

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

---

In re: Application for limited proceeding for recovery of incremental storm restoration costs related to Hurricanes Irma and Nate by Duke Energy Florida, LLC

---

Docket No. 20170272-EI

Dated: August 17, 2018

**DUKE ENERGY FLORIDA, LLC'S RESPONSE TO STAFF'S THIRD SET OF INTERROGATORIES (NOS. 28-29)**

Duke Energy Florida, LLC ("DEF"), subject to and without waiving the contemporaneously served objections to these requests, responds to the Staff of the Florida Public Service Commission ("Staff") Third Set of Interrogatories to DEF (Nos. 28-29) as follows:

28. Please refer to Exhibit JC-1, Forensic Analysis of Storm Damage to DEF's Distribution System as a Result of Hurricane Irma ("Accenture Report)). Did Accenture Consulting perform a forensic analysis of storm damage to DEF's transmission system as a result of Hurricane Irma?
- a. If not, did DEF or another company perform a forensic analysis of DEF's transmission system following Hurricane Irma?
- b. If not, why not?

**Answer:**

**Accenture Consulting did not perform a forensic analysis of storm damage to DEF's transmission system.**

- a. Pickett and Associates, Inc., performed a forensic analysis of failed structures on the Transmission system that met the following criteria.**
- **Cascading failure of 5 or more structures**
  - **Failed steel or concrete poles**
  - **Failed dead-end or large angle structures**

**Copies of these reports are produced in response to Staff's Second Request for Production, number 2.**

- b. N/A**

29. On page 18, lines 9-11 of his direct testimony, DEF Witness Buckler stated that DEF estimated that it has incurred at least \$1.64 million in incremental accounts receivable charge-offs in the months of January, February, and March 2018.
- a. Please provide an updated estimate of incremental account receivable charge-offs through the allowable recovery period ending May 31, 2018.

**Answer:**

**DEF estimates it has incurred \$2.143 million in incremental accounts receivable charge-offs for the period ending May 31, 2018.**

**AFFIDAVIT**

STATE OF FLORIDA

COUNTY OF \_\_\_\_\_

I hereby certify that on this \_\_\_\_\_ day of August, 2018, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared ROBERT MATTHEWS, who is personally known to me, and he acknowledged before me that he provided the answers to interrogatory number 28, of STAFF'S THIRD SET OF INTERROGATORIES TO DUKE ENERGY FLORIDA, LLC (NOS. 28-29) in Docket No. 20170272-EI, and that the responses are true and correct based on his personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this \_\_\_\_\_ day of August, 2018.

\_\_\_\_\_  
ROBERT MATTHEWS

\_\_\_\_\_  
Notary Public  
State of Florida, at Large

My Commission Expires:  
\_\_\_\_\_

**AFFIDAVIT**

STATE OF NORTH CAROLINA

COUNTY OF MECKLENBURG

I hereby certify that on this \_\_\_\_\_ day of August, 2018, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared BRYAN BUCKLER, who is personally known to me, and he acknowledged before me that he provided the answers to interrogatory number 29 of STAFF'S THIRD SET OF INTERROGATORIES TO DUKE ENERGY FLORIDA, LLC (NOS. 28-29) in Docket No. 20170272-EI, and that the responses are true and correct based on his personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this \_\_\_\_\_ day of August, 2018.

\_\_\_\_\_  
BRYAN BUCKLER

\_\_\_\_\_  
Notary Public  
State of Florida, at Large

My Commission Expires:  
\_\_\_\_\_