



Matthew R. Bernier
Sr. Counsel
Duke Energy Florida, Inc.

March 7, 2014

Ms. Carlotta Stauffer, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: *Petition of Duke Energy Florida, Inc., to Modify Scope of Existing Environmental Compliance Program; Docket No. 130301-EI*

Dear Ms. Stauffer:

Please find enclosed for electronic filing on behalf of Duke Energy Florida, Inc. ("DEF"), DEF's Response to Staff's Third Data Request (Nos. 1-4).

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.

Respectfully,

s/Matthew R. Bernier

Matthew R. Bernier
Sr. Counsel
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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 to the following this 7th day of March, 2014.

s/Matthew R. Bernier
Matthew R. Bernier

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**DUKE ENERGY FLORIDA, INC.'S RESPONSES TO
STAFF'S THIRD DATA REQUEST (NOS. 1-4)
Docket No. 130301-EI**

1. In DEF's 2013 Review of Integrated Clean Air Compliance Plan filed on April 1, 2013, in Docket No. 130007-EI, starting on page 22, DEF discusses extending the life of CR 1 and 2 an additional 25 years (life extension). Please complete the table below summarizing the estimated revenue requirements for life extension assuming a high gas scenario and a mid-gas scenario. Please present all values in \$M in \$2014 and use the Company's most recent fuel forecast.

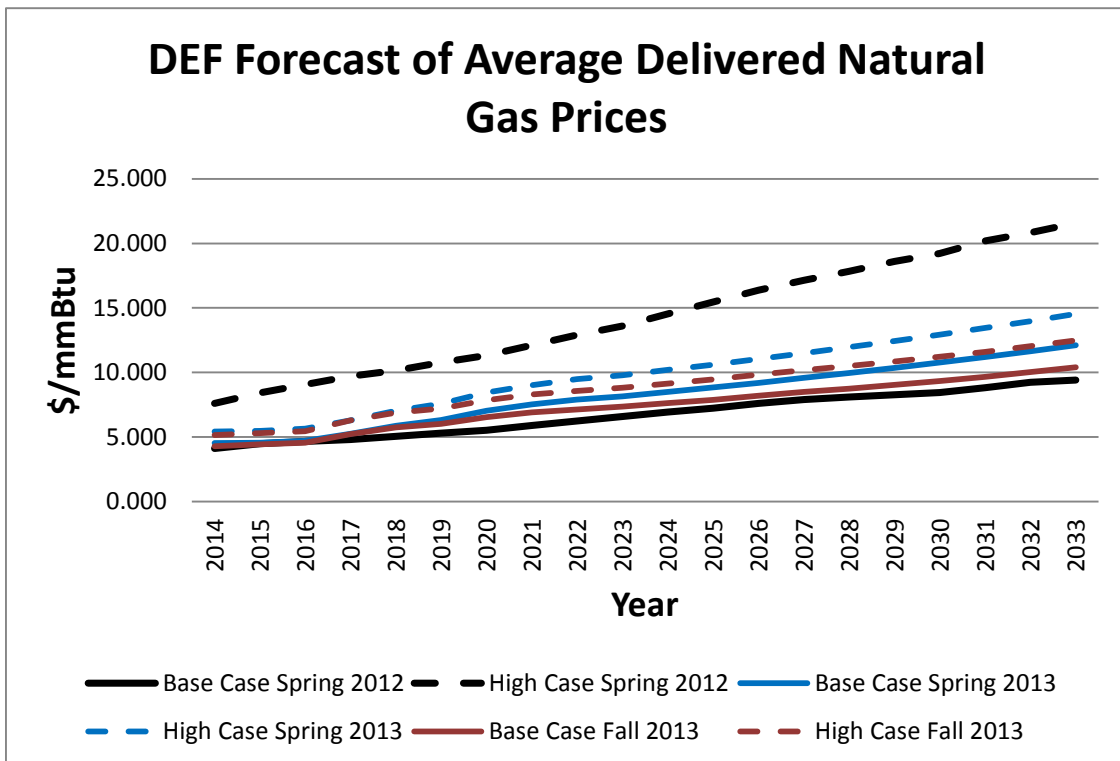
| | Generation | Transmission | Fuel | O&M | Other | Total | Bill Impact \$/1,000 kWh (Nominal) |
|-------------|-------------------|---------------------|-------------|----------------|--------------|--------------|---|
| 2014 | | | | | | | |
| 2015 | | | | | | | |
| 2016 | | | | | | | |
| 2017 | | | | | | | |
| 2018 | | | | | | | |
| 2019 | | | | | | | |
| 2020 | | | | | | | |
| 2021 | | | | | | | |
| 2022 | | | | | | | |
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| 2028 | | | | | | | |
| 2029 | | | | | | | |
| 2030 | | | | | | | |
| 2031 | | | | | | | |
| 2032 | | | | | | | |
| 2033 | | | | | | | |
| 2034 | | | | | | | |
| 2035 | | | | | | | |

| | Generation | Transmission | Fuel | O&M | Other | Total | Bill Impact \$/1,000 kWh (Nominal) |
|------|------------|--------------|------|-----|-------|-------|--|
| 2036 | | | | | | | |
| 2037 | | | | | | | |
| 2038 | | | | | | | |
| 2039 | | | | | | | |
| 2040 | | | | | | | |
| 2041 | | | | | | | |

Response:

DEF is providing the attachments: Mid Gas and High Gas consistent with the analyses performed to support the recommendations and decisions outlined in the Clean Air Compliance Plan update filed in April 2013. The fuel forecasts (base and high gas price) were prepared in the spring of 2012.

The chart below compares DEF's current base and high gas price forecasts with those used in the Clean Air Plan update and in the analysis used in development of data for the proposed alternative in the December 2013 Petition.



2. Please complete the table below summarizing the estimated revenue requirements for DEF's proposed Alternative (Alternative 2) assuming a high gas scenario and a mid-gas scenario. Please present all values in \$M in \$2014 and use the Company's most recent fuel forecast.

| | Generation | Transmission | Fuel | O&M | Other | Total | Bill Impact \$/1,000 kWh (Nominal) |
|-------------|-------------------|---------------------|-------------|----------------|--------------|--------------|---|
| 2014 | | | | | | | |
| 2015 | | | | | | | |
| 2016 | | | | | | | |
| 2017 | | | | | | | |
| 2018 | | | | | | | |
| 2019 | | | | | | | |
| 2020 | | | | | | | |
| 2021 | | | | | | | |
| 2022 | | | | | | | |
| 2023 | | | | | | | |
| 2024 | | | | | | | |
| 2025 | | | | | | | |
| 2026 | | | | | | | |
| 2027 | | | | | | | |
| 2028 | | | | | | | |
| 2029 | | | | | | | |
| 2030 | | | | | | | |
| 2031 | | | | | | | |
| 2032 | | | | | | | |
| 2033 | | | | | | | |
| 2034 | | | | | | | |
| 2035 | | | | | | | |
| 2036 | | | | | | | |
| 2037 | | | | | | | |
| 2038 | | | | | | | |
| 2039 | | | | | | | |
| 2040 | | | | | | | |
| 2041 | | | | | | | |

Response:

DEF performed analysis of the differential between Alternative 1 and Alternative 2 using our base fuel price forecast current at the time of that analysis (the analysis was performed in the 3rd quarter of 2013 using the Spring 2013 forecast). In this case, the results of that analysis favored Alternative 2, extending operation of Crystal River Units 1 and 2 in compliance with MATS through site emissions averaging coupled with necessary compliance projects. Since Alternative 1 is based on replacing the energy and capacity supplied by Units 1 and 2 through the purchase of output from alternate resources reliant on natural gas as a fuel source, use of a higher fuel gas price forecast case would further advantage Alternate 2. Accordingly, a higher fuel gas price case was not performed.

As discussed in the response to Question 1 above, DEF performed the analysis using the fuel forecasts current at the time of the analysis. DEF does not anticipate that an update to the current forecasts will materially affect the results.

Given that this response is based on the fuel forecast current at the time of the analysis, and that DEF has not performed a high gas price scenario, the information requested above is the same as that requested in question 18 in the first data request.

3. Page 12, of DEF's Crystal River South (Units 1 and 2) Environmental Compliance Study Addendum: CR South Limited Continued Operation, contains a table titled "Base Case Results - CPVRR Differential Values for Key Segments of Cost."

Please describe what costs are contained in the category titled Other Costs..

Response:

The cost differential results from the planning model included in the "Other" category include Emissions, Fixed Costs, Cogen Contract Costs and Emergency Energy and Miscellaneous.

4. On page 5 of the petition in the instant docket DEF states:

the qualitative planning assessment concluded that the limited continued operations alternative (Alternative 2) has a significant positive impact on system reliability if operations of CR 1 and 2 are continued until replacement generation can be added near Crystal River, or until transmission projects can be completed to address grid concerns.

If CR 1 and 2 were retired in 2016 would the “grid concerns” mentioned in the statement above occur during steady state operation? Please explain answer.

Response:

Yes. The “grid concerns” referenced would occur during steady state operation. Meaning that there does not need to be a transmission contingency (n-1) to occur for some of the grid issues to be realized if CR 1 and 2 were retired in 2016.

Mid Gas Scenario

| CRS 2016 Retirement - 2014\$ (\$M) | | | | | | |
|------------------------------------|------------|--------------|--------|-------|--------|--------|
| | Generation | Transmission | Fuel | O&M | Other | Total |
| 2014 | 32 | (0) | 1,525 | 204 | 580 | 2,341 |
| 2015 | 42 | 9 | 1,577 | 201 | 575 | 2,404 |
| 2016 | 60 | 33 | 1,443 | 359 | 579 | 2,475 |
| 2017 | 236 | 37 | 1,216 | 402 | 555 | 2,446 |
| 2018 | 365 | 59 | 1,188 | 256 | 543 | 2,411 |
| 2019 | 376 | 70 | 1,244 | 175 | 534 | 2,399 |
| 2020 | 352 | 65 | 1,215 | 174 | 1,057 | 2,864 |
| 2021 | 342 | 62 | 1,231 | 171 | 1,080 | 2,887 |
| 2022 | 354 | 65 | 1,204 | 157 | 1,069 | 2,850 |
| 2023 | 392 | 171 | 1,224 | 151 | 1,068 | 3,005 |
| 2024 | 903 | 226 | 1,115 | 131 | 855 | 3,230 |
| 2025 | 1,223 | 205 | 1,041 | 125 | 683 | 3,277 |
| 2026 | 1,550 | 186 | 873 | 110 | 544 | 3,263 |
| 2027 | 1,406 | 169 | 863 | 96 | 558 | 3,092 |
| 2028 | 1,276 | 153 | 825 | 86 | 545 | 2,886 |
| 2029 | 1,159 | 139 | 811 | 86 | 562 | 2,758 |
| 2030 | 1,089 | 142 | 790 | 78 | 554 | 2,653 |
| 2031 | 1,013 | 139 | 793 | 78 | 561 | 2,585 |
| 2032 | 921 | 126 | 774 | 78 | 561 | 2,460 |
| 2033 | 839 | 114 | 771 | 76 | 574 | 2,373 |
| 2034 | 765 | 104 | 743 | 73 | 565 | 2,249 |
| 2035 | 726 | 98 | 742 | 68 | 566 | 2,200 |
| 2036 | 690 | 91 | 719 | 72 | 564 | 2,137 |
| 2037 | 552 | 94 | 807 | 73 | 580 | 2,107 |
| 2038 | 536 | 97 | 792 | 72 | 588 | 2,085 |
| 2039 | 498 | 91 | 778 | 68 | 587 | 2,022 |
| 2040 | 453 | 83 | 752 | 65 | 584 | 1,937 |
| 2041 | | | | | | |
| CPVRR | 18,153 | 2,830 | 27,057 | 3,686 | 17,671 | 69,398 |

| CRS Life Extension - 2014\$ (\$M) | | | | | | |
|-----------------------------------|------------|--------------|--------|-------|--------|--------|
| | Generation | Transmission | Fuel | O&M | Other | Total |
| 2014 | 32 | (0) | 1,525 | 204 | 580 | 2,341 |
| 2015 | 57 | 9 | 1,608 | 203 | 581 | 2,458 |
| 2016 | 81 | 8 | 1,488 | 264 | 659 | 2,499 |
| 2017 | 252 | 12 | 1,284 | 218 | 699 | 2,464 |
| 2018 | 322 | 11 | 1,201 | 184 | 692 | 2,410 |
| 2019 | 365 | 34 | 1,211 | 173 | 667 | 2,451 |
| 2020 | 390 | 47 | 1,198 | 171 | 1,200 | 3,006 |
| 2021 | 376 | 43 | 1,214 | 171 | 1,223 | 3,027 |
| 2022 | 343 | 39 | 1,186 | 163 | 1,206 | 2,938 |
| 2023 | 356 | 143 | 1,200 | 161 | 1,202 | 3,063 |
| 2024 | 878 | 200 | 1,088 | 143 | 983 | 3,292 |
| 2025 | 1,208 | 182 | 1,011 | 136 | 800 | 3,337 |
| 2026 | 1,537 | 165 | 837 | 116 | 643 | 3,297 |
| 2027 | 1,395 | 150 | 834 | 103 | 662 | 3,143 |
| 2028 | 1,298 | 142 | 800 | 88 | 633 | 2,960 |
| 2029 | 1,200 | 133 | 805 | 86 | 634 | 2,857 |
| 2030 | 1,091 | 121 | 772 | 81 | 627 | 2,692 |
| 2031 | 992 | 110 | 767 | 83 | 639 | 2,590 |
| 2032 | 941 | 114 | 754 | 78 | 620 | 2,507 |
| 2033 | 889 | 113 | 765 | 75 | 627 | 2,468 |
| 2034 | 818 | 102 | 731 | 71 | 612 | 2,334 |
| 2035 | 752 | 92 | 730 | 71 | 624 | 2,268 |
| 2036 | 723 | 87 | 707 | 71 | 613 | 2,202 |
| 2037 | 573 | 93 | 803 | 74 | 632 | 2,176 |
| 2038 | 531 | 92 | 788 | 70 | 628 | 2,111 |
| 2039 | 484 | 85 | 764 | 69 | 628 | 2,029 |
| 2040 | 461 | 81 | 742 | 65 | 620 | 1,969 |
| 2041 | | | | | | |
| CPVRR | 18,345 | 2,409 | 26,812 | 3,392 | 19,933 | 70,891 |

| Differential - 2014\$ (\$M) | | | | | | | Bill Impact \$/1000 Kwh (Nominal) |
|-----------------------------|------------|--------------|------|-------|-------|-------|---|
| | Generation | Transmission | Fuel | O&M | Other | Total | |
| 2014 | 0 | 0 | - | - | (0) | 0 | N/A |
| 2015 | 15 | 0 | 31 | 2 | 6 | 54 | 1.48 |
| 2016 | 21 | (26) | 44 | (95) | 80 | 24 | 0.88 |
| 2017 | 15 | (25) | 68 | (184) | 144 | 19 | 0.75 |
| 2018 | (43) | (48) | 13 | (73) | 149 | (1) | 0.45 |
| 2019 | (10) | (36) | (34) | (2) | 133 | 52 | 2.08 |
| 2020 | 38 | (18) | (17) | (3) | 143 | 142 | 5.11 |
| 2021 | 33 | (19) | (17) | (0) | 143 | 140 | 5.32 |
| 2022 | (11) | (26) | (18) | 6 | 137 | 88 | 3.72 |
| 2023 | (35) | (28) | (23) | 10 | 134 | 57 | 2.75 |
| 2024 | (24) | (26) | (28) | 12 | 128 | 62 | 3.05 |
| 2025 | (15) | (23) | (30) | 12 | 117 | 60 | 3.06 |
| 2026 | (13) | (21) | (37) | 6 | 99 | 34 | 1.97 |
| 2027 | (11) | (19) | (29) | 7 | 103 | 51 | 2.90 |
| 2028 | 21 | (11) | (25) | 1 | 87 | 74 | 4.04 |
| 2029 | 40 | (6) | (6) | (1) | 72 | 99 | 5.57 |
| 2030 | 2 | (21) | (18) | 3 | 73 | 39 | 2.69 |
| 2031 | (21) | (30) | (26) | 4 | 78 | 6 | 0.94 |
| 2032 | 20 | (12) | (20) | (0) | 59 | 47 | 3.29 |
| 2033 | 51 | (2) | (6) | (1) | 53 | 95 | 6.47 |
| 2034 | 53 | (2) | (12) | (2) | 47 | 85 | 6.09 |
| 2035 | 26 | (6) | (12) | 2 | 58 | 68 | 5.33 |
| 2036 | 33 | (4) | (12) | (1) | 49 | 66 | 5.37 |
| 2037 | 21 | (1) | (4) | 1 | 51 | 69 | 5.88 |
| 2038 | (5) | (5) | (4) | (1) | 40 | 26 | 2.52 |
| 2039 | (15) | (6) | (14) | 1 | 41 | 8 | 0.98 |
| 2040 | 7 | (1) | (9) | (0) | 35 | 32 | 3.25 |
| 2041 | - | - | - | - | - | - | - |
| CPVRR | - | - | - | - | - | - | - |

| | |
|---------------------------|-------|
| CPVRR Differential \$2014 | 1,493 |
| CPVRR Differential \$2012 | 1,317 |

High Gas Scenario

| CRS 2016 Retirement - 2014\$ (\$M) | | | | | | |
|------------------------------------|------------|--------------|--------|-------|--------|--------|
| | Generation | Transmission | Fuel | O&M | Other | Total |
| 2014 | 32 | (0) | 1,958 | 228 | 574 | 2,792 |
| 2015 | 42 | 9 | 2,058 | 225 | 570 | 2,903 |
| 2016 | 60 | 33 | 1,962 | 438 | 577 | 3,072 |
| 2017 | 236 | 37 | 1,664 | 484 | 555 | 2,977 |
| 2018 | 365 | 59 | 1,651 | 305 | 543 | 2,923 |
| 2019 | 376 | 70 | 1,783 | 201 | 535 | 2,965 |
| 2020 | 352 | 65 | 1,750 | 204 | 1,057 | 3,428 |
| 2021 | 342 | 62 | 1,815 | 208 | 1,079 | 3,507 |
| 2022 | 354 | 65 | 1,811 | 189 | 1,069 | 3,488 |
| 2023 | 392 | 171 | 1,876 | 181 | 1,067 | 3,687 |
| 2024 | 903 | 226 | 1,668 | 149 | 891 | 3,837 |
| 2025 | 1,223 | 205 | 1,536 | 136 | 751 | 3,851 |
| 2026 | 1,550 | 186 | 1,237 | 119 | 604 | 3,697 |
| 2027 | 1,406 | 169 | 1,252 | 108 | 620 | 3,555 |
| 2028 | 1,276 | 153 | 1,216 | 99 | 604 | 3,349 |
| 2029 | 1,159 | 139 | 1,210 | 98 | 625 | 3,232 |
| 2030 | 1,089 | 142 | 1,186 | 89 | 617 | 3,124 |
| 2031 | 1,013 | 139 | 1,220 | 89 | 624 | 3,085 |
| 2032 | 921 | 126 | 1,191 | 84 | 630 | 2,953 |
| 2033 | 839 | 114 | 1,197 | 89 | 641 | 2,880 |
| 2034 | 765 | 104 | 1,166 | 86 | 628 | 2,748 |
| 2035 | 726 | 98 | 1,172 | 81 | 636 | 2,713 |
| 2036 | 690 | 91 | 1,159 | 80 | 641 | 2,661 |
| 2037 | 552 | 94 | 1,363 | 82 | 660 | 2,751 |
| 2038 | 536 | 97 | 1,339 | 76 | 679 | 2,728 |
| 2039 | 498 | 91 | 1,298 | 82 | 679 | 2,648 |
| 2040 | 453 | 83 | 1,274 | 80 | 668 | 2,559 |
| 2041 | | | | | | |
| CPVRR | 18,153 | 2,830 | 40,013 | 4,292 | 18,824 | 84,112 |

| CRS Life Extension - 2014\$ (\$M) | | | | | | |
|-----------------------------------|------------|--------------|--------|-------|--------|--------|
| | Generation | Transmission | Fuel | O&M | Other | Total |
| 2014 | 32 | (0) | 1,958 | 228 | 574 | 2,792 |
| 2015 | 57 | 9 | 2,124 | 228 | 579 | 2,997 |
| 2016 | 81 | 8 | 2,014 | 304 | 675 | 3,082 |
| 2017 | 252 | 12 | 1,724 | 237 | 727 | 2,952 |
| 2018 | 322 | 11 | 1,609 | 199 | 724 | 2,866 |
| 2019 | 365 | 34 | 1,664 | 189 | 699 | 2,952 |
| 2020 | 390 | 47 | 1,683 | 202 | 1,222 | 3,544 |
| 2021 | 376 | 43 | 1,743 | 205 | 1,248 | 3,614 |
| 2022 | 343 | 39 | 1,730 | 195 | 1,235 | 3,541 |
| 2023 | 356 | 143 | 1,775 | 193 | 1,236 | 3,704 |
| 2024 | 878 | 200 | 1,582 | 155 | 1,046 | 3,862 |
| 2025 | 1,208 | 182 | 1,447 | 139 | 890 | 3,867 |
| 2026 | 1,537 | 165 | 1,163 | 120 | 726 | 3,711 |
| 2027 | 1,395 | 150 | 1,177 | 108 | 741 | 3,571 |
| 2028 | 1,298 | 142 | 1,157 | 96 | 712 | 3,404 |
| 2029 | 1,200 | 133 | 1,169 | 91 | 719 | 3,312 |
| 2030 | 1,091 | 121 | 1,133 | 88 | 707 | 3,140 |
| 2031 | 992 | 110 | 1,149 | 89 | 719 | 3,058 |
| 2032 | 941 | 114 | 1,134 | 82 | 709 | 2,979 |
| 2033 | 889 | 113 | 1,158 | 84 | 718 | 2,962 |
| 2034 | 818 | 102 | 1,117 | 81 | 699 | 2,816 |
| 2035 | 752 | 92 | 1,118 | 80 | 715 | 2,757 |
| 2036 | 723 | 87 | 1,110 | 78 | 706 | 2,705 |
| 2037 | 573 | 93 | 1,324 | 79 | 737 | 2,806 |
| 2038 | 531 | 92 | 1,294 | 75 | 738 | 2,731 |
| 2039 | 484 | 85 | 1,251 | 81 | 736 | 2,637 |
| 2040 | 461 | 81 | 1,234 | 79 | 725 | 2,579 |
| 2041 | | | | | | |
| CPVRR | 18,345 | 2,409 | 38,739 | 3,785 | 21,663 | 84,941 |

| Differential - 2014\$ (\$M) | | | | | | | Bill Impact \$/1000 Kwh (Nominal) |
|-----------------------------|------------|--------------|--------|-------|--------|--------|---|
| | Generation | Transmission | Fuel | O&M | Other | Total | |
| 2014 | 0 | 0 | - | - | (0) | 0 | N/A |
| 2015 | 15 | 0 | 66 | 3 | 9 | 94 | 2.58 |
| 2016 | 21 | (26) | 52 | (134) | 98 | 10 | 0.46 |
| 2017 | 15 | (25) | 60 | (247) | 172 | (25) | -0.60 |
| 2018 | (43) | (48) | (43) | (106) | 181 | (57) | -1.39 |
| 2019 | (10) | (36) | (119) | (13) | 165 | (13) | -0.12 |
| 2020 | 38 | (18) | (67) | (2) | 165 | 116 | 4.19 |
| 2021 | 33 | (19) | (72) | (3) | 169 | 107 | 4.10 |
| 2022 | (11) | (26) | (81) | 6 | 166 | 53 | 2.36 |
| 2023 | (35) | (28) | (100) | 12 | 169 | 17 | 1.09 |
| 2024 | (24) | (26) | (86) | 6 | 155 | 25 | 1.43 |
| 2025 | (15) | (23) | (89) | 3 | 140 | 15 | 1.04 |
| 2026 | (13) | (21) | (74) | 1 | 121 | 14 | 1.01 |
| 2027 | (11) | (19) | (75) | 0 | 121 | 16 | 1.12 |
| 2028 | 21 | (11) | (59) | (3) | 107 | 55 | 3.05 |
| 2029 | 40 | (6) | (41) | (7) | 94 | 80 | 4.47 |
| 2030 | 2 | (21) | (54) | (1) | 90 | 16 | 1.31 |
| 2031 | (21) | (30) | (71) | (0) | 95 | (26) | -1.05 |
| 2032 | 20 | (12) | (58) | (3) | 79 | 26 | 1.93 |
| 2033 | 51 | (2) | (39) | (5) | 77 | 82 | 5.58 |
| 2034 | 53 | (2) | (49) | (5) | 71 | 68 | 4.87 |
| 2035 | 26 | (6) | (54) | (1) | 79 | 44 | 3.45 |
| 2036 | 33 | (4) | (49) | (2) | 65 | 44 | 3.62 |
| 2037 | 21 | (1) | (39) | (4) | 78 | 55 | 4.72 |
| 2038 | (5) | (5) | (45) | (1) | 59 | 4 | 0.48 |
| 2039 | (15) | (6) | (48) | (1) | 57 | (12) | -0.91 |
| 2040 | 7 | (1) | (40) | (2) | 56 | 21 | 2.10 |
| 2041 | - | - | - | - | - | - | - |
| CPVRR | 18,345 | 2,409 | 38,739 | 3,785 | 21,663 | 84,941 | |

| | |
|---------------------------|-----|
| CPVRR Differential \$2014 | 829 |
| CPVRR Differential \$2012 | 731 |