and expected supply availability by type of source for each of the next eight (8) calendar weeks following the request.
 - b. Each participant will determine the remaining days of fuel supply, expressed in terms of Days Burn, by fuel type for each of the next eight (8) calendar weeks following the request, considering current inventory, burn, and expected supply availability.
 - c. The FRCC Fuel Supply Shortage Task Force will calculate the remaining days of fuel supply, expressed in terms of Days Burn, for the FRCC RC Area. The Days Burn for the FRCC RC Area shall be the weighted average, based on energy source requirement, of the individual participants' Days Burn.

- d. Each participant will provide sufficient data to substantiate the previous calculations. Upon the initiation of a Fuel Supply Emergency, the following actions shall be taken, at the discretion of the FRCC OC:
 - e. Each participant will continue to provide an estimate of its energy source requirement and expected supply availability by type of source for each of the next eight (8) calendar weeks.
 - f. Each participant will continue to determine their Days Burn by fuel type for each of the next eight (8) calendar weeks.
 - g. Each participant will maintain the reporting frequency of items (1) and (2) above.
 - h. The FRCC Fuel Supply Shortage Task Force will continue to calculate the Days Burn for the FRCC RC Area in the manner previously described. This information will be provided to the FRCC OC on an as needed basis.
- 2. The Executive Vice President, Regulated Generation, or designee, will assure the operation of all generating units as appropriate to share energy to minimize a statewide fuel shortage.
- 3. The Senior Vice President, Fuels and Systems Optimization or designee, will be responsible for arranging any necessary transfer of fuels and the conditions affecting the transfer and payment and/or return of such fuel.

5.5 Authority for Reduction of Fuel Emergency Conditions

If any portion of this plan has been activated as a result of the declaration of a fuel emergency by the Governor of Florida, then this plan will remain active and in effect until the emergency has been terminated by the Governor.

If this plan has been initiated by the Fuel Supply Committee, then the Chairman, Fuel Supply Committee, will determine when fuel supply and inventory levels are such that the fuel emergency condition can be terminated. The Fuel Supply Committee chairman will then notify all affected departments of the termination of the fuel emergency condition and institute relaxation of the conservation measures consistent with system reliability requirements. The Fuel Supply Committee chairman will also notify the appropriate state and federal agencies as required.

Approvals

Recommend:

Taylor Smith
Engineer II, Operations Engineering

**Taylor
Smith**

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Taylor Smith
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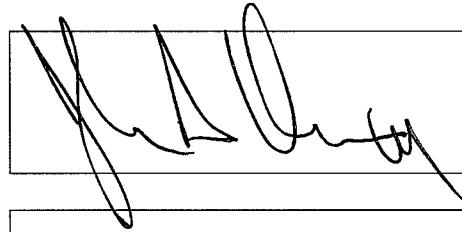
Approve:

Marcelo Pesantez
Manager, Operations Engineering

**Marcelo
Pesantez**

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Marcelo Pesantez
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John Verderame
SVP Fuels & System Optimization



Curtis Lloyd
General Manager, System
Operations

Curtis Lloyd

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Curtis Lloyd
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Effective date of this revision: 11/01/2025

NOTE: Upon final approval, provide copies to the following departments:

DEF Legal Department (for filing with the FPSC)

Submit to FRCC RC for EOP-011 review prior to effective date

DEF Regulatory

DEF Fossil Hydro Operations

DEF Fuels & System Optimization

Post on FRCC TOP/BA posting area

**ENERGY CONTROL CENTER
TRANSMISSION SYSTEM OPERATIONS DEPARTMENT
DUKE ENERGY FLORIDA**

Duke Energy Florida Fuel Emergency Plan Revision History

Rev #	Date of Revision	Description of Changes to Document
12	10/14/2025	Annual Procedure Update
11	10/15/2022	Updated sections 4.0, 5.2 and 5.4 to align with revisions to the FRCC Fuel Shortage Plan and the FRCC Generating Capacity Shortage Plan effective 11/1/2021 and general administrative updates to procedure. Updated section 4 for NERC Standard EOP-011-3 to address cold weather conditions and extreme weather conditions.
10	12/2019	Annual Procedure Update
9	12/2017	Annual review and update
8	12/2016	Updated procedure format and annual update
7	10/2015	Annual Procedure Update
6	10/2014	Annual Procedure Update
5	01/2013	Annual Procedure Update
4	12/2012	Annual Procedure Update
3.3	07/2011	Annual Procedure Update
3.2	12/2009	Annual Procedure Update
3.1	11/2008	Annual Procedure Update
3.0	04/2007	Annual Procedure Update
	01/2006	Annual Procedure Update
	05/2003	Annual Procedure Update
	06/2002	Annual Procedure Update
	12/1998	Annual Procedure Update
	09/1997	Annual Procedure Update
	10/1992	Annual Procedure Update
	01/1992	Implementation

ENERGY CONTROL CENTER
TRANSMISSION SYSTEM OPERATIONS DEPARTMENT
DUKE ENERGY FLORIDA

Duke Energy Florida Fuel Emergency Plan

Rev. 4412

Applicability	DEF ECC
Document Owner	<u>Taylor Smith</u> <u>William Unterbrink</u>
Date Approved	See Signature Page
Effective Date	<u>12/31/2022</u> <u>10/14/2025</u>
Review Cycle	Each 3 Calendar Years
Document Classification	Public
Region	FRCC – Duke Energy Florida, Inc. - NCR00063

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Critical DEF facilities
Hospitals and nursing homes
Customers on life-sustaining medical equipment
Airports and FAA facilities
Police and fire stations
Telephone and satellite communication facilities
Water treatment and pumping facilities
Critical government facilities
Newspaper, radio, and TV stations
Malls and large public arenas
Major commercial and industrial customers

Whenever possible during a capacity emergency, DEF will sustain uninterrupted service to critical loads and customers.

5.4 Statewide Fuel Supply Emergency

In the event that a Fuel Supply Emergency is declared by the Governor of Florida due to conditions either within DEF or in another utility, DEF will take the actions listed within this plan consistent with the actions directed by the Governor's order and the FRCC, specifically:

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a. Each participant will provide an estimate of its energy source requirement and expected supply availability by type of source for each of the next eight (8) calendar weeks following the request.

a.

b. Each participant will determine the remaining days of fuel supply, expressed in terms of Days Burn, by fuel type for each of the next eight (8) calendar weeks following the request, considering current inventory, burn, and expected supply availability.

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b.

e.—The FRCC Fuel Supply Shortage Task Force will calculate the remaining days of fuel supply, expressed in terms of Days Burn, for the FRCC RC Area. The Days Burn for the FRCC RC Area shall be the weighted average, based on energy source requirement, of the individual participants' Days Burn.

c.

d.—Each participant will provide sufficient data to substantiate the previous calculations. Upon the initiation of a Fuel Supply Emergency, the following actions shall be taken, at the ~~discretion~~ of the FRCC OC:

d.

e.—Each participant will continue to provide an estimate of its energy source requirement and expected supply availability by type of source for each of the next eight (8) calendar weeks.

e.

f.—Each participant will continue to determine their Days Burn by fuel type for each of the next eight (8) calendar weeks.

f.

g.—Each participant will maintain the reporting frequency of items (1) and (2) above.

g.

h.—The FRCC Fuel Supply Shortage Task Force will continue to calculate the Days Burn for the FRCC RC Area in the manner previously described. This information will be provided to the FRCC OC on an as needed basis.

h.

2. The Executive Vice President, Regulated Generation, or designee, will assure the operation of all generating units as appropriate to share energy to minimize a statewide fuel shortage.
3. The Senior Vice President, Fuels and Systems Optimization or designee, will be responsible for arranging any necessary transfer of fuels and the conditions affecting the transfer and payment and/or return of such fuel.

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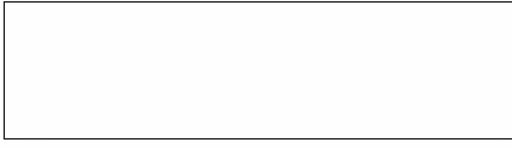
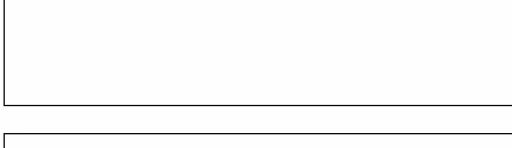
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Approvals	
Recommend:	<p><u>Taylor Smith</u><u>William Unterbrink</u> Engineer II, Operations Engineering</p> 
Approve:	<p><u>Marcelo Pesantez</u><u>Lee Schuster</u> Manager, Operations Engineering</p> 
	<p><u>John Verderame</u> <u>SVP</u> Fuels & System Optimization</p> 
	<p><u>Curtis Lloyd</u><u>Edward Scott</u> General Manager, System Operations</p> 
Effective date of this revision:	<p><u>12/31/2022</u><u>10/14/2025</u></p>
NOTE: Upon final approval, provide copies to the following departments: DEF Legal Department (for filing with the FPSC) Submit to FRCC RC for EOP-011 review prior to effective date DEF Regulatory DEF Fossil Hydro Operations DEF Fuels & System Optimization Post on FRCC TOP/BA posting area	

ENERGY CONTROL CENTER
TRANSMISSION SYSTEM OPERATIONS DEPARTMENT
DUKE ENERGY FLORIDA

Duke Energy Florida Fuel Emergency Plan Revision History

Rev #	Date of Revision	Description of Changes to Document
<u>12</u>	<u>10/14/2025</u>	<u>Annual Procedure Update</u>
11	10/15/2022	Updated sections 4.0, 5.2 and 5.4 to align with revisions to the FRCC Fuel Shortage Plan and the FRCC Generating Capacity Shortage Plan effective 11/1/2021 and general administrative updates to procedure. Updated section 4 for NERC Standard EOP-011-3 to address cold weather conditions and extreme weather conditions.
10	12/2019	Annual Procedure Update
9	12/2017	Annual review and update
8	12/2016	Updated procedure format and annual update
7	10/2015	Annual Procedure Update
6	10/2014	Annual Procedure Update
5	01/2013	Annual Procedure Update
4	12/2012	Annual Procedure Update
3.3	07/2011	Annual Procedure Update
3.2	12/2009	Annual Procedure Update
3.1	11/2008	Annual Procedure Update
3.0	04/2007	Annual Procedure Update
	01/2006	Annual Procedure Update
	05/2003	Annual Procedure Update
	06/2002	Annual Procedure Update
	12/1998	Annual Procedure Update
	09/1997	Annual Procedure Update
	10/1992	Annual Procedure Update
	01/1992	Implementation

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