DUKE ENERGY FLORIDA

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Duke Energy Florida, LLC

June 20, 2018

VIA ELECTRONIC DELIVERY

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

Re: *Petition for limited proceeding for approval of a smart meter opt-out tariff by Duke Energy Florida, LLC;* Docket 20180088-EI

Dear Ms. Stauffer:

Please find enclosed for electronic filing, Duke Energy Florida, LLC's Response to Staff's Third Data Request (Nos. 1-3).

Thank you for your assistance in this matter. If you have any questions concerning this filing, please feel free to contact me at (727) 820-4692.

Sincerely,

/s/ Dianne M. Triplett

Dianne M. Triplett

DMT/cmk
Enclosure

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 20th day of June, 2018.

/s/ Dianne M. Triplett
Attorney

Kyesha Mapp Office of General Counsel Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 kmapp@psc.state.fl.us	Elisabeth Draper Henry Merryday Division of Economics Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 edraper@psc.psc.state.fl.us hmerryda@psc.state.fl.us

DUKE ENERGY FLORIDA, LLC'S (DEF), RESPONSE TO STAFF'S THIRD DATA REQUEST (NOS. 1-3) REGARDING DEF'S PETITION FOR LIMITED PROCEEDING FOR APPROVAL OF A SMART METER OPT-OUT TARIFF DOCKET NO. 20180088-EI

1. Assuming a smart meter has not already been installed at a customer's premises, will customers be able to retain their existing non-communicating meters?

   a. If yes, please estimate the percentage of customers you predict will be able to retain their existing meters.

   b. If yes, please also explain why all NSMR customers should pay for the installation of a new meter through the NSMR charges when they may not require one.

RESPONSE:

No. The current meters in place today for customers are drive-by Automated Meter Reading (AMR) meters. Drive-by meters emit a radio frequency (RF) signal; that signal is picked up once a month by a meter reading vehicle driving by the neighborhood. Therefore, to address concerns for customers who object to having an RF communicating meter the Company's proposed tariff requires a different meter that does not communicate.

a. N/A

b. N/A

2. In the attachment to staff's Second Data Request, it is stated that the Customer Service of 3 minutes is excluded from NSMR fee calculation. However, it appears that it was included in the proposed fee ($96.34). Please explain this discrepancy.

RESPONSE:

This was a typo in the attachment provided in response to DR2. The Customer Service 3 minutes is included in the calculation and should have stated "included in" not "excluded from". Attached is a revised document reflecting the correction bearing bates numbers 20180088-DEF-STAFF DR3-000022 through 20180088-DEF-STAFF DR3-000024.

3. Please state the date of the first billing cycle in December 2018.

RESPONSE:

The first billing cycle (Cycle 1) for December 2018 can begin billing on November 27, 2018.

Duke Energy Florida
Non-Standard Meter Rider (NSMR) Incremental Work Descriptions
June 15, 2018

Non-Standard Meter Rider (NSMR) Incremental Work Descriptions

(Estimated incremental time required to perform each activity)

Customer Service (3 minutes) – Included in NSMR fee calculation

The 3 minute (0.05 hours) per customer is a conservative average estimate based on the incremental time to complete the required NSMR registration process beyond the standard time to set up a new customer account.

Customer call comes into Customer Contact Center requesting NSMR service.
Customer Care Specialists:

I. Verify the Customer of Record/Account Holder is the caller, note why the customer called in, quote the NSMR charges and explain that the one-time charge will be on the first billing statement if a certified AMI meter is already installed at the premise.
II. NSMR special condition will be set on the customer's account.
III. Create Customer Documentation to initiate NSMR process, including the customer account #.
IV. Check whether there is a non-communicating AMI meter already installed at the premise; if no, proceed to step V; if yes, proceed to step VI.
V. Create meter change order in CSS to be routed to the field for completion. If the request is for a brand new home, the request will be routed to the New Service team, which will create the meter order through CSS.
VI. If a non-communicating AMI meter is already installed, reverse the one-time NSMR fee.

Metering Services Work Order Management (5 minutes)

The 5 minutes (0.0833 hours) per customer is a conservative average for the Work Management Specialist to create applicable work orders (lab to program non-communicating AMI meter, manual meter reading route analysis for new manually-read customer and assignment to corresponding work groups).

Metering Services Lab Programming of Meter (30 minutes)

The 30 minutes (0.5 hours) is a conservative average to identify the appropriate meter type, disable radios and set up an internal courier shipment of the meter to the assigned field technician.

Meter Lab Tech prepares meter for shipment to Field Meter Tech:

- Meter Lab Tech is informed of need for a non-communicating AMI meter via work order

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Non-Standard Meter Rider (NSMR) Incremental Work Descriptions
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- Reviews information to confirm requested meter type and meter form are correct for this application
- Locates appropriate meter in inventory
- Removes meter from inventory, using inventory management system
- Powers up meter in lab on appropriate equipment
- Powers up and logs into computer
- Opens vendor software
- Connects optical probe from computer to meter
- Use the vendor provided software to log into meter
- Program meter with residential rate program
- Disconnects meter from computer and power
- Accuracy tests are performed
- Packages meter and ships to the appropriate location where the Meter & Service Tech would receive the meter and place on their truck.

Meter Exchange (45 minutes)

The 45 minutes (0.75 hours) for Field Meter Tech and vehicle consists of the 30 minute system average travel time from an Operations Center to customer premise, and 15 minutes to prepare meter, remove existing meter, and install new meter.

Field Meter Tech prepares to install meter:

- Field Meter Tech is informed of meter exchange via work order
- Verifies the appropriate meter, with radios disabled, is available and loads into truck
- Travels to customer premise
- Reviews work order before exiting vehicle
- Gathers and dons appropriate Personal Protective Equipment (PPE)
- Performs pre-job briefing
- Knocks on door of business/residence to inform customer of meter exchange
- Assesses site for safety issues while searching and walking to the meter
- Confirms the found meter is the correct meter to be exchanged
- Records current meter read of existing meter
- Removes meter seal and existing meter
- Installs Opt- out meter
- Confirms meter is showing correct displays and meter is working appropriately (Programs for special rates, if necessary)
- Installs meter seal
- Tag the removed meter
- Gathers any material, old seals, etc. to carry back to work vehicle
- Knocks on door of business/residence to inform customer that job is complete

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Non-Standard Meter Rider (NSMR) Incremental Work Descriptions
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- Returns to vehicle and closes out work order.

Vehicle for Field Meter Tech to perform meter exchange

The 45 minutes (0.75 hours) for Field Meter Tech and vehicle consists of the 30 minute system average travel time from an Operations Center to customer premise, and 15 minutes to prepare meter, remove existing meter, and install new meter. The actual DEF Fleet chargebacks to Metering Services for 2017 were identified by vehicle type. By adding up the monthly average costs of ownership, labor, parts, fuel, commercial work, and other non-fuel charges, a total monthly average charge per vehicle type was determined. Commercial work is defined as any vehicle maintenance work performed by an external party, while the labor and parts charges are for work by internal company resources on the vehicles.

Then, using the total monthly charges for the type of vehicle used by DEF Field Meter Techs, "Van > 8500", and dividing by the average number of payroll hours per month of 173.33 (40 hrs. x 52 weeks = 2080 hrs. per year. 2080 hrs. per year / 12 months = 173.3 hrs. per month). The resulting $5.90 represents an estimated average cost per hour to operate that type of vehicle.

Manual Meter Reading Route Analysis (20 minutes)

Previously, when a new manually read meter was installed, the performer working the install would go to the nearest manually-read meter they could find to record the meter number on the work order. When the order goes through the close process, the closer sets the newly installed meter up in the same route and on the same billing cycle as the "nearby" meter the field performer provided. With increased deployment of AMI technology, the population of manually-read meters is continually decreasing, thereby increasing the NSMR unit of time necessary to locate the nearest manually-read meter to the new install. It is no longer practical to require the field performer to complete this task.

For the AMI opt-out customers, the route analysis will consist of geographically locating the meter within the routing/mapping system. The Meter Route Analyst will have to utilize the routing/mapping system tools to locate the nearest remaining manually-read meter and add the opt-out meter to that existing route to minimize the inefficiencies of manual meter reading routes. This process will also include determining the customer's existing billing cycle and changing it to match the billing cycle of the nearest manually-read meter, again to minimize the inefficiencies of manual meter reading routes.