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# Public Service Commission

July 14, 2016

Matthew R. Bernier  
Duke Energy Florida, LLC  
106 East College Avenue, Suite 800  
Tallahassee, FL 32301  
[matthew.bernier@duke-energy.com](mailto:matthew.bernier@duke-energy.com)

## STAFF'S FIRST DATA REQUEST VIA US MAIL & EMAIL

**Re:Docket No. 160140-EQ - Petition for approval of modifications to standard interconnection agreement contained in the approved tariff by Duke Energy Florida, LLC.**

Dear Mr. Bernier,

By this letter, the Commission staff requests that Duke Energy Florida, LLC (DEF or Utility) provide responses to the following data requests.

1. Please refer to the petition, paragraph 3. Please identify and explain the following language: "recent developments in the nature of requested state jurisdictional interconnection requests," and how the proposed modifications addresses these changes.
2. Please refer to proposed tariff page 9.700, paragraph 1, specifically the statement "...providing all net output for sale to the company."
  - a. What effect, if any, would this proposed tariff have on Qualifying Facilities that are directly interconnected to DEF but not selling power to DEF?
  - b. Please explain if under the proposed tariff it is possible for a Qualifying Facility to be directly interconnected to DEF and not provide as-available power to DEF.
3. Please refer to proposed tariff page 9.701, paragraph 2.4. Please explain how this definition of Emergency Condition was derived and cite any and all rules and regulation used in crafting this definition.
4. Please refer to proposed tariff page 9.702, paragraph 2.18. Please explain why IEEE Standard 1547 was added.

5. Please refer to proposed tariff page 9.703, paragraphs 3.1 and 3.2.
  - a. Please explain how the Feasibility Study and Facilities Study in the proposed tariff are different from the previous requirement under the current tariff, and for each difference please explain why the new requirement was added.
  - b. Please provide estimated costs for performing each of these studies for a typical 50 MW Qualifying Facility.
  - c. Please provide estimated costs for performing each of these studies for a typical distributed generation resource.
6. Please refer to proposed tariff page 9.704, paragraphs 3.2 and 3.3. Please explain the changes to the language about final design specifications.
7. Please refer to proposed tariff page 9.704, paragraph 3.6. Please explain the removal of the language “best practices.”
8. Please refer to proposed tariff page 9.705, paragraph 4.1. Please explain the removal of the line “on or after the specified date for initiation of construction.”
9. Please refer to proposed tariff page 9.705, paragraph 4.2. Please explain the justification for and impact of the addition of the last sentence to the paragraph.
10. Please refer to proposed tariff page 9.705, paragraph 4.2.2. Please explain the addition of the last sentence, and specifically explain if the 15 day requirement is new and if so please detail what the prior arrangement was.
11. Please refer to proposed tariff page 9.706, paragraph 5.0. Please explain the necessity of the language “...if no sales to the company were involved” if sales were already required per proposed tariff page 9.700, paragraph 1.
12. Please refer to proposed tariff page 9.707, paragraph 7.5. Please explain the addition of the language “...and such costs shall be the sole responsibility of the QF.”
13. Please refer to proposed tariff pages 9.711 and 9.712. Please explain the basis for the additional terms on these pages on a paragraph by paragraph basis, and estimated costs to a QF or distributed generation resource.

Mr. Bernier  
July 13, 2016  
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Please file all responses electronically no later than Wednesday, August 3, 2016, from the Commission's website at [www.floridapsc.com](http://www.floridapsc.com), by selecting the Clerk's Office tab and Electronic Filing Web Form. Please feel free to call me by phone at (850) 413-6686 or email [owooten@psc.state.fl.us](mailto:owooten@psc.state.fl.us) if you have any questions.

Sincerely,



Orlando Wooten  
Engineering Specialist  
Division of Engineering

OW:tj

cc: Office of Commission Clerk (Docket: 160140- EQ)