Commissioners: Art Graham, Chairman Lisa Polak Edgar Ronald A, Brisé Eduardo E, Balbis Julie I, Brown

STATE OF FLORIDA

DIVISION OF ECONOMICS JAMES W. DEAN DIRECTOR (850) 413-6410

Hublic Service Commission

June 19, 2014

Mr. John T. Burnett Deputy General Counsel Duke Energy Florida, Inc. P.O. Box 14042 St. Petersburg, FL 33733 RECEIVED-FPSC

Re: Docket No. 140057-EI - Petition for approval of 2014 nuclear decommissioning study, by Duke Energy Florida, Inc.

Mr. Burnett:

Florida Public Service Commission staff is in the process of reviewing the Decommissioning study filed by Duke Energy Florida in the above referenced docket. As a result some questions and concerns have arisen which are enclosed with this letter.

Please provide your responses by July 21, 2014. If there are any questions, please contact Devlin Higgins at (850) 413-6433.

Sincerely, Devlin Higgins

Public Utility Analyst Division of Economics

Attachment

cc:

•Office of the Commission Clerk General Counsel (Young) Office of Public Counsel Diane Triplett James Michael Walls Blaise N. Gamba

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Data Request

- For the purposes of the following request, please refer to the Site-Specific Decommissioning Cost Estimate for the Crystal River Unit 3 Nuclear Generating Plant (Document No. P23-1680-001, Rev. 0), prepared by TLG Services, Inc., page x of xx. Please provide a copy of information contained in "Building Construction Cost Data," published by R.S. Means, that the Company relied upon for estimating costs presented in Duke's 2014 Decommissioning Study.
- 2. For the purposes of the following request, please refer to DEF's responses to Staff's First Data request, No. 15(a.). How much in total have DEF's (to include FPC and PEF) customers paid for ultimate disposal of spent nuclear fuel for CR3 per the Nuclear Waste Policy Act of 1982?
- 3. For the purposes of the following request, please refer to DEF's responses to Staff's First Data request, No. 17. Please provide a copy of the five remaining NRC RAIs regarding the CR3 PSDAR. Please also provide a brief statement clarifying whether any specific RAI responses could materially affect the analysis contained in DEF's 2014 Decommissioning Study.
- For the purposes of the following request, please refer to Florida Public Service Commission (FPSC) Order No. PSC-12-0225-PAA-EI, Page 10, third paragraph, third sentence. Does DEF have any insight as to what costs the "ISFSI capital costs" are being referred to here?
- 5. Over the past few Proposed Agency Action Decommissioning Study reviews (Dockets Nos. 991931-EG, 050078-EI, 100461-EI) the FPSC has addressed issues pertaining to End-of-Life Nuclear Materials and Supplies (EOL M&S) and the Last Core of Nuclear Fuel (Last Core). The appropriate recovery amounts were analyzed as part of the Decommissioning Study

review and the proper accounting is addressed during base rate proceedings. However, with CR3 now permanently off-line, and given certain stipulations in Duke's Revised and Restated Stipulation and Settlement Agreement (primarily Paragraph 5), how does the Company intend to address these two (historically worded) issues:

- a. Should the amortization expense associated with the unrecovered value of Materials and Supplies inventories that will exist at CR3 following plant shut down be revised?
- b. Should the amortization expense associated with the cost of the last core of nuclear fuel for CR3 be revised?
- c. Does the Company believe these two issues are relevant, or need to be addressed, in its instant decommissioning docket?
- 6. For the purposes of the following request, please refer to DEF's responses to Staff's First Data request, Nos. 51 and 54. Is staff correct to assume that the balances of \$51 million for EOL M&S and \$249 million for Last Core of Nuclear fuel will not increase? As in, are these amounts (gross of any salvage) considered final? If not, please explain how these two inventory amounts may increase.

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Request for Documents

1. Please provide the accounting work papers that support DEF's responses to Staff's First Data request, Nos. 51 and 54.