



Dianne M. Triplett
DEPUTY GENERAL COUNSEL
Duke Energy Florida, LLC

May 23, 2019

VIA ELECTRONIC MAIL

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

Re: *Application for limited proceeding to approve 2017 second revised and restated settlement agreement, including certain rate adjustments by Duke Energy Florida, LLC; Docket No. 20170183-EI*

Dear Mr. Teitzman:

Please find attached for electronic filing Duke Energy Florida, LLC's Response to Staff's Second Data Request for April 17, 2019 Motion (Nos. 1-5) in the above-referenced Docket.

Thank you for your assistance in this matter. Please feel free to call me at (727) 820-4692 should you have any questions concerning this matter.

Respectfully,

/s/ Dianne M. Triplett

Dianne M. Triplett

DMT/cmkn
Attachment

cc: Parties of Record

CERTIFICATE OF SERVICE

Docket No. 20170183-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic mail to the following this 23rd day of May, 2019.

/s/ Dianne M. Triplett

Attorney

<p>Margo DuVal / Suzanne S. Brownless Office of the General Counsel Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 mduval@psc.state.fl.us sbrownle@psc.state.fl.us</p> <p>J.R. Kelly / Charles J. Rehwinkel / Patty Christensen Office of Public Counsel c/o The Florida Legislature 111 West Madison Street, Room 812 Tallahassee, FL 32399 kelly.jr@leg.state.fl.us rehwinkel.charles@leg.state.fl.us christensen.patty@leg.state.fl.us</p> <p>George Cavros 120 E. Oakland Park Blvd, Suite 105 Fort Lauderdale, FL 33334 george@cavros-law.com</p>	<p>Robert Scheffel Wright / John T. LaVia III Gardner Law Firm 1300 Thomaswood Drive Tallahassee, FL 32308 schef@gbwlegal.com jlavia@gbwlegal.com</p> <p>James W. Brew / Laura A. Wynn Stone Mattheis Xenopoulos & Brew, P.C. 1025 Thomas Jefferson Street, NW Eighth Floor, West Tower Washington, D.C. 20007 jbrew@smxblaw.com law@smxblaw.com</p> <p>Jon C. Moyle, Jr. Moyle Law Firm, P.A. 118 North Gadsden Street Tallahassee, FL 32301 jmoyle@moylelaw.com</p>
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**Duke Energy Florida, LLC's Response to Staff's Second Data Request
for April 17, 2019 Motion (Nos. 1-5) re. Application for limited proceeding to
approve 2017 second revised and restated settlement agreement,
including certain rate adjustments, by Duke Energy Florida, LLC**

Docket No. 20170183-EI

1. Please provide actual and projected capital cost, per unit and total, of Electric Vehicle Service Equipment (EVSE) for the four segments at full implementation under both the original allocation and the proposed reallocation of EVSE.

RESPONSE:

Table 1 – Capital spend actuals and projections with current port allocations Includes total capital costs of completed installs and quoted jobs underway					
Segment	# Ports Priced	Original Target Ports Installed	Actual Capital (as of May 15, 2019)	Actual (Average) Capital Per Port	Projected Total Capital – Current Allocation
DCFC	12	30	\$469,157	\$39,096	\$1,172,893
MUD	59	325	\$302,399	\$5,125	\$1,665,757
Public L2	73	75	\$418,757	\$5,736	\$430,230
Workplace	57	100	\$328,576	\$5,764	\$576,449
Total	201	530	\$1,518,889	N/A	\$3,845,329*

(Totals may not foot due to rounding)

Table 2 – Capital Budget Impacts with ports Reallocated		
Segment	Ports Installed after Reallocation	Projected Total Capital with Reallocated Ports
DCFC	50	\$1,954,821
MUD	210	\$1,076,335
Public L2	130	\$745,732
Workplace	140	\$807,029
Total	530	\$4,583,917*

(Totals may not foot due to rounding)

**DEF capital budget could have up to 10% variance due to potential upgrades needed i.e. transformer upgrade, panel upgrade, etc. Projected costs for these upgrades are difficult to predict as each install is a custom project and treated on case-to-case basis. DEF evaluates all jobs for budget impacts to make a final decision on whether to proceed with the job.*

2. In response to Staff's First Data Request, dated April 29, 2019, No. 8, DEF indicated it is unlikely it will meet the revised multi-unit dwelling (MUD) segment EVSE goal by 12/31/19. Assuming DEF does not meet the revised goals and the Company reallocates

remaining unsubscribed MUD EVSE to other segments at the end of 2019, how does DEF plan to install all 530 EVSE and remain under the \$8.0 M cap imposed by the 2017 Second Revised and Restated Settlement Agreement, considering the higher capital costs of the DC Fast Charging (DCFC) segment units?

RESPONSE:

Any further reduction to the number of MUD units would be offset by increases across all other segments. Based on the current unit cost run rate, Public Level 2 and Workplace are in-line with MUD installed costs.

3. Please explain the reasons for the differences in the per unit O&M expenses for the four segments as shown in Table 2 – Program Costs, in DEF’s Electric Vehicle Charging Station Pilot Program Report, filed December 17, 2018.

RESPONSE:

In Table 2, freight and warranty were classified as O&M and should have been classified as capital, which impacts DCFC more than the other segments. Generally, MUD, Public L2 and Workplace are expected to have similar O&M annual costs per port. DEF expects O&M costs across these segments to be more in-line as the installed EVSE totals increase. DCFC will not have the same network fees, which is an O&M cost, as the other three segments.

4. Referring to the Motion, Attachment A, Page 3, please identify any changes in DCFC per unit costs based on assumed greater number of units per site, and how DEF plans to increase the number of DCFC units per site.

RESPONSE:

DEF does not anticipate any changes in the DCFC per unit costs for any additional units. DEF plans installations for multiple units per site to provide redundancy for the increasing number of all electric vehicles coming to market. DEF looks to place DCFC in key Florida corridors we serve and that have seen significant growth.

5. Please explain the meaning of the capital expenses in Table 2- Program Costs, in DEF’s Electric Vehicle Charging Station Pilot Program Report, filed December 17, 2018. Are these amounts the capital costs (total and per port), rather than annualized capital expense amounts?

RESPONSE:

Those are actual capital costs and not annualized capital expense amounts.