

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Commission review of numeric conservation goals (Duke Energy Florida, LLC). | DOCKET NO. 20240013-EG  
DATED: MAY 6, 2024

PCS PHOSPHATE'S FOURTH SET OF INTERROGATORIES  
TO DUKE ENERGY FLORIDA, LLC (NOS. 12-16)

White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate – White Springs, by and through its undersigned attorney, propounds the following interrogatories, pursuant to Rule 1.340, Florida Rules of Civil Procedure, to Duke Energy Florida, LLC. (DEF). These interrogatories shall be answered under oath by you or your agent, who is qualified and who will be identified, with the answers being served as provided by the Rules of Civil Procedure, and within the time period set out in Order No. PSC-2024-0022-PCO-EG. As provided by Rule 1.340(a), Florida Rules of Civil Procedure, each interrogatory shall be answered separately and fully in writing under oath unless it is objected to. Each answer shall be signed by the person making it.

Give the name, address, and relationship to DEF of those persons providing the answers to each of the following interrogatories.

If an interrogatory contained herein asks for information that has already been provided or is in the process of being provided to the Commission through a Commission audit, please so state, indicating the date provided and the audit document/record request number.

DEFINITIONS

“You”, “your”, “Company” or “DEF” refers to Duke Energy Florida, LLC., its employees and authorized agents.

“Document” refers to written matter of any kind, regardless of its form, and to information recorded on any storage medium, whether in electrical, optical or electromagnetic form, and capable of reduction to writing by the use of computer hardware and software.

“Identify” means:

- (a) With respect to a person, to state the person’s name, address and business relationship (e.g., “employee”) to the Company;
- (b) With respect to a document, to state the nature of the document in sufficient detail for identification in a request for production, its date, its author, and to identify its custodian. If the information or document identified is recorded in electrical, optical or electromagnetic form, identification includes a description of the computer hardware or software required to reduce it to readable form.

INSTRUCTIONS

1. To the extent an interrogatory calls for information which cannot now be precisely and completely furnished, such information as can be furnished should be included in the answer, together with a statement that further information cannot be furnished, and a statement as to the reasons therefor. If you expect to obtain further information between the time answers are served and the time of hearing, you are requested to state this fact in each answer. If the information which cannot now be furnished is believed to be available to another person, identify such other person and the reasons for believing such person has the described information.
2. In the event any interrogatory herein calls for information or for the identification of a document which you deem to be privileged, in whole or in part, the information should be given or the document identified to the fullest extent possible consistent with such claim of privilege and specify the grounds relied upon for the claim of privilege.
3. Documents or reports to be identified shall include all documents in your possession, custody and control and all other documents of which you have knowledge. If a document is produced in response to an interrogatory, please produce a scanned copy of the originals and all versions that are different in any way from the original, whether by interlineation, receipt stamp or notation. If the Utility does not have possession, custody, or control of the originals of the documents requested, please produce a scanned copy of the version(s) in the possession, custody, or control of the Utility, however, made.

4. Separate answers shall be furnished for each interrogatory, although where the context permits, an interrogatory may be answered by reference to the answer furnished to another interrogatory.
5. For each interrogatory, identify the name, address, telephone number and position of the person responsible for providing the answer.
6. Please provide all responses to these interrogatories that include workpapers, data, calculations and spreadsheets in non-password protected and executable PC-compatible computer program/models/software. Formulae, links, and cells, formatting, metadata and any other original features assisting in calculation should be intact. To the extent the data requested is not available in the form requested, please provide the information in the form that most closely matches what has been requested.
7. To the extent practicable, PCS Phosphate requests that responsive documents which cannot be provided in original electronic format be provided on compact disk(s) or other agreed upon electronic medium in an OCR (Optical Character Recognition) searchable PDF format with bates stamp numbering. PCS Phosphate also requests that responses for each interrogatory request be provided in separate electronic folders that include the documents responsive to that request.

INTERROGATORIES

12. Please refer to page 30 of the Direct Testimony of Jim Herndon:

“For this study, adoption curve input parameters were developed for each measure based on specific criteria, including measure maturity in the market, overall measure cost, and whether the measure was currently offered through a utility program.”

- a. Please provide the input parameters regarding the interruptible, curtailable, and generation standby markets.
- b. Please provide any assessments performed of the “measure maturity” of the interruptible, curtailable, and generation standby markets in Duke Energy Florida, LLC’s service territory.

13. Please refer to page 19 of 84 of Exhibit JH-3, Section 3.2.3 and Table 6:

“Large C&I customers are all customers on the General Service Demand (GSD) tariff or on the General Service Large Demand (GSLD) tariff.”

Please explain how Mr. Herndon evaluated load data for DEF C&I customers taking service under other tariffs, including IS, IST, CS, CST, and SS.

14. Please refer to pages 20 and 22 of 84 of Exhibit JH-3. Footnote 4 states that “DR potential . . . was not end-use specific for large C&I customers.” Figure 8 purports to show industrial baseline sales by end-use. Please explain how the explanation in footnote 4 impacts the information provided in figure 8.

15. Please refer to the following statement on page 32 of 84 of Exhibit JH-3:

“Large C&I accounts generally do not provide the utility with direct control over particular end-uses. Instead, many of these customers will forego electric demand temporarily if the financial incentive is large enough.”

- a. Is this a statement of general applicability? If so, please provide the sources relied upon and the context in which it was offered.
  - b. Is this a statement specific to DEF's rates and programs? If so, please explain the basis for that statement.
  - c. In assessing the technical potential for large C&I customers, did Mr. Herndon make assumptions regarding firm and non-firm customer service levels? Please explain.
16. Please refer to the following statement on page 33 of 84 of Exhibit JH-3:

The average load profile for each customer segment was combined with historical weather data, and used to estimate hourly load as a function of weather conditions.

Please explain what weather sensitivity analysis was performed on large C&I loads.

*/s/ James W. Brew* \_\_\_\_\_

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Chemicals, Inc. d/b/a PCS Phosphate – White  
Springs*

May 6, 2024

**AFFIDAVIT**

STATE OF FLORIDA

COUNTY OF \_\_\_\_\_)

I hereby certify that on this \_\_\_\_\_ day of \_\_\_\_\_, 2024, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared \_\_\_\_\_, who is personally known to me, and he/she acknowledged before me that he/she provided the answers to interrogatory number(s) \_\_\_\_\_ from PCS PHOSPHATE'S FOURTH SET OF INTERROGATORIES TO DUKE ENERGY FLORIDA, LLC. (NOS. 12-16) in Docket No(s). 20240013-EG, and that the responses are true and correct based on his/her personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this \_\_\_\_\_ day of \_\_\_\_\_, 2024.

\_\_\_\_\_  
Notary Public  
State of Florida, at Large

My Commission Expires:  
\_\_\_\_\_

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Storm protection plan cost recovery  
clause.

DOCKET NO. 20240013-EG

DATED: MAY 6, 2024

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of PCS PHOSPHATE'S FOURTH SET OF INTERROGATORIES TO DUKE ENERGY FLORIDA, LLC. (NOS. 12-16) has been served by electronic mail to the following this 6th day of May, 2024:

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/s/ Laura Wynn Baker