



Matthew R. Bernier  
ASSOCIATE GENERAL COUNSEL

May 10, 2019

**VIA ELECTRONIC MAIL**

Adam J. Teitzman, Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Re: *Review of 2019-2021 Storm Hardening Plan, Duke Energy Florida, LLC;*  
*Docket No. 20180146-EI*

Dear Mr. Teitzman:

Please find attached for filing Duke Energy Florida, LLC's Response to Staff's Fourth Data Request (Nos. 1-2) in the above-referenced Docket.

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 matter.

Respectfully,

*/s/ Matthew R. Bernier*

Matthew R. Bernier

MRB/cm  
Attachment

cc: Parties of Record

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished to the following by electronic mail this 10<sup>th</sup> day of May, 2019, to all parties of record as indicated below.

/s/ Matthew R. Bernier

Attorney

Jennifer Crawford / Walter Trierweiler Office of General Counsel Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 <a href="mailto:jcrawfor@psc.state.fl.us">jcrawfor@psc.state.fl.us</a> <a href="mailto:wtrierwe@psc.state.fl.us">wtrierwe@psc.state.fl.us</a>	J. R. Kelly / P. Christensen Office of Public Counsel c/o The Florida Legislature 111 West Madison Street, Room 812 Tallahassee, FL 32399 <a href="mailto:kelly.jr@leg.state.fl.us">kelly.jr@leg.state.fl.us</a> <a href="mailto:christensen.patty@leg.state.fl.us">christensen.patty@leg.state.fl.us</a>
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**Duke Energy Florida, LLC's Response to Staff's Fourth Data Request  
re. Review of 2019-2021 Storm Hardening Plan (Nos. 1-2)**

**Docket No. 20180146-EI**

**Please refer to DEF's response to Staff's third data request.**

- 1) Please refer to data request number 1. DEF states that Rule 250C reads that if the structure does not exceed 18 meters (60 feet) above ground or water level, then the provisions for the Rule does not apply. However, it appears that Rule 250C states that for construction grade B or C, all structures, including those below 18 meters (60 feet), shall be designed to withstand the extreme wind load associated with the Basic Wind Speed, as specified by Figure 250-2, in any direction on the structure. The Rule further states that for those structures below 60 feet, the conductors should not be considered. Please explain your interpretation of the Rules 261A1c, 261A2e, 261A3d, and 250C.

**RESPONSE:**

NESC Rule 250C states "If no portion of the structure or its supporting facilities exceed 18 m (60 ft) above ground or water level, the provisions of this rule are not required, except as specified in Rule 261A1c, 261A2e, or 261A3d."

The exceptions noted in rule 261 all indicate that "All structures including those below 18 m (60 ft) shall be designed to withstand, without conductors, the extreme wind load in Rule 250C." Duke Energy structures and their supported equipment do meet the extreme wind requirements of Rule 250C when analyzed "without conductors."

- 2) Please refer to data request number 12.
- a. Please explain what the "D", "T", and "Tx" represent in the row for Initiative 6.
  - b. Please explain why DEF is not estimating any costs for Initiatives 3, 4, and 6 for the years 2020 and 2021.
  - c. Please provide the estimated costs for Initiatives 3, 4, and 6 for the years 2020 and 2021. If DEF does not anticipate costs in these years, please explain why not.
  - d. Please explain if there are any changes to DEF's current plan for Initiatives 3-10. If yes, please provide an explanation of each change.
  - e. Please verify that the actual and estimated costs for Initiative 6 Post-Storm Data Collection and Forensic Analysis are correct.
  - f. Does DEF have any suggested improvements/alternatives/modifications including the elimination, of any of the Ten Initiatives? If so, please explain.

**RESPONSE:**

- a. “T” or “Tx” typically refers to “Transmission”; “D” typically refers to “Distribution.
- b. Distribution is not estimating any costs in 2020 or 2021 for Item 6 as the costs are dependent on if Duke Energy Florida is impacted by a major event and how much damaged is caused during the event. Estimating the cost is difficult and provides little value.
- DEF Transmission budgets O&M on an annual basis; Capital budgets are not available at this level of detail. While high level budget forecasts exist for O&M and Capital future expenditures, final approved budgets for specific programs are not available for 2020 and 2021.
- Initiatives 3 & 4 past years actual costs were provided; 2019 estimated budget is provided, whereas 2020 and 2021 budget is not available at this level of detail.
  - Initiative 6 provides actual costs invoiced for the year forensics were ordered due to storm damage; DEF does not budget at this level of detail for forensics analyses that may or may not be needed.
- c. Please see response to 2b.
- d. Distribution and Transmission have no changes at this time.
- e. A decimal point was missed for the Distribution portion of these costs in 2019. The estimated Distribution cost is \$257.5k.

Please see Transmission’s corrected information for Initiative 6

Activity	Any change from current plan (Y/N)*	Actual Cost									Estimated Cost								
		2016			2017			2018			2019			2020			2021		
		O&M	Capital	Total	O&M	Capital	Total	O&M	Capital	Total	O&M	Capital	Total	O&M	Capital	Total	O&M	Capital	Total
Funding Initiatives																			
Post-Storm Data Collection and Forensic Analysis	N	20,000-TX		20,000-TX	44,150-TX		44,150-TX	\$169k-D 94,250-TX		\$169k-D 94,250-TX	\$257.5k-D		\$257.5k-D			N/A-TX			N/A-TX

- f. Duke Energy Florida has incorporated multiple items from the 10 Part Storm Hardening Plan into its normal business practices and would welcome discussions on removing them from the reporting structure.