



Matthew R. Bernier
Associate General Counsel
Duke Energy Florida, LLC.

October 23, 2019

VIA ELECTRONIC FILING

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

Re: *Fuel and purchased power cost recovery clause with generating performance incentive factor; Docket No. 20190001-EI*

Dear Mr. Teitzman:

Please find enclosed for electronic filing on behalf of Duke Energy Florida, LLC (“DEF”), DEF’s Request for Extension of Confidential Classification concerning certain information contained in the direct testimony of Jeffrey Swartz and Exhibit No. __ (JS-1) and Exhibit Nos. __ (CAM-2T) and __ (CAM-3T) to the direct testimony of Christopher A. Menendez filed on March 2, 2018 in docket number 20180001-EI.

Portions of the documents submitted with the original March 2, 2018 Request for Confidential Classification are no longer confidential. Therefore, revised exhibits are provided as noted below.

This filing includes:

- Revised Exhibit A (confidential slip sheet only)
- Revised Exhibit B (two copies of redacted information)
- Revised Exhibit C (justification matrix)
- Revised Exhibit D (Affidavits of Christopher Menendez and Jeffrey Swartz)

DEF’s confidential Revised Exhibit A that accompanies the above-referenced filing, has been submitted under separate cover.

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 filing

Respectfully,

s/Matthew R. Bernier

Matthew R. Bernier
Associate General Counsel
Matt.Bernier@duke-energy.com

MRB/mw
Enclosures

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and purchased power cost
recovery clause with generating
performance incentive factor.

Docket No. 20190001-EI

Dated: October 23, 2019

**DUKE ENERGY FLORIDA, LLC'S
REQUEST FOR EXTENSION OF CONFIDENTIAL CLASSIFICATION**

Duke Energy Florida, LLC (“DEF” or “Company”), pursuant to Section 366.093, Florida Statutes (“F.S.”), and Rule 25-22.006, Florida Administrative Code (“F.A.C.”), submits its Request for Extension of Confidential Classification (“Request”) for certain information provided in the direct testimony of Jeffrey Swartz, in Exhibit No. __ (JS-1) to Mr. Swartz’s testimony, and in Exhibit Nos. __ (CAM-2T) and __ (CAM-3T) to the direct testimony of Christopher A. Menendez. In support of this Request, DEF states:

1. On March 2, 2018, DEF filed a request for confidential classification for certain information provided in the direct testimony of Jeffrey Swartz, in Exhibit No. __ (JS-1) to Mr. Swartz’s testimony, and in Exhibit Nos. __ (CAM-2T) and __ (CAM-3T) to the direct testimony of Christopher A. Menendez, (Document No. 02029-2018), which includes confidential business information such as contractual cost data, third-party proprietary information, and competitively negotiated data.

2. DEF’s March 2, 2018 Request was granted by Order No. PSC-2018-0198-CFO-EI on April 23, 2018. The period of confidential treatment granted by that order will expire on

October 23, 2019. Some of the information continues to warrant treatment as “proprietary confidential business information” within the meaning of Section 366.093(3), F.S. Accordingly, DEF is filing its Request for Extension of Confidential Classification.

3. DEF submits that certain information provided in the direct testimony of Jeffrey Swartz and in Exhibit No. __ (JS-1) to Mr. Swartz’s testimony, and in Exhibit Nos. __ (CAM-2T) and __ (CAM-3T) to the direct testimony of Christopher A. Menendez identified in Exhibit “A” and Exhibit “C” to the March 2, 2018 Request continues to be “proprietary confidential business information” within the meaning of section 366.093(3), F.S. and continues to require confidential classification. *See* Affidavits of Jeffrey Swartz and Christopher A. Menendez at ¶ 4, attached as Revised Exhibit “D”. This information is intended to be and is treated as confidential by the Company. The information has not been disclosed to the public. Pursuant to section 366.093(1), F.S., such materials are entitled to confidential treatment and are exempt from the disclosure provisions of the Public Records Act. *See* Affidavits of Jeffrey Swartz and Christopher A. Menendez ¶¶ 5-6.

4. Some of the information contained in DEF’s original Request for Confidential Classification is no longer confidential and therefore, DEF submits revised exhibits along with this Request. Otherwise, nothing has changed since the issuance of Order No. PSC-18-0198-CFO-EI to render the information stale or public such that continued confidential treatment would not be appropriate. Upon a finding by the Commission that this information continues to be “proprietary confidential business information,” it should continue to be treated as such for an additional period of at least 18 months and should be returned to DEF as soon as the information is no longer necessary for the Commission to conduct its business. *See* §366.093(4), F.S.

WHEREFORE, for the foregoing reasons, DEF respectfully requests that this Request for Extension of Confidential Classification be granted.

Respectfully submitted this 23rd day of October, 2019.

s/Matthew R. Bernier

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic mail this 23rd day of October, 2019 to all parties of record as indicated below.

s/Matthew R. Bernier

Attorney

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Revised Exhibit A

“CONFIDENTIAL”

(filed under separate cover)

Revised Exhibit B

REDACTED

(one copy)

1 discovered a failed LP turbine rupture disk. The disk had been breached by a foreign
2 object that caused a hole in the rupture diaphragm. DEF performed an inspection of
3 the Bartow Steam Turbine (“ST”) and discovered damage to the ST’s L-0 blades (and
4 determined part of an L-0 blade ruptured the LP turbine rupture disk), resulting in a
5 forced outage to the ST that lasted until April 8, 2017 (while the ST was off-line, the
6 Bartow combustion turbines (“CTs”) remained available to run in simple cycle
7 mode).

8 DEF performed a Root Cause Analysis (“RCA”) that determined the cause of the L-0
9 blade failure is [REDACTED]. After investigation, the
10 RCA Team determined that [REDACTED]
11 [REDACTED] both in the remainder of Duke Energy Corporation’s (“Duke Energy”) ST fleet
12 and elsewhere in the industry. Therefore, the failure of the Bartow ST’s L-0 Blades
13 was caused by events beyond DEF’s control, and DEF could not have reasonably
14 prevented the failure from occurring. DEF’s actions prior to and in the wake of the
15 blade failure were reasonable and prudent.

16
17 **Q. Are you sponsoring any exhibits?**

18 A. Yes. I am sponsoring the DEF RCA Report, attached as Exhibit No. __ (JS-1).
19

20 **Q: Is the RCA considered confidential by the Company?**

21 A: Yes. The RCA and portions of my testimony discussing the RCA’s findings are
22 confidential due to the ongoing claims process with the blades’ manufacturer and the
23 potential for insurance claims. In order to protect these rights, this information has

1 restoration team was formed to bring the unit back on-line; and a team was formed to
2 evaluate a long-term solution for Bartow.

3

4 **Q. Please describe the process DEF followed to ascertain the root cause of the event.**

5 A. DEF created a RCA Team consisting of internal experts to investigate and determine
6 the root cause of the event. The RCA Team consisted of seven individuals with
7 expertise in engineering, operations and process, and human performance.

8

9 Following industry standard procedures, the RCA Team employed specific tools used
10 to determine potential root cause(s) including: interviews, event and causal factor
11 review (“E&CF”), flawed barrier analysis, change analysis, component analysis,
12 visual inspections of the equipment, photographs taken following the event,
13 engineering calculations and measurements, and detailed review of outage reports and
14 maintenance logs.

15 **REDACTED**

16 **Q. Please describe the RCA Team’s conclusio**

17 A. The DEF RCA Team determined that the root cause of the failures in the ST L-0 40”

18 blades is [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

1 Notwithstanding the alternative causes hypothesized by the OEM, [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]

7

8 **Q. Did the RCA Team consider alternative potential root causes?**

9 A. Yes, DEF evaluated potential factors in the operation of the unit as well as specific
10 design factors unique to these blades, each of which was ultimately rejected as the
11 cause of the fifth failure and as the overall cause of all five failures. [REDACTED]

12 [REDACTED]
13 [REDACTED]

14

15 **Q. Why did the RCA Team reject these theories?**

16 A. The detailed rationale for rejecting these competing theories are contained in the
17 RCA, but in general (and with the exception of the [REDACTED]
18 [REDACTED] DEF was unable to find a correlation between any of the
19 individual factors and the blades' failures. However, it should be noted that DEF [REDACTED]

20 [REDACTED]

21 [REDACTED]

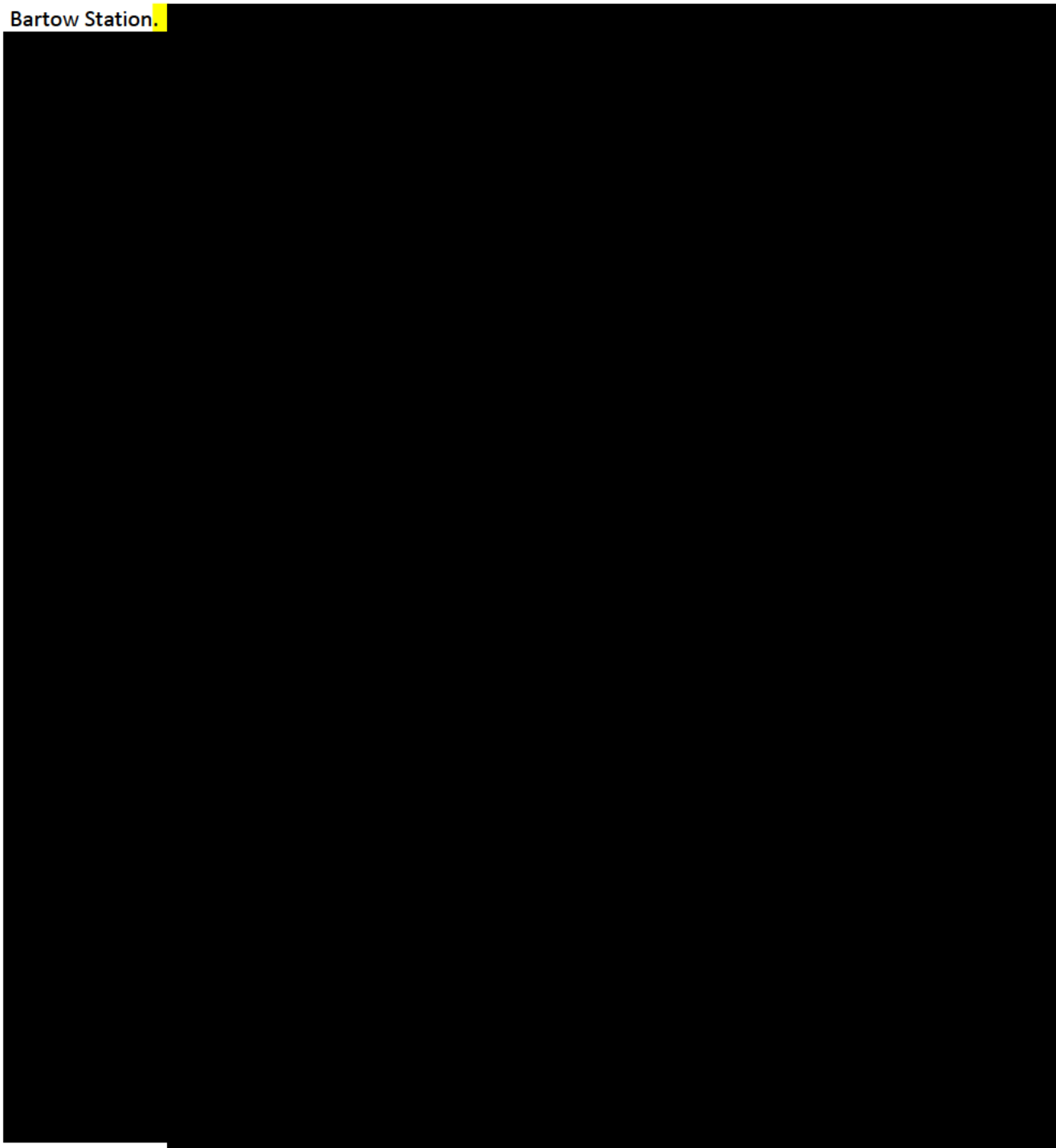
22 [REDACTED]

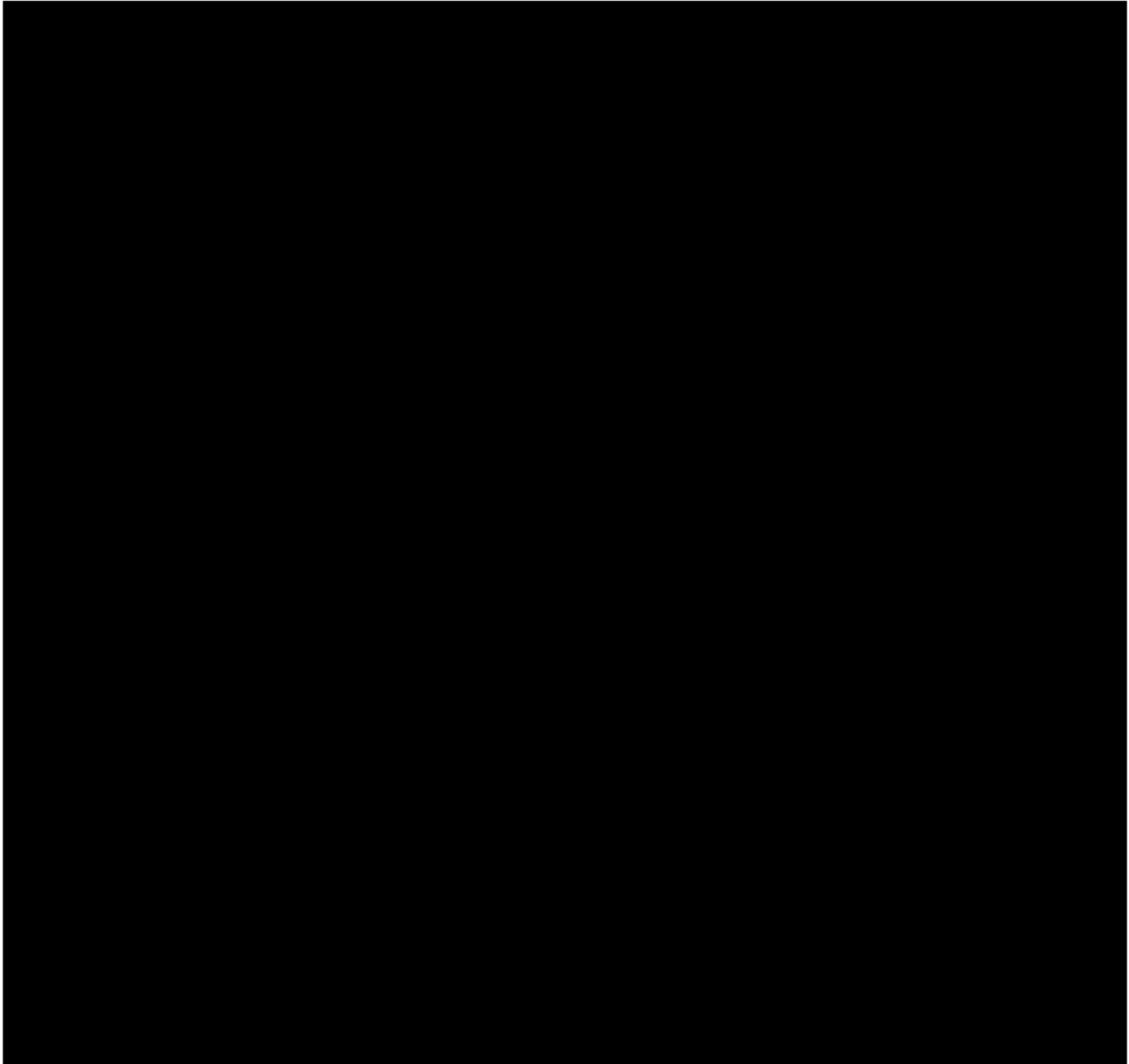
23 [REDACTED]

REDACTED

Executive Summary

Over the past 3 plus years, Duke Energy Florida LLC (Duke), at times working independently and at times together with Mitsubishi Hitachi Power Systems (MHPS), undertook a root cause analysis (RCA) of the cause(s) for the Unit 4S L-0 blade cracks and failures that occurred during normal station operations at Bartow Station.





Historical Overview

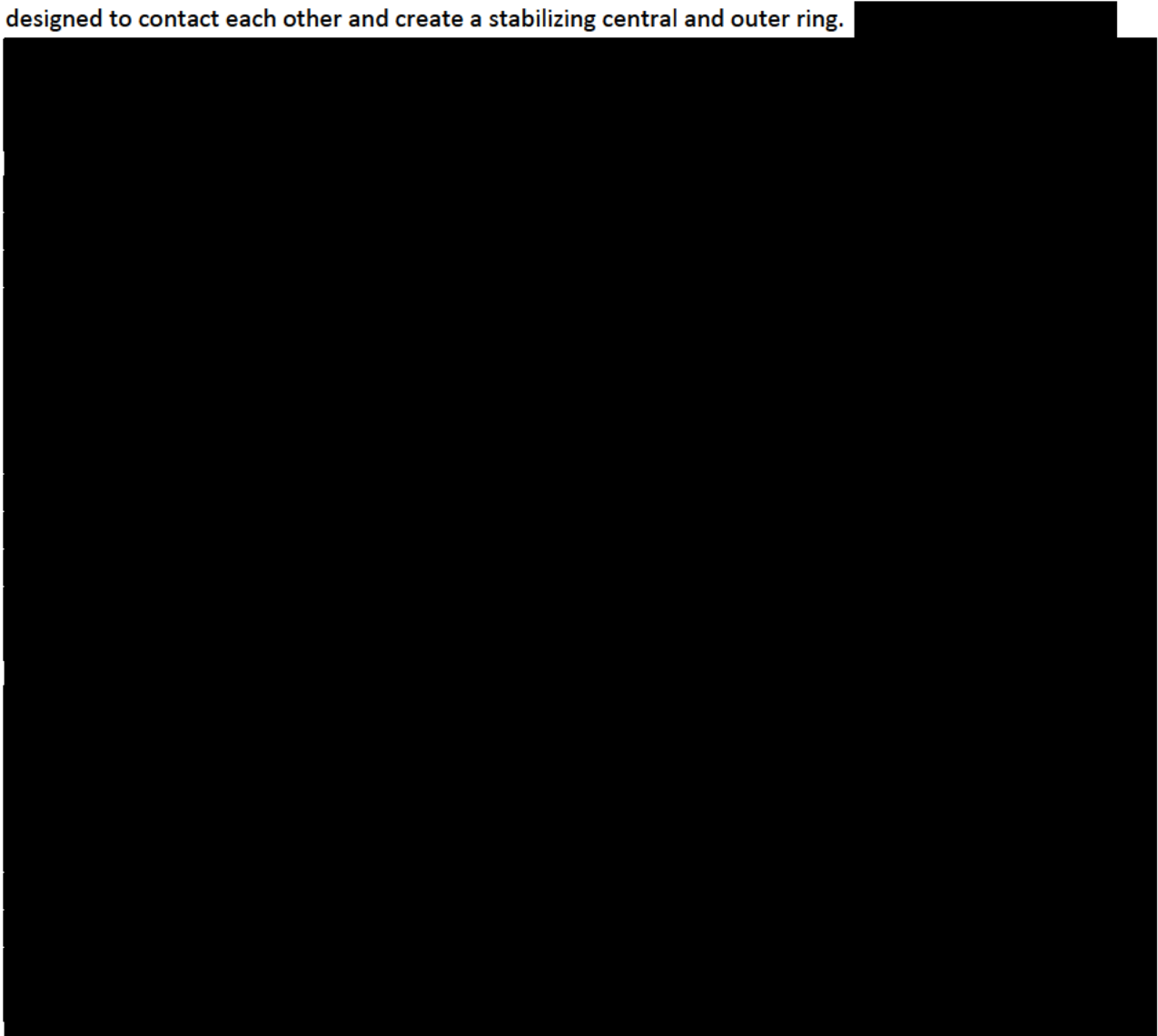
Bartow is a 4x1 CC Station with a steam turbine (ST) manufactured by MHPS. The ST was purchased from Tenaska Power Equipment, LLC (Tenaska) which intended to use it for a 3x1 CC with a gross output of 420MW. The ST was never delivered to Tenaska and remained with MHPS in a warehouse in Japan until Duke purchased the unit in 2006.



Before the ST was purchased by Duke, Duke contracted with MHPS to evaluate the ST design conditions and to update heat balances for a 4x1 CC configuration. MHPS updated the heat balances for use in a 4x1 CC configuration. CC units blend steam from the combustion turbines (CT) as they start-up and/or shut-down with steam to the ST. These blending events, which are a common occurrence for CC units, result in brief periods of higher steam temperatures and flows into the condenser near the ST L-0 blades.

Since commissioning of the Bartow ST in 2009, there have been five (5) events involving L-0 blade failures and/or replacements as described, below.

Each 40" MHPS steel blade is twisted with a "root end" that connects it to the hub, a snubber at the mid-point or mid-span, and a shroud with airfoil tips at the top. While the ST spins up to its operating speed of 3600rpm, each blade elongates and starts to untwist. The snubbers and airfoil tips are designed to contact each other and create a stabilizing central and outer ring.

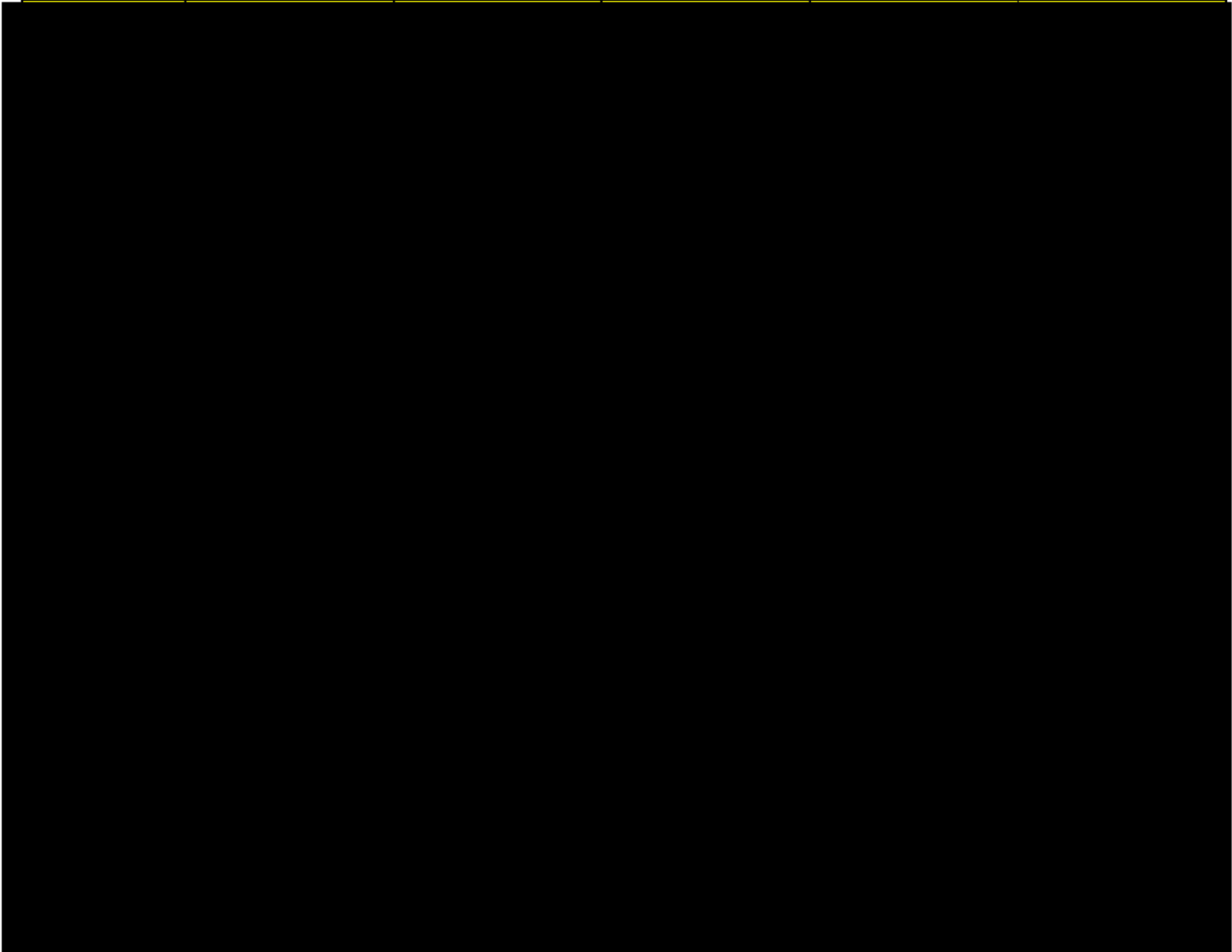


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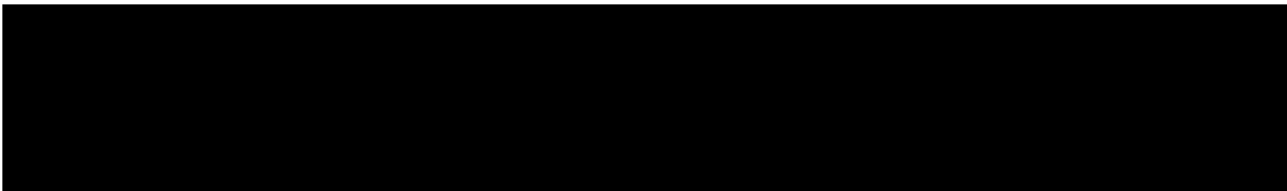


Table A: Bartow L-0 Events Summary

	Period 1	Period 2	Period 3	Period 4	Period 5
Date	June 2009 to March 2012	April 2012 to August 2014	December 2014 to April 2016	May 2016 to Oct 2016	December 2016 to February 2017
Service Duration	~34 Months	~28 Months	~17 Months	~5 Months	~2 Months

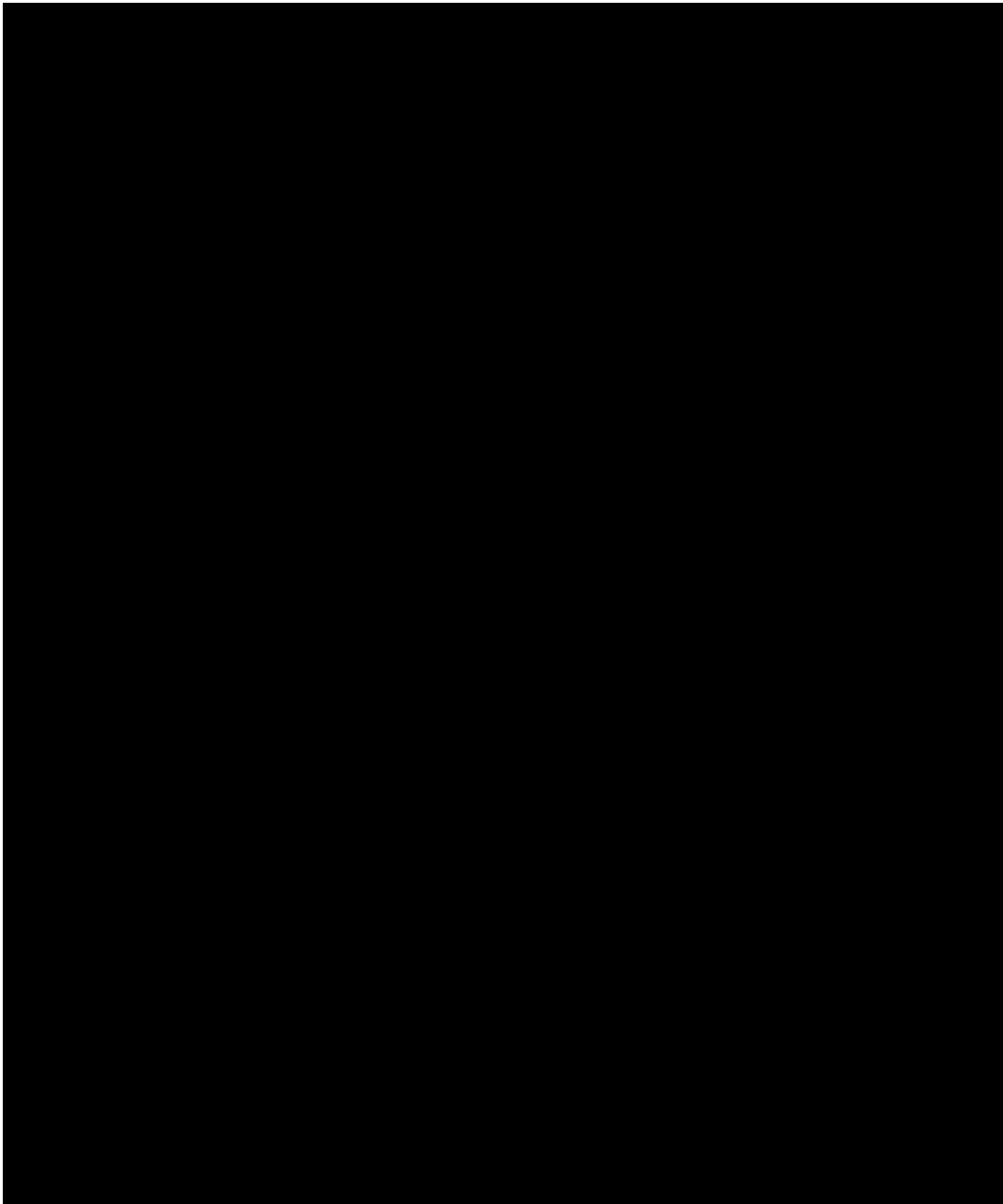


Information Shared with MHPS	Duke provided all requested PI data.	Duke provided all requested PI data.	Duke provided all requested PI data.	Duke provided all requested PI data.	Duke provided all requested PI data.
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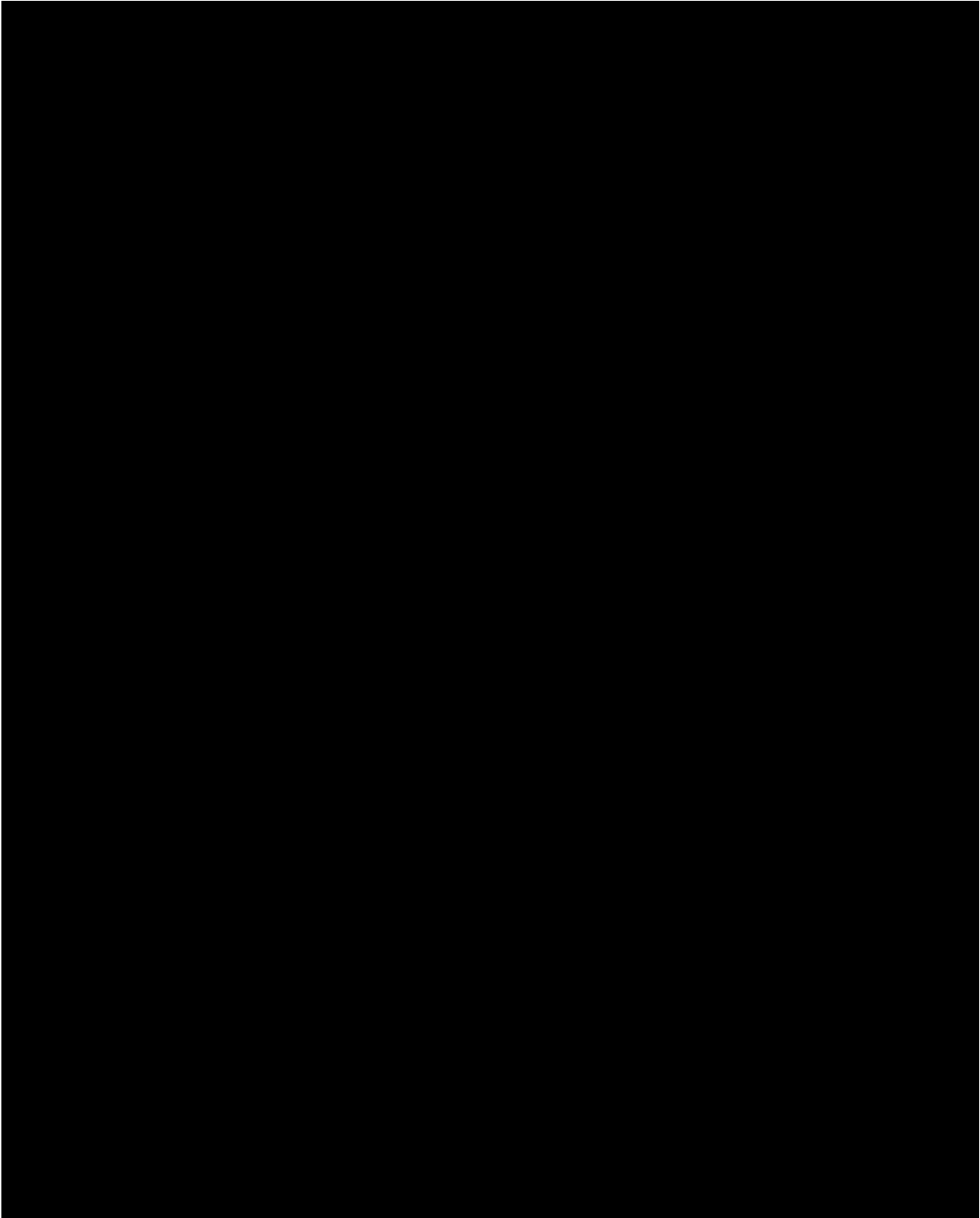


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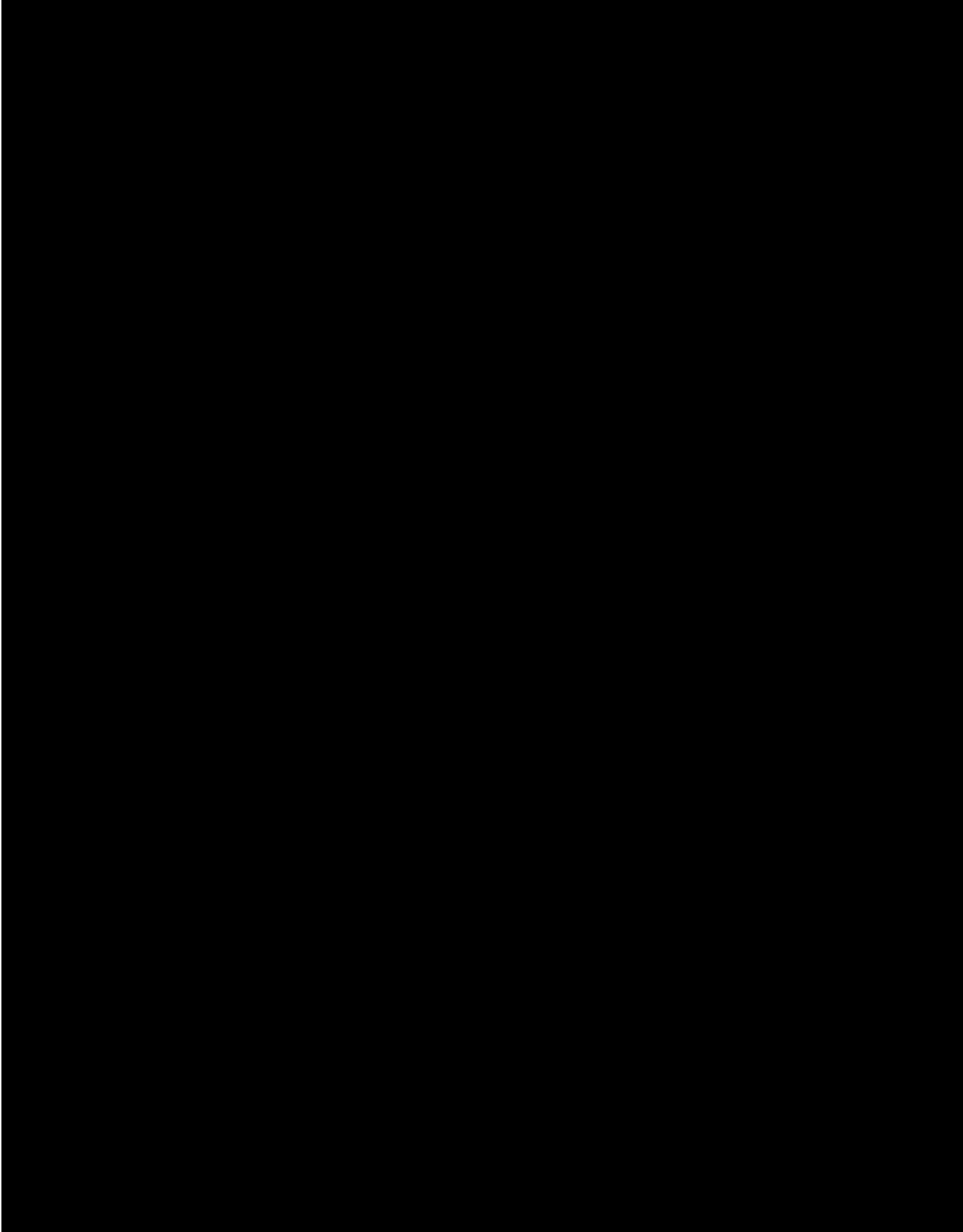
Docket No. 20180001
Duke Energy Florida
Witness: Swartz
Revised Exhibit No. ____ (JS-1)
Page 6 of 18



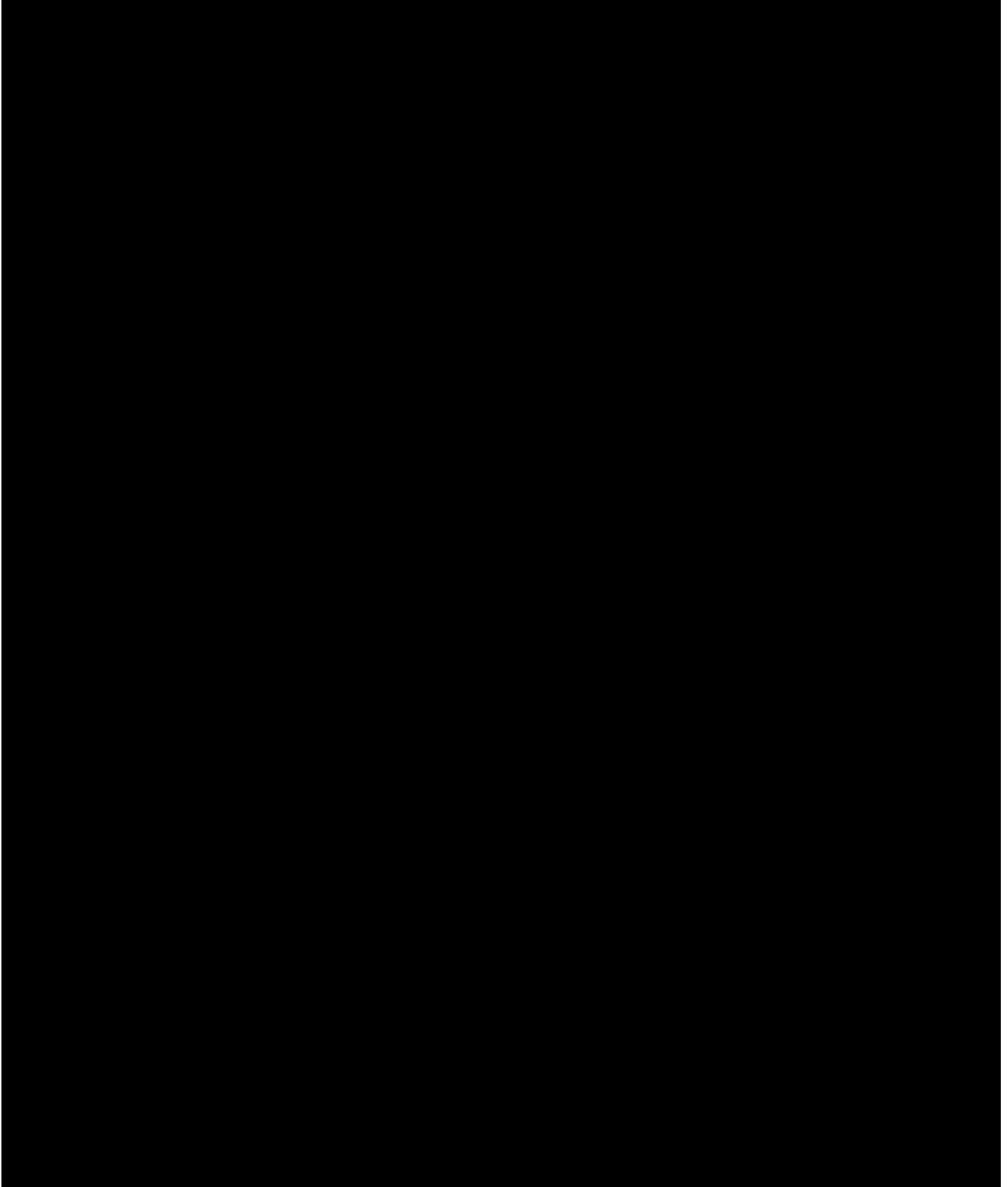
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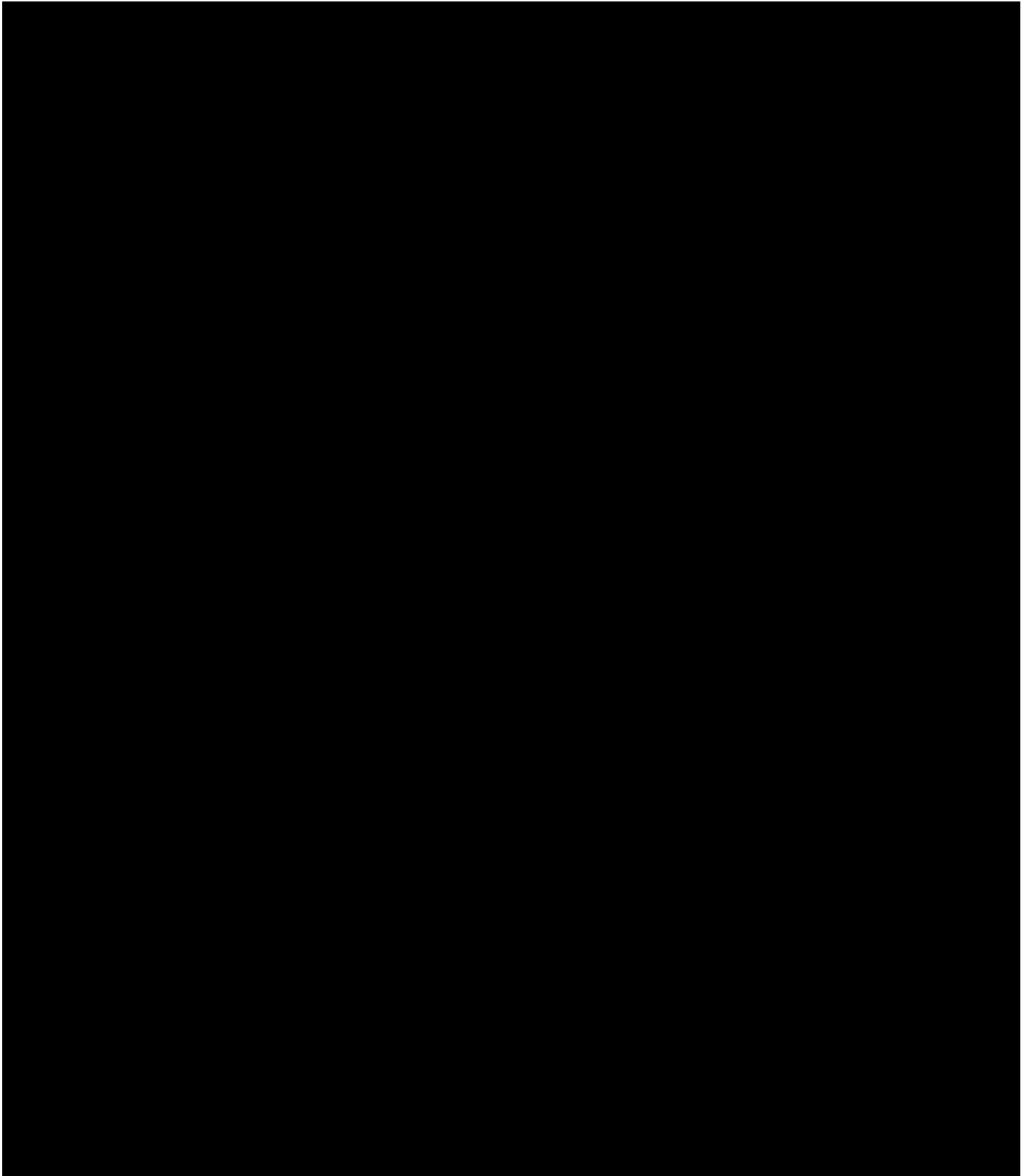


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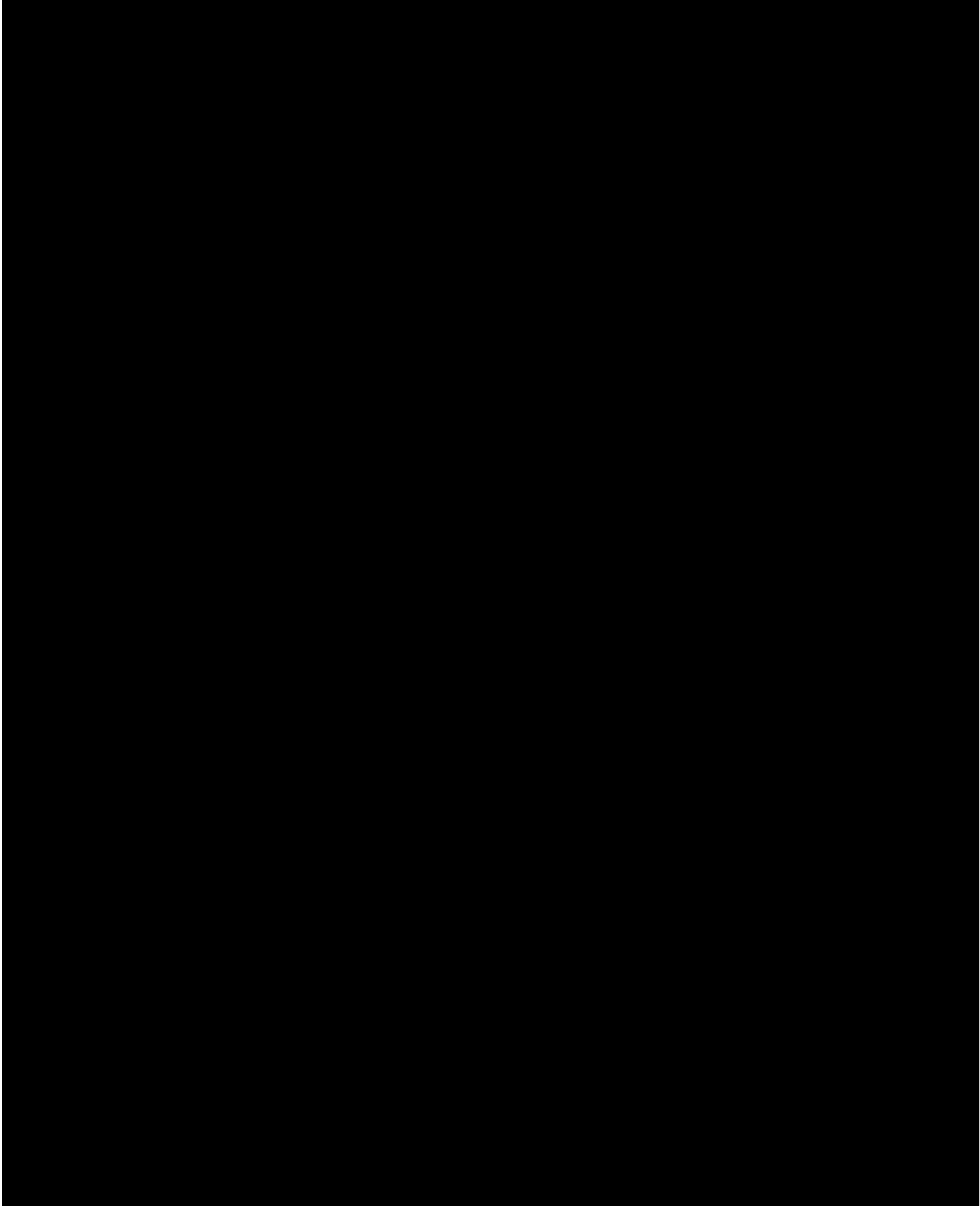


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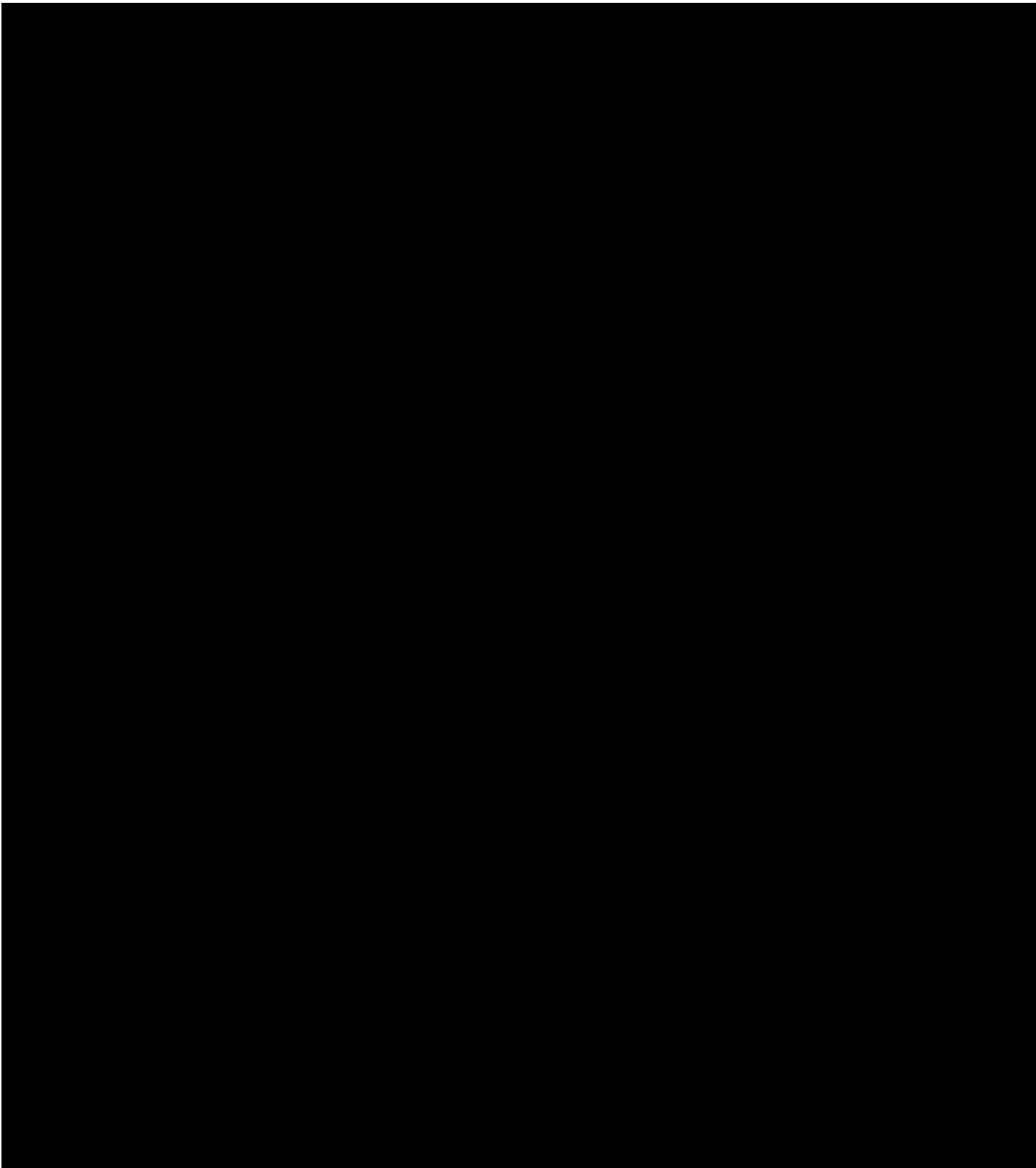
Docket No. 20180001
Duke Energy Florida
Witness: Swartz
Revised Exhibit No. ____ (JS-1)
Page 10 of 18



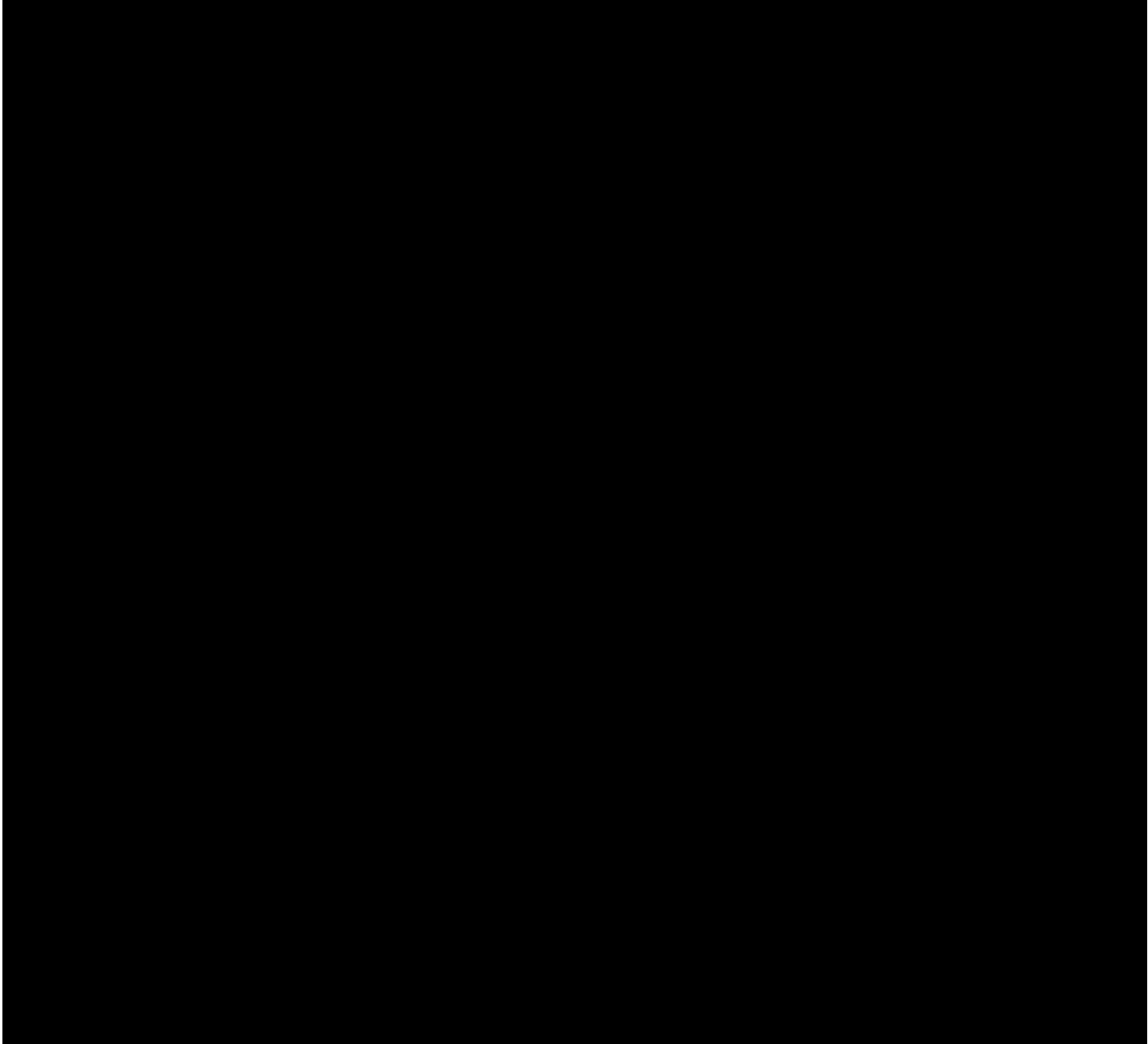
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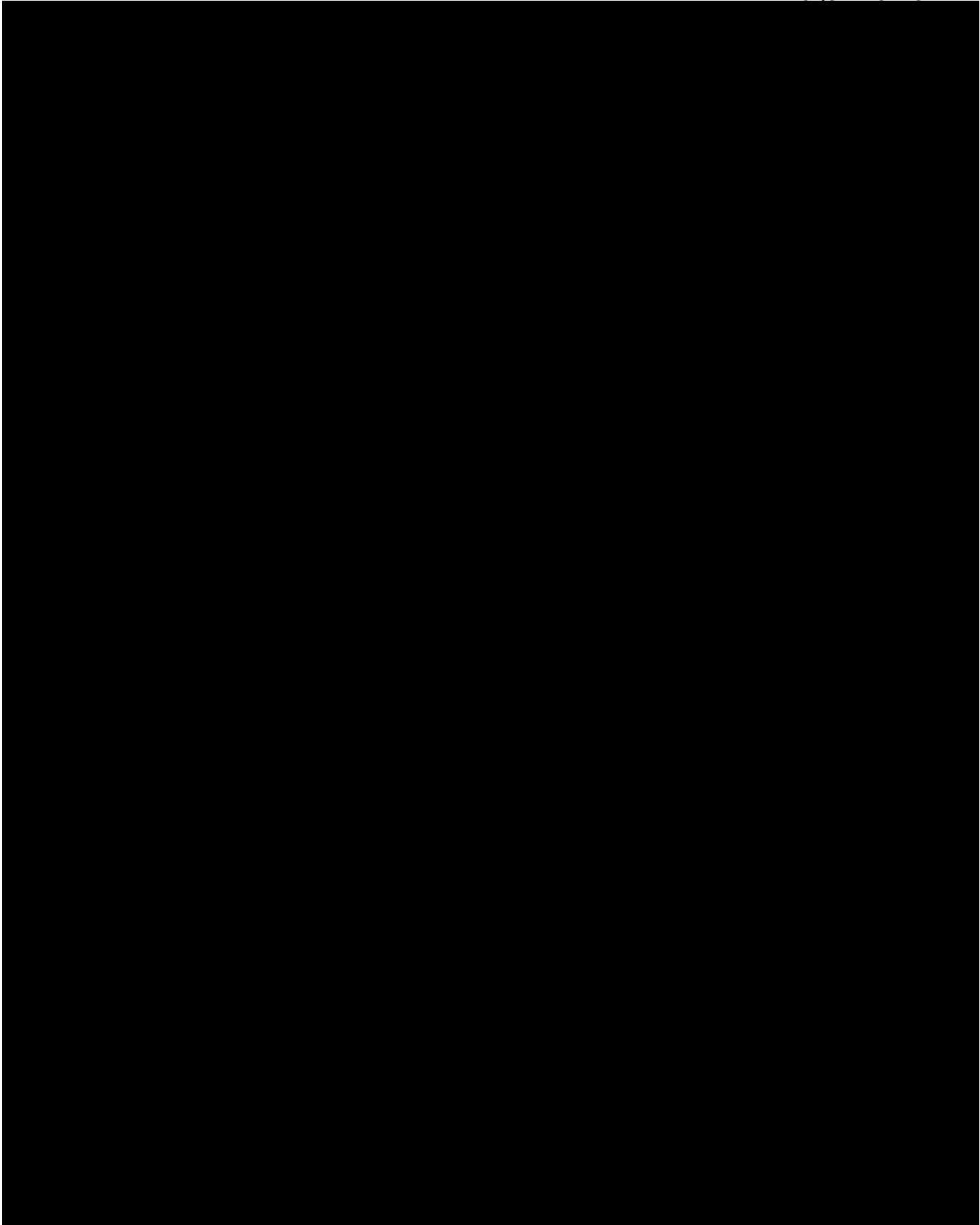
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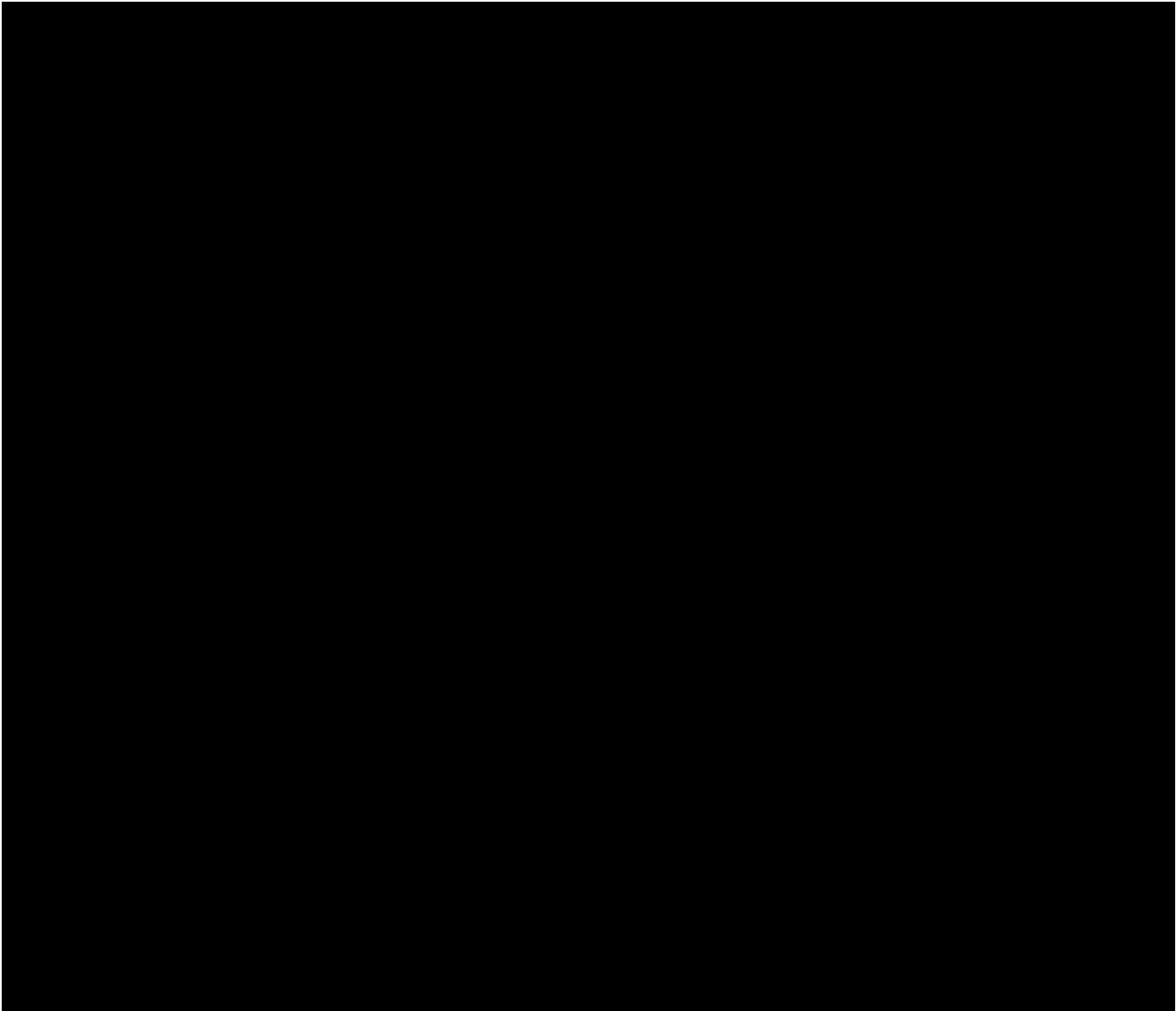
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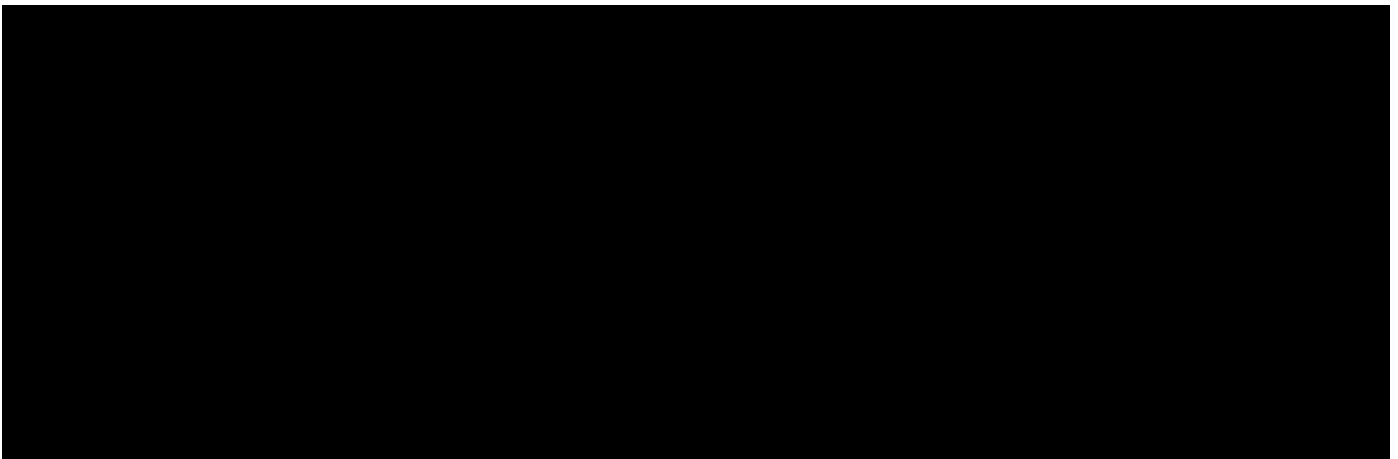
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CONCLUSION:

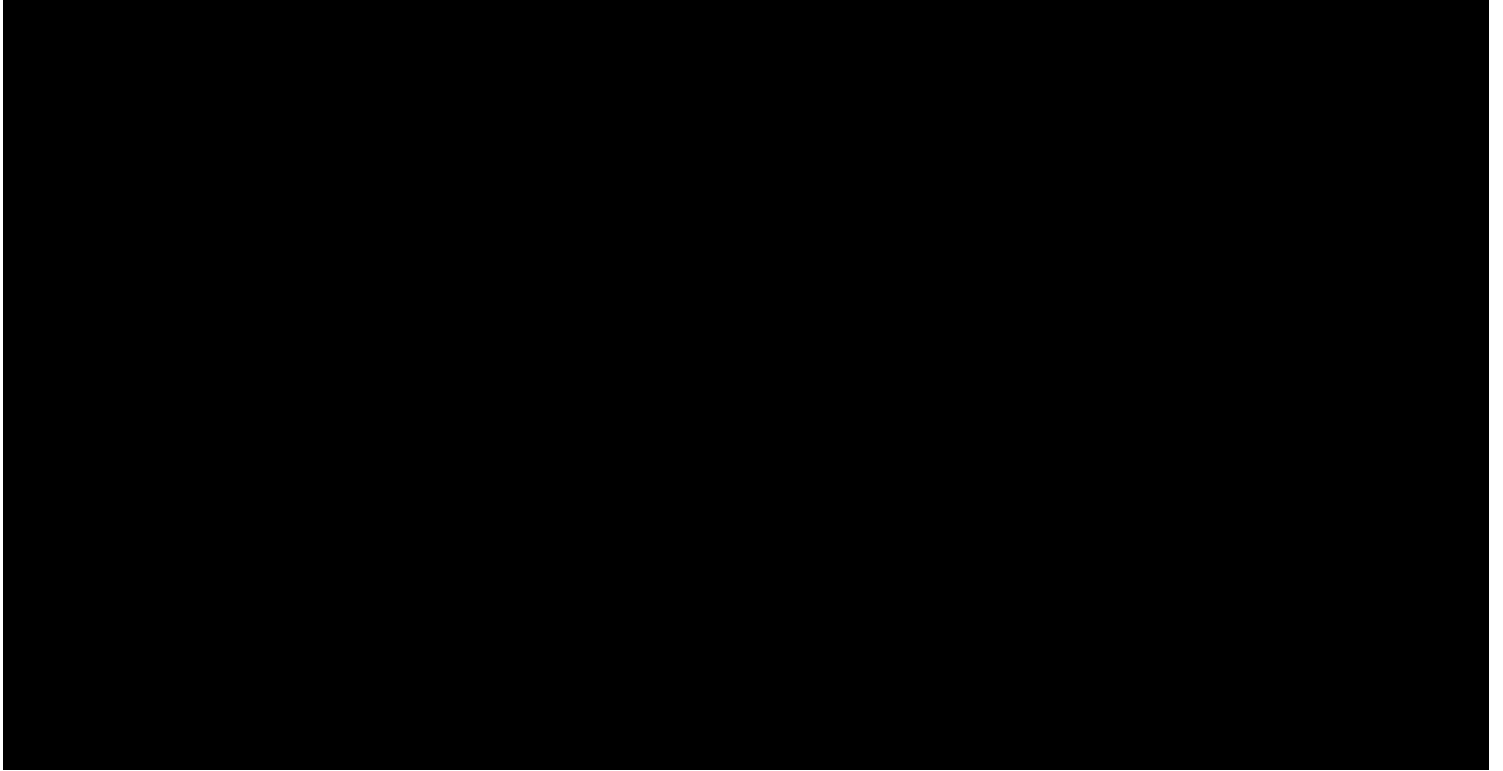


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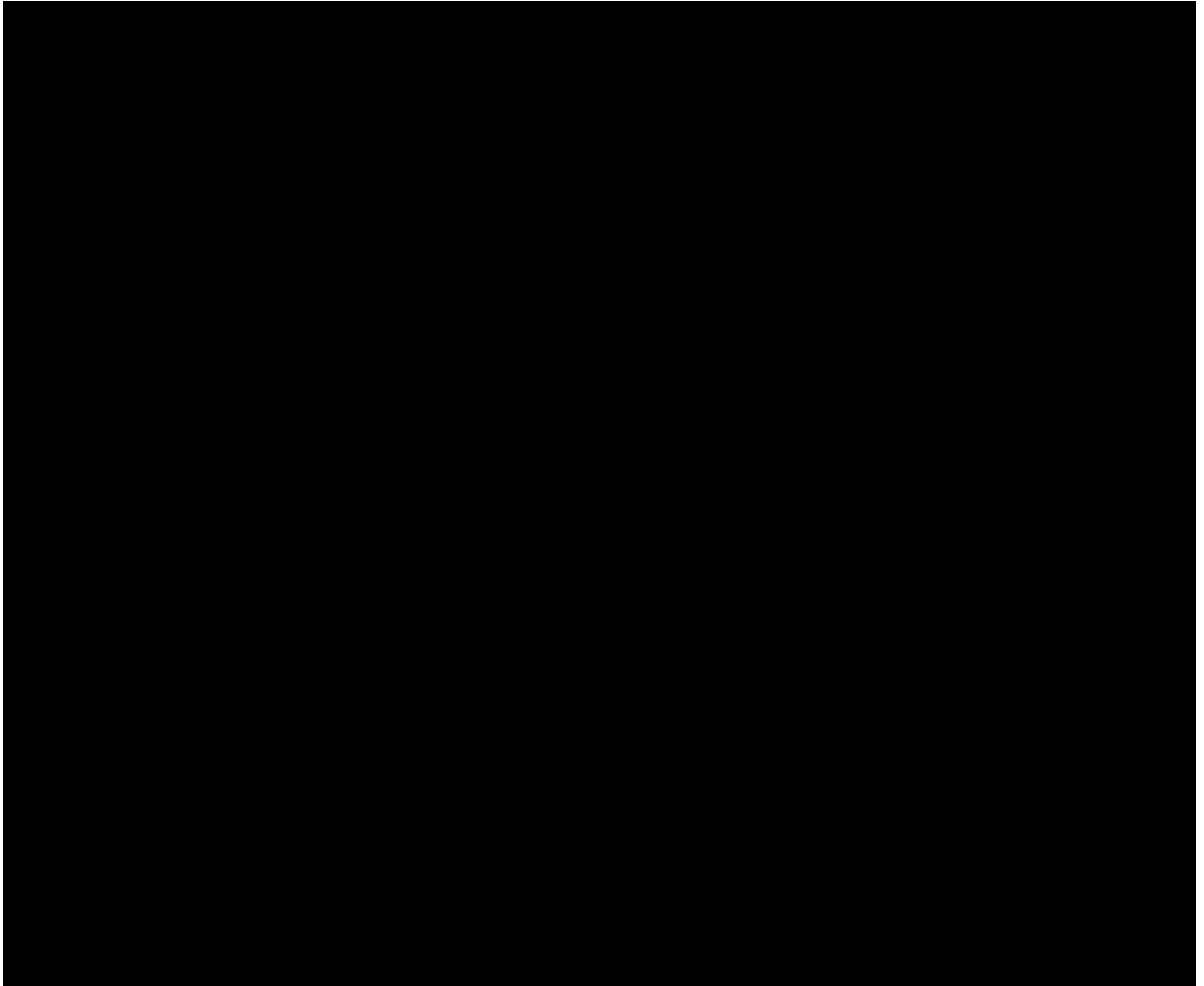
[REDACTED]

This RCA report is Duke's product and presents its view of the root cause based on all inputs received.

REDACTED



REDACTED



Duke Energy Florida, LLC
 Capacity Cost Recovery Clause
 Calculation of Actual True-Up
 January 2017 - December 2017

	JAN ACTUAL	FEB ACTUAL	MAR ACTUAL	APR ACTUAL	MAY ACTUAL	JUN ACTUAL	JUL ACTUAL	AUG ACTUAL	SEPT ACTUAL	OCT ACTUAL	NOV ACTUAL	DEC ACTUAL	Total
1 Base Production Level Capacity Costs													
2 Orange Cogen (ORANGE CO)	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	60,858,765
3 Orlando Cogen Limited (ORLACOGL)	5,102,804	5,102,804	5,102,804	5,102,804	5,089,383	5,094,138	5,096,530	5,099,746	5,097,899	4,988,662	5,015,745	5,023,523	60,916,840
4 Pasco County Resource Recovery (PASCOUNT)	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	21,417,600
5 Pinellas County Resource Recovery (PINCOUNT)	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	50,983,200
6 Polk Power Partners, L.P. (MULBERRY/ROYSTER)	6,733,888	6,656,139	6,675,150	6,669,159	6,662,563	6,900,122	6,965,675	6,965,675	6,965,675	6,965,675	6,965,675	6,965,675	82,091,070
7 Wheelabrator Ridge Energy, Inc. (RIDGEGEN)	1,097,143	646,573	648,924	678,961	684,116	705,834	719,623	750,224	765,134	751,969	754,931	755,868	8,959,300
8 US EcoGen	0	0	0	(3,000)	(90,000)	(93,000)	(90,000)	(93,000)	(93,000)	(90,000)	(93,000)	(90,000)	(735,000)
9 Calpine Osprey	92,394	0	0	0	0	0	0	0	0	0	0	0	92,394
10 Subtotal - Base Level Capacity Costs	24,131,193	23,510,479	23,531,842	23,552,887	23,451,026	23,712,058	23,796,792	23,827,608	23,840,671	23,721,270	23,748,315	23,760,029	284,584,168
11 Base Production Jurisdictional Responsibility	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	
12 Base Level Jurisdictional Capacity Costs	22,414,258	21,837,709	21,857,551	21,877,099	21,782,485	22,024,945	22,103,650	22,132,273	22,144,407	22,033,501	22,058,622	22,069,503	264,336,004
13 Intermediate Production Level Capacity Costs													
14 Southern Franklin	4,485,507	4,630,269	2,673,583	2,669,458	2,955,813	6,057,918	6,236,165	6,252,703	4,638,320	2,750,085	2,698,716	3,488,522	49,537,060
15 Schedule H Capacity Sales - NSB, RCID & Tallahassee	0	0	0	0	0	0	(73,253)	0	0	(75,671)	(6,305)	(37,835)	(193,065)
16 Subtotal - Intermediate Level Capacity Costs	4,485,507	4,630,269	2,673,583	2,669,458	2,955,813	6,057,918	6,162,912	6,252,703	4,638,320	2,674,414	2,692,410	3,450,687	49,343,995
17 Intermediate Production Jurisdictional Responsibility	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	
18 Intermediate Level Jurisdictional Capacity Costs	3,261,098	3,366,345	1,943,775	1,940,776	2,148,965	4,404,288	4,480,622	4,545,903	3,372,198	1,944,379	1,957,463	2,508,753	35,874,565
19 Peaking Production Level Capacity Costs													
20 Shady Hills	1,954,260	1,954,260	1,395,900	1,374,300	1,924,020	3,912,300	3,912,300	3,912,300	1,825,740	1,149,734	1,374,300	1,984,500	26,673,914
21 Vandolah (NSG)	2,924,309	2,889,528	1,965,274	1,943,845	2,795,467	5,785,430	5,768,280	5,707,232	2,712,726	1,918,109	2,015,348	2,943,834	39,369,382
22 Other	-	-	-	-	-	-	-	-	-	-	-	-	-
23 Subtotal - Peaking Level Capacity Costs	4,878,569	4,843,788	3,361,174	3,318,145	4,719,487	9,697,729.55	9,680,580	9,619,532	4,538,466	3,067,843	3,389,648	4,928,334	66,043,296
24 Peaking Production Jurisdictional Responsibility	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	
25 Peaking Level Jurisdictional Capacity Costs	4,679,718	4,646,355	3,224,173	3,182,897	4,527,121	9,302,450	9,286,000	9,227,440	4,353,478	2,942,798	3,251,486	4,727,455	63,351,371
26 Other Capacity Costs													
27 Retail Wheeling	(23,615)	(2,605)	(13,552)	(1,023)	(49,903)	(27)	(9,282)	(6,007)	(3,342)	(4,243)	0	(1,766)	(115,365)
28 RRSA Second Amendment ¹	-	-	-	-	-	-	-	-	-	-	-	-	-
29 Batch-19 Nuclear Fuel ²	-	-	-	-	-	-	(296,269)	-	(160,182)	-	-	-	(456,451)
30 ASC Servicing Fees ³	-	-	-	-	-	-	-	-	-	-	-	-	-
31 Total Other Capacity Costs	1,768,743	1,785,790	1,770,879	1,779,445	1,726,601	1,772,514	1,463,027	1,758,607	1,597,128	1,752,444	1,638,849	1,633,119	20,447,145
32 Total Capacity Costs (Line 12+18+25+31)	32,123,817	31,636,198	28,796,378	28,780,217	30,185,172	37,504,197	37,333,298	37,664,224	31,467,211	28,673,122	28,906,420	30,938,830	384,009,086
33 Nuclear Cost Recovery Clause													
34 CR3 Uprate Costs	4,459,192	4,431,769	4,404,346	4,376,920	4,349,497	4,322,073	4,294,649	4,267,226	4,239,801	4,212,377	4,184,953	4,157,530	51,700,333
35 Total Recoverable Nuclear Costs	4,459,192	4,431,769	4,404,346	4,376,920	4,349,497	4,322,073	4,294,649	4,267,226	4,239,801	4,212,377	4,184,953	4,157,530	51,700,333
36													
37 ISFSI Revenue Requirement ⁴	-	-	-	-	-	-	724,926	726,807	728,105	735,486	747,111	751,681	4,414,116
38 Total Recov Capacity & Nuclear Costs (Line 32+35+37)	36,583,010	36,067,968	33,200,724	33,157,137	34,534,669	41,826,271	42,352,873	42,658,257	36,435,117	33,620,985	33,838,484	35,848,041	440,123,535
39 Capacity Revenues:													
40 Capacity Cost Recovery Revenues (net of tax)	28,519,282	29,627,699	28,061,262	31,308,667	35,187,257	38,498,070	41,592,488	41,953,532	41,807,961	36,803,224	34,335,381	30,808,440	418,503,263
41 Prior Period True-Up Provision Over/(Under) Recovery	1,222,103	1,222,103	1,222,103	1,222,103	1,222,103	1,222,103	1,222,103	1,222,103	1,222,103	1,222,103	1,222,103	1,222,103	14,665,233
42 Current Period CCR Revenues (net of tax)	29,741,384	30,849,802	29,283,365	32,530,770	36,409,359	39,720,172	42,814,591	43,175,635	43,030,063	38,025,327	35,557,484	32,030,543	433,168,496
43 True-Up Provision													
44 True-Up Provision - Over/(Under) Recov (Line 42-38)	(6,841,625)	(5,218,166)	(3,917,359)	(626,367)	1,874,691	(2,106,098)	461,718	517,378	6,594,946	4,404,342	1,719,000	(3,817,498)	(6,955,039)
45 Interest Provision for the Month	7,805	3,244	(128)	(2,766)	(3,217)	(4,786)	(7,065)	(7,661)	(4,569)	(1,419)	19	(2,658)	(23,204)
46 Current Cycle Balance - Over/(Under)	(6,833,820)	(12,048,743)	(15,966,230)	(16,595,364)	(14,723,890)	(16,834,773)	(16,380,120)	(15,870,403)	(9,280,027)	(4,877,104)	(3,158,085)	(6,978,242)	(6,978,242)
47 Prior Period Balance - Over/(Under) Recovered	16,868,292	15,646,189	14,424,086	13,201,983	11,979,880	10,757,777	9,535,675	8,313,572	7,091,469	5,869,366	4,647,263	3,425,160	16,868,292
48 Prior Period Cumulative True-Up Collected/(Refunded)	(1,222,103)	(1,222,103)	(1,222,103)	(1,222,103)	(1,222,103)	(1,222,103)	(1,222,103)	(1,222,103)	(1,222,103)	(1,222,103)	(1,222,103)	(1,222,103)	(14,665,234)
49 Prior Period True-up Balance - Over/(Under)	15,646,189	14,424,086	13,201,983	11,979,880	10,757,777	9,535,675	8,313,572	7,091,469	5,869,366	4,647,263	3,425,160	2,203,058	2,203,058
50 Net Capacity True-up Over/(Under) (Line 46+49)	\$8,812,368	\$2,375,343	(\$2,764,247)	(\$4,615,483)	(\$3,966,112)	(\$7,299,099)	(\$8,066,548)	(\$8,778,934)	(\$3,410,661)	(\$229,841)	\$267,075	(\$4,775,185)	(\$4,775,185)

¹ Approved in Commission Order No. PSC-16-0138-FOF-EI
² Approved in Commission Order No. PSC-15-0465-S-EI
³ Approved in Commission Order No. PSC-15-0537-FOF-EI
⁴ Approved in Commission Order No. PSC-16-0425-PAA-EI

Duke Energy Florida, LLC
 Capacity Cost Recovery Clause
 Calculation of Actual/Estimated True-Up
 January 2017 - December 2017 (Filed July 27, 2017)

	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEPT	OCT	NOV	DEC	Total
	ACTUAL	ACTUAL	ACTUAL	ACTUAL	ACTUAL	ACTUAL	ESTIMATED	ESTIMATED	ESTIMATED	ESTIMATED	ESTIMATED	ESTIMATED	
1 Base Production Level Capacity Costs													
2 Orange Cogen (ORANGE CO)	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	60,858,764
3 Orlando Cogen Limited (ORLACOGL)	5,102,804	5,102,804	5,102,804	5,102,804	5,089,383	5,094,138	5,102,803	5,102,803	5,102,803	5,102,803	5,102,803	5,102,803	61,211,555
4 Pasco County Resource Recovery (PASCOUNT)	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	21,417,600
5 Pinellas County Resource Recovery (PINCOUNT)	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	50,983,200
6 Polk Power Partners, L.P. (MULBERRY/ROYSTER)	6,733,888	6,656,139	6,675,150	6,669,159	6,662,563	6,900,122	6,965,674	6,965,674	6,965,674	6,965,674	6,965,674	6,965,674	82,091,068
7 Wheelabrator Ridge Energy, Inc. (RIDGEGEN)	1,097,143	646,573	648,924	678,961	684,116	705,834	800,946	800,946	800,946	800,946	800,946	800,946	9,267,226
8 US EcoGen	-	-	-	(3,000)	(90,000)	(93,000)	-	-	-	-	-	-	(186,000)
9 Calpine Osprey	92,394	-	-	-	-	-	-	-	-	-	-	-	92,394
10 Subtotal - Base Level Capacity Costs	24,131,193	23,510,479	23,531,842	23,552,887	23,451,026	23,712,058	23,974,387	23,974,387	23,974,387	23,974,387	23,974,387	23,974,387	285,735,807
11 Base Production Jurisdictional Responsibility	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	
12 Base Level Jurisdictional Capacity Costs	22,414,258	21,837,709	21,857,551	21,877,099	21,782,485	22,024,945	22,268,609	22,268,609	22,268,609	22,268,609	22,268,609	22,268,609	265,405,704
13 Intermediate Production Level Capacity Costs													
14 Southern Franklin	4,485,507	4,630,269	2,673,583	2,669,458	2,955,813	6,057,918	6,260,918	6,260,918	4,623,002	2,712,100	2,712,100	3,531,058	49,572,645
15 Schedule H Capacity Sales - NSB & RCID	-	-	-	-	-	-	-	-	-	-	-	-	-
16 Subtotal - Intermediate Level Capacity Costs	4,485,507	4,630,269	2,673,583	2,669,458	2,955,813	6,057,918	6,260,918	6,260,918	4,623,002	2,712,100	2,712,100	3,531,058	49,572,645
17 Intermediate Production Jurisdictional Responsibility	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	
18 Intermediate Level Jurisdictional Capacity Costs	3,261,098	3,366,345	1,943,775	1,940,776	2,148,965	4,404,288	4,551,875	4,551,875	3,361,061	1,971,778	1,971,778	2,567,185	36,040,800
19 Peaking Production Level Capacity Costs													
20 Shady Hills	1,954,260	1,954,260	1,395,900	1,374,300	1,924,020	3,912,300	3,856,015	3,856,015	1,799,474	1,354,816	1,354,816	1,955,104	26,691,280
21 Vandolah (NSG)	2,924,309	2,889,528	1,965,274	1,943,845	2,795,467	5,785,430	5,539,623	5,495,150	2,629,977	1,937,310	1,981,783	2,788,227	38,675,923
22 Other	-	-	-	-	-	-	-	-	-	-	-	-	-
23 Subtotal - Peaking Level Capacity Costs	4,878,569	4,843,788	3,361,174	3,318,145	4,719,487	9,697,730	9,395,638	9,351,165	4,429,451	3,292,126	3,336,599	4,743,331	65,367,203
24 Peaking Production Jurisdictional Responsibility	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	
25 Peaking Level Jurisdictional Capacity Costs	4,679,718	4,646,355	3,224,173	3,182,897	4,527,121	9,302,450	9,012,672	8,970,012	4,248,907	3,157,939	3,200,600	4,549,993	62,702,836
26 Other Capacity Costs													
27 Retail Wheeling	(23,615)	(2,605)	(13,552)	(1,023)	(49,903)	(27)	(24,689)	(20,202)	(4,376)	(2,342)	(12,596)	(17,124)	(172,054)
28 RRSSA Second Amendment ¹													
29 Batch-19 Nuclear Fuel ²													
30 ASC Servicing Fees ³							(296,269)						(296,269)
31 Total Other Capacity Costs	1,768,743	1,785,790	1,770,879	1,779,445	1,726,601	1,772,514	1,447,620	1,744,413	1,756,275	1,754,346	1,740,128	1,674,699	20,721,452
32 Total Capacity Costs (Line 12+18+25+31)	32,123,817	31,636,198	28,796,378	28,780,217	30,185,172	37,504,198	37,280,776	37,534,909	31,634,852	29,152,673	29,181,116	31,060,484	384,870,792
33 Nuclear Cost Recovery Clause													
34 CR3 Uprate Costs	4,459,192	4,431,769	4,404,346	4,376,920	4,349,497	4,322,073	4,294,649	4,267,226	4,239,801	4,212,377	4,184,953	4,157,530	51,700,333
35 Total Recoverable Nuclear Costs	4,459,192	4,431,769	4,404,346	4,376,920	4,349,497	4,322,073	4,294,649	4,267,226	4,239,801	4,212,377	4,184,953	4,157,530	51,700,333
36													
37 ISFSI Revenue Requirement ⁴	-	-	-	-	-	-	697,042	710,787	766,141	770,260	771,297	772,653	4,488,180
38 Total Recov Capacity & Nuclear Costs (Line 32+35+37)	36,583,010	36,067,967	33,200,724	33,157,137	34,534,669	41,826,271	42,272,467	42,512,921	36,640,795	34,135,309	34,137,366	35,990,667	441,059,303
39 Capacity Revenues													
40 Capacity Cost Recovery Revenues (net of tax)	28,519,282	29,627,699	28,061,262	31,308,667	35,187,257	38,498,070	41,005,606	42,944,849	41,950,646	38,649,455	32,526,800	30,799,664	419,079,255
41 Prior Period True-Up Provision Over/(Under) Recovery	1,222,103	1,222,103	1,222,103	1,222,103	1,222,103	1,222,103	1,222,103	1,222,103	1,222,103	1,222,103	1,222,103	1,222,103	14,665,234
42 Current Period Revenues (net of tax)	29,741,384	30,849,802	29,283,365	32,530,770	36,409,359	39,720,172	42,227,709	44,166,952	43,172,749	39,871,557	33,748,903	32,021,766	433,744,489
43 True-Up Provision													
44 True-Up Provision - Over/(Under) Recov (Line 42-38)	(6,841,625)	(5,218,166)	(3,917,359)	(626,366)	1,874,691	(2,106,099)	(44,758)	1,654,030	6,531,954	5,736,248	(388,463)	(3,968,902)	(7,314,815)
45 Interest Provision for the Month	7,805	3,244	(128)	(2,766)	(3,217)	(4,786)	(3,641)	(3,459)	(1,203)	715	31	(2,176)	(9,582)
46 Current Cycle Balance - Over/(Under)	(6,833,820)	(12,048,743)	(15,966,230)	(16,595,363)	(14,723,889)	(16,834,773)	(16,883,172)	(15,232,600)	(8,701,850)	(2,964,887)	(3,353,319)	(7,324,397)	(7,324,397)
47 Prior Period Balance - Over/(Under) Recovered	16,868,292	16,868,292	16,868,292	16,868,292	16,868,292	16,868,292	16,868,292	16,868,292	16,868,292	16,868,292	16,868,292	16,868,292	16,868,292
48 Prior Period Cumulative True-Up Collected/(Refunded)	(1,222,103)	(2,444,206)	(3,666,309)	(4,888,411)	(6,110,514)	(7,332,617)	(8,554,720)	(9,776,823)	(10,998,926)	(12,221,028)	(13,443,131)	(14,665,234)	(14,665,234)
49 Prior Period True-up Balance - Over/(Under)	15,646,189	14,424,086	13,201,983	11,979,880	10,757,777	9,535,675	8,313,572	7,091,469	5,869,366	4,647,263	3,425,160	2,203,058	2,203,058
50 Net Capacity True-up Over/(Under) (Line 46+49)	8,812,368	2,375,343	(2,764,247)	(4,615,482)	(3,966,111)	(7,299,099)	(8,569,600)	(8,141,131)	(2,832,483)	1,682,376	71,841	(5,121,339)	(5,121,339)

¹ Approved in Commission Order No. PSC-16-0138-FOF-EI
² Approved in Commission Order No. PSC-15-0465-S-EI
³ Approved in Commission Order No. PSC-15-0537-FOF-EI
⁴ Approved in Commission Order No. PSC-16-0425-PAA-EI

Counterparty	Type	MW	Start Date - End Date	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	YTD
1 Orange Cogen (ORANGE CO)	QF	74.00	7/1/95 - 12/31/24	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	60,858,765
2 Orlando Cogen Limited (ORLACOGL)	QF	79.20	9/1/93 - 12/31/23	5,102,804	5,102,804	5,102,804	5,102,804	5,089,383	5,094,138	5,096,530	5,099,746	5,097,899	4,988,662	5,015,745	5,023,523	60,916,840
3 Pasco County Resource Recovery (PASCOUNT)	QF	23.00	1/1/95 - 12/31/24	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	21,417,600
4 Pinellas County Resource Recovery (PINCOUNT)	QF	54.75	1/1/95 - 12/31/24	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	50,983,200
5 Polk Power Partners, L.P. (MULBERRY)	QF	115.00	8/1/94 - 8/8/24	6,733,888	6,656,139	6,675,150	6,669,159	6,662,563	6,900,122	6,965,675	6,965,675	6,965,675	6,965,675	6,965,675	6,965,675	82,091,070
6 Wheelabrator Ridge Energy, Inc. (RIDGEGEN)	QF	39.60	8/1/94 - 12/31/23	1,097,143	646,573	648,924	678,961	684,116	705,834	719,623	750,224	765,134	751,969	754,931	755,868	8,959,300
7 Southern purchase - Franklin	Other	425	6/1/16 - 5/31/21	4,485,507	4,630,269	2,673,583	2,669,458	2,955,813	6,057,918	6,236,165	6,252,703	4,638,320	2,750,085	2,698,716	3,488,522	49,537,060
8 Retail Wheeling				(23,615)	(2,605)	(13,552)	(1,023)	(49,903)	(27)	(9,282)	(6,007)	(3,342)	(4,243)	0	(1,766)	(115,365)
9 CR-3 Projected Expense				4,459,192	4,431,769	4,404,346	4,376,920	4,349,497	4,322,073	4,294,649	4,267,226	4,239,801	4,212,377	4,184,953	4,157,530	51,700,333
10 ISFSI Return				0	0	0	0	0	0	724,926	726,807	728,105	735,486	747,111	751,681	4,414,116
11 ASC Servicing Fee				0	0	0	0	0	0	(296,269)	0	(160,182)	0	0	0	(456,451)
SUBTOTAL				32,959,883	32,569,913	30,596,218	30,601,242	30,796,432	34,185,023	34,836,981	35,161,337	33,376,374	31,504,974	31,472,095	32,245,996	390,306,468

Confidential Capacity Contracts (Aggregated):

Purchases/Sales (Net)	MW	Contracts	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	YTD
Vandolah Capacity - Northern Star		6/1/12-5/31/27	2,924,309	2,889,528	1,965,274	1,943,845	2,795,467	5,785,430	5,768,280	5,707,232	2,712,726	1,918,109	2,015,348	2,943,834	39,369,382
Schedule H Capacity Sales-City of Tallahassee	-1	on-going no term date	0	0	0	0	0	0	(73,253)	0	0	(75,671)	(6,305)	(37,835)	(193,065)
Shady Hills Tolling	517	4/1/07-4/30/24	1,954,260	1,954,260	1,395,900	1,374,300	1,924,020	3,912,300	3,912,300	3,912,300	1,825,740	1,149,734	1,374,300	1,984,500	26,673,914
EcoGen			0	0	0	(3,000)	(90,000)	(93,000)	(90,000)	(93,000)	(93,000)	(90,000)	(93,000)	(90,000)	(735,000)
Calpine Osprey	515	Oct-14 to Jan-17	92,394	0	0	0	0	0	0	0	0	0	0	0	92,394
RRSSA Second Amendment ¹															
Batch-19 Nuclear Fuel ²															
Total	1031		39,723,203	39,202,095	35,741,824	35,696,855	37,202,424	45,562,294	46,122,885	46,452,483	39,582,491	36,163,833	36,401,286	38,681,380	476,533,054

¹ Approved in Commission Order No. PSC-16-0138-FOF-EI

² Approved in Commission Order No. PSC-15-0465-S-EI

Revised Exhibit B

REDACTED
(one copy)

1 discovered a failed LP turbine rupture disk. The disk had been breached by a foreign
2 object that caused a hole in the rupture diaphragm. DEF performed an inspection of
3 the Bartow Steam Turbine (“ST”) and discovered damage to the ST’s L-0 blades (and
4 determined part of an L-0 blade ruptured the LP turbine rupture disk), resulting in a
5 forced outage to the ST that lasted until April 8, 2017 (while the ST was off-line, the
6 Bartow combustion turbines (“CTs”) remained available to run in simple cycle
7 mode).

8 DEF performed a Root Cause Analysis (“RCA”) that determined the cause of the L-0
9 blade failure is [REDACTED]. After investigation, the
10 RCA Team determined that [REDACTED]
11 [REDACTED] both in the remainder of Duke Energy Corporation’s (“Duke Energy”) ST fleet
12 and elsewhere in the industry. Therefore, the failure of the Bartow ST’s L-0 Blades
13 was caused by events beyond DEF’s control, and DEF could not have reasonably
14 prevented the failure from occurring. DEF’s actions prior to and in the wake of the
15 blade failure were reasonable and prudent.

16
17 **Q. Are you sponsoring any exhibits?**

18 A. Yes. I am sponsoring the DEF RCA Report, attached as Exhibit No. __ (JS-1).
19

20 **Q: Is the RCA considered confidential by the Company?**

21 A: Yes. The RCA and portions of my testimony discussing the RCA’s findings are
22 confidential due to the ongoing claims process with the blades’ manufacturer and the
23 potential for insurance claims. In order to protect these rights, this information has

1 restoration team was formed to bring the unit back on-line; and a team was formed to
2 evaluate a long-term solution for Bartow.

3

4 **Q. Please describe the process DEF followed to ascertain the root cause of the event.**

5 A. DEF created a RCA Team consisting of internal experts to investigate and determine
6 the root cause of the event. The RCA Team consisted of seven individuals with
7 expertise in engineering, operations and process, and human performance.

8

9 Following industry standard procedures, the RCA Team employed specific tools used
10 to determine potential root cause(s) including: interviews, event and causal factor
11 review (“E&CF”), flawed barrier analysis, change analysis, component analysis,
12 visual inspections of the equipment, photographs taken following the event,
13 engineering calculations and measurements, and detailed review of outage reports and
14 maintenance logs.

15 **REDACTED**

16 **Q. Please describe the RCA Team’s conclusio**

17 A. The DEF RCA Team determined that the root cause of the failures in the ST L-0 40”

18 blades is [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

1 Notwithstanding the alternative causes hypothesized by the OEM, [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]

7

8 **Q. Did the RCA Team consider alternative potential root causes?**

9 A. Yes, DEF evaluated potential factors in the operation of the unit as well as specific
10 design factors unique to these blades, each of which was ultimately rejected as the
11 cause of the fifth failure and as the overall cause of all five failures. [REDACTED]

12 [REDACTED]
13 [REDACTED]

14

15 **Q. Why did the RCA Team reject these theories?**

16 A. The detailed rationale for rejecting these competing theories are contained in the
17 RCA, but in general (and with the exception of the [REDACTED]
18 [REDACTED] DEF was unable to find a correlation between any of the
19 individual factors and the blades' failures. However, it should be noted that DEF [REDACTED]

20 [REDACTED]

21 [REDACTED]

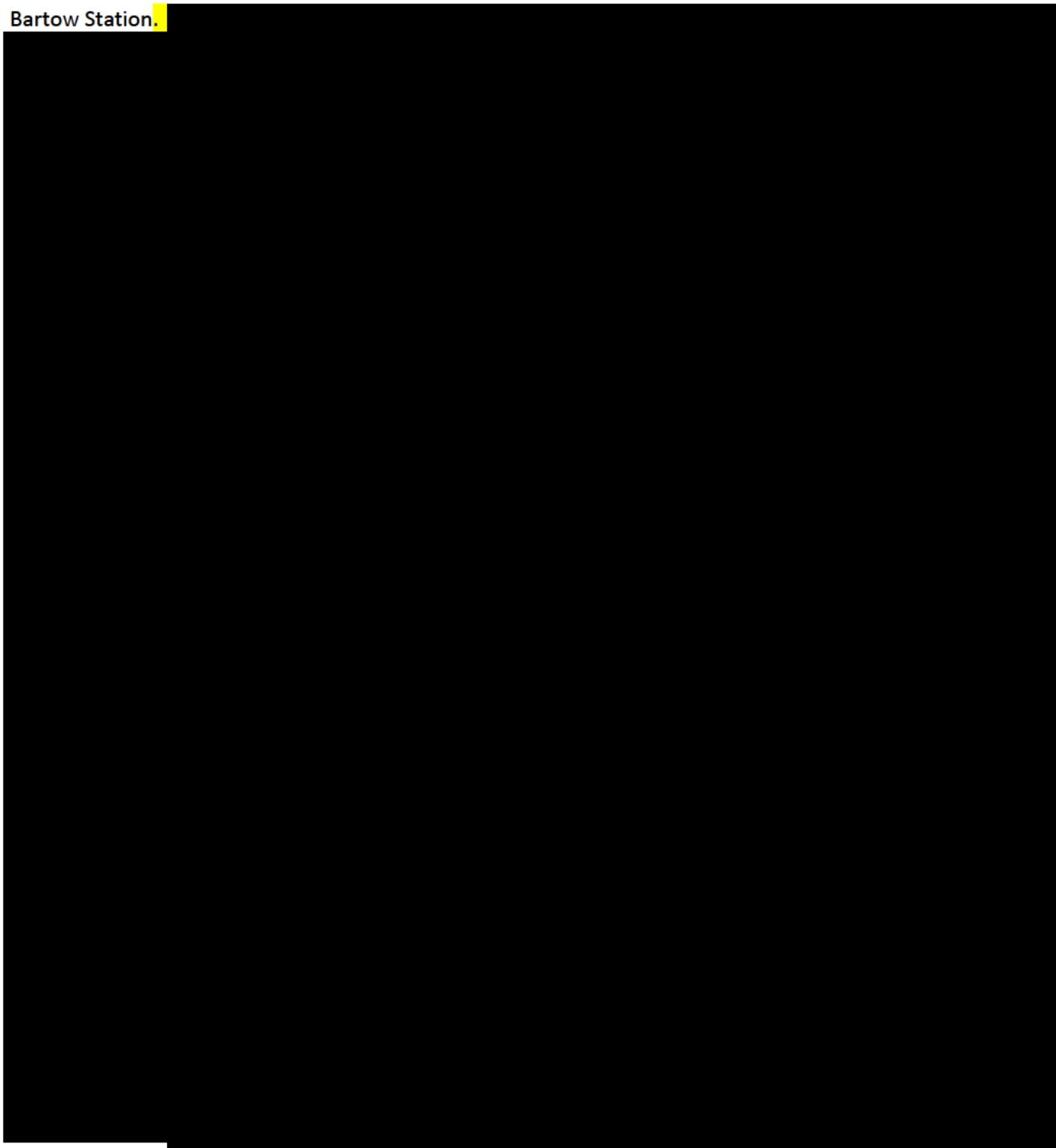
22 [REDACTED]

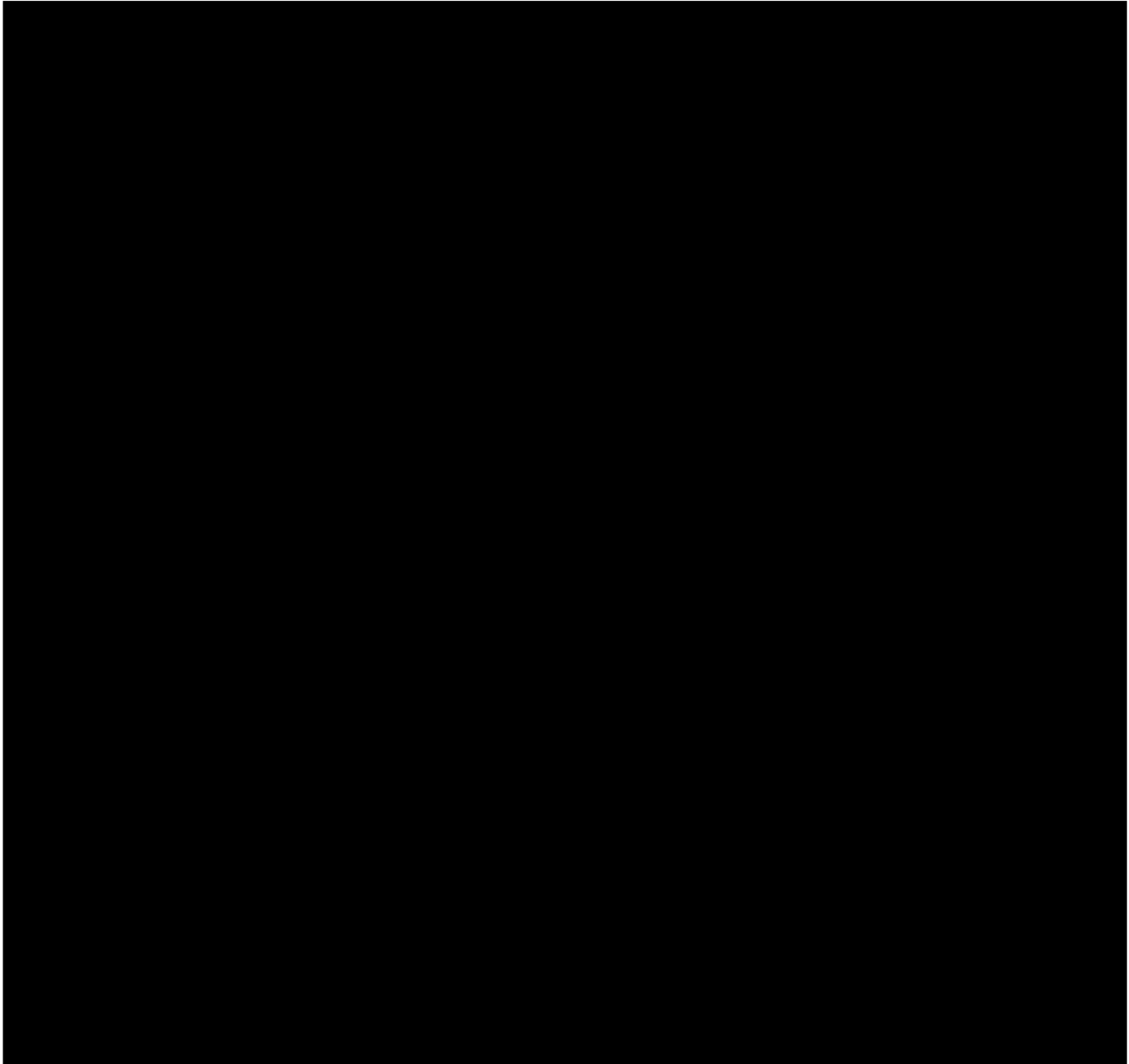
23 [REDACTED]

REDACTED

Executive Summary

Over the past 3 plus years, Duke Energy Florida LLC (Duke), at times working independently and at times together with Mitsubishi Hitachi Power Systems (MHPS), undertook a root cause analysis (RCA) of the cause(s) for the Unit 4S L-0 blade cracks and failures that occurred during normal station operations at Bartow Station.





Historical Overview

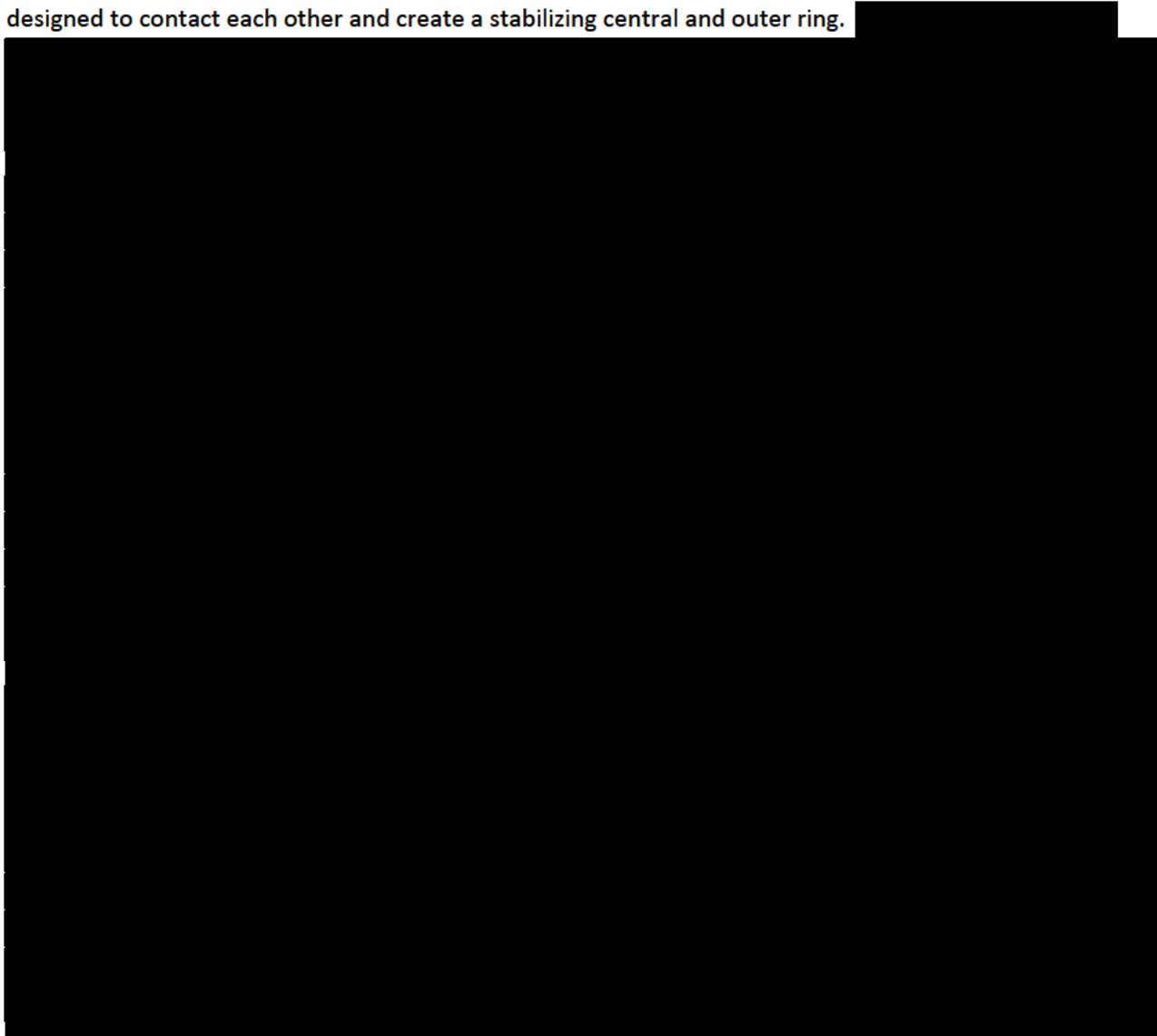
Bartow is a 4x1 CC Station with a steam turbine (ST) manufactured by MHPS. The ST was purchased from Tenaska Power Equipment, LLC (Tenaska) which intended to use it for a 3x1 CC with a gross output of 420MW. The ST was never delivered to Tenaska and remained with MHPS in a warehouse in Japan until Duke purchased the unit in 2006.



Before the ST was purchased by Duke, Duke contracted with MHPS to evaluate the ST design conditions and to update heat balances for a 4x1 CC configuration. MHPS updated the heat balances for use in a 4x1 CC configuration. CC units blend steam from the combustion turbines (CT) as they start-up and/or shut-down with steam to the ST. These blending events, which are a common occurrence for CC units, result in brief periods of higher steam temperatures and flows into the condenser near the ST L-0 blades.

Since commissioning of the Bartow ST in 2009, there have been five (5) events involving L-0 blade failures and/or replacements as described, below.

Each 40" MHPS steel blade is twisted with a "root end" that connects it to the hub, a snubber at the mid-point or mid-span, and a shroud with airfoil tips at the top. While the ST spins up to its operating speed of 3600rpm, each blade elongates and starts to untwist. The snubbers and airfoil tips are designed to contact each other and create a stabilizing central and outer ring.

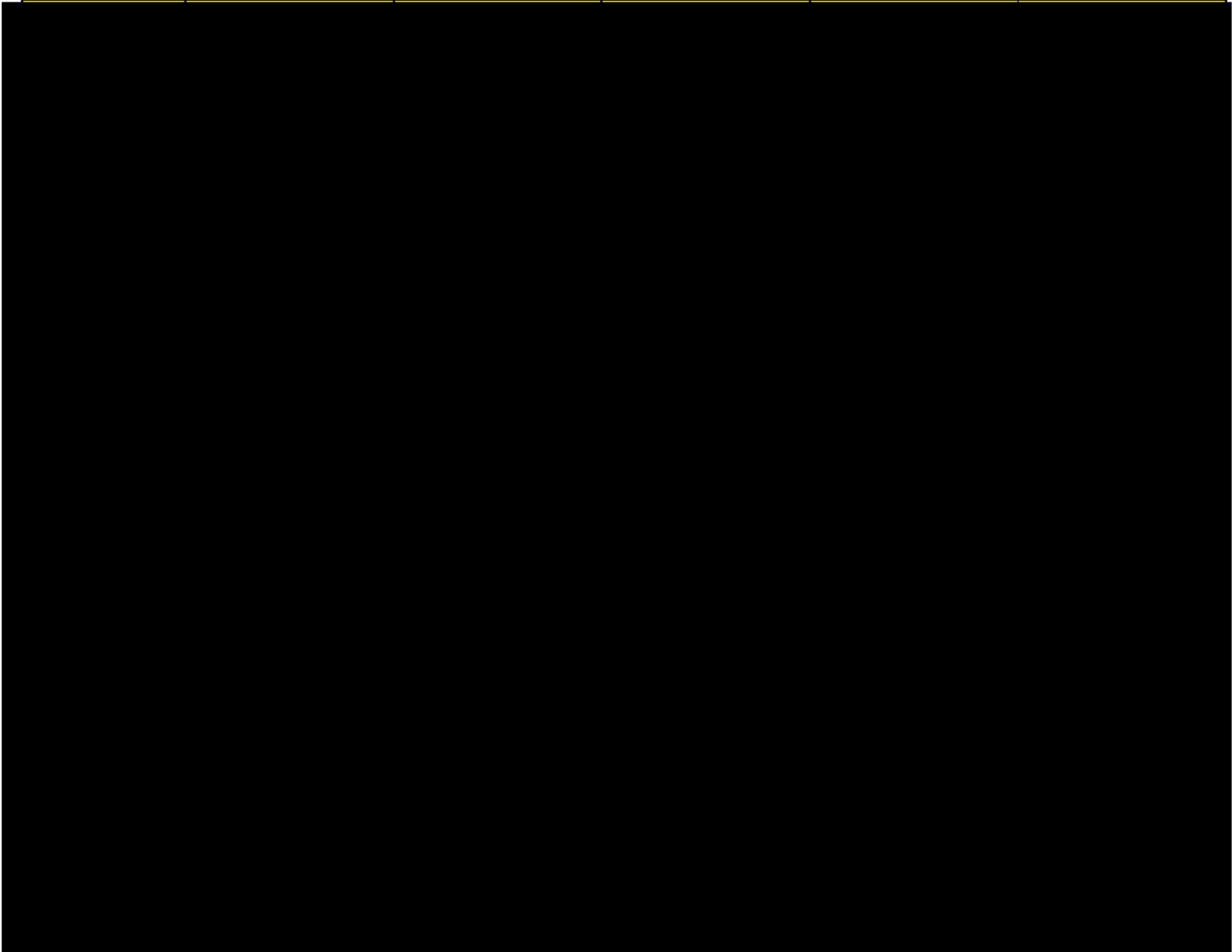


REDACTED

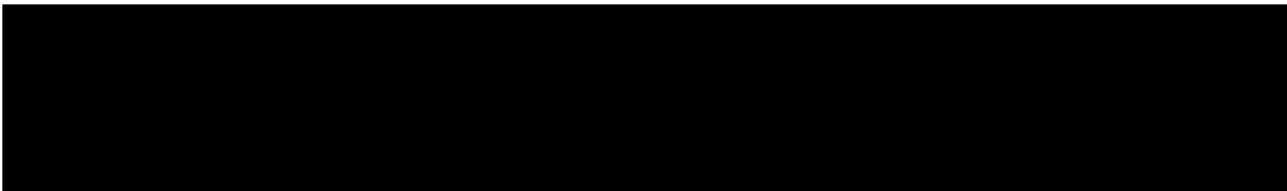


Table A: Bartow L-0 Events Summary

	Period 1	Period 2	Period 3	Period 4	Period 5
Date	June 2009 to March 2012	April 2012 to August 2014	December 2014 to April 2016	May 2016 to Oct 2016	December 2016 to February 2017
Service Duration	~34 Months	~28 Months	~17 Months	~5 Months	~2 Months

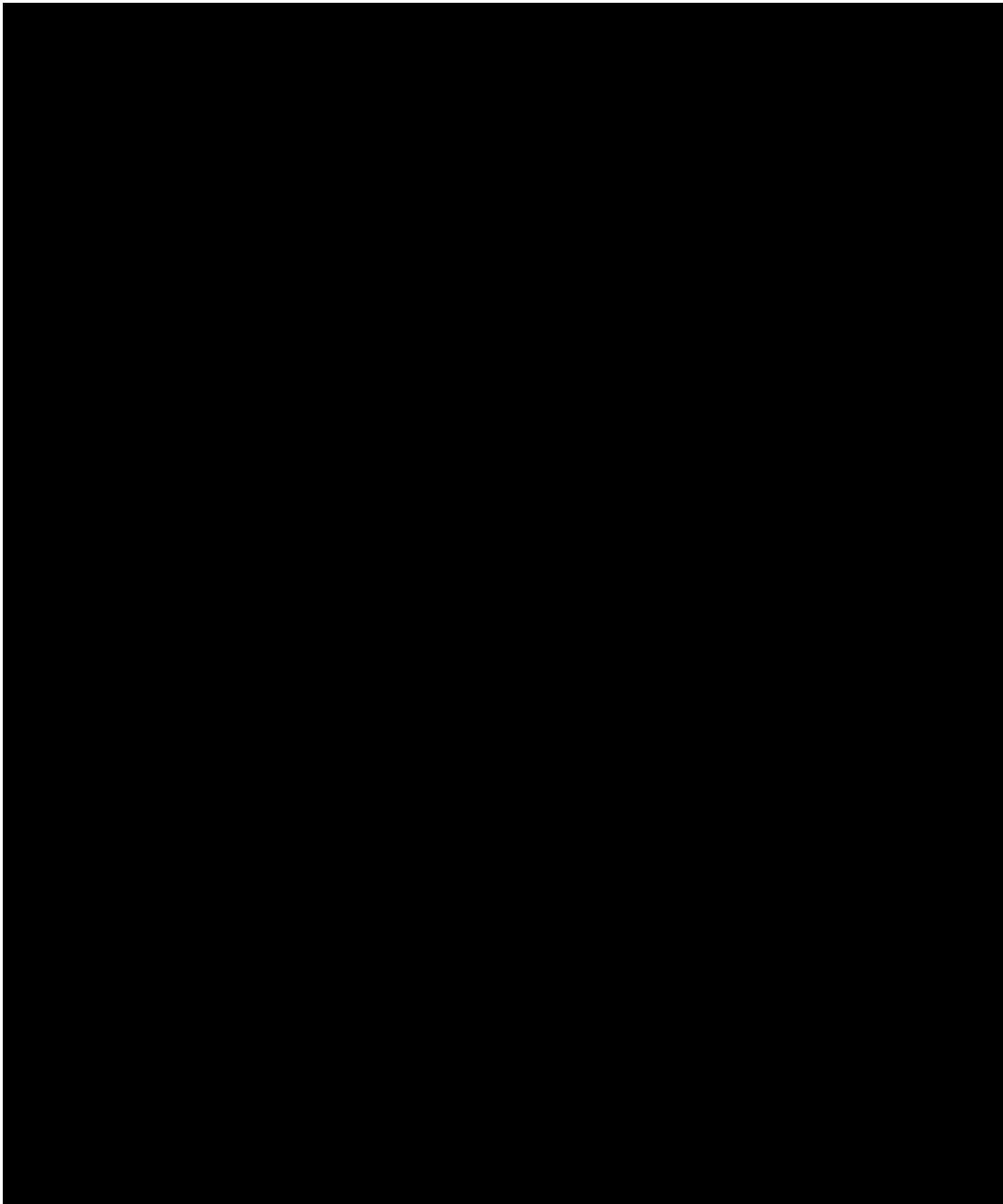


Information Shared with MHPS	Duke provided all requested PI data.	Duke provided all requested PI data.	Duke provided all requested PI data.	Duke provided all requested PI data.	Duke provided all requested PI data.
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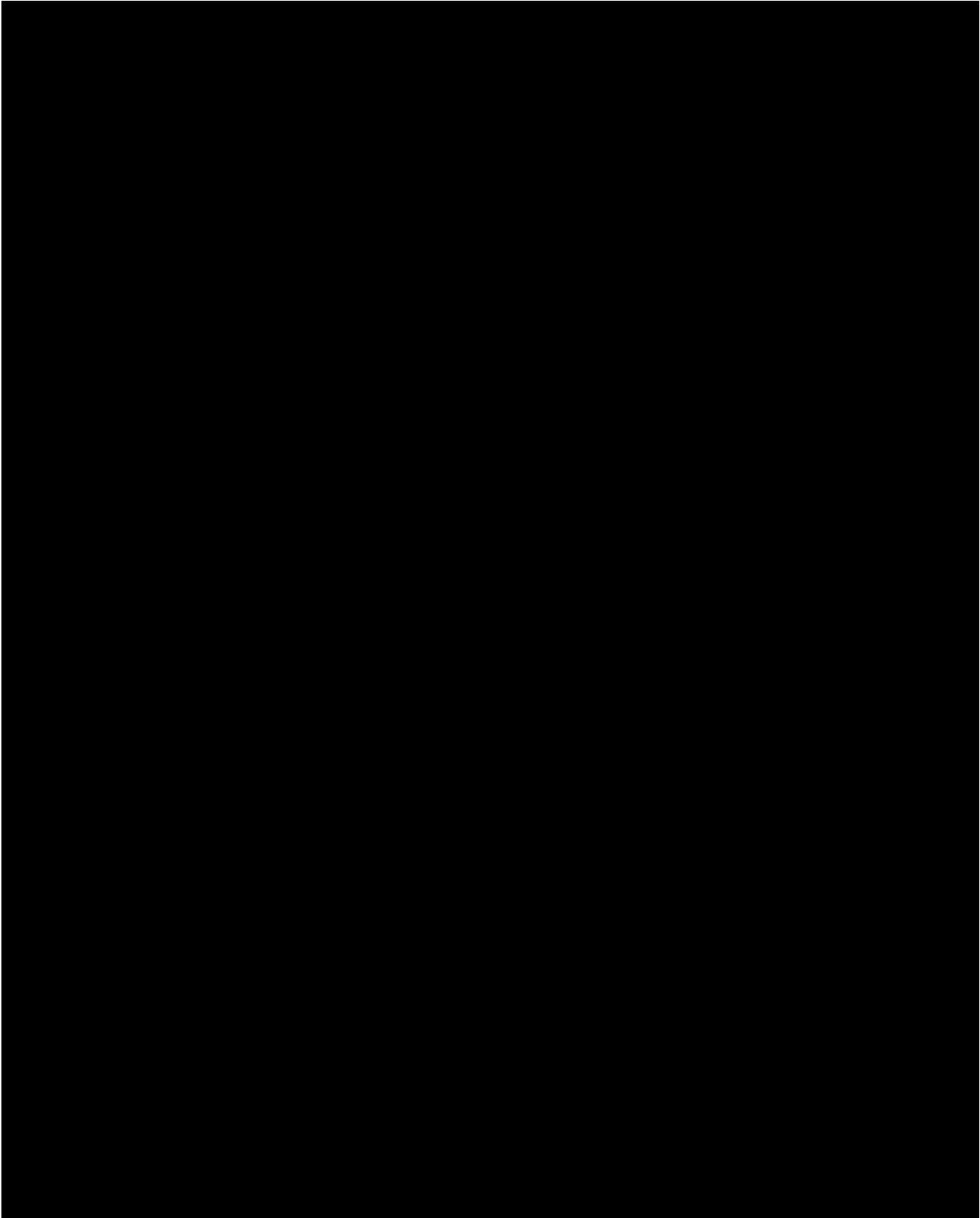
REDACTED

Docket No. 20180001
Duke Energy Florida
Witness: Swartz
Revised Exhibit No. ____ (JS-1)
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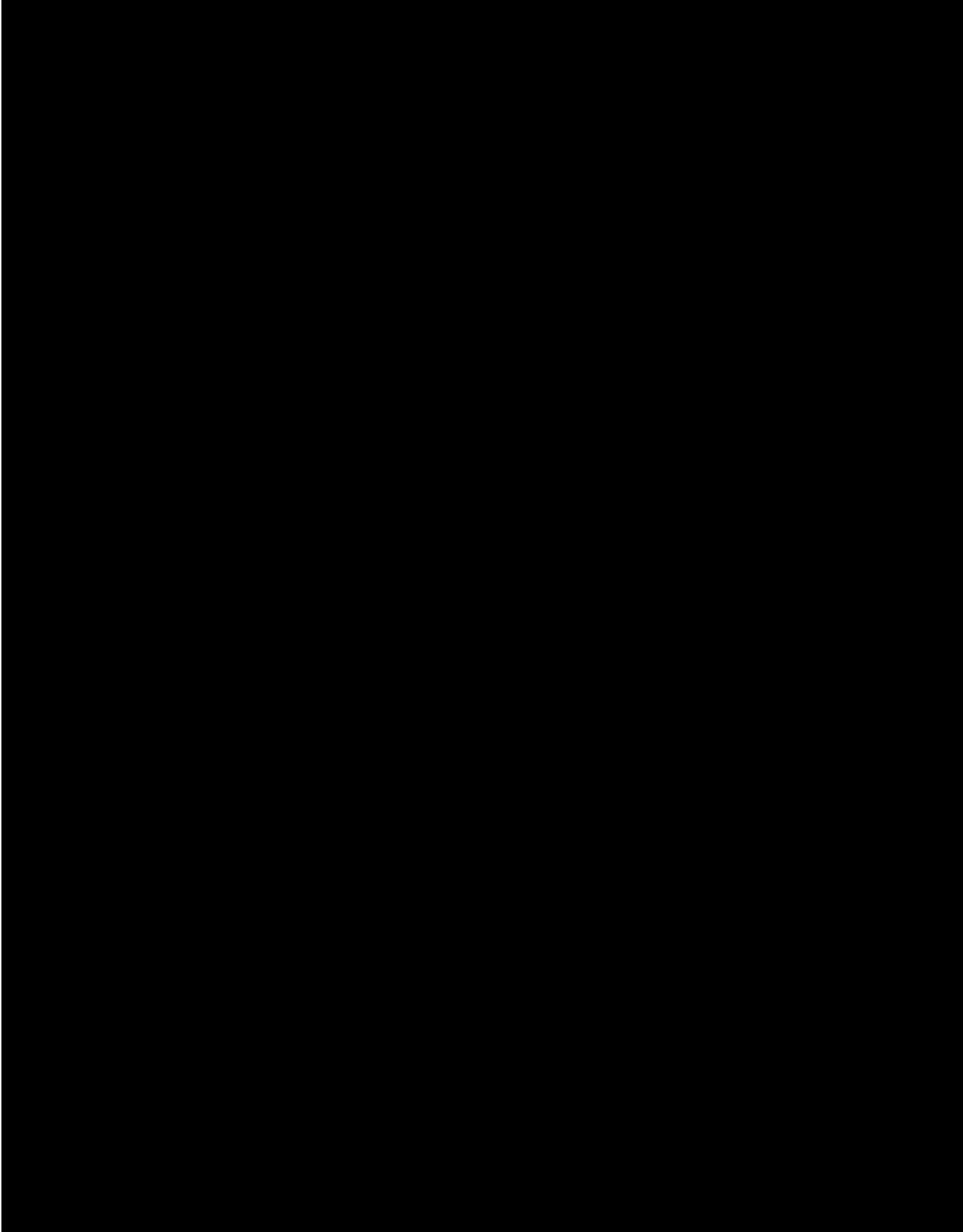


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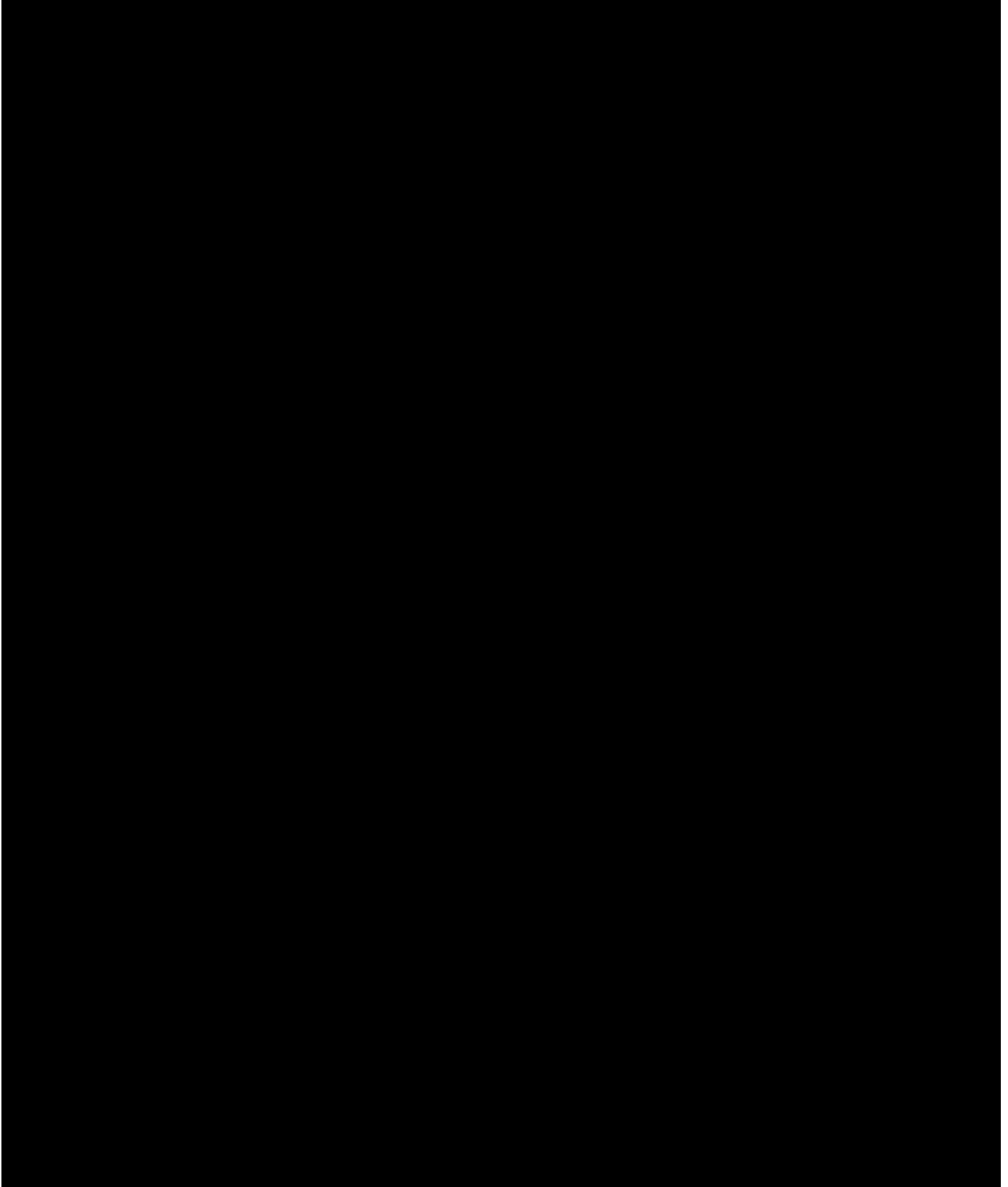
Docket No. 20180001
Duke Energy Florida
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REDACTED

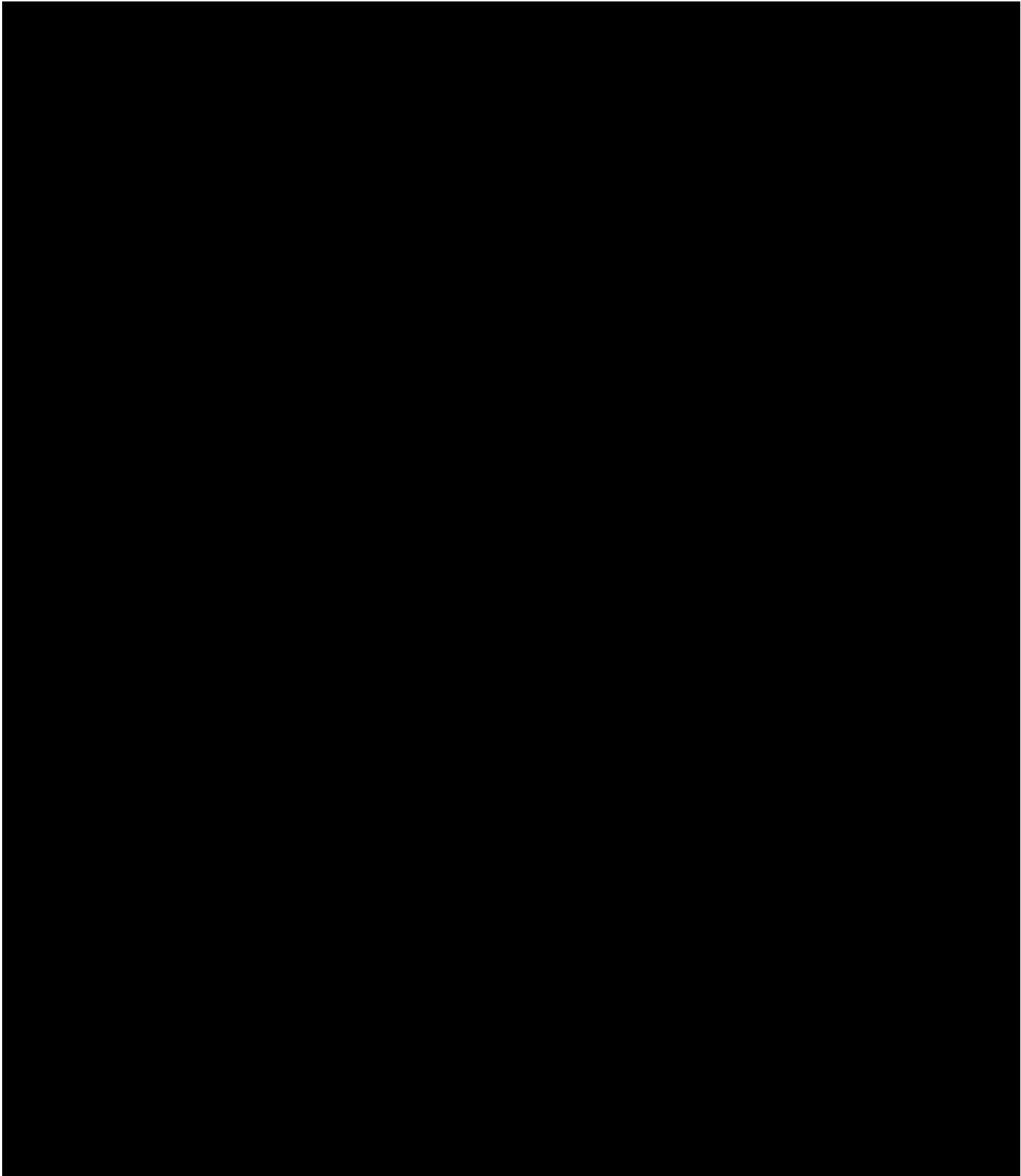


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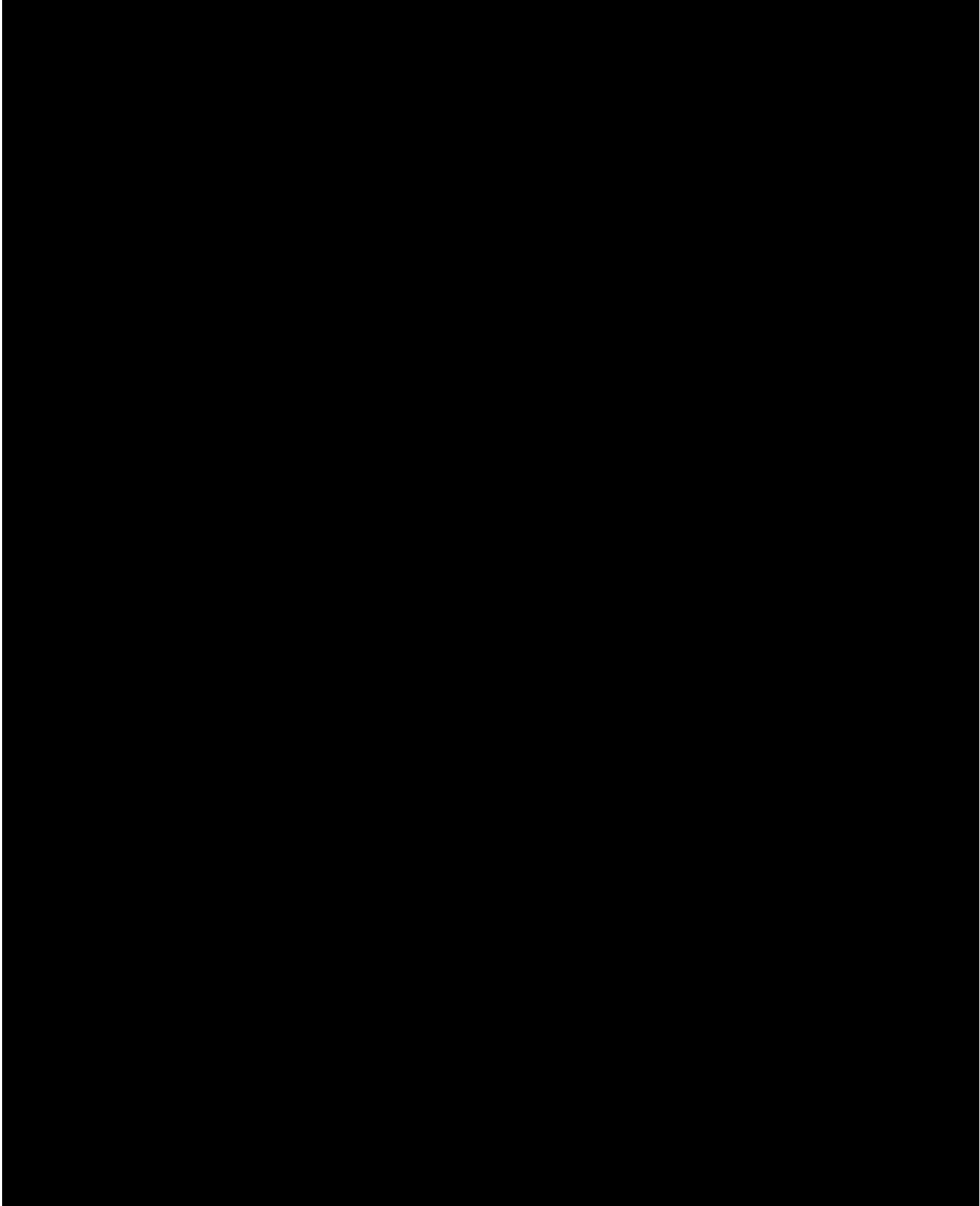


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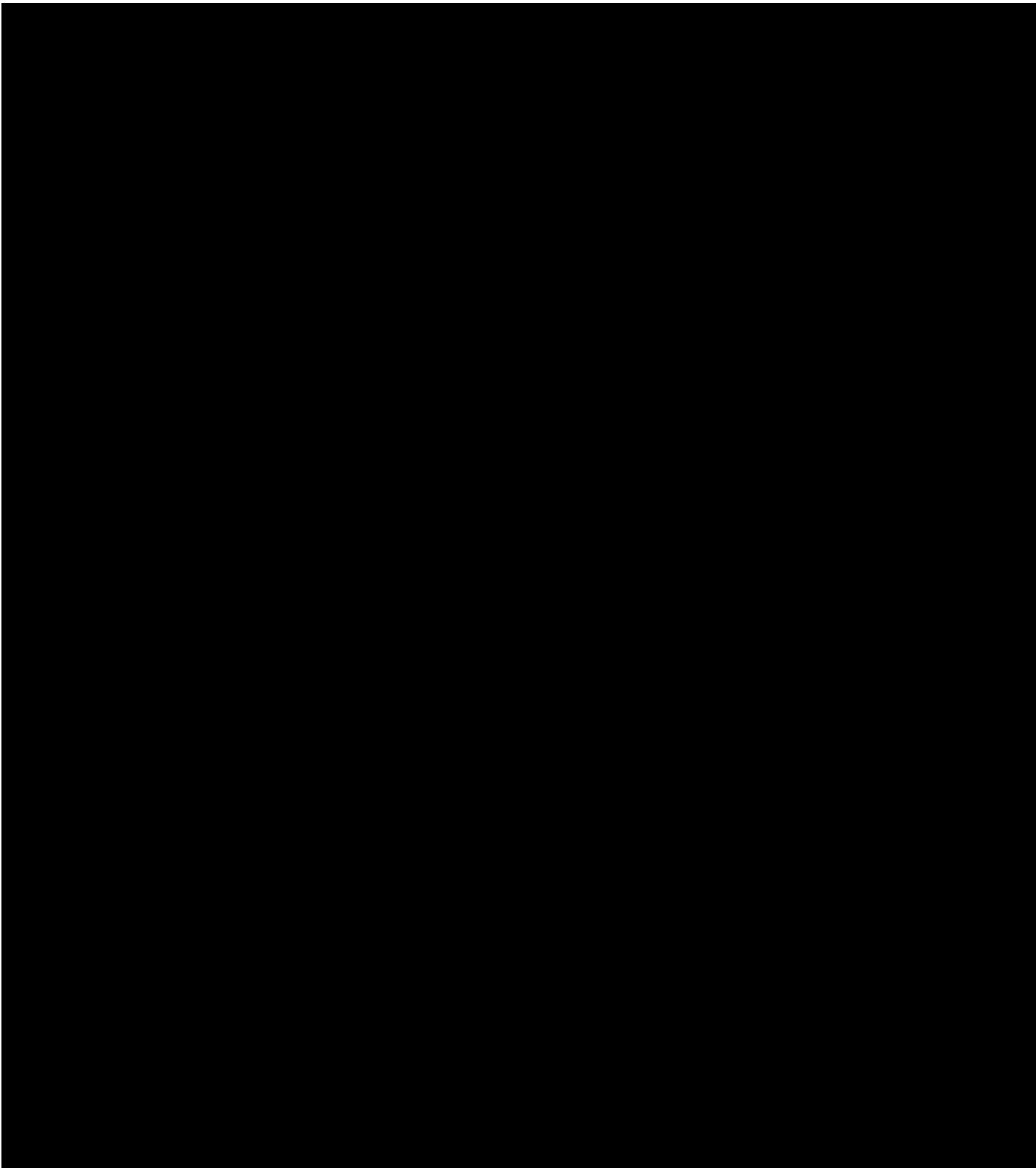
Docket No. 20180001
Duke Energy Florida
Witness: Swartz
Revised Exhibit No. ____ (JS-1)
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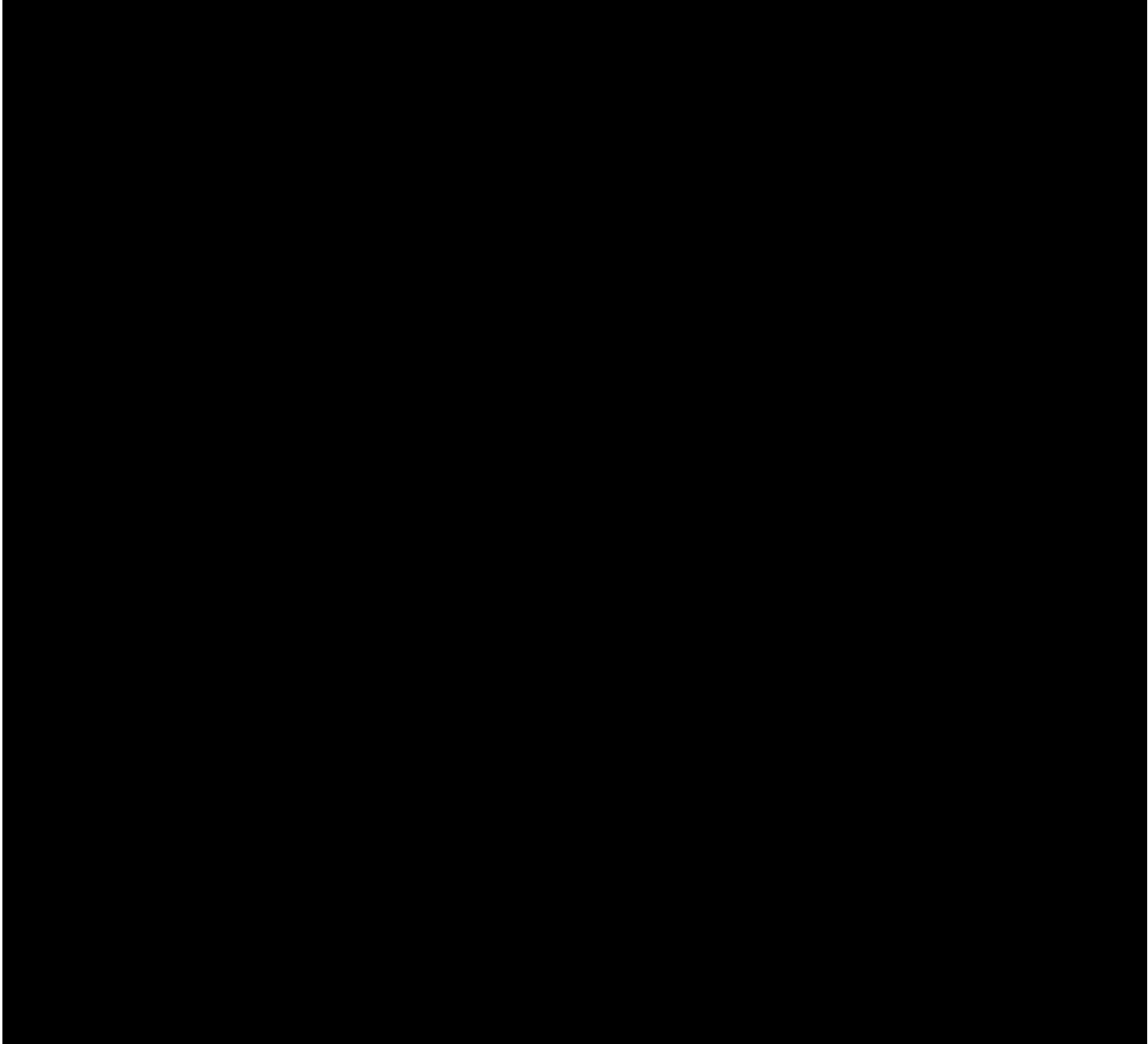
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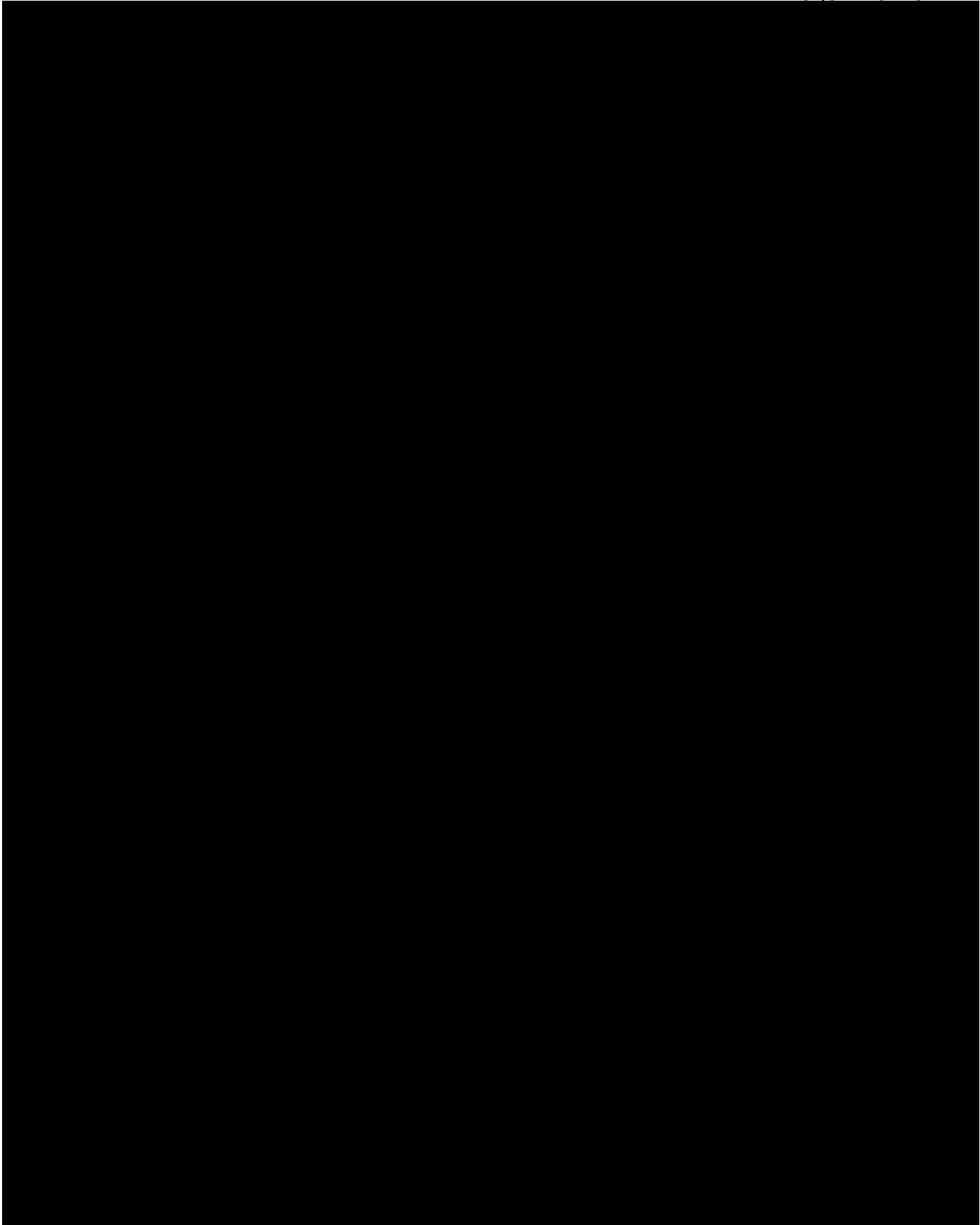
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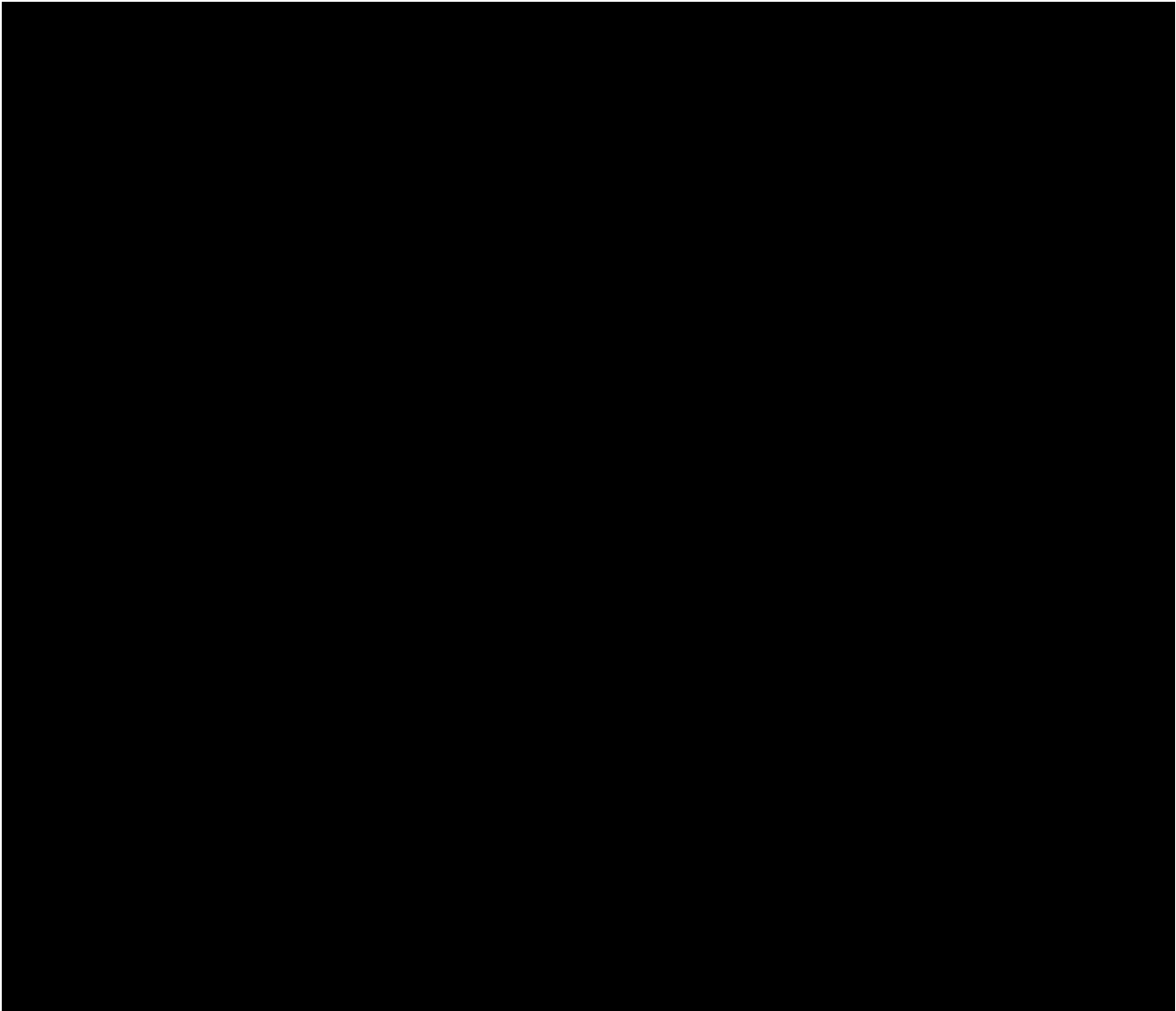
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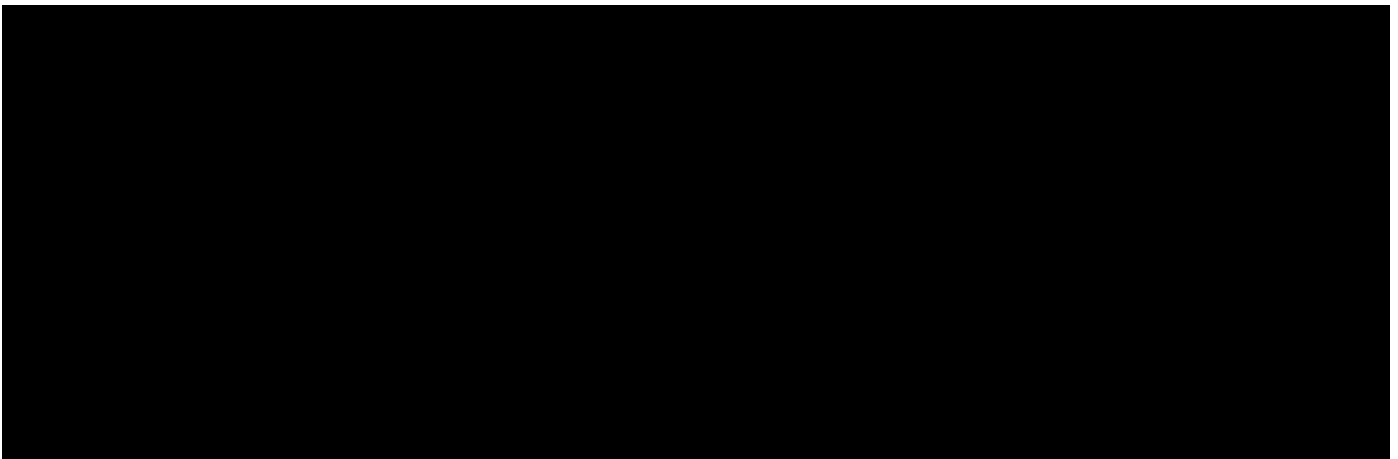
REDACTED



REDACTED



CONCLUSION:

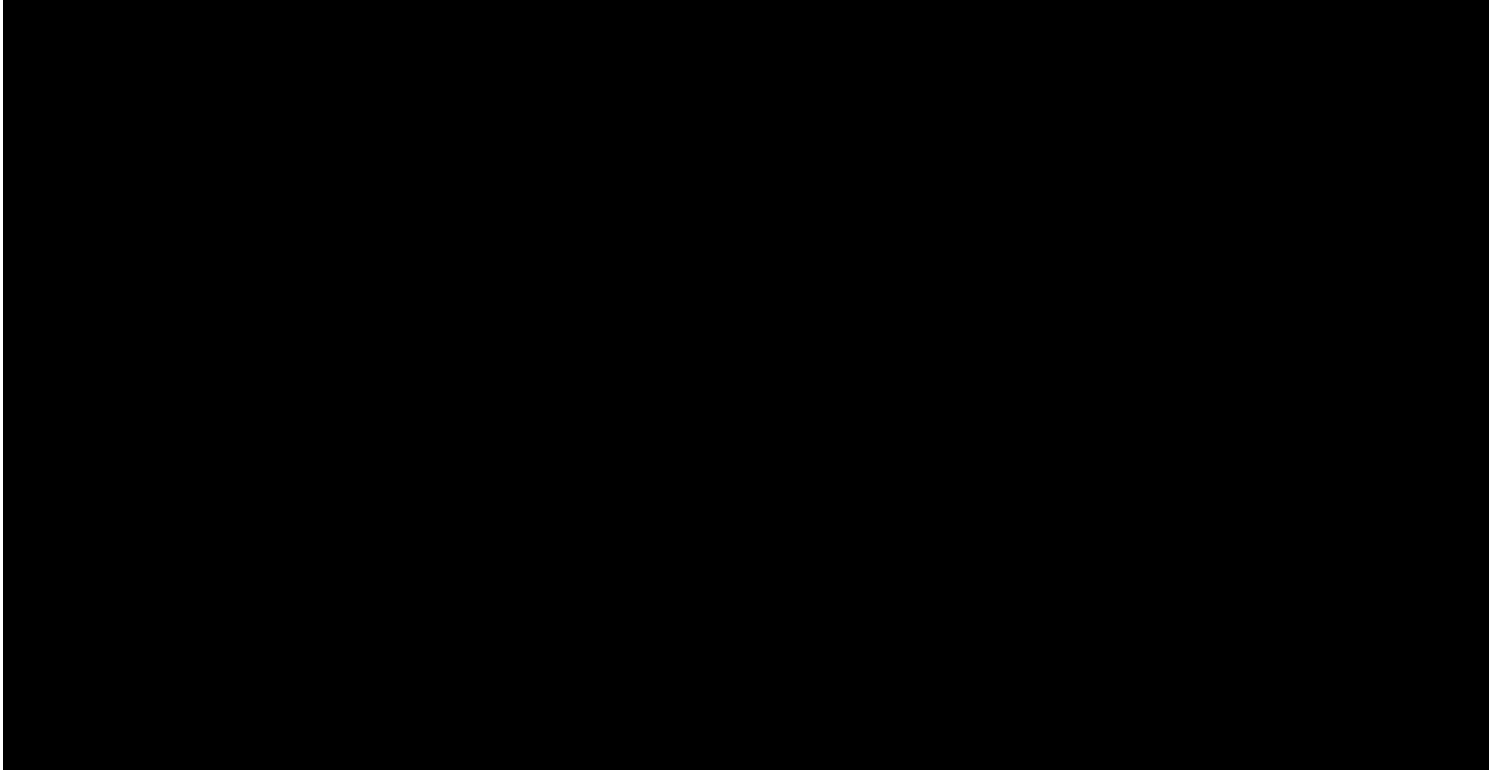


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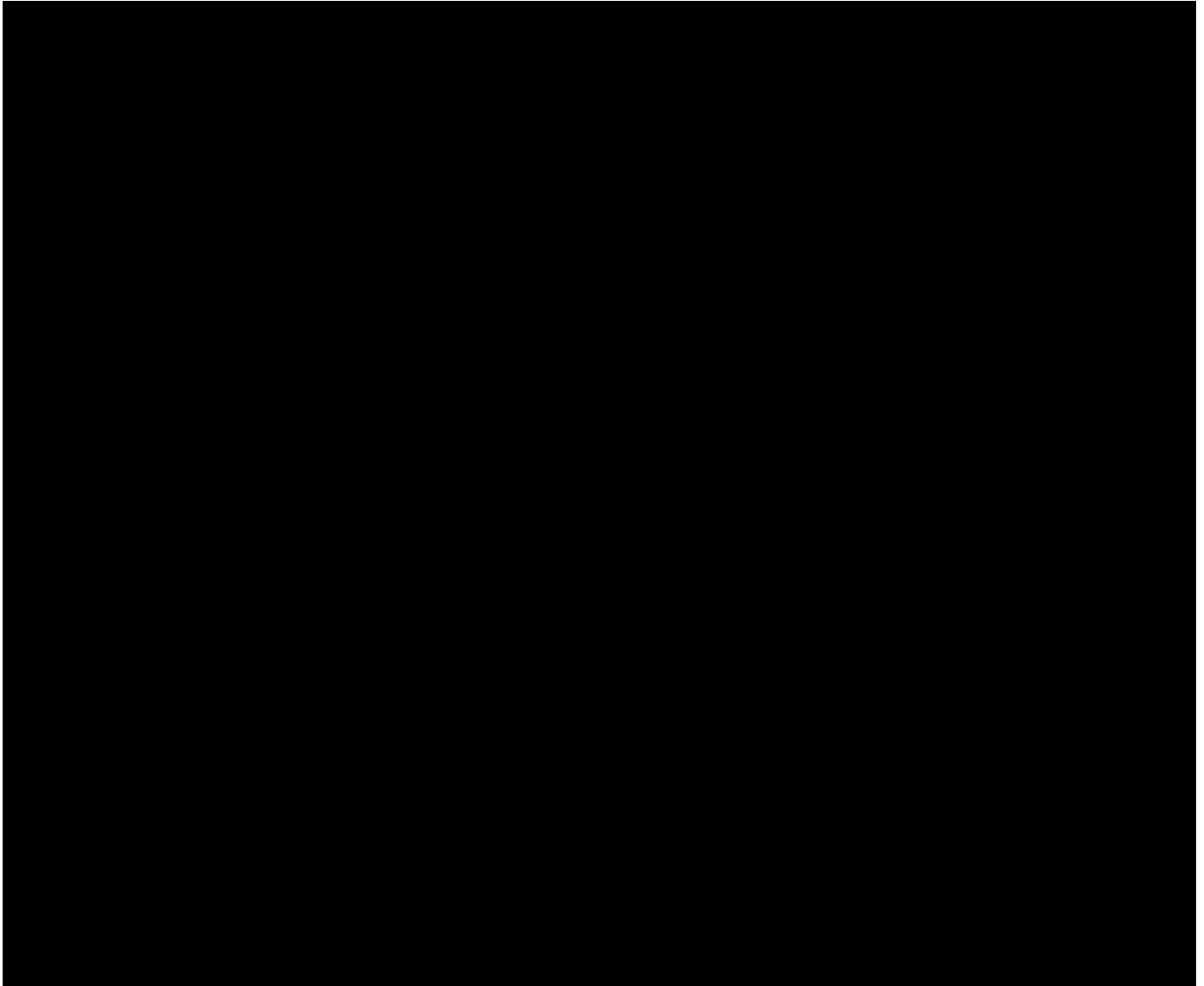
[REDACTED]

This RCA report is Duke's product and presents its view of the root cause based on all inputs received.

REDACTED



REDACTED



Duke Energy Florida, LLC
 Capacity Cost Recovery Clause
 Calculation of Actual True-Up
 January 2017 - December 2017

	JAN ACTUAL	FEB ACTUAL	MAR ACTUAL	APR ACTUAL	MAY ACTUAL	JUN ACTUAL	JUL ACTUAL	AUG ACTUAL	SEPT ACTUAL	OCT ACTUAL	NOV ACTUAL	DEC ACTUAL	Total
1 Base Production Level Capacity Costs													
2 Orange Cogen (ORANGE CO)	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	60,858,765
3 Orlando Cogen Limited (ORLACOGL)	5,102,804	5,102,804	5,102,804	5,102,804	5,089,383	5,094,138	5,096,530	5,099,746	5,097,899	4,988,662	5,015,745	5,023,523	60,916,840
4 Pasco County Resource Recovery (PASCOUNT)	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	21,417,600
5 Pinellas County Resource Recovery (PINCOUNT)	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	50,983,200
6 Polk Power Partners, L.P. (MULBERRY/ROYSTER)	6,733,888	6,656,139	6,675,150	6,669,159	6,662,563	6,900,122	6,965,675	6,965,675	6,965,675	6,965,675	6,965,675	6,965,675	82,091,070
7 Wheelabrator Ridge Energy, Inc. (RIDGEGEN)	1,097,143	646,573	648,924	678,961	684,116	705,834	719,623	750,224	765,134	751,969	754,931	755,868	8,959,300
8 US EcoGen	0	0	0	(3,000)	(90,000)	(93,000)	(90,000)	(93,000)	(93,000)	(90,000)	(93,000)	(90,000)	(735,000)
9 Calpine Osprey	92,394	0	0	0	0	0	0	0	0	0	0	0	92,394
10 Subtotal - Base Level Capacity Costs	24,131,193	23,510,479	23,531,842	23,552,887	23,451,026	23,712,058	23,796,792	23,827,608	23,840,671	23,721,270	23,748,315	23,760,029	284,584,168
11 Base Production Jurisdictional Responsibility	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	
12 Base Level Jurisdictional Capacity Costs	22,414,258	21,837,709	21,857,551	21,877,099	21,782,485	22,024,945	22,103,650	22,132,273	22,144,407	22,033,501	22,058,622	22,069,503	264,336,004
13 Intermediate Production Level Capacity Costs													
14 Southern Franklin	4,485,507	4,630,269	2,673,583	2,669,458	2,955,813	6,057,918	6,236,165	6,252,703	4,638,320	2,750,085	2,698,716	3,488,522	49,537,060
15 Schedule H Capacity Sales - NSB, RCID & Tallahassee	0	0	0	0	0	0	(73,253)	0	0	(75,671)	(6,305)	(37,835)	(193,065)
16 Subtotal - Intermediate Level Capacity Costs	4,485,507	4,630,269	2,673,583	2,669,458	2,955,813	6,057,918	6,162,912	6,252,703	4,638,320	2,674,414	2,692,410	3,450,687	49,343,995
17 Intermediate Production Jurisdictional Responsibility	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	
18 Intermediate Level Jurisdictional Capacity Costs	3,261,098	3,366,345	1,943,775	1,940,776	2,148,965	4,404,288	4,480,622	4,545,903	3,372,198	1,944,379	1,957,463	2,508,753	35,874,565
19 Peaking Production Level Capacity Costs													
20 Shady Hills	1,954,260	1,954,260	1,395,900	1,374,300	1,924,020	3,912,300	3,912,300	3,912,300	1,825,740	1,149,734	1,374,300	1,984,500	26,673,914
21 Vandolah (NSG)	2,924,309	2,889,528	1,965,274	1,943,845	2,795,467	5,785,430	5,768,280	5,707,232	2,712,726	1,918,109	2,015,348	2,943,834	39,369,382
22 Other	-	-	-	-	-	-	-	-	-	-	-	-	-
23 Subtotal - Peaking Level Capacity Costs	4,878,569	4,843,788	3,361,174	3,318,145	4,719,487	9,697,729.55	9,680,580	9,619,532	4,538,466	3,067,843	3,389,648	4,928,334	66,043,296
24 Peaking Production Jurisdictional Responsibility	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	
25 Peaking Level Jurisdictional Capacity Costs	4,679,718	4,646,355	3,224,173	3,182,897	4,527,121	9,302,450	9,286,000	9,227,440	4,353,478	2,942,798	3,251,486	4,727,455	63,351,371
26 Other Capacity Costs													
27 Retail Wheeling	(23,615)	(2,605)	(13,552)	(1,023)	(49,903)	(27)	(9,282)	(6,007)	(3,342)	(4,243)	0	(1,766)	(115,365)
28 RRSA Second Amendment ¹	-	-	-	-	-	-	-	-	-	-	-	-	-
29 Batch-19 Nuclear Fuel ²	-	-	-	-	-	-	(296,269)	-	(160,182)	-	-	-	(456,451)
30 ASC Servicing Fees ³	-	-	-	-	-	-	-	-	-	-	-	-	-
31 Total Other Capacity Costs	1,768,743	1,785,790	1,770,879	1,779,445	1,726,601	1,772,514	1,463,027	1,758,607	1,597,128	1,752,444	1,638,849	1,633,119	20,447,145
32 Total Capacity Costs (Line 12+18+25+31)	32,123,817	31,636,198	28,796,378	28,780,217	30,185,172	37,504,197	37,333,298	37,664,224	31,467,211	28,673,122	28,906,420	30,938,830	384,009,086
33 Nuclear Cost Recovery Clause													
34 CR3 Uprate Costs	4,459,192	4,431,769	4,404,346	4,376,920	4,349,497	4,322,073	4,294,649	4,267,226	4,239,801	4,212,377	4,184,953	4,157,530	51,700,333
35 Total Recoverable Nuclear Costs	4,459,192	4,431,769	4,404,346	4,376,920	4,349,497	4,322,073	4,294,649	4,267,226	4,239,801	4,212,377	4,184,953	4,157,530	51,700,333
36													
37 ISFSI Revenue Requirement ⁴	-	-	-	-	-	-	724,926	726,807	728,105	735,486	747,111	751,681	4,414,116
38 Total Recov Capacity & Nuclear Costs (Line 32+35+37)	36,583,010	36,067,968	33,200,724	33,157,137	34,534,669	41,826,271	42,352,873	42,658,257	36,435,117	33,620,985	33,838,484	35,848,041	440,123,535
39 Capacity Revenues:													
40 Capacity Cost Recovery Revenues (net of tax)	28,519,282	29,627,699	28,061,262	31,308,667	35,187,257	38,498,070	41,592,488	41,953,532	41,807,961	36,803,224	34,335,381	30,808,440	418,503,263
41 Prior Period True-Up Provision Over/(Under) Recovery	1,222,103	1,222,103	1,222,103	1,222,103	1,222,103	1,222,103	1,222,103	1,222,103	1,222,103	1,222,103	1,222,103	1,222,103	14,665,233
42 Current Period CCR Revenues (net of tax)	29,741,384	30,849,802	29,283,365	32,530,770	36,409,359	39,720,172	42,814,591	43,175,635	43,030,063	38,025,327	35,557,484	32,030,543	433,168,496
43 True-Up Provision													
44 True-Up Provision - Over/(Under) Recov (Line 42-38)	(6,841,625)	(5,218,166)	(3,917,359)	(626,367)	1,874,691	(2,106,098)	461,718	517,378	6,594,946	4,404,342	1,719,000	(3,817,498)	(6,955,039)
45 Interest Provision for the Month	7,805	3,244	(128)	(2,766)	(3,217)	(4,786)	(7,065)	(7,661)	(4,569)	(1,419)	19	(2,658)	(23,204)
46 Current Cycle Balance - Over/(Under)	(6,833,820)	(12,048,743)	(15,966,230)	(16,595,364)	(14,723,890)	(16,834,773)	(16,380,120)	(15,870,403)	(9,280,027)	(4,877,104)	(3,158,085)	(6,978,242)	(6,978,242)
47 Prior Period Balance - Over/(Under) Recovered	16,868,292	15,646,189	14,424,086	13,201,983	11,979,880	10,757,777	9,535,675	8,313,572	7,091,469	5,869,366	4,647,263	3,425,160	16,868,292
48 Prior Period Cumulative True-Up Collected/(Refunded)	(1,222,103)	(1,222,103)	(1,222,103)	(1,222,103)	(1,222,103)	(1,222,103)	(1,222,103)	(1,222,103)	(1,222,103)	(1,222,103)	(1,222,103)	(1,222,103)	(14,665,234)
49 Prior Period True-up Balance - Over/(Under)	15,646,189	14,424,086	13,201,983	11,979,880	10,757,777	9,535,675	8,313,572	7,091,469	5,869,366	4,647,263	3,425,160	2,203,058	2,203,058
50 Net Capacity True-up Over/(Under) (Line 46+49)	\$8,812,368	\$2,375,343	(\$2,764,247)	(\$4,615,483)	(\$3,966,112)	(\$7,299,099)	(\$8,066,548)	(\$8,778,934)	(\$3,410,661)	(\$229,841)	\$267,075	(\$4,775,185)	(\$4,775,185)

¹ Approved in Commission Order No. PSC-16-0138-FOF-EI
² Approved in Commission Order No. PSC-15-0465-S-EI
³ Approved in Commission Order No. PSC-15-0537-FOF-EI
⁴ Approved in Commission Order No. PSC-16-0425-PAA-EI

Duke Energy Florida, LLC
 Capacity Cost Recovery Clause
 Calculation of Actual/Estimated True-Up
 January 2017 - December 2017 (Filed July 27, 2017)

	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEPT	OCT	NOV	DEC	Total
	ACTUAL	ACTUAL	ACTUAL	ACTUAL	ACTUAL	ACTUAL	ESTIMATED	ESTIMATED	ESTIMATED	ESTIMATED	ESTIMATED	ESTIMATED	
1 Base Production Level Capacity Costs													
2 Orange Cogen (ORANGE CO)	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	60,858,764
3 Orlando Cogen Limited (ORLACOGL)	5,102,804	5,102,804	5,102,804	5,102,804	5,089,383	5,094,138	5,102,803	5,102,803	5,102,803	5,102,803	5,102,803	5,102,803	61,211,555
4 Pasco County Resource Recovery (PASCOUNT)	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	21,417,600
5 Pinellas County Resource Recovery (PINCOUNT)	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	50,983,200
6 Polk Power Partners, L.P. (MULBERRY/ROYSTER)	6,733,888	6,656,139	6,675,150	6,669,159	6,662,563	6,900,122	6,965,674	6,965,674	6,965,674	6,965,674	6,965,674	6,965,674	82,091,068
7 Wheelabrator Ridge Energy, Inc. (RIDGEGEN)	1,097,143	646,573	648,924	678,961	684,116	705,834	800,946	800,946	800,946	800,946	800,946	800,946	9,267,226
8 US EcoGen	-	-	-	(3,000)	(90,000)	(93,000)	-	-	-	-	-	-	(186,000)
9 Calpine Osprey	92,394	-	-	-	-	-	-	-	-	-	-	-	92,394
10 Subtotal - Base Level Capacity Costs	24,131,193	23,510,479	23,531,842	23,552,887	23,451,026	23,712,058	23,974,387	23,974,387	23,974,387	23,974,387	23,974,387	23,974,387	285,735,807
11 Base Production Jurisdictional Responsibility	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	
12 Base Level Jurisdictional Capacity Costs	22,414,258	21,837,709	21,857,551	21,877,099	21,782,485	22,024,945	22,268,609	22,268,609	22,268,609	22,268,609	22,268,609	22,268,609	265,405,704
13 Intermediate Production Level Capacity Costs													
14 Southern Franklin	4,485,507	4,630,269	2,673,583	2,669,458	2,955,813	6,057,918	6,260,918	6,260,918	4,623,002	2,712,100	2,712,100	3,531,058	49,572,645
15 Schedule H Capacity Sales - NSB & RCID	-	-	-	-	-	-	-	-	-	-	-	-	-
16 Subtotal - Intermediate Level Capacity Costs	4,485,507	4,630,269	2,673,583	2,669,458	2,955,813	6,057,918	6,260,918	6,260,918	4,623,002	2,712,100	2,712,100	3,531,058	49,572,645
17 Intermediate Production Jurisdictional Responsibility	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	
18 Intermediate Level Jurisdictional Capacity Costs	3,261,098	3,366,345	1,943,775	1,940,776	2,148,965	4,404,288	4,551,875	4,551,875	3,361,061	1,971,778	1,971,778	2,567,185	36,040,800
19 Peaking Production Level Capacity Costs													
20 Shady Hills	1,954,260	1,954,260	1,395,900	1,374,300	1,924,020	3,912,300	3,856,015	3,856,015	1,799,474	1,354,816	1,354,816	1,955,104	26,691,280
21 Vandolah (NSG)	2,924,309	2,889,528	1,965,274	1,943,845	2,795,467	5,785,430	5,539,623	5,495,150	2,629,977	1,937,310	1,981,783	2,788,227	38,675,923
22 Other	-	-	-	-	-	-	-	-	-	-	-	-	-
23 Subtotal - Peaking Level Capacity Costs	4,878,569	4,843,788	3,361,174	3,318,145	4,719,487	9,697,730	9,395,638	9,351,165	4,429,451	3,292,126	3,336,599	4,743,331	65,367,203
24 Peaking Production Jurisdictional Responsibility	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	
25 Peaking Level Jurisdictional Capacity Costs	4,679,718	4,646,355	3,224,173	3,182,897	4,527,121	9,302,450	9,012,672	8,970,012	4,248,907	3,157,939	3,200,600	4,549,993	62,702,836
26 Other Capacity Costs													
27 Retail Wheeling	(23,615)	(2,605)	(13,552)	(1,023)	(49,903)	(27)	(24,689)	(20,202)	(4,376)	(2,342)	(12,596)	(17,124)	(172,054)
28 RRSSA Second Amendment ¹													
29 Batch-19 Nuclear Fuel ²													
30 ASC Servicing Fees ³							(296,269)						(296,269)
31 Total Other Capacity Costs	1,768,743	1,785,790	1,770,879	1,779,445	1,726,601	1,772,514	1,447,620	1,744,413	1,756,275	1,754,346	1,740,128	1,674,699	20,721,452
32 Total Capacity Costs (Line 12+18+25+31)	32,123,817	31,636,198	28,796,378	28,780,217	30,185,172	37,504,198	37,280,776	37,534,909	31,634,852	29,152,673	29,181,116	31,060,484	384,870,792
33 Nuclear Cost Recovery Clause													
34 CR3 Uprate Costs	4,459,192	4,431,769	4,404,346	4,376,920	4,349,497	4,322,073	4,294,649	4,267,226	4,239,801	4,212,377	4,184,953	4,157,530	51,700,333
35 Total Recoverable Nuclear Costs	4,459,192	4,431,769	4,404,346	4,376,920	4,349,497	4,322,073	4,294,649	4,267,226	4,239,801	4,212,377	4,184,953	4,157,530	51,700,333
36													
37 ISFSI Revenue Requirement ⁴	-	-	-	-	-	-	697,042	710,787	766,141	770,260	771,297	772,653	4,488,180
38 Total Recov Capacity & Nuclear Costs (Line 32+35+37)	36,583,010	36,067,967	33,200,724	33,157,137	34,534,669	41,826,271	42,272,467	42,512,921	36,640,795	34,135,309	34,137,366	35,990,667	441,059,303
39 Capacity Revenues													
40 Capacity Cost Recovery Revenues (net of tax)	28,519,282	29,627,699	28,061,262	31,308,667	35,187,257	38,498,070	41,005,606	42,944,849	41,950,646	38,649,455	32,526,800	30,799,664	419,079,255
41 Prior Period True-Up Provision Over/(Under) Recovery	1,222,103	1,222,103	1,222,103	1,222,103	1,222,103	1,222,103	1,222,103	1,222,103	1,222,103	1,222,103	1,222,103	1,222,103	14,665,234
42 Current Period Revenues (net of tax)	29,741,384	30,849,802	29,283,365	32,530,770	36,409,359	39,720,172	42,227,709	44,166,952	43,172,749	39,871,557	33,748,903	32,021,766	433,744,489
43 True-Up Provision													
44 True-Up Provision - Over/(Under) Recov (Line 42-38)	(6,841,625)	(5,218,166)	(3,917,359)	(626,366)	1,874,691	(2,106,099)	(44,758)	1,654,030	6,531,954	5,736,248	(388,463)	(3,968,902)	(7,314,815)
45 Interest Provision for the Month	7,805	3,244	(128)	(2,766)	(3,217)	(4,786)	(3,641)	(3,459)	(1,203)	715	31	(2,176)	(9,582)
46 Current Cycle Balance - Over/(Under)	(6,833,820)	(12,048,743)	(15,966,230)	(16,595,363)	(14,723,889)	(16,834,773)	(16,883,172)	(15,232,600)	(8,701,850)	(2,964,887)	(3,353,319)	(7,324,397)	(7,324,397)
47 Prior Period Balance - Over/(Under) Recovered	16,868,292	16,868,292	16,868,292	16,868,292	16,868,292	16,868,292	16,868,292	16,868,292	16,868,292	16,868,292	16,868,292	16,868,292	16,868,292
48 Prior Period Cumulative True-Up Collected/(Refunded)	(1,222,103)	(2,444,206)	(3,666,309)	(4,888,411)	(6,110,514)	(7,332,617)	(8,554,720)	(9,776,823)	(10,998,926)	(12,221,028)	(13,443,131)	(14,665,234)	(14,665,234)
49 Prior Period True-up Balance - Over/(Under)	15,646,189	14,424,086	13,201,983	11,979,880	10,757,777	9,535,675	8,313,572	7,091,469	5,869,366	4,647,263	3,425,160	2,203,058	2,203,058
50 Net Capacity True-up Over/(Under) (Line 46+49)	8,812,368	2,375,343	(2,764,247)	(4,615,482)	(3,966,111)	(7,299,099)	(8,569,600)	(8,141,131)	(2,832,483)	1,682,376	71,841	(5,121,339)	(5,121,339)

¹ Approved in Commission Order No. PSC-16-0138-FOF-EI
² Approved in Commission Order No. PSC-15-0465-S-EI
³ Approved in Commission Order No. PSC-15-0537-FOF-EI
⁴ Approved in Commission Order No. PSC-16-0425-PAA-EI

Counterparty	Type	MW	Start Date - End Date	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	YTD
1 Orange Cogen (ORANGE CO)	QF	74.00	7/1/95 - 12/31/24	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	60,858,765
2 Orlando Cogen Limited (ORLACOGL)	QF	79.20	9/1/93 - 12/31/23	5,102,804	5,102,804	5,102,804	5,102,804	5,089,383	5,094,138	5,096,530	5,099,746	5,097,899	4,988,662	5,015,745	5,023,523	60,916,840
3 Pasco County Resource Recovery (PASCOUNT)	QF	23.00	1/1/95 - 12/31/24	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	21,417,600
4 Pinellas County Resource Recovery (PINCOUNT)	QF	54.75	1/1/95 - 12/31/24	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	50,983,200
5 Polk Power Partners, L.P. (MULBERRY)	QF	115.00	8/1/94 - 8/8/24	6,733,888	6,656,139	6,675,150	6,669,159	6,662,563	6,900,122	6,965,675	6,965,675	6,965,675	6,965,675	6,965,675	6,965,675	82,091,070
6 Wheelabrator Ridge Energy, Inc. (RIDGEGEN)	QF	39.60	8/1/94 - 12/31/23	1,097,143	646,573	648,924	678,961	684,116	705,834	719,623	750,224	765,134	751,969	754,931	755,868	8,959,300
7 Southern purchase - Franklin	Other	425	6/1/16 - 5/31/21	4,485,507	4,630,269	2,673,583	2,669,458	2,955,813	6,057,918	6,236,165	6,252,703	4,638,320	2,750,085	2,698,716	3,488,522	49,537,060
8 Retail Wheeling				(23,615)	(2,605)	(13,552)	(1,023)	(49,903)	(27)	(9,282)	(6,007)	(3,342)	(4,243)	0	(1,766)	(115,365)
9 CR-3 Projected Expense				4,459,192	4,431,769	4,404,346	4,376,920	4,349,497	4,322,073	4,294,649	4,267,226	4,239,801	4,212,377	4,184,953	4,157,530	51,700,333
10 ISFSI Return				0	0	0	0	0	0	724,926	726,807	728,105	735,486	747,111	751,681	4,414,116
11 ASC Servicing Fee				0	0	0	0	0	0	(296,269)	0	(160,182)	0	0	0	(456,451)
SUBTOTAL				32,959,883	32,569,913	30,596,218	30,601,242	30,796,432	34,185,023	34,836,981	35,161,337	33,376,374	31,504,974	31,472,095	32,245,996	390,306,468

Confidential Capacity Contracts (Aggregated):

Purchases/Sales (Net)	MW	Contracts	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	YTD
Vandolah Capacity - Northern Star		6/1/12-5/31/27	2,924,309	2,889,528	1,965,274	1,943,845	2,795,467	5,785,430	5,768,280	5,707,232	2,712,726	1,918,109	2,015,348	2,943,834	39,369,382
Schedule H Capacity Sales-City of Tallahassee	-1	on-going no term date	0	0	0	0	0	0	(73,253)	0	0	(75,671)	(6,305)	(37,835)	(193,065)
Shady Hills Tolling	517	4/1/07-4/30/24	1,954,260	1,954,260	1,395,900	1,374,300	1,924,020	3,912,300	3,912,300	3,912,300	1,825,740	1,149,734	1,374,300	1,984,500	26,673,914
EcoGen			0	0	0	(3,000)	(90,000)	(93,000)	(90,000)	(93,000)	(93,000)	(90,000)	(93,000)	(90,000)	(735,000)
Calpine Osprey	515	Oct-14 to Jan-17	92,394	0	0	0	0	0	0	0	0	0	0	0	92,394
RRSSA Second Amendment ¹															
Batch-19 Nuclear Fuel ²															
Total	1031		39,723,203	39,202,095	35,741,824	35,696,855	37,202,424	45,562,294	46,122,885	46,452,483	39,582,491	36,163,833	36,401,286	38,681,380	476,533,054

¹ Approved in Commission Order No. PSC-16-0138-FOF-EI

² Approved in Commission Order No. PSC-15-0465-S-EI

Revised Exhibit C

DUKE ENERGY FLORIDA Confidentiality Justification Matrix

DOCUMENT/RESPONSES	PAGE/LINE	JUSTIFICATION
<p>Revised Exhibit No. ___ (JS-1), to the direct testimony of Jeffrey Swartz, filed on March 2, 2018</p>	<p>DEF’s Root Cause Analysis Report-Bartow Steam Turbine Event February 6, 2018</p> <p>Page 1 of 18: All information in the first paragraph after “Bartow Station” to the end of the page.</p> <p>Page 2 of 18: All information on this page except for the paragraph entitled “Historical Overview” is confidential.</p> <p>Page 3 of 18: All information beginning in the Third Paragraph after “and outer ring” to the end of the page.</p> <p>Page 4 of 18: the entire paragraph is confidential.</p> <p>Page 5 of 18: All information in the “Bartow L-0 Events Summary” except rows entitled “Date”, “Service Duration” and “Information Shared with MHPS” is confidential.</p> <p>Pages 6 through 14 of 18: All information on all pages in their entirety is</p>	<p>§366.093(3)(d), F.S. The document in question contains confidential information, the disclosure of which would impair DEF’s efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), F.S. The document in question contains confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>

	<p>confidential.</p> <p>Page 15 of 18: The entire page is confidential except for “conclusion”.</p> <p>Page 16 of 18: The entire paragraph is confidential except the last sentence beginning with “This RCA report”.</p> <p>Pages 17 and 18 of 18: All information is confidential.</p>	
DOCUMENT/RESPONSES	PAGE/LINE	JUSTIFICATION
<p>Direct Testimony of Jeffrey Swartz; specifically pages 3, 5, and 6, filed on March 2, 2018</p>	<p>Page 3: Line 9-remaining portion of sentence after “failure is” and before “After”</p> <p>Page 3: Lines 10 and 11- all information after “determined that” and before “both”.</p> <p>Page 5: Lines 18 through 23- The remaining portion of sentence after “blades is”.</p> <p>Page 6: Lines 1 through 6- all information after “OEM” and before “Did”.</p> <p>Page 6: Lines 11 through 13- all information after “failures” and before “Why”.</p> <p>Page 6: Lines 17 and 18- all information after “of the” and before “DEF”.</p>	<p>§366.093(3)(d), F.S. The document in question contains confidential information, the disclosure of which would impair DEF’s efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), F.S. The document in question contains confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>

	Page 6: Lines 19 through 23- the remaining sentence after “DEF”.	
DOCUMENT/RESPONSES	PAGE/LINE	JUSTIFICATION
Exhibit No. ____ (CAM-2T) Sheet 2 of 3	All information on rows titled “RRSSA Second Amendment,” and “Batch 19 Nuclear Fuel”.	<p>§366.093(3)(d), F.S. The document in question contains confidential information, the disclosure of which would impair DEF’s efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), F.S. The document in question contains confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
DOCUMENT/RESPONSES	PAGE/LINE	JUSTIFICATION
Exhibit No. ____ (CAM-2T) Sheet 3 of 3	All information on rows titled “RRSSA Second Amendment,” and “Batch 19 Nuclear Fuel”	<p>§366.093(3)(d), F.S. The document in question contains confidential information, the disclosure of which would impair DEF’s efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), F.S.</p>

		The document in question contains confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
DOCUMENT/RESPONSES	PAGE/LINE	JUSTIFICATION
Exhibit No. ____ (CAM-3T) Schedule A12, Sheet 9 of 9	All information on rows titled "RRSSA Second Amendment," and "Batch 19 Nuclear Fuel".	<p>§366.093(3)(d), F.S. The document in question contains confidential information, the disclosure of which would impair DEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), F.S. The document in question contains confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>

REVISED EXHIBIT D

AFFIDAVIT OF
JEFFREY A. SWARTZ

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and purchased power cost
recovery clause with generating
performance incentive factor.

Docket No. 20190001-EI

Dated: October 23, 2019

**AFFIDAVIT OF JEFFREY SWARTZ IN SUPPORT OF
DUKE ENERGY FLORIDA'S
REQUEST FOR EXTENSION OF CONFIDENTIAL CLASSIFICATION**

STATE OF FLORIDA

COUNTY OF PINELLAS

BEFORE ME, the undersigned authority duly authorized to administer oaths, personally appeared Jeffrey Swartz, who being first duly sworn, on oath deposes and says that:

1. My name is Jeffrey Swartz. I am over the age of 18 years old and I have been authorized by Duke Energy Florida (hereinafter "DEF" or the "Company") to give this affidavit in the above-styled proceeding on DEF's behalf and in support of DEF's Request for Extension of Confidential Classification (the "Request"). The facts attested to in my affidavit are based upon my personal knowledge.

2. I am the Vice President of Florida Generation in the Fossil Hydro Operations Department. This section is responsible for overall leadership and strategic direction of DEF's power generation fleet.

3. As the Vice President of Florida Generation, I am responsible, along with the other members of the section, for strategic and tactical planning to operate and maintain DEF's non-nuclear generation fleet, generation fleet project and additions

recommendations, major maintenance programs, outage and project management, and retirement of generation facilities.

4. DEF is seeking an extension of confidential classification for portions of my direct testimony, specifically information on pages 3, 5, and 6, and Exhibit No. ___(JS-1) to my direct testimony filed on March 2, 2018 in Docket No. 20180001. DEF is requesting an extension of confidential classification of this information because it contains sensitive business information, the disclosure of which would impair the Company's competitive business interests and ability to contract for goods and services on favorable terms.

5. The Company is requesting an extension of confidential classification of portions of my testimony and Exhibit No. ___(JS-1) because it contains proprietary and confidential third-party owned information, the disclosure of which would impair third-party's competitive business interests, and if disclosed, the Company's competitive business interests and efforts to contact for goods or services on favorable terms. DEF has not publicly disclosed the detailed findings contained in the Root Cause Analysis report.

6. Upon receipt of its this confidential information, strict procedures are established and followed to maintain the confidentiality of the terms of the documents and information provided, including restricting access to those persons who need the information to assist the Company, and restricting the number of, and access to the information and contracts. At no time since receiving the information in question has the Company publicly disclosed that information. The Company has treated and continues to treat the information at issue as confidential.

7. This concludes my affidavit.

Further affiant sayeth not.

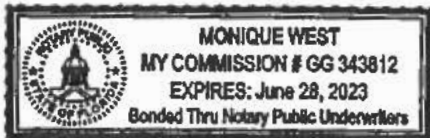
Dated the 17th day of October, 2019.

Jeffrey Swartz
(Signature)
Jeffrey Swartz
Vice President Florida Generation
Duke Energy Florida, LLC
Florida Regional Headquarters
St. Petersburg, FL

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 17th day of October, 2019 by Jeffrey Swartz. He is personally known to me or has produced his _____ driver's license, or his _____ as identification.

Monique West
(Signature)
Monique West
(Printed Name)
NOTARY PUBLIC, STATE OF _____
June 28, 2023
(Commission Expiration Date)

(AFFIX NOTARIAL SEAL)



(Serial Number, If Any)

REVISED EXHIBIT D

**AFFIDAVIT OF
CHRISTOPHER A.
MENENDEZ**

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and purchased power cost
recovery clause with generating
performance incentive factor

Docket No. 20190001-EI

Dated: October 23, 2019

**AFFIDAVIT OF CHRISTOPHER A. MENENDEZ IN SUPPORT OF
DUKE ENERGY FLORIDA'S
REQUEST FOR EXTENSION OF CONFIDENTIAL CLASSIFICATION**

STATE OF FLORIDA

COUNTY OF PINELLAS

BEFORE ME, the undersigned authority duly authorized to administer oaths, personally appeared Christopher A. Menendez, who being first duly sworn, on oath deposes and says that:

1. My name is Christopher A. Menendez. I am over the age of 18 years old and I have been authorized by Duke Energy Florida (hereinafter "DEF" or the "Company") to give this affidavit in the above-styled proceeding on DEF's behalf and in support of DEF's Request for Extension of Confidential Classification (the "Request"). The facts attested to in my affidavit are based upon my personal knowledge.

2. I am the Rates and Regulatory Strategy Manager within the Regulatory Planning Projects department. This department is responsible for regulatory planning and cost recovery for DEF.

3. As the Rates and Regulatory Strategy Manager, I am responsible, along with the other members of the section, for the production and review of the regulatory financial reports of DEF and analysis of state, federal and local regulations and their impact on DEF.

4. DEF is seeking an extension of confidential classification for a portion of Exhibit No. __ (CAM-2T); Calculation of Actual True-Up, Sheet 2 of 3 and Calculation of Actual/Estimated True Up, Sheet 3 of 3 and Exhibit No. ____ (CAM-3T); Schedule A12, Sheet 9 of 9, to my direct testimony filed on March 2, 2018 in Docket No. 20180001. There are no changes to the information contained in DEF's confidential Exhibit A, redacted Exhibit B, and justification matrix C. The referenced Exhibits are on file with the Clerk. DEF is requesting an extension of confidential classification of this information because it contains competitively sensitive contractual confidential business information of capacity suppliers DEF contracts with.

5. DEF negotiates with potential capacity suppliers to obtain competitive contracts for capacity purchase options that provide economic value and system reliability to DEF and its customers. In order to obtain such contracts, however, DEF must be able to assure capacity suppliers that sensitive business information, such as the contractual terms, will be kept confidential. DEF enters into contracts that require the information will be protected from disclosure. In order to protect this confidential information, it is also necessary to keep additional information that could be used to compute the confidential information at issue if made public; for example, if costs relating to one contract were held confidential, but all other contractual costs and the resulting subtotal were public, the confidential information would become apparent. For

this reason, DEF has held confidential the remaining information on the subject exhibits that could be used to compute to the confidential information in need of protection.

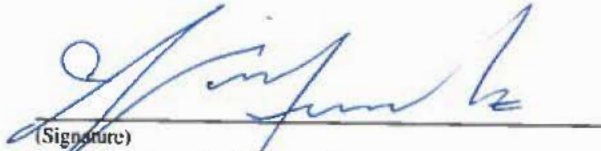
6. Absent such measures, suppliers would run the risk that sensitive business information that they provided in their contracts with DEF would be made available to the public and, as a result, end up in possession of potential competitors. Faced with that risk, persons or companies who otherwise would contract with DEF might decide not to do so if DEF did not keep those terms confidential. Without DEF's measures to maintain the confidentiality of sensitive terms in contracts between DEF and capacity suppliers, the Company's efforts to obtain competitive capacity contracts could be undermined. Additionally, the disclosure of confidential information in DEF's capacity purchases could adversely impact DEF's competitive business interests. If such information was disclosed to DEF's competitors, DEF's efforts to obtain competitive capacity purchase options that provide economic value to both DEF and its customers could be compromised by DEF's competitors changing their consumption or purchasing behavior within the relevant markets.

7. Upon receipt of confidential information from capacity suppliers, and with its own confidential information, strict procedures are established and followed to maintain the confidentiality of the terms of the documents and information provided, including restricting access to those persons who need the information to assist the Company, and restricting the number of, and access to the information and contracts. At no time since receiving the contracts and information in question has the Company publicly disclosed that information or contracts. The Company has treated and continues to treat the information and contracts at issue as confidential.

8. This concludes my affidavit.

Further affiant sayeth not.

Dated the 16th day of October, 2019.



(Signature)
Christopher A. Menendez
Rates and Regulatory Strategy Manager
Regulatory Planning Projects
Duke Energy Florida, LLC
299 1st Avenue South
St. Petersburg, FL 33701

16th THE FOREGOING INSTRUMENT was sworn to and subscribed before me this day of October, 2019, by Christopher A. Menendez. He is personally known to me or has produced his _____ driver's license, or his _____ as identification.



(Signature)

Monique West

(Printed Name)

NOTARY PUBLIC, STATE OF FLORIDA

June 28, 2023

(Commission Expiration Date)

(Serial Number, If Any)

(AFFIX NOTARIAL SEAL)

