#### BEFORE THE PUBLIC SERVICE COMMISSION

| In re: Environmental Cost Recovery | DOCKE  | Γ NO. 130007-EI |
|------------------------------------|--------|-----------------|
| Clause.                            |        |                 |
|                                    | FILED: | OCTOBER 7, 2013 |

# DUKE ENERGY FLORIDA'S MOTION FOR LEAVE TO FILE REVISED DIRECT TESTIMONY AND EXHIBITS

Duke Energy Florida ("DEF"), pursuant to Rule 28-106.204, Florida Administrative Code (F.A.C.), hereby moves for leave to file the revised direct testimony and exhibits of Thomas G. Foster and the revised direct testimony and exhibit of Jeffrey Swartz proffered herewith. In support, DEF states:

- 1. DEF has determined that two corrections should be made to the pre-filed direct testimony and Exhibit Nos. \_\_(TGF-3), \_\_(TGF-4), \_\_(TGF-5) and \_\_(TGF-6) of Thomas G. Foster, and, the pre-filed testimony of Jeffrey Swartz. As shown in Attachment A to this motion, the net impact of such corrections would reduce DEF's requested 2014 retail revenue requirements by a total of \$258,862; however, this would not change DEF's proposed ECRC residential factor of \$2.43 (1000/kWh). Each correction is summarized below and on Attachments B and C to this motion:
- (a) Exhibit No.\_\_(TGF-3) Schedule 82-8E page 8 of 18 and Exhibit No.\_\_(TGF-4) page 21 of 24 Project 7.4p Bottom Ash (PH)/Fly Ash (Ammonia) total estimated expenditures were increased by \$2,296,400 to correct a data entry error.
- (b) Exhibit No.\_\_(TGF-5) Schedule 42-2P page 4 of 45 line 1 7.4 CAIR/CAMR Crystal River Base was reduced by \$300,000 to correct a data entry error.
- 2. DEF respectfully submits that revising the testimony and exhibits of Mr. Foster and Mr. Swartz to make the corrections discussed above ensures that the Commission has accurate information at the time of the ECRC hearing.

3. In accordance with Rule 28-106.204(3), F.A.C., counsel for the Applicants has attempted to contact counsel for Staff and Intervenors to this proceeding and is authorized to state that Public Counsel takes no position and that no party, including Public Counsel, objects to this Motion.

WHEREFORE, Duke Energy Florida respectfully requests that the Prehearing Officer grant DEF leave to file the revised testimony and exhibits of Thomas G. Foster and Jeffrey Swartz proffered with this motion for inclusion in the record at the Commission's November hearing in this docket.

By:

RESPECTFULLY SUBMITTED this  $7^{th}$  day of October, 2013.

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#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic mail this 7th day of October, 2013 to all parties of record as indicated below.

GARY V. PERKO

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| ъ   | 4   | ω  | 2  | 1 To<br>a<br>b<br>c   | Line                                      |
|---|---|--|--|---|---|
| Total Projected Jurisdictional Amount Adjusted for Taxes (Line 4 x Revenue Tax Multiplier of 1.00072) | Total Jurisdictional Amount to Be Recovered/(Refunded) in the Projection period January 2014 - December 2014 (Line 1 - Line 2 - Line 3) | Final True-up for the period January 2012 - December 2012 (Form 42-1A, Line 3) | True-up for Estimated Over/(Under) Recovery for the current period January 2013 - December 2013 (Form 42-2E, Line $5+6+10$ ) | 1 Total Jurisdictional Rev. Req. for the projected period a Projected O&M Activities (Form 42-2P, Lines 7 through 9) b Projected Capital Projects (Form 42-3P, Lines 7 through 9) c Total Jurisdictional Rev. Req. for the projected period (Lines 1a + 1b) |   |
| \$ 66,980,415 \$ 1,641,168 \$ 1,126,198 \$ 17,374,881 \$ 87,122,663                                   | 66,932,223  | (2,175,994)  | (9, 164, 896)  | \$ 39,210,034 \$<br>16,381,300<br>55,591,334  | Energy<br>(\$)                            |
| \$ 1,641,168  | 1,639,988   | 200,889  | (1,080,581)  | \$ 760,296 \$<br>0<br>760,296   | Transmission<br>Demand<br>(\$)            |
| \$ 1,126,198  | 1,125,388   | (93,212)   | (244,896)  |   | As Filed Distribution Demand (\$)         |
| \$ 17,374,881   | 17,362,380  | 67,153   | (7,056,822)  | 785,819 \$ 1,047,781 \$ 41,803,930<br>1,462 9,324,930 25,707,691<br>787,281 10,372,711 67,511,621   | Production<br>Demand<br>(\$)              |
| \$ 87,122,663   | 87,059,979  | (2,001,164)  | (7,056,822) (17,547,195)   | \$ 41,803,930<br>25,707,691<br>67,511,621   | Total<br>(\$)                             |
| \$ 66,721,524 \$ 1,641,172 \$ 1,126,199 \$ 17,374,906 \$ 86,863,801                                   | 66,673,519  | (2,175,994)  | (9,184,847)  | \$ 38,931,379 \$<br>16,381,300<br>55,312,679  | Energy<br>(\$)                            |
| \$ 1,641,172  | 1,639,991   | 200,889  | (9,184,847) (1,080,584)  |   | Transmission<br>Demand<br>(\$)            |
| \$ 1,126,199  | 1,125,389   | (93,212)   | (244,896)  | 760,296 \$ 785,819<br>0 1,462<br>760,296 787,281  | Revised<br>Distribution<br>Demand<br>(\$) |
| \$ 17,374,906   | 17,362,405  | 67,153   | (7,056,845)  | \$ 1,047,783 \$ 41,525,277<br>9,324,930 25,707,691<br>10,372,713 67,232,968   | Production<br>Demand<br>(\$)              |
| \$ 86,863,801   | 86,801,304  | (2,001,164)  | (7,056,845) (17,567,172)   | \$ 41,525,277<br>25,707,691<br>67,232,968   | Total<br>(\$)                             |
| \$ (258,862)  | (258,675)   | 0  | (19,978)   | \$ (278,653)<br>0<br>(278,653)  | Difference<br>Total<br>(\$)               |

## Corrections to Testimony of Thomas G. Foster Orginally Submitted August 1, 2013

| Page | Line | From             | То               |
|------|------|------------------|------------------|
| 2    | 18   | \$<br>17,547,195 | \$<br>17,567,173 |
| 2    | 21   | \$<br>19,548,359 | \$<br>19,568,337 |
| 7    | 20   | \$6.7M           | \$9.0M           |
| 7    | 20   | 145%             | 194%             |

## Corrections to Testimony of Thomas G. Foster Orginally Submitted August 30, 2013

| Page | Line                       | From            | То              |
|------|----------------------------|-----------------|-----------------|
| 3    | 2                          | \$87.1M         | \$86.9M         |
| 3    | 8                          | \$19.5M         | \$19.6M         |
| 3    | 11                         | \$17.5M         | \$17.6M         |
| 8    | 4                          | \$41.8M         | \$41.5M         |
| 8    | 21                         | \$67.5M         | \$67.2M         |
| 10   | Rate Class Table           |                 |                 |
|      | General Service Non-Demand |                 |                 |
|      | Secondary                  | 0.236 cents/kWh | 0.235 cents/kWh |
|      | Primary                    | 0.234 cents/kWh | 0.233 cents/kWh |
|      | Transmission               | 0.231 cents/kWh | 0.230 cents/kWh |
|      | General Service            | 0.206 cents/kWh | 0.205 cents/kWh |
|      | General Service Demand     |                 |                 |
|      | Secondary                  | 0.221 cents/kWh | 0.220 cents/kWh |
|      | Primary                    | 0.219 cents/kWh | 0.218 cents/kWh |
|      | Transmission               | 0.217 cents/kWh | 0.216 cents/kWh |
|      | Curtailable                |                 |                 |
|      | Secondary                  | 0.294 cents/kWh | 0.293 cents/kWh |
|      | Primary                    | 0.291 cents/kWh | 0.290 cents/kWh |
|      | Transmission               | 0.288 cents/kWh | 0.287 cents/kWh |
| 11   | 8                          | 0.232 cents/kWh | 0.231 cents/kWh |
| 11   | 11                         | \$67.5M         | \$67.2M         |
| 11   | 12                         | \$19.5M         | \$19.6M         |

## Corrections to Testimony of Jeffrey Swartz Orginally Submitted August 1, 2013

| Page | Line | From   | То     |
|------|------|--------|--------|
| 2    | 20   | \$6.7M | \$9.0M |
| 2    | 20   | 145%   | 194%   |
| 3    | 4    | \$7.6M | \$9.9M |

## Corrections to Testimony of Jeffrey Swartz Orginally Submitted August 30, 2013

| Page | Line | From    | То      |
|------|------|---------|---------|
| 2    | 17   | \$35.7M | \$35.4M |
| 3    | 6    | \$1M    | \$0.7M  |