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DEF's response to PCS Phosphate's first
set of interrogatories, Nos. 1-2

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Storm Protection Plan Cost Recovery
Clause

Docket No. 20210010-EI

Dated: July 15, 2021

**DUKE ENERGY FLORIDA, LLC'S
RESPONSE TO PCS PHOSPHATES'S FIRST SET OF INTERROGATORIES (NOS. 1-2)**

Duke Energy Florida, LLC ("DEF") responds to White Springs Agricultural Chemicals Inc. D/B/A PCS Phosphate's ("PCS") First Set of Interrogatories to DEF (Nos. 1-2) as follows:

INTERROGATORIES

1. For this interrogatory, please refer to Exh. No. __ (CAM-1) Form 5E. Please provide the voltage levels (e.g., 34.5kV, 69 kV, etc.) for all transmission-level operations and maintenance activities projects.

RESPONSE

Please see the attached document bearing bates numbers 20210010-DEF-000001 through 20210010-DEF-000002.

2. For this interrogatory, please refer to Exh. No. __ (CAM-1) Form 7E. Please provide the voltage levels (e.g., 34.5kV, 69 kV, etc.) for all transmission-level capital investment activities projects.

RESPONSE

Please see the attached document bearing bates numbers 20210010-DEF-000003 through 20210010-DEF-000004.

Duke Energy Florida
Storm Protection Plan Cost Recovery Clause
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Docket No. 20210010-EI

Duke Energy Florida, LLC

Witness: C.A.Menendez

Exh. No. (CAM-1)

Form 5E

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Line	O&M Activities		O&M Expenditures	OH or UG	Voltage Level
1. Distribution					
1.1	Feeder Hardening - Distribution				
	Substation	Feeder	Operations Center	OH / UG	
1.1.1	Maitland	W0087	FL Longwood Ops	112,863	OH N/A - Distr bution
1.1.2	Deltona	W4564	FL Deland Ops	166,840	OH N/A - Distr bution
1.1.3	Deland	W0806	FL Deland Ops	146,150	OH N/A - Distr bution
1.1.4	Deland	W0808	FL Deland Ops	183,990	OH N/A - Distr bution
1.1.5	Port Richey West	C209	FL Seven Springs Ops	211,934	OH N/A - Distr bution
1.1.6	Tarpon Springs	C308	FL Seven Springs Ops	240,244	OH N/A - Distr bution
1.1.7	Port St Joe Ind	N202	FL Monticello Ops	144,293	OH N/A - Distr bution
1.1.8	Taft	K1028	FL SE Orlando Ops	75,845	OH N/A - Distr bution
1.1.9	Northridge	K1822	FL Lake Wales Ops	63,465	OH N/A - Distr bution
1.1.10	Winter Garden	K203	FL Winter Garden Ops	152,255	OH N/A - Distr bution
1.1.11	Winter Garden	K206	FL Winter Garden Ops	118,224	OH N/A - Distr bution
1.1.12	Ocoee	M1095	FL Winter Garden Ops	96,204	OH N/A - Distr bution
1.1.13	Seminole	J895	FL Walsingham Ops	148,319	OH N/A - Distr bution
1.1.14	Ulmerton	J240	FL Walsingham Ops	111,785	OH N/A - Distr bution
1.1.15	Highlands	C2808	FL Clearwater Ops	57,175	OH N/A - Distr bution
1.1.16	East Clearwater	C902	FL Clearwater Ops	152,675	OH N/A - Distr bution
1.1.17	Pasadena	X211	FL St Pete Ops	218,272	OH N/A - Distr bution
1.1.18	Engineering/Materials for 2022 Projects	-	-	-	OH
	TOTAL		2,400,532	OH	
2. Transmission					
2.1	Structure Hardening - Pole Replacements		Line ID	OH / UG	
2.1.1	Please refer to Form 5E page 3 of 3				
2.2	Structure Hardening - Tower Replacements				
2.2.1	Bayview - Tri City	(HD-2)	2,537	OH	115kV
2.2.2	Tri City - Ulmerton	(HD-8)	2,537	OH	115kV
2.2.3	Holopaw - West Lake Wales	(WLXF-3)	15,222	OH	115kV
	TOTAL		20,296		
2.3	Structure Hardening - Cathodic Protection				
2.3.1	Crystal River - Central Florida	(CCF)	106,432	OH	230kV
2.3.2	Crystal River - Curlew	(CC)	106,432	OH	230kV
	TOTAL		212,864		
2.4	Structure Hardening - Drone Inspections				
2.4.1	Crystal River - Lake Tarpon 500kV	(CLT)	47,318	OH	500kV
2.4.2	Crystal River - Central Florida - 500kV	(CRCF)	38,348	OH	500kV
2.4.3	Central Florida - Kathleen - 500kV	(CFK)	24,668	OH	500kV
	TOTAL		110,334		

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Line	O&M Activities		O&M Expenditures	OH or UG	Voltage Level
2.	Transmission				
2.1	Structure Hardening - Pole Replacements	Line ID		OH / UG	
2.2.1	Avon Park Pl - South Polk	(AF-1)	135,820	OH	230kV
2.2.2	Fisheating Creek - Sun N Lakes	(ALP-SUC-1)	177,405	OH	69kV
2.2.3	Apopka South – Clarcona	(ASC-1)	4,446	OH	69kV
2.2.4	Bayboro - Central Plaza	(BCP-1)	11,315	OH	115kV
2.2.5	Bushnell East - Center Hill Radial	(BW-1)	14,147	OH	69kV
2.2.6	Brookridge - Brookville West (BWV CKT)	(BWV-1)	16,359	OH	115kV
2.2.7	Brookridge - Fl Crushed Stone Cogen Pl	(BWV-2)	12,829	OH	115kV
2.2.8	Zephyrhills North - Dade City (TECO)	(BZ-6)	25,144	OH	69kV
2.2.9	Bronson – Newberry	(CF-2)	18,784	OH	230kV
2.2.10	Ft White – Newberry	(CF-3)	34,882	OH	230kV
2.2.11	Bellevue - Maricamp	(CFO-SSB-1)	2,022	OH	69kV
2.2.12	Florida Gas Transmission - St Marks East	(CP-3)	7,077	OH	230kV
2.2.13	Monticello - Boston (Ga Pwr)	(DB-2)	2,828	OH	69kV
2.2.14	Disston - Kenneth	(DK-1)	18,858	OH	115kV
2.2.15	Taylor Ave - Walsingham	(DL-LTW-1)	10,066	OH	69kV
2.2.16	Seminole - Starkey Road	(DLW-5)	9,688	OH	69kV
2.2.17	Davenport - West Davenport Radial	(DWD-1)	3,183	OH	69kV
2.2.18	Palm Harbor - Tarpon Springs	(ECTW-4)	18,858	OH	69kV
2.2.19	Deland - Deland West	(ED-1)	4,831	OH	69kV
2.2.20	Ft White - High Springs	(FH-1)	5,255	OH	69kV
2.2.21	Clearwater - Highlands	(HCL-1)	8,800	OH	69kV
2.2.22	Higgins Pl - Curlew CKT #2	(HGC-1)	1,257	OH	115kV
2.2.23	Alderman - Tarpon Springs	(HTW-2)	3,771	OH	115kV
2.2.24	Cypresswood - Haines City	(ICLW-2)	7,955	OH	69kV
2.2.25	Dundee - Lake Wales	(ICLW-3)	6,672	OH	69kV
2.2.26	Ft White – Jasper	(JF-1)	74,072	OH	69kV
2.2.27	Cross Bayou - GE Pinellas	(LD-2)	5,041	OH	69kV
2.2.28	Clearwater - East Clearwater	(LECW-3)	21,307	OH	69kV
2.2.29	Largo - Taylor Ave	(LTW-1)	7,543	OH	69kV
2.2.30	Altamonte - North Longwood CKT #2	(NLA-1)	1,258	OH	69kV
2.2.31	Atwater - Quincy	(QX-1)	1,618	OH	115kV
2.2.32	Lake Wales - West Lake Wales CKT #2	(WLL-1)	2,839	OH	69kV
2.2.33	Altamonte – Maitland	(WO-1)	37,394	OH	69kV
2.2.34	Altamonte - North Longwood CKT #1	(WO-2)	18,841	OH	69kV
2.2.35	Lockwood Tap	(FTO-1-TL1)	25,190	OH	69kV
2.2.36	Ft Meade - South Polk	(AF-2)	92,711	OH	230kV
2.2.37	Largo - Ulmerton West	(DLW-2)	3,771	OH	69kV
2.2.38	Kelly Park - Zellwood	(EP-3)	62,659	OH	69kV
2.2.39	Hanson - Cherry Lake Radial	(HC-1)	1,213	OH	115kV
2.2.40	GE Pinellas - Largo	(LD-3)	11,330	OH	69kV
2.2.41	Isleworth - Disney World Northwest	(WT-3)	46,515	OH	69kV
2.2.42	Perry North Tap	(DP-1-TL3)	2,223	OH	69kV
2.2.43	Ulmerton West - Walsingham	(DLW-6)	7,962	OH	69kV
2.2.44	Apopka South - Woodsmere	(WP-2)	201	OH	69kV
2.2.45	Ft Meade - Dry Prairie	(FV-1)	9,174	OH	230kV
2.2.46	Webster SEC 69kV Tapline	(BCF-BW-2-TL4)	28,832	OH	69kV
2.2.47	Unassigned 2021 Projects		322,570	OH	TBD
2.2.48	Engineering/Materials for 2022 Projects	-	0	OH	
	TOTAL		1,346,516	OH	
	2021 Pole Replacement Base Rates	\$34.8M Capital	51%		
	Allocation of O&M to Base Rates vs. SPPCRC		686,009		

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Form 7E

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Line	Capital Investment Activities		Capital Expenditures	OH or UG	Voltage Level
1. Distribution					
1.1 Feeder Hardening - Distribution					
	Substation	Feeder	Operations Center	OH / UG	
1.1.1	Maitland	W0087	FL Longwood Ops	OH	N/A - Distribution
1.1.2	Deltona	W4564	FL Deland Ops	OH	N/A - Distribution
1.1.3	Deland	W0806	FL Deland Ops	OH	N/A - Distribution
1.1.4	Deland	W0808	FL Deland Ops	OH	N/A - Distribution
1.1.5	Port Richey West	C209	FL Seven Springs Ops	OH	N/A - Distribution
1.1.6	Tarpon Springs	C308	FL Seven Springs Ops	OH	N/A - Distribution
1.1.7	Port St Joe Ind	N202	FL Monticello Ops	OH	N/A - Distribution
1.1.8	Taft	K1028	FL SE Orlando Ops	OH	N/A - Distribution
1.1.9	Northridge	K1822	FL Lake Wales Ops	OH	N/A - Distribution
1.1.10	Winter Garden	K203	FL Winter Garden Ops	OH	N/A - Distribution
1.1.11	Winter Garden	K206	FL Winter Garden Ops	OH	N/A - Distribution
1.1.12	Ocoee	M1095	FL Winter Garden Ops	OH	N/A - Distribution
1.1.13	Seminole	J895	FL Walsingham Ops	OH	N/A - Distribution
1.1.14	Ulmerton	J240	FL Walsingham Ops	OH	N/A - Distribution
1.1.15	Highlands	C2808	FL Clearwater Ops	OH	N/A - Distribution
1.1.16	East Clearwater	C902	FL Clearwater Ops	OH	N/A - Distribution
1.1.17	Pasadena	X211	FL St Pete Ops	OH	N/A - Distribution
1.1.18	Engineering/Materials for 2022 Projects	-	-	OH	N/A - Distribution
	TOTAL		59,216,438		
1.2	Lateral Hardening - O/H Engineering/Materials for 2022 Projects	TBD	1,562,280	OH	N/A - Distribution
1.3	SOG Engineering/Materials for 2022 Projects	TBD	3,550,162	OH	N/A - Distribution
4.1	Lateral Hardening Underground Engineering/Materials for 2022 Projects	TBD	2,257,660	U/G	N/A - Distribution
2. Transmission					
2.1 Structure Hardening - Pole Replacements		Line ID		OH / UG	
2.1.1	Please refer to Form 7E page 3 of 3				
2.2 Structure Hardening - Tower Replacements		Line ID			
2.2.1	Bayview - Tri City	(HD-2)	227,550	OH	115kV
2.2.2	Tri City - Ulmerton	(HD-8)	227,550	OH	115kV
2.2.3	Holopaw - West Lake Wales	(WLXF-3)	1,365,300	OH	115kV
	TOTAL		1,820,400		
2.3 Structure Hardening - Cathodic Protection		Line ID			
2.3.1	Crystal River - Central Florida	(CCF)	512,000	OH	230kV
2.3.2	Crystal River - Curlew	(CC)	512,000	OH	230kV
	TOTAL		1,024,000		

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2.	Transmission			
2.1	Structure Hardening - Pole Replacements		OH / UG	
2.2.1	Avon Park Pl - South Polk	(AF-1) 6,639,741	OH	230kV
2.2.2	Fisheating Creek - Sun N Lakes	(ALP-SUC-1) 6,305,803	OH	69kV
2.2.3	Apopka South - Clarcona	(ASC-1) 546,910	OH	69kV
2.2.4	Bayboro - Central Plaza	(BCP-1) 497,911	OH	115kV
2.2.5	Bushnell East - Center Hill Radial	(BW-1) 1,905,706	OH	69kV
2.2.6	Brookridge - Brooksville West (BWV CKT)	(BWV-1) 772,629	OH	115kV
2.2.7	Brookridge - Ft Crushed Stone Cogen Pl	(BWV-2) 120,325	OH	115kV
2.2.8	Zephyrhills North - Dade City (TECO)	(BZ-6) 759,439	OH	69kV
2.2.9	Bronson - Newberry	(CF-2) 2,427,019	OH	230kV
2.2.10	Ft White - Newberry	(CF-3) 4,564,590	OH	230kV
2.2.11	Bellevue - Maricamp	(CFO-SSB-1) 248,438	OH	69kV
2.2.12	Florida Gas Transmission - St Marks East	(CP-3) 1,409,460	OH	230kV
2.2.13	Monticello - Boston (Ga Pwr)	(DB-2) 347,874	OH	69kV
2.2.14	Disston - Kenneth	(DK-1) 776,018	OH	115kV
2.2.15	Taylor Ave - Walsingham	(DL-LTW-1) 547,733	OH	69kV
2.2.16	Seminole - Starkey Road	(DLW-5) 294,810	OH	69kV
2.2.17	Davenport - West Davenport Radial	(DWD-1) 464,385	OH	69kV
2.2.18	Palm Harbor - Tarpon Springs	(ECTW-4) 776,018	OH	69kV
2.2.19	Deland - Deland West	(ED-1) 720,647	OH	69kV
2.2.20	Ft White - High Springs	(FH-1) 645,946	OH	69kV
2.2.21	Clearwater - Highlands	(HCL-1) 362,051	OH	69kV
2.2.22	Higgins Pl - Curlew CKT #2	(HGC-1) 51,734	OH	115kV
2.2.23	Alderman - Tarpon Springs	(HTW-2) 190,103	OH	115kV
2.2.24	Cypresswood - Haines City	(ICLW-2) 929,320	OH	69kV
2.2.25	Dundee - Lake Wales	(ICLW-3) 814,073	OH	69kV
2.2.26	Ft White - Jasper	(JF-1) 4,116,347	OH	69kV
2.2.27	Cross Bayou - GE Pinellas	(LD-2) 165,237	OH	69kV
2.2.28	Clearwater - East Clearwater	(LECW-3) 877,862	OH	69kV
2.2.29	Largo - Taylor Ave	(LTW-1) 324,016	OH	69kV
2.2.30	Altamonte - North Longwood CKT #2	(NLA-1) 168,096	OH	69kV
2.2.31	Atwater - Quincy	(QX-1) 198,749	OH	115kV
2.2.32	Lake Wales - West Lake Wales CKT #2	(WLL-1) 1,588,766	OH	69kV
2.2.33	Altamonte - Maitland	(WO-1) 1,849,394	OH	69kV
2.2.34	Altamonte - North Longwood CKT #1	(WO-2) 1,040,040	OH	69kV
2.2.35	Lockwood Tap	(FTO-1-TL1) 765,205	OH	69kV
2.2.36	Ft Meade - South Polk	(AF-2) 2,853,950	OH	230kV
2.2.37	Largo - Ulmerton West	(DLW-2) 113,579	OH	69kV
2.2.38	Kelly Park - Zellwood	(EP-3) 2,083,868	OH	69kV
2.2.39	Hanson - Cherry Lake Radial	(HC-1) 332,868	OH	115kV
2.2.40	GE Pinellas - Largo	(LD-3) 383,133	OH	69kV
2.2.41	Isleworth - Disney World Northwest	(WT-3) 2,005,352	OH	69kV
2.2.42	Perry North Tap	(DP-1-TL3) 273,278	OH	69kV
2.2.43	Ulmerton West - Walsingham	(DLW-6) 251,446	OH	69kV
2.2.44	Apopka South - Woodsmere	(WP-2) 24,844	OH	69kV
2.2.45	Ft Meade - Dry Prairie	(FV-1) 1,677,424	OH	230kV
2.2.46	Webster SEC 69kV Tapline	(BCF-BW-2-TL4) 5,202,400	OH	69kV
2.2.47	Unassigned 2021 Projects	TBD 8,891,802	OH	TBD
	Engineering/Materials for 2022 Projects	- 2,144,702	OH	
	TOTAL for 2021 & 2022 Engineering	70,451,040	OH	
	TOTAL for 2021 Only	68,306,338		
	2021 Pole Replacement Base Rates	34,800,000		
	Allocation of O&M to Base Rates vs. SPPCRC	51%		