

<p align="center"><u>Docket Nos. 20200069-EI and 20200092-EI</u> Comprehensive Exhibit List for Entry into Hearing Record September 1, 2020</p>					
EXH #	Witness	I.D. # As Filed	Exhibit Description	Issue Nos.	Entered
STAFF					
1		Exhibit List	Comprehensive Exhibit List		
STAFF HEARING EXHIBITS					
2			DEF's Motion to Approve 2020 SPP/SPPCRC Agreement with Corrected Attachments 1 and 2 to Exhibit A. Filed July 17 & 20, 2020 Docket No. 20200092-EI. DN. 03874-2020 DN. 03905-2020 <i>[Bates No. 00001-00031]</i>		
3	Foster (1, 3a, 3b, 3c, 3e, 3f, 3g, 4, 6) Oliver (2, 3d, 5, 6)		DEF's Response to Staff's First Set of Interrogatories Nos. 1-6. Filed August 19, 2020 Docket No. 20200092-EI <i>[Bates No. 00032-00039]</i>		

4			Stipulation (by Walmart, TECO, Duke, FPL, and Gulf). Filed July 20, 2020 Docket No. 20200069-EI DN. 03918-2020 <i>[Bates No. 00040-00049]</i>		
5	Foster (1-4)		DEF's Response to Walmart's First Set of Interrogatories Nos. 1-4. Filed August 26, 2020 Docket No. 20200092-EI <i>[Bates No. 00050-00053]</i>		
6			DEF, OPC, and White Springs Joint Motion for Approval of Settlement Agreement and attached Stipulation and Settlement Agreement. Filed August 10, 2020 Docket No. 20200092-EI DN. 04332-2020 <i>[Bates No. 00054-00067]</i>		
7			Walmart Inc. Direct Testimony and Exhibits of Steve W. Chriss. Filed August 28, 2020 Docket No. 20200092-EI <i>[Bates No. 00068-00124]</i>		
8	Thomas G. Foster		Summary Of Projected Period Recovery Amount. Projected Period: January 2021 Through December 2021. (Exhibit TGF-1) Filed July 24, 2020 Docket No. 20200092-EI <i>[Bates No. 00125-00140]</i>		

DEF's Motion to Approve 2020 SPP/SPPCRC Agreement
with Corrected Attachments 1 and 2 to Exhibit A.

Filed July 17 & 20, 2020

Docket No. 20200092-EI.

DN. 03874-2020

DN. 03905-2020

FLORIDA PUBLIC SERVICE COMMISSION
DOCKET: 20200069-EI EXHIBIT: 2
PARTY: STAFF HEARING EXHIBITS
DESCRIPTION: DEF's Motion to Approve 2020
SPP/SPPCRC Agreement with Corrected
Attachments 1 and 2 to Exhibit A. Fi...

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of 2020-2029 Storm Protection Plan
pursuant to Rule 25-6.030, F.A.C.,
Duke Energy Florida, LLC.

Docket No. 20200069-EI

In re: Storm Protection Plan Cost Recovery Clause

Docket No. 20200092-EI

Filed: July 17, 2020

**DUKE ENERGY FLORIDA, LLC'S
MOTION TO APPROVE 2020 SPP/SPPCRC AGREEMENT**

Duke Energy Florida, LLC (“DEF” or “the Company”), pursuant to Rule 28-106.204, Florida Administrative Code, hereby requests that the Florida Public Service Commission (“FPSC” or “Commission”) approve the 2020 SPP/SPPCRC Agreement included with this Motion as Attachment “1” and made a part hereof, and states:

1. DEF filed its 2020-29 Storm Protection Plan (“SPP”) in Docket No. 20200069-EI on April 10, 2020. After submitting the SPP, the Company met with the Office of Public Counsel (“OPC”) and White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate (“PCS Phosphate”) via telephone to discuss ways to simplify issues associated with SPP cost recovery for DEF.

2. On July 24, 2020, DEF will file its petition and testimonies in support of its projected 2021 SPP costs for recovery through Storm Protection Plan Cost Recovery Clause (“SPPCRC”) in 2021.

3. As part of this Agreement, the signatories have established the reasonable costs DEF should be permitted to recover through the SPPCRC in 2021, subject to Commission review for prudence in the normal course of the clause proceedings, assuming the Company’s SPP is approved without modification. Thus, the Agreement is intended to avoid potentially time consuming and contentious issues about which SPP costs are “incremental” and whether the

Company is seeking “double recovery” of certain costs. It is also intended to (1) promote transparency and (2) simplify the review of costs (i.e., O&M expenses and return and depreciation expense on capital projects) the Company will recover through the SPPCRC to avoid duplicative recovery of costs through the utility’s existing base rates or any other cost recovery mechanism as required by Rule 25-6.031(6)(b), Florida Administrative Code, in accord with Section 366.96(8), Florida Statutes. The calculation of the agreed-upon amount is described more fully in the 2020 Agreement and Exhibits A and B to the Agreement.

4. If approved by the Commission, the 2020 Agreement will establish a series of stipulations that will reduce the issues to be litigated in Docket Nos. 20200069-EI and 20200092-EI (with regards to DEF). Approving these stipulations should also reduce the volume of discovery in the SPPCRC docket, clarify the issues to be litigated for DEF in both dockets, and promote administrative and regulatory efficiency in those dockets.

5. The Parties entered into the 2020 Agreement, each for their own reasons, but all in recognition that the cumulative total of the regulatory activity before the Commission--now and for the rest of 2020 and through 2021--is anticipated to be greater than normal. To maximize the administrative and regulatory efficiency benefits inherent in the 2020 Agreement for the Parties and the Commission, and given that discovery in the SPPCRC docket is anticipated to begin in earnest with the filing of DEF’s petition on July 24, 2020, DEF, with the support of the Parties, requests that the Commission schedule the 2020 Agreement for consideration at an agenda conference as soon as possible.

6. The standard for approving a settlement agreement is whether it is in the public interest. *See Fla. Indus. Power Users Group v. Brown*, 273 So.3d 926 (Fla. 2019). The 2020 Agreement is in the public interest for the reasons specified above and as specified in the agreement

itself. The Parties to the 2020 Agreement agree that the 2020 Agreement is in the public interest and should be approved.

7. The undersigned counsel has consulted with counsel for the parties engaged in DEF's issues in the subject dockets and is authorized to represent that: the Office of Public Counsel and PCS Phosphate support the relief requested in this Motion; Walmart does not object to this Motion; and FIPUG has not provided a position as of the filing of this Motion.

WHEREFORE, DEF respectfully requests the Commission grant this Motion and approve the 2020 SPP/SPPCRC Agreement.

/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 to the following this 16th day of July, 2020.

/s/ Matthew R. Bernier

Attorney

<p>J. Crawford / C. Murphy / R. Dziechciarz Office of General Counsel FL Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 jcrawfor@psc.state.fl.us cmurphy@psc.state.fl.us rdziechc@psc.state.fl.us</p> <p>Ken Hoffman / Mark Bubriski 134 West Jefferson St. Tallahassee, FL 32301-1713 ken.hoffman@fpl.com mark.bubriski@nexteraenergy.com</p> <p>John T. Burnett / Christopher T. Wright / Jason A. Higginbotham Florida Power & Light Company 700 Universe Blvd. Juno Beach, FL 33408-0420 john.t.burnett@fpl.com christopher.wright@fpl.com jason.higginbotham@fpl.com</p> <p>Stephanie Eaton 110 Oakwood Dr., Ste. 500 Winston-Salem, NC 27013 seaton@spilmanlaw.com</p> <p>Derrick Price Williamson / Barry Naum 1100 Bent Creek Blvd., Ste. 101 Mechanicsburg, PA 17050 dwilliamson@spilmanlaw.com bnaum@spilmanlaw.com</p>	<p>J.R. Kelly / Charles Rehwinkel Office of Public Counsel c/o The Florida Legislature 111 W. Madison St., Room 812 Tallahassee, FL 32399-1400 kelly.jr@leg.state.fl.us rehwinkel.charles@leg.state.fl.us</p> <p>Russell A. Badders Gulf Power Company One Energy Place Pensacola, FL 32520 russell.badders@nexteraenergy.com</p> <p>Mike Cassel 208 Wildlight Ave. Yulee, FL 32097 mcassel@fpuc.com</p> <p>Paula K. Brown Regulatory Affairs P.O. Box 11 Tampa, FL 33601-0111 regdept@tecoenergy.com</p> <p>James A. Brew / Laura Wynn Baker 1025 Thomas Jefferson St., N.W., Ste. 800W Washington, DC 20007 jbrew@smxblaw.com lwb@smxblaw.com</p> <p>Jon C. Moyle, Jr. / Karen A. Putnal 118 North Gadsden Street Tallahassee, FL 32301 jmoyle@moylelaw.com kputnal@moylelaw.com mqualls@moylelaw.com</p>
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ATTACHMENT 1

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of 2020-2029 Storm Protection Plan
pursuant to Rule 25-6.030, F.A.C.,
Duke Energy Florida, LLC.

Docket No. 20200069-EI

In re: Storm Protection Plan Cost Recovery Clause

Docket No. 20200092-EI

2020 SPP/SPPCRC Agreement

THIS AGREEMENT is dated this 17th day of July, 2020, and is by and between Duke Energy Florida, LLC (“DEF” or the “Company”), the Office of Public Counsel (“OPC” or “Citizens”), and White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate (“PCS”). DEF, OPC and PCS, shall be referred to herein as the “Parties” and the term “Party” shall be the singular form of the term “Parties.” OPC and PCS will be referred to herein as the “Consumer Parties.” This document shall be referred to as the “2020 SPP/SPPCRC Agreement.”

Recitals

Storm Protection Plan and Storm Protection Plan Cost Recovery Clause

A. In 2019, the Florida Legislature enacted section 366.96, Florida Statutes, entitled “Storm protection plan cost recovery.” Section 366.96(3) requires DEF and the other public electric utilities to file a transmission and distribution storm protection plan (“SPP”) at least every three years that covers the immediate 10-year planning period, and explain the systematic approach they will follow to achieve the objectives of reducing restoration costs and outage times associated with extreme weather events and enhancing overall reliability. The Commission must determine whether it is in the public interest to approve, approve with modification, or deny each utility’s SPP no later than 180 days after the utility

files a plan that contains all of the elements required by Commission Rule. The new statute also creates a storm protection plan cost recovery clause (“SPPCRC”) to promote the timely recovery of costs incurred by a utility pursuant to its SPP. Rules 25-6.030 and 25-6.031, Florida Administrative Code, were adopted by the Commission to implement section 366.96, Florida Statutes.

B. Rule 25-6.030 requires each utility to file a SPP at least every three years with the Commission, and specifies the required elements of the utility’s SPP. Subsection 25-6.030(3)(h) requires a Plan to include “an estimate of rate impacts for each of the first three years of the Storm Protection Plan for the utility’s typical residential, commercial, and industrial customers.” Pursuant to the Order Establishing Procedure (“OEP”) for Docket No. 20200069-EI, opened by the Commission to review DEF’s SPP, DEF filed its 2020-2029 SPP on April 10, 2020.

C. Rule 25-6.031 governs the new SPPCRC created by section 366.93, Florida Statutes. Subsection 6(b) of that rule states: “Storm Protection Plan costs recoverable through the clause shall not include costs recovered through the utility’s base rates or any other cost recovery mechanism.” The Commission opened Docket No. 20200092-EI to consider issues related to SPP costs through the SPPCRC. DEF anticipates filing its petition for SPP cost recovery in Docket No. 20200092-EI, on or about July 24, 2020, in accordance with that docket’s OEP.

Overall Regulatory Activity

D. The cumulative total of the regulatory activity described above, together with the other annual clause proceedings and other dockets and rulemakings pending at the FPSC, is greater than normal and this led the Parties to discuss ways to resolve some or all of the

potentially time-consuming issues in the dockets, particularly the SPPCRC as it pertains to DEF, by agreement or stipulation in a manner that promotes regulatory economy and administrative efficiency and that serves the public interest. This SPP/SPPCRC 2020 Agreement is the product of those discussions and is being filed for approval in the above-styled Dockets to resolve some or all of the issues in those dockets as discussed further below.

E. The Parties have entered into this 2020 SPP/SPPCRC Agreement in compromise of positions taken in accord with their rights and interests under chapters 350, 366 and 120, Florida Statutes, as applicable, and as part of a negotiated exchange of consideration among the Parties to this 2020 SPP/SPPCRC Agreement. Each Party has agreed to concessions to the others with the expectation, intent, and understanding such that all provisions of the 2020 SPP/SPPCRC Agreement, upon approval by the Commission, will be enforced by the Commission as to all matters addressed herein with respect to all Parties.

F. The Parties agree that this 2020 SPP/SPPCRC Agreement is in the public interest and should be approved.

NOW, THEREFORE, in light of the mutual covenants of the Parties and the benefits accruing to all Parties through this 2020 SPP/SPPCRC Agreement, and for good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged, the Parties agree as follows:

1. Project-level Detail. Except for its Vegetation Management (VM) Programs, DEF has included project-level detail for all Programs for 2020 in its initial Storm Protection Plan (SPP) filed on April 10, 2020, for approval by the FPSC. As of May 27, 2020, DEF has provided project level detail to the Consumer Parties for costs expected to be requested for SPP cost recovery in 2021, included in DEF's current plan, recognizing that planning is on-

going and changes should be expected. As necessary, DEF will update this information when it files for cost recovery in the Storm Protection Plan Cost Recovery Clause (“SPPCRC”) later in 2020. The Parties agree that the following three Programs do not have project components: (1) Vegetation Management, (2) Distribution Pole Replacement and Inspection Activity, and (3) Transmission Pole/Tower Inspections; therefore, project-level detail is not needed or required in either discovery or the Company’s SPPCRC filing for these three programs for 2020 and 2021.

By the sooner of April 30, 2021 or when DEF files its projected 2022 SPPCRC costs, DEF will provide project-level detail to the Consumer Parties for costs expected to be requested for 2022 SPP cost recovery, included in DEF’s current plan at that time, recognizing that planning is on-going and changes should be expected. As necessary, DEF will update this information when it files for cost recovery in the SPPCRC later in 2021.

2. 2020 SPP Cost Recovery. DEF will not seek recovery of any revenue requirements incurred in 2020 through the SPPCRC.

3. Rate Base Items. DEF will be permitted to seek recovery of return on capital expenditures and assets related to the SPP programs, as well as the incremental depreciation expense for the SPP assets, in the following manner:

(a) DEF will not seek recovery of any revenue requirements incurred in 2020 through the SPPCRC. There may be limited capital expenditures incurred in 2020 associated with the activities DEF is requesting recovery for in 2021. For those programs that are approved by the Commission in DEF’s proposed SPP in 2020, DEF will include the Construction Work In Progress (“CWIP”) balances as of January 1, 2021 as the beginning SPPCRC Rate Base balances and calculate a return on these costs from January 1, 2021 forward for cost recovery in 2021.

(b) DEF is not seeking recovery of any targeted underground costs or Self Optimizing Grid costs through the SPPCRC in 2021. The costs for these programs are being recovered through DEF's current base rates pursuant to the 2017 Second Revised and Restated Settlement Agreement ("2017 Settlement Agreement") and will continue to be recovered through base rates. DEF represents that it has, or will by December 31, 2021 have, materially met its commitments in aggregate under the 2017 Settlement Agreement which included investments such as targeted underground (TUG) and Self Optimizing Grid (SOG). This does not preclude DEF from seeking recovery in the SPPCRC in future years of TUG or SOG costs, nor does it preclude any party from challenging whether, at that time, such costs are or were already being recovered through base rates.

(c) DEF is seeking to increase its investment in the wood pole replacement activities associated with its Transmission Structure Hardening program. DEF has averaged \$34.8 million of Transmission wood pole replacement expenditures annually over the 2017-2019 period. See Exhibit A attached hereto. The parties agree this is a reasonable estimate of what is currently included in base rates. For 2021, DEF will include an adjustment in the SPPCRC to remove the revenue requirements associated with \$34.8 million of pole replacement costs from recovery in 2021 (i.e., these costs will be recovered through base rates); any amount in excess of \$34.8 million will be eligible for recovery through the SPPCRC. For purposes of developing this credit, as shown in Exhibit A, DEF will reflect this expenditure evenly over the 12-month period where the total year-to-date ("YTD") adjustment amount used to develop the credit cannot exceed the YTD total expenditures in the activity in any month. In addition, for ease of accounting, any wood to non-wood pole projects expected to go in service in 2021 will be tracked using SPPCRC accounting. To ensure amounts incurred in 2020 related to these projects are not included for recovery through

the SPPCRC in 2021, an adjustment will be made in the SPPCRC filing to zero out the 2021 SPPCRC wood to non-wood beginning balance SPPCRC Rate Base. The two adjustments mentioned above will not be necessary once base rates are reset after expiration of the 2017 Settlement Agreement.

(d) The parties agree that the Distribution Feeder Hardening Program and the transmission cathodic protection and lattice tower replacement activities (incorporated within DEF's Transmission Structure Hardening Program in its proposed SPP) are new activities. For any of these activities approved by the Commission in DEF's SPP in 2020, any dollars prudently spent on these activities are eligible for recovery through the SPPCRC in 2021. The parties acknowledge that some minor start-up/engineering related costs may be incurred in preparation for these activities in 2020. To the extent such Program/activity-related costs are incurred in 2020, DEF will not request recovery of any revenue requirements associated with these costs incurred in 2020. DEF will include the CWIP balances related to these costs as of January 1, 2021 as the beginning SPPCRC Rate Base balances and calculate a return on these costs from January 1, 2021 forward for cost recovery through the SPPCRC.

(e) For 2021, DEF will continue to recover costs associated with its on-going distribution pole inspection and replacement activities through base rates. The Company will also not seek recovery of the Operations and Maintenances ("O&M") expenses from asset transfers related to the on-going distribution pole inspection and replacement activities through the SPPCRC. If the Commission approves DEF's Feeder Hardening Program included in its proposed SPP in 2020, the Parties agree that DEF may recover any pole replacement costs prudently incurred as part of that program through the SPPCRC beginning in 2021.

(f) To ensure that there is no double recovery between base rate revenue and SPPCRC revenue, the Company will employ the following protocols for capital items:

(i) For assets being retired and replaced with new assets as part of a program approved by the Commission in the Company's proposed SPP, the Company will not seek to recover the cost of removal net of salvage associated with the related assets to be retired through the SPPCRC. Rather, such net cost of removal will be debited to the Company's accumulated depreciation reserve according to normal regulatory plant accounting procedures.

(ii) Project records and fixed asset records for SPP capital projects will be maintained in a manner that clearly distinguishes capital and assets in retail rate base from capital and assets being recovered through the SPPCRC.

(iii) For SPP capital projects, any depreciation expense from the SPP asset additions will be reduced by the depreciation expense savings that result from the retirement of assets removed from service during the SPP project. Only the net of the two depreciation amounts will be recoverable through the SPPCRC.

(iv) Whenever the Company petitions for a change to its base rates and charges pursuant to sections 366.06 and/or 366.07, Florida Statutes, the assets being recovered through the SPPCRC that have been determined prudent through a final true-up in the SPPCRC by the Commission as of the end of the historic year presented in the Company's minimum filing requirements may, at the Company's option, be included in the Company's minimum filing requirement schedules and included in retail rate base for the applicable test year. Once recovery begins through base rates, these costs will simultaneously be removed from the SPPCRC. Thereafter, new SPP capital and assets related to SPP programs that were not included in the test year used to set base rates may be submitted for recovery through the SPPCRC petition process.

4. Operations and Maintenance Expenses.

(a) DEF will not request recovery of any O&M costs incurred in 2020 through the SPPCRC. DEF will not seek to recover Vegetation Management costs through the SPPCRC in 2021. In 2021, except as described below, DEF shall only be permitted to seek recovery of O&M costs associated with capital expenditures for SPP programs/projects that are approved by the Commission as part of DEF's proposed SPP in 2020 and that are approved for recovery in 2021 through the SPPCRC (costs associated with the Distribution Feeder Hardening Program or Transmission Structure Hardening Program). An example of this would be O&M activities associated with DEF's new Feeder Hardening program for wire transfer costs (reattaching existing wire to a new pole).

(b) If approved by the Commission as part of DEF's proposed SPP in 2020, DEF shall be permitted to seek recovery of the costs associated with the new drone inspection activities in its 2021 SPPCRC filing.

(c) Additionally, DEF will not include an estimate for implementation and administrative costs associated with items such as incremental Information Technology ("IT"), billing, legal, regulatory, travel and accounting costs in its projection filing for 2021; however, DEF is not prohibited from seeking recovery for costs of this nature in its 2021 estimated actual filing. This does not preclude any party from challenging the prudence of these costs, but acknowledges the Company's right to seek recovery in the future.

(d) DEF expects incremental O&M costs associated with an increase in its expenditures for the Company's wood to non-wood pole activities. DEF will be allowed recovery of prudently incurred O&M amounts associated with this activity in the same ratio that capital expenditures are included in the SPPCRC for 2021. For example, if the Company incurs capital costs of \$71 million

in 2021 and the amount recovered in base rates is \$34.8 million (as agreed to by the Parties in paragraph 3(c)), then DEF would remove O&M costs from the amount it seeks to recover based on a calculation of \$34.8 million divided by \$71 million. For this example, this would require removal of approximately 49% of the total O&M associated with this activity for recovery in 2021 through the SPPCRC.

(e) The Parties agree that cathodic protection, feeder hardening, and tower upgrade capital work are new activities and incremental to what DEF has previously included in base rates. As such, if the Commission approves these activities as part of DEF's proposed SPP, all O&M expenses that are prudently incurred in connection with these capital activities are appropriately recoverable through the SPPCRC.

5. Distribution Pole Replacements. Distribution Pole Replacement and Inspection Activity is an existing storm hardening activity under the Company's 2019-2021 Storm Hardening Plan ("SHP") that is included in the Company's SPP in Exhibit No. __ (JWO-1), § V. As explained in Exhibit No. __ (JWO-2), the existing Distribution Pole Replacement and Inspection Activity will be incorporated into the SPP Feeder and Lateral Hardening Program beginning in 2022. DEF will not seek recovery of the existing Distribution Pole Replacement and Inspection Activity costs through the SPPCRC prior to the 2021 SPPCRC filing for rates effective with the first billing cycle of 2022.

6. No Bundling. DEF will not, as a means of demonstrating that it has met the threshold for accruing Allowance for Funds Used During Construction ("AFUDC") in Rule 25-6.0141, Florida Administrative Code, aggregate SPP capital projects (a) that are not in the same geographic vicinity or (b) that would otherwise only be aggregated solely because the projects or activities: (i) are part of the same SPP program; (ii) will be performed by the same contractor; (iii)

are part of the same SPP program budget or (iv) are being managed by the same company project manager. If the FPSC amends the AFUDC Rule such that a utility is expressly authorized to aggregate projects as described above, DEF shall be permitted to implement that methodology notwithstanding anything contained herein.

7. Other SPP items.

(a) The Parties agree that the following existing SHP Initiatives are not part of the Company's SPP: Geographic Information System; Post-Storm Data Collection; Outage Data - Overhead and Underground Systems; Increase Coordination with Local Governments; Collaborative Research; and Disaster Preparedness and Recovery Plan.

(b) DEF and PCS agree that the 2017 Settlement Agreement did not contemplate a distinct rate recovery track, including the allocation of costs, for storm protection costs through the clause that is being established in accordance with the SPP statute and Rule. DEF and PCS agree that any allocation of SPP costs for the purposes of the SPPCRC to become effective for 2021 shall not be considered precedential, and that a proper allocation of SPP costs is required and should be implemented with DEF's next rate case.

(c) Nothing in this Agreement shall be construed to prevent any Party from challenging the reasonableness and/or prudence of all or part of any SPP program or project in any future proceeding or the reasonableness and/or prudence of any costs in any SPPCRC proceeding, nor limit the amount of allowed discovery as specified in the Order Establishing Procedure for Docket Nos. 20200069-EJ or 20200092-EI.

8. Accounting and Cost Estimating Methodologies. The parties recognize that the accounting and cost estimating methodologies DEF has employed in the past related to their SHP and other Grid investments were appropriate for those purposes; DEF is currently engaged in

revisiting and updating these processes to meet reporting needs associated with Section 366.96, F.S., and Rules 25-6.030 and 25-6.031, F.A.C. DEF agrees to work to align its presentation of cost estimating and recognition of actuals with the goal of presenting a meaningful comparison to the Commission related to SPP Programs. DEF agrees to address steps taken in this regard in the 2021 SPPCRC proceedings.

9. The parties agree this Settlement Agreement assumes DEF's base rates are reset on or about January 1, 2022. In the event this does not occur, DEF will continue to account for certain SPP costs through base rates in 2022 and DEF will show that any costs included in its 2022 projection filing are not also being recovered through base rates.

Executed, via electronic signature, the 17th day of July, 2020.

/s Catherine Stempien
Duke Energy Florida, LLC
Catherine Stempien
State President

/s J.R. Kelly
Office of Public Counsel
J.R. Kelly
Public Counsel

/s James Brew
White Springs Agricultural Chemicals, Inc.
d/b/a PCS Phosphate
James W. Brew
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EXHIBIT A

DUKE ENERGY FLORIDA, LLC
Storm Protection Plan Cost Recovery Clause
Calculation of Projected Period Amount
January 2021 - December 2021

Exhibit A

FOR ILLUSTRATIVE/ DISCUSSION PURPOSES ONLY

Return on Capital Investments, Depreciation and Taxes
For Project: Structure Hardening - Wood to Non-Wood Pole Replacements -- Transmission
(in Dollars)

Line	Description	Beginning of Period Amount	Projected Jan-21	Projected Feb-21	Projected Mar-21	Projected Apr-21	Projected May-21	Projected Jun-21	Projected Jul-21	Projected Aug-21	Projected Sep-21	Projected Oct-21	Projected Nov-21	Projected Dec-21	End of Period Total
1	Investments														
a.	Expenditures/Additions	4 000 000	\$2,000,000	\$5,000,000	\$9,000,000	\$6,000,000	\$5,000,000	\$5,000,000	\$6,000,000	\$7,000,000	\$7,000,000	\$5,000,000	\$7,000,000	\$7,000,000	\$71,000,000
b.	Clearings to Plant	0	2 000 000	5 000 000	9 000 000	6 000 000	5 000 000	5 000 000	6 000 000	7 000 000	7 000 000	5 000 000	7 000 000	7 000 000	71 000 000
c.	Pole Replacement Activity currently recovered through 2021 Base Rates	(4 000 000)	(2,000,000)	(3,800,000)	(2,900,000)	(2,900,000)	(2,900,000)	(2,900,000)	(2,900,000)	(2,900,000)	(2,900,000)	(2,900,000)	(2,900,000)	(2,900,000)	(34,800,000)
d.	Other		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
2	SPPCRC Plant-in-Service/Depreciation Base	\$0	0	1 200 000	7 300 000	10 400 000	12 500 000	14 600 000	17 700 000	21 800 000	25 900 000	28 000 000	32 100 000	36 200 000	36,200,000
3	Less: Accumulated Depreciation	\$0	0	(3 300)	(23 375)	(51 975)	(86 350)	(126 500)	(175 175)	(235 125)	(306 350)	(383 350)	(471 625)	(571 175)	
4	CWIP - Non-Interest Bearing	\$0	0	0	0	0	0	0	0	0	0	0	0	0	0
5	Net Investment (Lines 2 3 4)	-	\$0	\$1 196 700	\$7 276 625	\$10 348 025	\$12 413 650	\$14 473 500	\$17 524 825	\$21 564 875	\$25 593 650	\$27 616 650	\$31 628 375	\$35 628 825	
6	Average Net Investment		\$0	\$598 350	\$4 236 663	\$8 812 325	\$11 380 838	\$13 443 575	\$15 999 163	\$19 544 850	\$23 579 263	\$26 605 150	\$29 622 513	\$33 628 600	
7	Return on Average Net Investment (1)	Jan-Dec													
a.	Debt Component	1.83%	\$0	\$912	\$6 461	\$13 439	\$17 356	\$20 501	\$24 399	\$29 806	\$35 958	\$40 573	\$45 174	\$51 284	285 863
b.	Equity Component Grossed Up For Taxes	6.16%	\$0	\$3 072	\$21 748	\$45 237	\$58 422	\$69 010	\$82 129	\$100 330	\$121 040	\$136 573	\$152 062	\$172 627	962 250
c.	Other		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	0
8	Investment Expenses														
a.	Depreciation	3.30%	\$0	\$3 300	\$20 075	\$28 600	\$34 375	\$40 150	\$48 675	\$59 950	\$71 225	\$77 000	\$88 275	\$99 550	571 175
b.	Amortization		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	0
c.	Dismantlement		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
d.	Property Taxes	0.007651	\$0	\$765	\$4 654	\$6 631	\$7 970	\$9 309	\$11 285	\$13 899	\$16 513	\$17 852	\$20 466	\$23 081	132 426
9	Total System Recoverable Expenses (Lines 7 8)		\$0	\$8,049	\$52,938	\$93,906	\$118,122	\$138,971	\$166,488	\$203,985	\$244,737	\$271,998	\$305,978	\$346,541	\$1,951,714
a.	Recoverable Costs Allocated to Energy		0	0	0	0	0	0	0	0	0	0	0	0	0
b.	Recoverable Costs Allocated to Demand		\$0	\$8 049	\$52 938	\$93 906	\$118 122	\$138 971	\$166 488	\$203 985	\$244 737	\$271 998	\$305 978	\$346 541	\$1 951 714
10	Energy Jurisdictional Factor		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
11	Demand Jurisdictional Factor - Distribution		0.70203	0.70203	0.70203	0.70203	0.70203	0.70203	0.70203	0.70203	0.70203	0.70203	0.70203	0.70203	0.70203
12	Retail Energy-Related Recoverable Costs		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
13	Retail Demand-Related Recoverable Costs		0	5 651	37 164	65 925	82 925	97 561	116 880	143 204	171 813	190 951	214 806	243 282	1 370 162
14	Total Jurisdictional Recoverable Costs (Lines 12 13)		\$0	\$5 651	\$37 164	\$65 925	\$82 925	\$97 561	\$116 880	\$143 204	\$171 813	\$190 951	\$214 806	\$243 282	\$1 370 162

Notes:
 Note 1: Assumed WACC will be updated as needed in SPPCRC filing to be consistent with Order PSC-2020-0165-PAE-EU in Docket No. 20200118-EU
 Note 2: Assumed spend by month is for illustrative purposes only. These numbers will be updated with SPPCRC filings.
 Note 3: Assumed beginning balance is for illustrative purposes only; beginning balance will be adjusted out as shown so no revenue requirements associated with it will be recovered through SPPCRC in 2021.
 Note 4: Annual spend excludes COR consistent with spend eligible for recovery through SPPCRC.

Monthly Adjustment Basis Calculation

Ann. Spend on Wood to Non-wood Trans Pole Replacement

	\$ millions
2017	40.5
2018	30.2
2019	33.6

Average **34.8** Spend excludes COR consistent with spend eligible for recovery through SPPCRC.

O&M Expenses	Projected Jan-21	Projected Feb-21	Projected Mar-21	Projected Apr-21	Projected May-21	Projected Jun-21	Projected Jul-21	Projected Aug-21	Projected Sep-21	Projected Oct-21	Projected Nov-21	Projected Dec-21	TOTAL 2021
TOTAL O&M	106 056	265 141	477 254	318 169	265 141	265 141	318 169	371 197	371 197	265 141	371 197	371 197	3 765 000
SPPCRC O&M	\$4,089	\$135,222	\$243,399	\$162,266	\$135,222	\$135,222	\$162,266	\$189,311	\$189,311	\$135,222	\$189,311	\$189,311	\$1,920,150
Base O&M	\$1 968	\$129 919	\$233 854	\$155 903	\$129 919	\$129 919	\$155 903	\$181 887	\$181 887	\$129 919	\$181 887	\$181 887	\$1 844 850

Note 5: Assumed O&M spend by month is for illustrative purposes only. These numbers will be updated with SPPCRC filings.

EXHIBIT B

Recov Mech: **Base** **CRC**

Capital (millions)			2021	2022	Notes:	Expected Impacted Accounts
Distribution	Feeder Hardening	Structure Strengthening, BIL, Conductor Upgrades, Relocating Difficult to Access Facilities, Replacing Oil-Filled Equipment	60.0	90.0	New program, no costs have been included in base rates. Planned inspection and pole replacement included in this line. Poles replaced due to an unplanned event, like a car hitting a pole, will continue to be recovered through base rates.	360, 364, 365, 368
Distribution	Feeder Hardening	Pole Inspection & Replacement	22.1	15.6		364, 365, 368
Distribution	Lateral Hardening	Lateral Undergrounding, OH Hardening, Structure Strengthening, Conductor Upgrades, Upgrade Open Wire Secondary, Fusing, Line Relocation, Hazard Tree	83.8	140.0	Contains elements of legacy TUG and Detriorated Conductor. Planned inspection and pole replacement included in this line. Poles replaced due to an unplanned event, like a car hitting a pole, will continue to be recovered through base rates.	360, 364, 365, 366, 367, 368
Distribution	Lateral Hardening	Pole Inspection & Replacement	Part of \$22M shown above	40.0		364, 365, 367, 368
Distribution	SOG	Capacity, Connectivity, Automation	79.7	75.0	This is a new program, no costs have been included in base rates.	362, 364, 365, 366, 367, 368, 369
Distribution	UG Flood Mitigation	Raise pad mount xfmr, waterproof connections, submersible switchgear	N/A	0.5		366, 367, 368
Distribution	VM		1.9	1.9		364, 365, 368
Transmission	Structure Hardening	Wood to non-wood upgrade	34.8		2021 base amount is the 2017-2019 average.	355, 356
Transmission	Structure Hardening	Wood to non-wood upgrade	36.2	119.8		355, 356
Transmission	Structure Hardening	Tower Upgrade	2.0	4.0	New activitiy, no costs have been included in base rates.	354, 356
Transmission	Structure Hardening	Cathodic Protection	1.0	1.5	New activitiy, no costs have been included in base rates.	354, 356
Transmission	Structure Hardening	Gang Operated Air Break, OH Ground Wire	-	7.0	New activitiy, no costs have been included in base rates.	354, 355, 356
Transmission	Substation Flood Mitigation		-	-	New program, no costs have been included in base rates.	352, 353
Transmission	Loop Radially-Fed Substations		-	-	New program, no costs have been included in base rates.	350, 352, 353, 355, 356
Transmission	Substation Hardening	Breaker upgrades, electronic relays	5.5	7.5		352, 353
Transmission	VM		9.0	10.9		356

Note 1: Dollars shown above are consistent with DEF's Storm Protection Plan filed April 10, 2020. These values will change as Programs are engineered and implemented.

Note 2: Accounts shown are DEF's expectation of accounts impacted by the Plan today. Other accounts could be impacted as actual costs are incurred.

		Recov Mech	Base	CRC		
O&M (millions)	Program	Activity	2021	2022	Notes:	Expected Impacted Accounts
Distribution	Feeder Hardening	Structure Strengthening, BIL, Conductor Upgrades, Relocating Difficult to Access Facilities, Replacing Oil-Filled Equipment	2.4	3.6	New program, has not been a program to proactively harden feeders.	408, 593, 594, 926
Distribution	Feeder Hardening	Pole Inspection & Replacement	5.5	2.1	Planned inspection and pole replacement included in this line. Poles replaced due to an unplanned event, like a car hitting a pole, will continue to be recovered through base rates.	408, 583, 593, 926
Distribution	Lateral Hardening	Lateral Undergrounding, OH Hardening, Structure Strengthening, Conductor Upgrades, Upgrade Open Wire Secondary, Fusing, Line Relocation, Hazard Tree	1.0	1.6	Contains elements of legacy TUG and Detriorated Conductor.	408, 593, 594, 926
Distribution	Lateral Hardening	Pole Inspection & Replacement	Part of \$5.5M shown above	5.5	Planned inspection and pole replacement included in this line. Poles replaced due to an unplanned event, like a car hitting a pole, will continue to be recovered through base rates.	408, 583, 593, 926
Distribution	SOG	Capacity, Connectivity, Automation	1.6	1.5		408, 593, 926
Distribution	UG Flood Mitigation	Raise pad mount xfmr, waterproof connections, submersible switchgear	-	-	This is a new program, no spend has been included in base rates previously.	408, 593, 926
Distribution	VM		42.6	43.9		408, 593, 926
Transmission	Structure Hardening	Wood to non-wood upgrade	0.8			408, 571, 926
Transmission	Structure Hardening	Wood to non-wood upgrade	1.0	3.0		408, 571, 926
Transmission	Structure Hardening	Structure Inspections	0.4	0.4		408, 563, 926
Transmission	Structure Hardening	Drone Inspections	0.1	0.1		408, 563, 926
Transmission	Structure Hardening	Tower Upgrade	0.017	0.033		408, 571, 926
Transmission	Structure Hardening	Cathodic Protection	0.4	0.4		408, 571, 926
Transmission	Structure Hardening	Gang Operated Air Break, OH Ground Wire	-	0.013		408, 571, 926
Transmission	Substation Flood Mitigation		-	-	New program, no costs have been included in base rates.	
Transmission	Loop Radially-Fed Substations		-	-	New program, no costs have been included in base rates.	
Transmission	Substation Hardening	Breaker upgrades, electronic relays	-	-		
Transmission	VM		8.2	8.5		408, 571, 926

Note 1: Dollars shown above are consistent with DEF's Storm Protection Plan filed April 10, 2020. These values will change as Programs are engineered and implemented.

Note 2: Accounts shown are DEF's expectation of accounts impacted by the Plan today. Other accounts could be impacted as actual costs are incurred.

Note 3: In addition to the amounts shown above, DEF may include an estimate of incremental costs more administrative in nature. Examples could include: external legal costs associated with FPSC activities, travel for participation in FPSC proceedings associated with the Plan, potential FTE needed for tracking and reporting.

Capital

Account	Description	Area
362	Station Equipment	Distribution
364	Poles, towers and fixtures	Distribution
365	OH conductors and devices	Distribution
366	UG conduits	Distribution
367	UG conductors and devices	Distribution
368	Line transformers	Distribution
369	Services	Distribution
354	Towers and fixtures	Transmission
355	Poles and fixtures	Transmission
356	OH conductors and devices	Transmission
352	Structures and improvements	Transmission
353	Station Equipment	Transmission
361	Structures and improvements	Distribution
360	Land and land rights	Distribution
350	Land and land rights	Transmission
359	Roads and trails	Transmission

O&M

Account	Description	Area
408	Taxes other than income taxes, utility operating income.	Taxes
583	Overhead line expenses	Distribution
593	Maintenance of overhead lines	Distribution
594	Maintenance of underground lines	Distribution
563	Overhead line expenses	Transmission
571	Maintenance of OH Lines	Transmission
926	Employee pensions and benefits	Operation



Matthew R. Bernier
ASSOCIATE GENERAL COUNSEL

July 20, 2020

VIA ELECTRONIC FILING

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

Re: *Review of 2020-2029 Storm Protection Plan Pursuant to Rule 25-6.030, F.A.C.,*
Docket No. 20200069-EI
Storm Protection Plan Cost Recovery Clause;
Docket No. 20200092-EI

Dear Mr. Teitzman:

Please find attached for filing updated Exhibits A and B to Attachment 1 of Duke Energy Florida, LLC's (DEF) Motion to Approve 2020 SPP/SPPCRC Agreement which was electronically filed on July 17, 2020, in the above-referenced Dockets (Document No. 03874-2020). Please note there are no substantive changes; DEF is removing the header information that should have been removed prior to filing the Agreement.

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.

Sincerely,

/s/ Matthew R. Bernier

MRB/cmkn
Enclosures

Matthew R. Bernier

cc: Parties of Record

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic mail to the following this 20th day of July, 2020.

/s/ Matthew R. Bernier

Attorney

<p>J. Crawford / C. Murphy / R. Dziechciarz Office of General Counsel FL Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 jcrawfor@psc.state.fl.us cmurphy@psc.state.fl.us rdziehc@psc.state.fl.us</p> <p>Ken Hoffman / Mark Bubriski 134 West Jefferson St. Tallahassee, FL 32301-1713 ken.hoffman@fpl.com mark.bubriski@nexteraenergy.com</p> <p>John T. Burnett / Christopher T. Wright / Jason A. Higginbotham Florida Power & Light Company 700 Universe Blvd. Juno Beach, FL 33408-0420 john.t.burnett@fpl.com christopher.wright@fpl.com jason.higginbotham@fpl.com</p> <p>Stephanie Eaton 110 Oakwood Dr., Ste. 500 Winston-Salem, NC 27013 seaton@spilmanlaw.com</p> <p>Derrick Price Williamson / Barry Naum 1100 Bent Creek Blvd., Ste. 101 Mechanicsburg, PA 17050 dwilliamson@spilmanlaw.com bnaum@spilmanlaw.com</p>	<p>J.R. Kelly / Charles Rehwinkel Office of Public Counsel c/o The Florida Legislature 111 W. Madison St., Room 812 Tallahassee, FL 32399-1400 kelly.jr@leg.state.fl.us rehwinkel.charles@leg.state.fl.us</p> <p>Russell A. Badders Gulf Power Company One Energy Place Pensacola, FL 32520 russell.badders@nexteraenergy.com</p> <p>Mike Cassel 208 Wildlight Ave. Yulee, FL 32097 mcassel@fpuc.com</p> <p>Paula K. Brown Regulatory Affairs P.O. Box 11 Tampa, FL 33601-0111 regdept@tecoenergy.com</p> <p>James A. Brew / Laura Wynn Baker 1025 Thomas Jefferson St., N.W., Ste. 800W Washington, DC 20007 jbrew@smxblaw.com lwb@smxblaw.com</p> <p>Jon C. Moyle, Jr. / Karen A. Putnal 118 North Gadsden Street Tallahassee, FL 32301 jmoyle@moylelaw.com kputnal@moylelaw.com mqualls@moylelaw.com</p>
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EXHIBIT A

DUKE ENERGY FLORIDA, LLC
Storm Protection Plan Cost Recovery Clause
Calculation of Projected Period Amount
January 2021 - December 2021

Exhibit A

ILLUSTRATIVE EXAMPLE

Return on Capital Investments, Depreciation and Taxes
For Project: Structure Hardening - Wood to Non-Wood Pole Replacements -- Transmission
(in Dollars)

Line	Description	Beginning of Period Amount	Projected Jan-21	Projected Feb-21	Projected Mar-21	Projected Apr-21	Projected May-21	Projected Jun-21	Projected Jul-21	Projected Aug-21	Projected Sep-21	Projected Oct-21	Projected Nov-21	Projected Dec-21	End of Period Total
1	Investments														
a.	Expenditures/Additions	4 000 000	\$2,000,000	\$5,000,000	\$9,000,000	\$6,000,000	\$5,000,000	\$5,000,000	\$6,000,000	\$7,000,000	\$7,000,000	\$5,000,000	\$7,000,000	\$7,000,000	\$71,000,000
b.	Clearings to Plant	0	2 000 000	5 000 000	9 000 000	6 000 000	5 000 000	5 000 000	6 000 000	7 000 000	7 000 000	5 000 000	7 000 000	7 000 000	71 000 000
c.	Pole Replacement Activity currently recovered through 2021 Base Rates	(4 000 000)	(2,000,000)	(3,800,000)	(2,900,000)	(2,900,000)	(2,900,000)	(2,900,000)	(2,900,000)	(2,900,000)	(2,900,000)	(2,900,000)	(2,900,000)	(2,900,000)	(34,800,000)
d.	Other		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
2	SPPCRC Plant-in-Service/Depreciation Base	\$0	0	1 200 000	7 300 000	10 400 000	12 500 000	14 600 000	17 700 000	21 800 000	25 900 000	28 000 000	32 100 000	36 200 000	362,000,000
3	Less: Accumulated Depreciation	\$0	0	(3 300)	(23 375)	(51 975)	(86 350)	(126 500)	(175 175)	(235 125)	(306 350)	(383 350)	(471 625)	(571 175)	
4	CWIP - Non-Interest Bearing	\$0	0	0	0	0	0	0	0	0	0	0	0	0	
5	Net Investment (Lines 2 3 4)	-	\$0	\$1 196 700	\$7 276 625	\$10 348 025	\$12 413 650	\$14 473 500	\$17 524 825	\$21 564 875	\$25 593 650	\$27 616 650	\$31 628 375	\$35 628 825	
6	Average Net Investment		\$0	\$598 350	\$4 236 663	\$8 812 325	\$11 380 838	\$13 443 575	\$15 999 163	\$19 544 850	\$23 579 263	\$26 605 150	\$29 622 513	\$33 628 600	
7	Return on Average Net Investment (1)	Jan-Dec													
a.	Debt Component	1.83%	\$0	\$912	\$6 461	\$13 439	\$17 356	\$20 501	\$24 399	\$29 806	\$35 958	\$40 573	\$45 174	\$51 284	285 863
b.	Equity Component Grossed Up For Taxes	6.16%	\$0	\$3 072	\$21 748	\$45 237	\$58 422	\$69 010	\$82 129	\$100 330	\$121 040	\$136 573	\$152 062	\$172 627	962 250
c.	Other		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	0
8	Investment Expenses														
a.	Depreciation	3.30%	\$0	\$3 300	\$20 075	\$28 600	\$34 375	\$40 150	\$48 675	\$59 950	\$71 225	\$77 000	\$88 275	\$99 550	571 175
b.	Amortization		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	0
c.	Dismantlement		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
d.	Property Taxes	0.007651	\$0	\$765	\$4 654	\$6 631	\$7 970	\$9 309	\$11 285	\$13 899	\$16 513	\$17 852	\$20 466	\$23 081	132 426
9	Total System Recoverable Expenses (Lines 7 8)		\$0	\$8,049	\$52,938	\$93,906	\$118,122	\$138,971	\$166,488	\$203,985	\$244,737	\$271,998	\$305,978	\$346,541	\$1,951,714
a.	Recoverable Costs Allocated to Energy		0	0	0	0	0	0	0	0	0	0	0	0	0
b.	Recoverable Costs Allocated to Demand		\$0	\$8 049	\$52 938	\$93 906	\$118 122	\$138 971	\$166 488	\$203 985	\$244 737	\$271 998	\$305 978	\$346 541	\$1 951 714
10	Energy Jurisdictional Factor		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
11	Demand Jurisdictional Factor - Distribution		0.70203	0.70203	0.70203	0.70203	0.70203	0.70203	0.70203	0.70203	0.70203	0.70203	0.70203	0.70203	0.70203
12	Retail Energy-Related Recoverable Costs		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
13	Retail Demand-Related Recoverable Costs		0	5 651	37 164	65 925	82 925	97 561	116 880	143 204	171 813	190 951	214 806	243 282	1 370 162
14	Total Jurisdictional Recoverable Costs (Lines 12 13)		\$0	\$5 651	\$37 164	\$65 925	\$82 925	\$97 561	\$116 880	\$143 204	\$171 813	\$190 951	\$214 806	\$243 282	\$1 370 162

Notes:
 Note 1: Assumed WACC will be updated as needed in SPPCRC filing to be consistent with Order PSC-2020-0165-PAE-EU in Docket No. 20200118-EU
 Note 2: Assumed spend by month is for illustrative purposes only. These numbers will be updated with SPPCRC filings.
 Note 3: Assumed beginning balance is for illustrative purposes only; beginning balance will be adjusted out as shown so no revenue requirements associated with it will be recovered through SPPCRC in 2021.
 Note 4: Annual spend excludes COR consistent with spend eligible for recovery through SPPCRC.

Monthly Adjustment Basis Calculation

Ann. Spend on Wood to Non-wood Trans Pole Replacement

	\$ millions
2017	40.5
2018	30.2
2019	33.6
Average	34.8

Spend excludes COR consistent with spend eligible for recovery through SPPCRC.

O&M Expenses	Projected Jan-21	Projected Feb-21	Projected Mar-21	Projected Apr-21	Projected May-21	Projected Jun-21	Projected Jul-21	Projected Aug-21	Projected Sep-21	Projected Oct-21	Projected Nov-21	Projected Dec-21	TOTAL 2021
TOTAL O&M	106 056	265 141	477 254	318 169	265 141	265 141	318 169	371 197	371 197	265 141	371 197	371 197	3 765 000
SPPCRC O&M	54,089	135,222	243,399	162,266	135,222	135,222	162,266	189,311	189,311	135,222	189,311	189,311	1,920,150
Base O&M	51 968	129 919	233 854	155 903	129 919	129 919	155 903	181 887	181 887	129 919	181 887	181 887	1 844 850

Note 5: Assumed O&M spend by month is for illustrative purposes only. These numbers will be updated with SPPCRC filings.

EXHIBIT B

Recov Mech: **Base** **CRC**

Capital (millions)			2021	2022	Notes:	Expected Impacted Accounts
Distribution	Feeder Hardening	Structure Strengthening, BIL, Conductor Upgrades, Relocating Difficult to Access Facilities, Replacing Oil-Filled Equipment	60.0	90.0	New program, no costs have been included in base rates. Planned inspection and pole replacement included in this line. Poles replaced due to an unplanned event, like a car hitting a pole, will continue to be recovered through base rates.	360, 364, 365, 368
Distribution	Feeder Hardening	Pole Inspection & Replacement	22.1	15.6		364, 365, 368
Distribution	Lateral Hardening	Lateral Undergrounding, OH Hardening, Structure Strengthening, Conductor Upgrades, Upgrade Open Wire Secondary, Fusing, Line Relocation, Hazard Tree	83.8 Part of \$22M shown above	140.0	Contains elements of legacy TUG and Detriorated Conductor. Planned inspection and pole replacement included in this line. Poles replaced due to an unplanned event, like a car hitting a pole, will continue to be recovered through base rates.	360, 364, 365, 366, 367, 368
Distribution	Lateral Hardening	Pole Inspection & Replacement	79.7	40.0		364, 365, 367, 368
Distribution	SOG	Capacity, Connectivity, Automation		75.0	This is a new program, no costs have been included in base rates.	362, 364, 365, 366, 367, 368, 369
Distribution	UG Flood Mitigation	Raise pad mount xfmr, waterproof connections, submersible switchgear	N/A	0.5		366, 367, 368
Distribution	VM		1.9	1.9		364, 365, 368
Transmission	Structure Hardening	Wood to non-wood upgrade	34.8		2021 base amount is the 2017-2019 average.	355, 356
Transmission	Structure Hardening	Wood to non-wood upgrade	36.2	119.8		355, 356
Transmission	Structure Hardening	Tower Upgrade	2.0	4.0	New activitiy, no costs have been included in base rates.	354, 356
Transmission	Structure Hardening	Cathodic Protection	1.0	1.5	New activitiy, no costs have been included in base rates.	354, 356
Transmission	Structure Hardening	Gang Operated Air Break, OH Ground Wire	-	7.0	New activitiy, no costs have been included in base rates.	354, 355, 356
Transmission	Substation Flood Mitigation		-	-	New program, no costs have been included in base rates.	352, 353
Transmission	Loop Radially-Fed Substations		-	-	New program, no costs have been included in base rates.	350, 352, 353, 355, 356
Transmission	Substation Hardening	Breaker upgrades, electronic relays	5.5	7.5		352, 353
Transmission	VM		9.0	10.9		356

Note 1: Dollars shown above are consistent with DEF's Storm Protection Plan filed April 10, 2020. These values will change as Programs are engineered and implemented.

Note 2: Accounts shown are DEF's expectation of accounts impacted by the Plan today. Other accounts could be impacted as actual costs are incurred.

		Recov Mech	Base	CRC		
O&M (millions)	Program	Activity	2021	2022	Notes:	Expected Impacted Accounts
Distribution	Feeder Hardening	Structure Strengthening, BIL, Conductor Upgrades, Relocating Difficult to Access Facilities, Replacing Oil-Filled Equipment	2.4	3.6	New program, has not been a program to proactively harden feeders.	408, 593, 594, 926
Distribution	Feeder Hardening	Pole Inspection & Replacement	5.5	2.1	Planned inspection and pole replacement included in this line. Poles replaced due to an unplanned event, like a car hitting a pole, will continue to be recovered through base rates.	408, 583, 593, 926
Distribution	Lateral Hardening	Lateral Undergrounding, OH Hardening, Structure Strengthening, Conductor Upgrades, Upgrade Open Wire Secondary, Fusing, Line Relocation, Hazard Tree	1.0	1.6	Contains elements of legacy TUG and Detriorated Conductor.	408, 593, 594, 926
Distribution	Lateral Hardening	Pole Inspection & Replacement	Part of \$5.5M shown above	5.5	Planned inspection and pole replacement included in this line. Poles replaced due to an unplanned event, like a car hitting a pole, will continue to be recovered through base rates.	408, 583, 593, 926
Distribution	SOG	Capacity, Connectivity, Automation	1.6	1.5		408, 593, 926
Distribution	UG Flood Mitigation	Raise pad mount xfmr, waterproof connections, submersible switchgear	-	-	This is a new program, no spend has been included in base rates previously.	408, 593, 926
Distribution	VM		42.6	43.9		408, 593, 926
Transmission	Structure Hardening	Wood to non-wood upgrade	0.8			408, 571, 926
Transmission	Structure Hardening	Wood to non-wood upgrade	1.0	3.0		408, 571, 926
Transmission	Structure Hardening	Structure Inspections	0.4	0.4		408, 563, 926
Transmission	Structure Hardening	Drone Inspections	0.1	0.1		408, 563, 926
Transmission	Structure Hardening	Tower Upgrade	0.017	0.033		408, 571, 926
Transmission	Structure Hardening	Cathodic Protection	0.4	0.4		408, 571, 926
Transmission	Structure Hardening	Gang Operated Air Break, OH Ground Wire	-	0.013		408, 571, 926
Transmission	Substation Flood Mitigation		-	-	New program, no costs have been included in base rates.	
Transmission	Loop Radially-Fed Substations		-	-	New program, no costs have been included in base rates.	
Transmission	Substation Hardening	Breaker upgrades, electronic relays	-	-		
Transmission	VM		8.2	8.5		408, 571, 926

Note 1: Dollars shown above are consistent with DEF's Storm Protection Plan filed April 10, 2020. These values will change as Programs are engineered and implemented.

Note 2: Accounts shown are DEF's expectation of accounts impacted by the Plan today. Other accounts could be impacted as actual costs are incurred.

Note 3: In addition to the amounts shown above, DEF may include an estimate of incremental costs more administrative in nature. Examples could include: external legal costs associated with FPSC activities, travel for participation in FPSC proceedings associated with the Plan, potential FTE needed for tracking and reporting.

Capital

Account	Description	Area
362	Station Equipment	Distribution
364	Poles, towers and fixtures	Distribution
365	OH conductors and devices	Distribution
366	UG conduits	Distribution
367	UG conductors and devices	Distribution
368	Line transformers	Distribution
369	Services	Distribution
354	Towers and fixtures	Transmission
355	Poles and fixtures	Transmission
356	OH conductors and devices	Transmission
352	Structures and improvements	Transmission
353	Station Equipment	Transmission
361	Structures and improvements	Distribution
360	Land and land rights	Distribution
350	Land and land rights	Transmission
359	Roads and trails	Transmission

O&M

Account	Description	Area
408	Taxes other than income taxes, utility operating income.	Taxes
583	Overhead line expenses	Distribution
593	Maintenance of overhead lines	Distribution
594	Maintenance of underground lines	Distribution
563	Overhead line expenses	Transmission
571	Maintenance of OH Lines	Transmission
926	Employee pensions and benefits	Operation

DEF's Response to Staff's First Set of Interrogatories Nos.
1-6.

Filed August 19, 2020

Docket No. 20200092-EI

FLORIDA PUBLIC SERVICE COMMISSION
DOCKET: 20200069-EI EXHIBIT: 3
PARTY: STAFF HEARING EXHIBITS
DESCRIPTION: Foster (1, 3a, 3b, 3c, 3e, 3f,
3g, 4, 6) Oliver (2, 3d, 5, 6)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of 2020-2029 Storm Protection Plan
pursuant to Rule 25-6.030, F.A.C.,
Duke Energy Florida, LLC.

Docket No. 20200069-EI

In re: Storm Protection Plan Cost Recovery Clause

Docket No. 20200092-EI

Dated: August 19, 2020

**DUKE ENERGY FLORIDA, LLC'S RESPONSE TO
STAFF'S FIRST SET OF INTERROGATORIES (NOS. 1-6)**

Duke Energy Florida, LLC ("DEF") responds to the Staff of the Florida Public Service Commission's ("Staff") First Set of Interrogatories to DEF (Nos. 1-6) as follows:

INTERROGATORIES

1. Paragraph 3 of the Petition states in part "the signatories have established the reasonable costs DEF should be permitted to recover through the SPPCRC in 2021." In Exhibit B to the Agreement, blue colored dollar amounts are categorized as "Base" and green colored dollar amounts as "CRC."
 - a. Are the "Base" and "CRC" amounts in Exhibit B system million-dollar amounts? If not please clarify.
 - b. Are the "Base" amounts in Exhibit B the average of annual system expenditures for the 2017-2019 period? If not, how were each of the "Base" amounts derived?
 - c. Please provide the "Base" amount associated with the very first activity shown. The activity has a \$60 amount as the 2021 CRC amount on page 1 of 3 of Exhibit B.
 - d. Please provide the "Base" amount associated with very first activity shown. The activity has a \$2.4 amount as the 2021 CRC amount on page 2 of 3 of Exhibit B.
 - e. For purposes of the SPPCRC, is it the signatories' intent to allow DEF to recover both direct and indirect charges for DEF employees without making an adjustment for costs that may already be included in base rates for its employees? If so, please explain.

Response:

- a. Yes, the dollars are in millions.
- b. The purpose of Exhibit B was to provide a view of where DEF expects to recover dollars in 2021 and 2022 and what accounts the underlying Programs are expected to impact. The Exhibit shows all Programs with estimated spend for 2021 and 2022. For all "Base" capital amounts, except for the Wood to non-wood upgrade, DEF is not seeking any incremental recovery in 2021 and therefore the dollars shown are the total expected spend on those activities for the year. For the Wood to non-wood upgrade, the base

amount shown is the average of the 2017 – 2019 annual spend. For the “Base” O&M amounts shown on page 2 of 3 of the Exhibit, with the exception of the Wood to non-wood upgrade activity, DEF is also not seeking any incremental recovery in 2021 and the dollars shown are the total expected spend on those activities for the year. Paragraph F.4(d) of the Agreement addresses how the base amount will be determined for the Wood to non-wood upgrade activity in 2021.

- c. This is a new activity and there has not been “Base” spend on it historically. This is addressed in paragraph F.3(d) of the Agreement.
 - d. This is a new activity and there has not been “Base” spend on it historically. This is addressed in paragraph F.4(e) of the Agreement.
 - e. There is no adjustment beyond what the Agreement identifies needed. The Agreement identifies what activities are net new and have not had amounts included in base rates for them before. Absent these new activities the identified costs both direct and indirect would not be incurred. For the Wood to non-wood upgrade, the Agreement identifies how the adjustment for amounts previously included in base rates will be calculated.
2. Please refer to Section F.3(a) of the Agreement addressing accrual of certain 2020 capital expenses to a Construction Work In Progress (CWIP) balance. On what day did the first 2020 capital expense accrue to a non-interest bearing CWIP balance for each program with a 2020 CWIP year-ending balance for SPPCRC purposes?

Response:

\$0 have been spent through July 2020.

3. Please refer to Sections F.3(e) and F.5 of the Agreement. These sections identify an on-going Distribution Pole Replacement and Inspection Activity and a Feeder Hardening Program, and a Feeder and Lateral Hardening Program.
- a. Section F.3(e) states that DEF “will also not seek recovery of the Operations and Maintenance (“O&M”) expenses from asset transfers related to the on-going . . . activities through the SPPCRC.” Section F.5 states that DEF “will not seek recovery of the existing Distribution Pole Replacement and Inspection Activity costs through the SPPCRC prior to the 2021 SPPCRC filings for rates effective with the first billing cycle of 2022.” Is the intent of the signatories to allow DEF to defer cost recovery of O&M expense incurred during 2021 for the on-going Distribution Pole Replacement and Inspection Activity? If so, what interest rate, if any, will be applied to the deferred monthly balance?
 - b. Does the existing Distribution Pole Replacement and Inspection Activity include activities involving poles on feeder circuits as well as poles on lateral circuits or is it limited to just activities involving poles on feeder circuits?

- c. Does Section F.3(e) allow DEF to recover through the SPPCRC all prudently incurred 2021 pole replacement cost beginning in 2021? If not, please explain how DEF will distinguish between O&M pole replace costs due to each of the programs and activities that give rise to O&M pole replace costs regardless of whether such activities are included in the approved SPP.
- d. Is the Feeder Hardening Program identified in Section F.3(e) the same program as the Feeder and Lateral Hardening Program identified in Section F.5 that will subsume the existing Distribution Pole Replacement and Inspection Activity beginning in 2022?
- e. Staff is unable to identify a Feeder and Lateral Hardening Program in Exhibit B. However, a Feeder Hardening Program and a Lateral Hardening Program are individually listed in Exhibit B. Is it correct that the language in Section F.5 refers to both the Feeder Hardening Program and the Lateral Hardening Program? If not please explain.
- f. Please explain how Section F.5 would be implemented in the SPPCRC, if at all, assuming the Commission approves either the Feeder Hardening Program or the Lateral Hardening Program but not the other.
- g. Please explain how Section F.3(e) would be implemented in the SPPCRC, if at all, assuming the Commission approves the Lateral Hardening Program but not the Feeder Hardening Program.

Response:

- a. No. Costs associated with the on-going Distribution Pole Replacement and Inspection Activity as addressed in F.3(e) incurred in 2021 will be recovered through base rates and not included in the SPPCRC.
- b. It includes both poles on feeder and lateral circuits.
- c. No. DEF is allowed recovery of all pole replacement costs but some will continue through base rates as described in the agreement. The only distribution pole replacement costs DEF will recover through the SPPCRC in 2021 are related to the new Feeder Hardening program. As part of planning, pole replacement activities are planned and budgeted based on specific programs with specific Capital and O&M accounting related to that program. The accounting is then applied to each individual activity ensuring O&M costs are appropriately categorized.
- d. The Feeder Hardening Program and Lateral Hardening Program are two separate Programs that are referred to together in Section F.5. The reference in F.5 is addressing the Feeder Hardening Program as well as the Lateral Hardening Program.
- e. Yes. Please also see also explanation in response to 3.d.
- f. On August 10, the Commission voted to approve DEF's Stipulation and Settlement Agreement Regarding the Storm Protection Plan. Both Programs were approved.
- g. On August 10, the Commission voted to approve DEF's Stipulation and Settlement Agreement Regarding the Storm Protection Plan. Both Programs were approved.

4. Please refer to Section F.4.(c) of the Agreement addressing costs for activities such as legal, regulatory, travel, and accounting.
 - a. Does the Agreement contemplate an interest rate be applied to DEF's 2020 O&M actual/estimated recovery variance in the event that DEP seeks recovery of 2021 O&M expenses it did not include in its SPPCRC projection filing of 2021 O&M expenses? If so, what is that rate.
 - b. Please clarify the intent of the signatories with respect to DEF's future SPPCRC filing in 2021 for recovery of actual and estimated costs associated with these types of activities.
 - c. Do the signatories believe that Commission approval of the Agreement entitles DEF to recovery of its SPPCRC legal, regulatory, travel, and accounting expenses through the SPPCRC?
 - d. Do the signatories believe that Commission approval of the Agreement entitles DEF to recovery of its SPP legal, regulatory, travel, and accounting expenses through the SPPCRC?

Response:

- a. This was not specifically addressed in the Agreement. DEF will account for any over or under recovery consistent with traditional clause cost recovery and accrue the commercial paper rate on any over or under recoveries.
 - b. To the extent incurred, DEF will include them in the actual and estimated costs when filed in 2021 and they will be treated like any other cost in a cost recovery clause. As specified in the Agreement, this will not preclude any of the parties from challenging the prudence of these costs at that time. To the extent they are found to be prudently incurred, DEF will be allowed recovery of these costs.
 - c. Please see DEF's response to 4.b above. While these costs are not specifically identified in the Agreement for recovery, there is nothing in the Agreement that prohibits DEF from requesting recovery through the SPPCRC. The signatories contemplated that DEF would seek recovery of this type of cost.
 - d. Please see DEF's response to 4.b above. While these costs are not specifically identified in the Agreement for recovery, there is nothing in the Agreement that prohibits DEF from requesting recovery through the SPPCRC. The signatories contemplated that DEF would seek recovery of this type of cost.
5. Please refer to Section F.8 of the Agreement. Please provide a preliminary listing that identifies each of the processes that DEF has agreed to revisit for purposes of implementing the requirements of Section 366.96, Florida Statutes, and Rule 25-6.031, Florida Administrative Code.

Response:

DEF has not agreed to any itemized list of processes to revisit. DEF has agreed to look at how costs to be incurred and recovered through the SPPCRC are accounted for primarily with an eye towards making future reconciliations more meaningful. For instance, in accordance with the Duke Energy Regulated Electric and Gas Capitalization Guidelines, Duke uses two types of projects – “specials” and “blankets” – to capture costs for capital expenditures. Blankets are typically used when the capital expenditures per work order are less than \$50,000 and there is no cost separation required. While work orders for the Storm Protection Plan may meet the criteria for being less than \$50,000, in order to provide a more meaningful comparison of estimated versus actual costs, DEF currently intends to use “special” projects for new work orders for all SPP programs with the exception of Pole Replacement.

6. Identify all persons who participated in preparing responses to the foregoing interrogatories and, for each person, identify the interrogatories and sub-parts to which they provided responses or information used to prepare the responses.

Response:

Jay W. Oliver and Thomas G. Foster, as identified in the attached affidavits.

AFFIDAVIT

STATE OF FLORIDA

COUNTY OF PINELLAS

I hereby certify that on this _____ day of _____, 2020, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared Thomas G. Foster, who is personally known to me, and he acknowledged before me that he provided the answers to interrogatory numbers 1, 3a, 3b, 3c, 3e, 3f, 3g, and 4, from STAFF'S FIRST SET OF INTERROGATORIES TO DUKE ENERGY FLORIDA, LLC (Nos. 1-6) in Docket No(s). 20200069-EI, 20200092-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 _____, 2020.

Thomas G. Foster

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 _____, 2020, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared Jay W. Oliver, who is personally known to me, and he acknowledged before me that he provided the answers to interrogatory numbers 2, 3d, and 5, from STAFF'S FIRST SET OF INTERROGATORIES TO DUKE ENERGY FLORIDA, LLC (Nos. 1-6) in Docket No(s). 20200069-EI, 20200092-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 _____, 2020.

Jay W. Oliver

Notary Public
State of North Carolina

My Commission Expires:

4

Stipulation (by Walmart, TECO, Duke, FPL, and Gulf).

Filed July 20, 2020

Docket No. 20200069-EI

DN. 03918-2020

FLORIDA PUBLIC SERVICE COMMISSION
DOCKET: 20200069-EI EXHIBIT: 4
PARTY: STAFF HEARING EXHIBITS
DESCRIPTION: Stipulation (by Walmart,
TECO, Duke, FPL, and Gulf). Filed July 20,
2020 Docket No. 20200069-EI DN. 039...

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Review of 2020-2029 Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Tampa Electric Company. : DOCKET NO. 20200067-EI
:
:
In re: Review of 2020-2029 Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Duke Energy Florida, LLC. : DOCKET NO. 20200069-EI
:
:
In re: Review of 2020-2029 Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Gulf Power Company. : DOCKET NO. 20200070-EI
:
:
In re: Review of 2020-2029 Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Florida Power & Light Company. : DOCKET NO. 20200071-EI
:
Filed: July 20, 2020

STIPULATION

WHEREAS, Walmart Inc. ("Walmart"), Tampa Electric Company ("TECO"), Duke Energy Florida, LLC ("DEF"), Gulf Power Company ("Gulf"), and Florida Power & Light Company ("FPL") (collectively, "Companies") have signed this Stipulation;

WHEREAS, on April 29, 2020, Walmart submitted Petitions to Intervene in the four Storm Protection Plan ("SPP") Dockets: 20200067-EI (TECO); 20200069-EI (DEF); 20200070 (Gulf); and 20200071 (FPL) (collectively, "SPP Dockets");

WHEREAS, on July 13 2020, Walmart submitted its proposed Issues to the parties for inclusion in Staff's Issues list for the Hearing, which Issues were supported by Walmart's pre-filed Direct Testimony of its witnesses Steve W. Chriss and Lisa V. Perry, filed May 26, 2020;

WHEREAS, one of the proposed Issues that Walmart submitted was as follows:

Issue No. 1 Should the Commission reject the proposed illustrative SPP rate designs of DEF and Gulf, which recover SPP costs from demand-metered customers through a \$/kWh energy charge or defer that issue to the SPP Clause Docket, 20200092-EI?;

WHEREAS, on July 16, 2020, the parties participated in an Informal Conference during which the Companies and Staff opined that Walmart's proposed Issue No. 1 was an issue for the SPP Clause Docket, 20200092-EI;

WHEREAS, following the Informal Conference, Walmart contacted all interested parties regarding their position on its proposed Stipulation. The Office of Public Counsel and Florida Industrial Power Users Group indicated that they do not take a position. White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate – White Springs has not responded as of the time of this filing; and

WHEREAS, based upon the Companies' agreement to defer the Issue, Walmart agrees to defer proposed Issue No. 1 to the SPP Clause Docket, 20200092-EI, upon entry of a Stipulation to that effect.

THEREFORE, Walmart hereby stipulates that its Issue No. 1 may be withdrawn from the SPP Dockets and deferred for the Commission's consideration in the SPP Clause Docket, 20200092-EI, and agrees that the parties may offer revisions to the phrasing of the issue in that Docket in accordance with the standard issue identification process.

July 20, 2020

By /s/Stephanie U. Eaton
Stephanie U. Eaton (FL State Bar No. 165610)
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Counsel to Walmart Inc.

By /s/Malcolm N. Means _____

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Counsel to Florida Power & Light Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail to the following parties this 20th day of July, 2020.

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Certificate of Service

Docket Nos. 20200067-EI, 20200069-EI, 20200070-EI, and 20200071-EI

Page 2

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/s/ Stephanie U. Eaton
Stephanie U. Eaton

DEF's Response to Walmart's First Set of Interrogatories
Nos. 1-4.

Filed August 26, 2020

Docket No. 20200092-EI

FLORIDA PUBLIC SERVICE COMMISSION
DOCKET: 20200069-EI EXHIBIT: 5
PARTY: STAFF HEARING EXHIBITS
DESCRIPTION: Foster (1-4)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Storm Protection Plan Cost
Recovery Clause

Docket No. 20200092-EI

Dated: August 26, 2020

**DUKE ENERGY FLORIDA, LLC'S RESPONSE TO
WALMART INC.'S FIRST SET OF INTERROGATORIES (NOS. 1-4)**

Duke Energy Florida, LLC ("DEF") responds to Walmart Inc.'s ("Walmart") First Set of Interrogatories to DEF (Nos. 1-4) as follows:

INTERROGATORIES

1. Under the proposed Settlement Agreement among DEF, the Florida Industrial Power Users Group ("FIPUG"), White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate – White Springs ("PCS"), and Office of Public Counsel ("OPC") in the Storm Protection Plan ("SPP") Cost Recovery Clause Docket, 20200092-EI, is DEF's intent is to recover from ratepayers the cost of its SPP programs in 2021 through an energy charge?

Response:

Yes. The first Settlement Agreement filed on July 17, 2020 in Paragraph 7(b) addresses the allocation of costs. Under the second proposed Settlement Agreement filed on August 10, 2020 in Docket No. 20200092-EI the Parties agree that DEF should implement the SPPCRC rate factors as shown on DEF exhibit TGF-1, page 14, for 2021, but that such rates shall not be deemed precedential for future SPPCRC purposes.

FIPUG was not a signatory but counsel for FIPUG indicated they take no position on the motions.

2. Is it DEF's position that using an energy charge instead of a demand charge adequately reflects cost causation on an intra-class basis? If so, please explain?

Response:

Yes. Please refer to Witness Foster's rebuttal testimony in Docket 20200069-EI, filed on July 1, 2020, generally Section IV discusses DEF's billing methodology, and specifically DEF's position on this question is discussed on Page 10 lines 15-21.

3. Is DEF aware if the other Florida Investor-Owned Utilities ("IOUs") – Florida Power & Light Company ("FPL"), Gulf Power Company ("Gulf"), and Tampa Electric Company ("TECO") – intend to recover the cost of their respective SPP programs in 2021 through a demand charge?

Response:

DEF is without specific knowledge of the other companies' specific intent; it appears from the filings the other companies have agreed to bill on a demand basis from demand customers in 2021.

4. Is DEF aware if the other Florida IOUs – FPL, Gulf, and TECO – intend to recover the cost of their respective SPP programs after 2021 through a demand charge?

Response:

DEF is without specific knowledge of the other companies' future intentions and the agreements filed by each company speak for themselves.

AFFIDAVIT

STATE OF FLORIDA

COUNTY OF PINELLAS

I hereby certify that on this _____ day of _____, 2020, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared Thomas G. Foster, who is personally known to me, and he acknowledged before me that he provided the answers to interrogatory numbers 1 through 4, from WALMART INC'S FIRST SET OF INTERROGATORIES TO DUKE ENERGY FLORIDA, LLC (Nos. 1-4) in Docket No(s). 20200069-EI, 20200092-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 _____, 2020.

Thomas G. Foster

Notary Public
State of Florida, at Large

My Commission Expires:

DEF, OPC, and White Springs Joint Motion for Approval of
Settlement Agreement and attached Stipulation and
Settlement Agreement

Filed August 10, 2020

Docket No. 20200092-EI

DN. 04332-2020

FLORIDA PUBLIC SERVICE COMMISSION
DOCKET: 20200069-EI EXHIBIT: 6
PARTY: STAFF HEARING EXHIBITS
DESCRIPTION: DEF, OPC, and White Springs
Joint Motion for Approval of Settlement
Agreement and attached Stipulati...

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Storm Protection Plan Cost
Recovery Clause

Docket No. 20200092-EI

Dated: August 10, 2020

JOINT MOTION FOR APPROVAL OF SETTLEMENT AGREEMENT

Pursuant to Rule 28-106.204(1), Florida Administrative Code (“F.A.C.”), Duke Energy Florida, LLC (“DEF” or the “Company”), the Office of Public Counsel (“OPC” or “Citizens”), and White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate (“PCS Phosphate”), by and through their respective undersigned counsel, hereby file this Joint Motion and request that the Florida Public Service Commission (“Commission”) review and approve the Stipulation and Settlement Agreement (“Agreement”), provided as Attachment A to this Joint Motion, as a full and complete resolution of all matters pertaining to DEF in Docket No. 20200092-EI, in accordance with Section 120.57(4), Florida Statutes (“F.S.”), and enter a final order reflecting such approval to effectuate implementation of the Agreements. In support of this motion, the Parties state as follows:

1. On June 27, 2019, the Governor of Florida signed CS/CS/CS/SB 796 addressing Storm Protection Plan Cost Recovery, which was codified in Section 366.96, F.S. Therein, the Florida Legislature directed each utility to file a ten-year Storm Protection Plan (“SPP”) that explains the storm hardening programs and projects the utility will implement to achieve the legislative objectives of reducing restoration costs and outage times associated with extreme weather events and enhancing reliability. *See* Section 366.96(3), F.S. The Florida Legislature also directed the Commission to conduct an annual proceeding to

determine the utility's prudently incurred SPP costs and to allow the utility to recover such costs through a charge separate and apart from its base rates, to be referenced as the Storm Protection Plan Cost Recovery Clause ("SPPCRC"). *See* Section 366.96(7), F.S.

2. Rule 25-6.030, F.A.C., requires each utility to file an updated SPP at least every three years that covers the utility's immediate ten-year planning period. Rule 25-6.031(2), F.A.C., provides that after a utility has filed its SPP it may petition the Commission for recovery of the costs associated with the SPP and implementation activities through the SPPCRC.
3. On July 17, 2020, the Prehearing Officer issued the Order Establishing Procedure ("OEP") in Docket No. 20200092-EI.
4. Pursuant to the schedule established in the OEP, on July 24, 2020, DEF filed its 2021 projection petition and supporting testimonies and exhibits of Thomas G. Foster (Exhibit No. TGF-1) and Jay Oliver ("SPPCRC Petition").
5. The SPPCRC Petition requests recovery of approximately \$10 million in revenue requirements through the SPPCRC during the period January – December 2021, which is the revenue requirements for its projected SPP related costs that are being passed through the SPPCRC in 2021 of approximately \$100.9M (capital) and \$4.6M (O&M).
6. As a direct result of the extensive discovery performed in DEF's SPP docket,¹ the Parties² initially entered into the 2020 SPP/SPPCRC Agreement on July 17, 2020 that resolved several SPP and SPPCRC issues. Subsequently, on July 31, 2020, the Parties³ entered into a Stipulation and Settlement Agreement in the SPP Docket ("SPP Settlement") that, if approved by this Commission, will resolve all issues in the SPP Docket.

¹ Docket No. 20200069-EI.

² With the exception of FIPUG, which did not respond with a position prior to the time of filing.

³ Walmart, Inc., was also a party to the SPP Stipulation and Settlement Agreement.

7. The Agreement entered into today is intended to resolve all remaining DEF-specific issues raised in the SPPCRC docket (Docket No. 20200069 – EI). This Agreement is premised on approval of the SPP Settlement. The Parties hereby jointly request that the Commission review and approve this Agreement in its entirety and without modification.
8. The Commission has a “long history of encouraging settlements, giving great weight and deference to settlements, and enforcing them in the spirit in which they were reached by the parties.” *Re Florida Power & Light Co.*, Docket No. 20050045-EI, Order No. PSC-2005-0902-S-EI (FPSC Sept. 14, 2005). The proper standard for the Commission’s approval of a settlement agreement is whether it is in the public interest. *Sierra Club v. Brown*, 243 So. 3d 903, 910-913 (Fla. 2018) (citing *Citizens of State v. FPSC*, 146 So. 3d 1143, 1164 (Fla. 2014)); *see also Gulf Coast Elec. Coop., Inc. v. Johnson*, 727 So. 2d 259, 264 (Fla. 1999) (“[I]n the final analysis, the public interest is the ultimate measuring stick to guide the PSC in its decisions”).
9. The proposed Agreement represents a reasonable compromise of competing positions and is a full and complete resolution of all matters in Docket No. 20200092-EI. If approved by the Commission, the Agreement will establish a series of stipulations that will eliminate all issues to be litigated in this docket as pertaining to the Parties.
10. The terms of the proposed Agreements reflect the Parties’ assessments of their respective litigation positions, as well as their efforts to reach a reasonable and mutually acceptable compromise. The respective Parties entered into the proposed Agreements, each for their own reasons, but all in recognition that the cumulative total of the regulatory activity before the Commission—now and for the rest of 2020 and through 2021—is anticipated to be greater than normal. To maximize the administrative and regulatory efficiency benefits

inherent in the proposed Agreement for the Parties and the Commission, the Parties ask that the Commission consider this Agreement as soon as its schedule permits, but in any event prior to the need to conduct extensive discovery in this docket.

11. Considered as a whole, the Agreements fairly and reasonably balances the interests of customers and the utilities, and is consistent with the stated purpose and intent of Section 366.96, F.S. Approving the Agreement is consistent with the Commission's long-standing policy of encouraging the settlement of contested proceedings in a manner that benefits the customers of utilities subject to the Commission's regulatory jurisdiction. Accordingly, the Agreement is in the public interest and should be approved.
12. DEF has consulted with counsel for FIPUG, which take no position on the relief sought by this motion, and Walmart Inc., which objects to the relief sought by this motion.

WHEREFORE, for all the reasons stated above, the Parties jointly and respectfully request that the Florida Public Service Commission expeditiously approve both the Settlement Agreement provided as Attachment A to this Joint Motion.

Respectfully submitted this 10th day of August, 2020,

By: /s/Matthew R. Bernier

Matthew R. Bernier
Associate General Counsel
106 East College Avenue, Suite 800
Tallahassee, Florida 32301

FOR DUKE ENERGY FLORIDA, LLC

By: /s/ Charles J. Rehwinkel

Charles J. Rehwinkel
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FOR OFFICE OF PUBLIC COUNSEL

By: /s/ James Brew

James W. Brew
Stone Mattheis Xenopoulos & Brew
1025 Thomas Jefferson St., NW, Suite 800 West
Washington DC 20007-5201

FOR WHITE SPRINGS AGRICULTURAL CHEMICAL CO. dba PCS PHOSPHATE

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic mail to the following this 10th day of August, 2020.

s/ Matthew R. Bernier

Attorney

<p>Jennifer Crawford / Shaw Stiller Office of General Counsel FL Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 jcrawfor@psc.state.fl.us sstiller@psc.state.fl.us</p> <p>Ken Hoffman / Mark Bubriski 134 West Jefferson St. Tallahassee, FL 32301-1713 ken.hoffman@fpl.com mark.bubriski@nexteraenergy.com</p> <p>John T. Burnett / Christopher T. Wright / Jason A. Higginbotham Florida Power & Light Company 700 Universe Blvd. Juno Beach, FL 33408-0420 john.t.burnett@fpl.com christopher.wright@fpl.com jason.higginbotham@fpl.com</p> <p>Stephanie Eaton 110 Oakwood Dr., Ste. 500 Winston-Salem, NC 27013 seaton@spilmanlaw.com</p> <p>Derrick Price Williamson / Barry Naum 1100 Bent Creek Blvd., Ste. 101 Mechanicsburg, PA 17050 dwilliamson@spilmanlaw.com bnaum@spilmanlaw.com</p>	<p>J.R. Kelly / Charles Rehwinkel Office of Public Counsel c/o The Florida Legislature 111 W. Madison St., Room 812 Tallahassee, FL 32399-1400 kelly.jr@leg.state.fl.us rehwinkel.charles@leg.state.fl.us</p> <p>Russell A. Badders Gulf Power Company One Energy Place Pensacola, FL 32520 russell.badders@nexteraenergy.com</p> <p>Mike Cassel 208 Wildlight Ave. Yulee, FL 32097 mcassel@fpuc.com</p> <p>Paula K. Brown Regulatory Affairs P.O. Box 11 Tampa, FL 33601-0111 regdept@tecoenergy.com</p> <p>James A. Brew / Laura Wynn Baker 1025 Thomas Jefferson St., N.W., Ste. 800W Washington, DC 20007 jbrew@smxblaw.com lwb@smxblaw.com</p>
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ATTACHMENT A
STIPULATION AND SETTLEMENT AGREEMENT

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Storm Protection Plan Cost
Recovery Clause

Docket No. 20200092-EI

Dated: August 10, 2020

_____ /

SPPCRC STIPULATION AND SETTLEMENT AGREEMENT

WHEREAS, Duke Energy Florida, LLC (“DEF”), Citizens through the Office of Public Counsel (“OPC”), White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate (“PCS Phosphate”), and the Florida Industrial Power Users Group (“FIPUG”) (collectively, the “Parties) have signed this SPPCRC Stipulation and Settlement Agreement (the “Agreement”); unless the context clearly requires otherwise, the term “Party” or “Parties” means a signatory to this Agreement;

WHEREAS, On June 27, 2019, the Governor of Florida signed CS/CS/CS/SB 796 addressing Storm Protection Plan Cost Recovery, which was codified in Section 366.96, F.S.;

WHEREAS, the Florida Legislature found in Section 366.96(1)(c), F.S., that it was in the State’s interest to “strengthen electric utility infrastructure to withstand extreme weather conditions by promoting the overhead hardening of electrical transmission and distribution facilities, the undergrounding of certain electrical distribution lines, and vegetation management,” and for each electric utility to “mitigate restoration costs and outage times to utility customers when developing transmission and distribution storm protection plans.” Section 366.96(1)(e), F.S.;

WHEREAS, the Florida Legislature directed each utility to file a ten-year Storm Protection Plan (“SPP”) that explains the storm hardening programs and projects the utility will implement to achieve the legislative objectives of reducing restoration costs and outage times associated with

extreme weather events and enhancing reliability. *See* Section 366.96(3), F.S.;

WHEREAS, The Florida Legislature directed the Florida Public Service Commission (“Commission”) to conduct an annual proceeding to determine the utility’s prudently incurred SPP costs and to allow the utility to recover such costs through a charge separate and apart from its base rates, to be referenced as the Storm Protection Plan Cost Recovery Clause (“SPPCRC”). *See* Section 366.96(7), F.S.;

WHEREAS, Section 366.96(8), F.S., and Rule 25-6.031(6)(b), F.A.C., provide that the SPP costs to be recovered through the SPPCRC may not include costs recovered through the utility’s base rates or any other cost recovery mechanism;

WHEREAS, Rule 25-6.030, F.A.C., requires each utility to file an updated SPP at least every three years that covers the utility’s immediate ten-year planning period and specifies the information to be included in each utility’s SPP;

WHEREAS, Rule 25-6.031, F.A.C., provides that after a utility has filed its SPP it may petition the Commission for recovery of the costs associated with the SPP and implementation activities and specifies the information to be included in each utility’s SPPCRC filings;

WHEREAS, on July 24, 2020, DEF filed its 2021 SPPCRC projection petition, supported by the testimonies and exhibits of Thomas G. Foster (Exhibit No. __ (TGF-1) and Jay Oliver;

WHEREAS, the Parties engaged in significant discovery in the SPP docket, and have thoroughly reviewed and evaluated DEF’s 2020-2029 SPP and;

WHEREAS, the Parties have entered into this Agreement in compromise of positions taken in accord with their rights and interests under Chapters 350, 366, and 120, Florida Statutes, as applicable, and as a part of the negotiated exchange of consideration among the Parties to this Agreement each has agreed to concessions to the others with the expectation that all provisions of

the Agreement will be enforced by the Commission as to all matters addressed herein with respect to all Parties regardless of whether a court ultimately determines such matters to reflect Commission policy, upon acceptance of the Agreement as provided herein and upon approval as in the public interest;

WHEREAS, the Parties have entered into a Stipulation and Settlement Agreement that, if approved, resolves all issues in the Docket No. 20200069-EI;

WHEREAS; the Parties have entered into this SPPCRC Stipulation and Settlement with the intent of resolving all issues in Docket No. 20200092-EI should the Commission approve the Stipulation and Settlement Agreement in the SPP Docket; and

NOW THEREFORE, in consideration of the foregoing and the covenants contained herein, the Parties hereby stipulate and agree:

DEF 2021 PROJECTED SPPCRC FILING

(Docket No. 20200092-EI)

1. The Parties agree that the Commission has a record basis to approve the reasonableness of costs presented in DEF's Petition and testimonies in Docket No. 20200092-EI for cost recovery in 2021.
2. The Parties agree that the Commission has a record basis presented in DEF's Petition and testimonies in Docket No. 20200092-EI to approve the reasonableness of the revenue requirements to be collected by DEF through the SPPCRC in 2021.
3. The Parties agree that DEF should implement the SPPCRC rate factors as shown on DEF exhibit TGF-1, page 14, for 2021, but that such rates shall not be deemed precedential for future SPPCRC purposes. The Parties further agree that the recovery of SPP costs through the SPPCRC may be affected by DEF's next base rate case if SPP-related expenditures (both capital and operating) shift from base rates to SPPCRC

recovery. The OPC takes no position with regard to this provision, and the other signatories agree that this issue should be addressed in the 2021 SPPCRC docket, consistent with any SPP related base rate changes, and with any changes to be implemented in the 2022 SPPCRC billings.

4. The Parties agree that DEF should be permitted to seek recovery of the development of its initial 2020-2029 SPP development costs through the SPPCRC, provided that DEF has the burden of proving the reasonableness and prudence of those costs, and all intervenor parties retain their right to challenge the reasonableness and prudence thereof, in the applicable SPPCRC proceeding. The Parties agree that to the extent this provision is construed to conflict with either the 2020 SPP/SPPCRC Settlement (filed July 17, 2020 in Docket Nos. 20200069-EI and 20200092-EI) or the 2020 SPP Settlement Agreement (filed July 31, 2020 in Docket No. 20200069-EI), this paragraph controls over the conflicting provision(s) in those Agreements.
5. OPC and PCS Phosphate retain the right to challenge the prudence of any project or costs submitted by DEF for recovery through the SPPCRC in 2021 at the appropriate time.
6. The Parties stipulate to enter into the record the testimonies and exhibits of Thomas G. Foster and Jay Oliver. If this Agreement is approved in its entirety, the Parties likewise waive cross-examination of any and all witnesses and waive the filing of post-hearing briefs.
7. Nothing in the Agreement will have precedential value.
8. The provisions of the Agreement are contingent upon approval by the Commission in its entirety without modification. Except as expressly set out herein, no Party agrees, concedes, or waives any position with respect to any of the issues identified in the

Prehearing Order, and this Agreement does not expressly address any specific issue, or any position taken thereon. The Parties will support approval of the Agreement and will not request or support any order, relief, outcome, or result in conflict with it. No Party to the Agreement will request, support, or seek to impose a change to any provision of the Agreement. Approval of the Agreement in its entirety will resolve all matters and issues in this docket. This docket will be closed effective on the date that the Commission Order approving this Agreement is final, and no Party to the Agreement will seek appellate review of any order issued in this docket.

9. The Parties agree that approval of the Agreement is in the public interest.
10. This Agreement may be executed in counterpart originals, and a scanned .pdf copy of an original signature shall be deemed an original, or via electronic signature. Any person or entity that executes a signature page to this Agreement shall become and be deemed a Party with the full range of rights and responsibilities provided hereunder, notwithstanding that such person or entity is not listed in the first recital above and executes the signature page subsequent to the date of this Agreement, it being expressly understood that the addition of any such additional Party(ies) shall not disturb or diminish the benefits of this Agreement to any current Party.

Executed this 10th day of August, 2020.

By: /s/Matthew R. Bernier

Matthew R. Bernier
Associate General Counsel
106 East College Avenue, Suite 800
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FOR DUKE ENERGY FLORIDA, LLC

By: /s/ Charles J. Rehwinkel

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FOR WHITE SPRINGS AGRICULTURAL CHEMICAL CO. dba PCS PHOSPHATE

Walmart Inc. Direct Testimony and Exhibits of
Steve W. Chriss.

Filed August 28, 2020

Docket No. 20200092-EI

FLORIDA PUBLIC SERVICE COMMISSION
DOCKET: 20200069-EI EXHIBIT: 7
PARTY: STAFF HEARING EXHIBITS
DESCRIPTION: Walmart Inc. Direct Testimony
and Exhibits of Steve W. Chriss.
Filed August 28, 2020 Docket No. 202000...

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August 28, 2020

VIA ELECTRONIC FILING

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

Re: Docket No. 20200092-EI; In re: Storm Protection Plan Cost Recovery Clause

Dear Mr. Teitzman:

Please find enclosed for filing in the above-referenced case on behalf of Walmart Inc. the Direct Testimony and Exhibits of Steve W. Chriss.

Please contact me if you have any questions concerning this filing.

Sincerely,

/s/ Stephanie U. Eaton
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SUE:sds
Enclosures
c: Parties of Record

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail to the following parties this 28th day of August, 2020.

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/s/ Stephanie U. Eaton
Stephanie U. Eaton

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Storm Protection Plan Cost Recovery : DOCKET NO. 2020092-EI
Clause. :
: Filed: August 28, 2020

DIRECT TESTIMONY AND EXHIBITS OF

STEVE W. CHRISS

ON BEHALF OF

WALMART INC.

Contents

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Rate Design for Recovery of SPP Costs 6

Exhibits

Exhibit SWC-1: Witness Qualifications Statement

Exhibit SWC-2: Stipulation between Walmart Inc., Tampa Electric Company, Duke Energy Florida, LLC, Gulf Power Company, and Florida Power & Light Company, filed July 20, 2020, in Docket Nos. 20200067-EI, 20200069-EI, 20200070-EI, and 20200071-EI, and approved at July 28, 2020 Prehearing Conference

Exhibit SWC-3: Duke Energy Florida, LLC's Response to Walmart Inc.'s First Set of Interrogatories, No. 3 and First Request for Production of Documents, No. 1

1 **Introduction**

2 **Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND OCCUPATION.**

3 A. My name is Steve W. Chriss. My business address is 2608 SE J St., Bentonville,
4 Arkansas 72716. I am employed by Walmart Inc. ("Walmart") as Director, Energy
5 Services.

6 **Q. ON WHOSE BEHALF ARE YOU TESTIFYING IN THESE DOCKETS?**

7 A. I am testifying on behalf of Walmart.

8 **Q. PLEASE DESCRIBE YOUR EDUCATION AND EXPERIENCE.**

9 A. In 2001, I completed a Master of Science in Agricultural Economics at Louisiana State
10 University. From 2001 to 2003, I was an Analyst and later a Senior Analyst at the
11 Houston office of Econ One Research, Inc., a Los Angeles-based consulting firm. My
12 duties included research and analysis on domestic and international energy and
13 regulatory issues. From 2003 to 2007, I was an Economist and later a Senior Utility
14 Analyst at the Public Utility Commission of Oregon in Salem, Oregon. My duties
15 included appearing as a witness for PUC Staff in electric, natural gas, and
16 telecommunications dockets. I joined the energy department at Walmart in July 2007
17 as Manager, State Rate Proceedings. I was promoted to Senior Manager, Energy
18 Regulatory Analysis, in June 2011. I was promoted to my current position in October
19 2016, and the position was re-titled in October 2018. My Witness Qualifications
20 Statement is attached as Exhibit SWC-1.

1 **Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE THE FLORIDA PUBLIC**
2 **SERVICE COMMISSION ("COMMISSION")?**

3 A. Yes. I testified in Docket Nos 20110138-EI, 20120015-EI, 20130040-EI, 20130140-EI,
4 20140002-EG, 20160021-EI, 20160186-EI, and 20190061-EI.¹

5 **Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE OTHER STATE**
6 **REGULATORY COMMISSIONS?**

7 A. Yes. I have submitted testimony in over 210 proceedings before 40 other utility
8 regulatory commissions. I have also submitted testimony before legislative
9 committees in Kansas, Missouri, North Carolina, and South Carolina. My testimony
10 has addressed topics including, but not limited to, cost of service and rate design,
11 return on equity ("ROE"), revenue requirements, ratemaking policy, large customer
12 renewable programs, qualifying facility rates, telecommunications deregulation,
13 resource certification, energy efficiency/demand side management, fuel cost
14 adjustment mechanisms, decoupling, and the collection of cash earnings on
15 construction work in progress ("CWIP").

¹ I filed testimony in Docket Nos. 20200067-EI, 20200069-EI, 20200070-EI, and 20200071-EI, but that testimony was withdrawn and the issues raised in my testimony were deferred to Docket No. 20200092-EI by Stipulation filed in those Dockets on July 20, 2020, Exhibit SWC-2, and granted at the July 28, 2020 Prehearing Conference in those Dockets.

1 **Q. DO YOU HOLD ANY ENERGY-RELATED MEMBERSHIPS WITHIN THE STATE OF**
2 **FLORIDA?**

3 A. Yes. I am a member of the Florida Advisory Council on Climate and Energy.²

4 **Q. ARE YOU SPONSORING EXHIBITS IN YOUR TESTIMONY?**

5 A. Yes. I am sponsoring the Exhibits listed in the Table of Contents.

6 **Q. PLEASE BRIEFLY DESCRIBE WALMART'S OPERATIONS IN FLORIDA.**

7 A. As shown on Walmart's website, Walmart operates 384 retail units and eight
8 distribution centers and employs over 106,000 associates in Florida. In fiscal year
9 ending 2020, Walmart purchased \$7.4 billion worth of goods and services from
10 Florida-based suppliers, supporting over 87,000 supplier jobs.³

11 **Q. PLEASE BRIEFLY DESCRIBE WALMART'S OPERATIONS WITHIN THE SERVICE**
12 **TERRITORIES OF EACH OF THE UTILITIES THAT SUBMITTED 2020-2029**
13 **TRANSMISSION AND DISTRIBUTION STORM PROTECTION PLANS FOR WHICH COST**
14 **RECOVERY IS BEING SOUGHT IN THIS DOCKET.**

15 A. Walmart has 73 retail units and one distribution center served by Duke Energy Florida,
16 LLC ("DEF"), 149 retail units and four distribution centers served by Florida Power &
17 Light Company ("FPL"), 28 retail units served by Gulf Power Company ("Gulf"), and 36
18 retail units and one distribution center served by Tampa Electric Company ("TECO").⁴

² <https://www.fdacs.gov/Energy/Florida-Advisory-Council-on-Climate-and-Energy>

³ <http://corporate.walmart.com/our-story/locations/united-states#/united-states/florida>

⁴ FPL, Gulf, DEF, and TECO are collectively referred to as "Utilities."

1 **Purpose of Testimony and Summary of Recommendations**

2 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

3 A. Pursuant to Rule 25-6.031 F.A.C., the Commission opened Docket No. 20200092-EI to
4 examine the Storm Protection Plan Recovery Clause ("SPPRC") for the Utilities. The
5 purpose of my testimony is to address cost recovery for DEF's 2020-2029 Transmission
6 and Distribution Storm Protection Plan ("SPP") that was submitted pursuant to Rule
7 25-6.030 of the Florida Administrative Code, specifically addressing the issue of rate
8 design.

9 **Q. PLEASE SUMMARIZE WALMART'S RECOMMENDATIONS TO THE COMMISSION.**

10 A. Walmart's recommendations to the Commission are as follows:

11 1) Walmart does not take a position on the Utilities' proposed SPP cost allocation
12 methodologies; however, to the extent that alternative cost of service models or
13 modifications to the models for each utility are proposed by other parties, Walmart
14 reserves the right to address any such proposals.

1 2) Walmart does not oppose the proposed rate designs for SPP cost recovery put forth
2 by FPL, Gulf, and TECO, which would recover SPP costs from demand-metered
3 customers through a \$/kW demand charge.⁵

4
5 3) The Commission should reject the proposed rate design of DEF, which recovers SPP
6 costs from demand-metered customers through a \$/kWh energy charge. Instead, the
7 Commission should require DEF to charge demand-metered customers on a demand,
8 or \$/kW, charge for the reasons explained below.⁶

9 **Q. DOES THE FACT THAT YOU MAY NOT ADDRESS AN ISSUE OR POSITION ADVOCATED**
10 **BY DEF INDICATE WALMART'S SUPPORT?**

11 A. No. The fact that an issue is not addressed herein or in related filings should not be
12 construed as an endorsement of, agreement with, or consent to any filed position.

13

⁵FPL: Direct Testimony of Renae B. Deaton, Exhibit RBD-1, page 14; Par. 27 of the July 27, 2020 Settlement Agreement approved by the Commission at the August 10, 2020 hearing; Gulf: Direct Testimony of Renae B. Deaton, Exhibit RBD-1, page 12; Par. 27 of the July 27, 2020 Settlement Agreement approved by the Commission at the August 10, 2020 hearing; TECO: Direct Testimony of William R. Ashburn, page 7, line 23 to line 25. Walmart notes that when Gulf originally submitted its SPP, it proposed a rate design for SPP cost recovery through a \$/kWh energy charge; however, pursuant to negotiations among the Office of Public Counsel ("OPC"), Walmart, FPL, and Gulf, a Settlement Agreement was entered on July 27, 2020 ("July 27, 2020 Settlement Agreement"), which was approved by the Commission on August 10, 2020. In the July 27, 2020 Settlement Agreement, paragraph 27, Gulf agreed to recover SPP costs from demand-metered customers through a \$/kW demand charge. Walmart supports this change in rate design.

⁶ DEF entered into a Settlement Agreement dated July 17, 2020 and filed on July 20, 2020 in Docket No. 20200069-EI ("SPP Case"), to which Walmart took no position, and a second Settlement Agreement on August 10, 2020 in this Docket with OPC and White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate ("PCS Phosphate") that would accept a \$/kWh rate design.

1 **Rate Design for Recovery of SPP Costs**

2 **Q. GENERALLY, WHAT IS WALMART'S POSITION ON SETTING RATES BASED ON THE**
3 **UTILITY'S COST OF SERVICE?**

4 A. Walmart advocates that rates be set based on the utility's cost of service for each rate
5 class. This produces equitable rates that reflect cost causation, sends proper price
6 signals, and minimizes price distortions.

7 **Q. WHAT IS YOUR UNDERSTANDING OF THE COSTS TO BE INCURRED AND RECOVERED**
8 **BY EACH UTILITY IN EXECUTING ON THEIR RESPECTIVE SPPs?**

9 A. My understanding is that Rule 25-6.030 of the Florida Administrative Code targets the
10 enhancement of a utility's transmission and distribution infrastructure in order to
11 reduce restoration costs and outage times associated with extreme weather in order
12 to improve overall service reliability.

13 **Q. IS IT YOUR UNDERSTANDING THAT TRANSMISSION AND DISTRIBUTION**
14 **INFRASTRUCTURE COSTS ARE FIXED AND DO NOT CHANGE WITH THE AMOUNT OF**
15 **ENERGY CONSUMED BY CUSTOMERS?**

16 A. Yes.

17 **Q. IN YOUR EXPERIENCE, ARE TRANSMISSION AND DISTRIBUTION COSTS**
18 **TRADITIONALLY ALLOCATED TO CUSTOMERS USING DEMAND-BASED ALLOCATORS?**

19 A. Yes, as the fixed transmission and distribution costs are incurred to ensure that the
20 utilities can meet the instantaneous peak customer demands across their systems.

21 My general understanding of Florida's Utilities is that they typically allocate their
22 transmission demand costs based on each class's contribution to the respective

1 utility's 12 monthly coincident peaks ("12 CP").⁷ Additionally, my general
2 understanding is that the Utilities typically allocate their distribution demand costs
3 based on each class's non-coincident peak demand ("NCP" for DEF, Gulf, and TECO,
4 and "GCP" for FPL).⁸

5

6 **Q. WHAT IS YOUR UNDERSTANDING OF THE PROPOSED RATE DESIGN PROPOSED BY**
7 **DEF IN THIS COST RECOVERY DOCKET?**

8 A. My understanding is that DEF proposed \$/kWh energy charges from both demand and
9 non-demand metered classes.⁹ DEF is aware that this rate design differs from that of
10 FPL, Gulf and TECO, stating in discovery responses that "it appears from the filings the
11 other companies have agreed to bill on a demand basis from demand customers in
12 2021."¹⁰

13 **Q. DOES WALMART OPPOSE THE PROPOSED RATE DESIGNS PUT FORTH BY FPL, GULF,**
14 **AND TECO?**

15 A. No. FPL, Gulf, and TECO have appropriately designed the proposed SPP cost recovery
16 rates to reflect cost causation.

⁷ Each utility may treat specific costs differently. As an example, FPL allocates transmission pull-offs for transmission-level customers on a customer basis. See Direct Testimony of Renae B. Deaton, page 22, line 2 to line 3, *Petition for rate increase by Florida Power & Light Company*, Docket No. 20160021-EI (filed Mar. 15, 2016).

⁸ Some distribution costs may be classified as customer-related, but it does not appear that any of the Utilities propose to classify any SPP costs in that manner.

⁹ Direct Testimony of Thomas G. Foster, Exh. No. ____ (TGF-1), page 14.

¹⁰ DEF's Aug. 26, 2020 Resp. to Walmart's First Set of Interrogatories, Int. No. 3, and POD No. 1, Exhibit SWC-3.

1 **Q. DOES WALMART HAVE A CONCERN WITH THE PROPOSED RATE DESIGN PUT FORTH**
2 **BY DEF IN THIS CASE AND BY VIRTUE OF A PARTIAL SETTLEMENT?**

3 A. Yes. By proposing \$/kWh energy rates for demand metered customers, DEF proposes
4 to recover SPP costs differently than how those costs will be incurred and allocated to
5 customers.

6 **Q. PLEASE EXPLAIN.**

7 A. As described earlier, the Utilities will incur demand-related costs as they execute on
8 their respective SPPs. Demand costs are fixed costs incurred by the Utilities to size
9 their systems such that they can meet the peak kW demands imposed by their rate
10 classes and do not vary with changes in how many kWh of energy are consumed by
11 their customers. These demand-related costs should be recovered in a manner that
12 reflects the way in which they are incurred and allocated.

13 **Q. DOES THE RECOVERY OF DEMAND-RELATED COSTS THROUGH AN ENERGY CHARGE**
14 **VIOLATE COST CAUSATION PRINCIPLES?**

15 A. Yes. The shift in recovering demand-related costs through an energy charge, as
16 proposed by DEF, violates cost causation principles, which hold that, to the extent
17 possible, costs should be allocated to, and recovered from customers on the same
18 basis (*i.e.*, demand-related costs should be recovered through demand charges and
19 energy-related costs should be recovered through energy charges).

1 **Q. DOES RECOVERY OF DEMAND-RELATED COSTS THROUGH AN ENERGY CHARGE**
2 **CREATE INTRA-CLASS COST SHIFTS?**

3 A. Yes. The change in recovering demand-related costs from per kW demand charges to
4 per kWh energy charges results in a shift in demand cost responsibility from lower
5 load factor customers to higher load factor customers. Two customers can have the
6 same level of demand and cause the utility to incur the same amount of fixed cost,
7 but because one customer uses more kWhs than the other, that customer will pay
8 more of the demand cost than the customer that uses fewer kWhs. This results in a
9 misallocation of cost responsibility as higher load factor customers overpay for the
10 demand-related costs incurred by the utilities to serve them. In other words, higher
11 load factor customers are paying for a portion of the demand-related costs that are
12 incurred to serve lower load factor customers simply because of the manner in which
13 the utility recovers those costs in rates.

14 **Q. CAN YOU PROVIDE A GENERAL ILLUSTRATION OF THIS SHIFT IN DEMAND COST**
15 **RESPONSIBILITY?**

16 A. Yes. Assume the following:
17 1) A utility has only two customers (Customer 1 and Customer 2), with individual
18 peak demands of 20 kW for a total system load of 40 kW.
19 2) The annual revenue requirement or cost to the utility associated with the
20 investment to serve these customers is \$2,000, which will be recovered each year.
21 Each customer is responsible for one-half of the cost, or \$1,000 of demand-related
22 or fixed costs per customer.

1 3) Customer 1 has a monthly demand of 20 kW and a load factor of 60 percent and
2 consumes 105,120 kWh/year (20 kW * 60% * 8760 hours).

3 4) Customer 2 has a monthly demand of 20 kW and a load factor of 30 percent and
4 consumes 52,560 kWh/year (20 kW * 30% * 8760 hours).

5 **Q. IN YOUR ILLUSTRATION, IF THE DEMAND-RELATED COSTS WERE RECOVERED**
6 **THROUGH A DEMAND CHARGE ON A PER KW BASIS, WHAT WOULD THE PER KW**
7 **CHARGE BE?**

8 A. The charge would be \$4.17 per kW-month ($\$2,000 / 40 \text{ kW} / 12 \text{ months}$). Each
9 customer would then pay \$1,000 for the demand-related cost they impose on the
10 system ($20 \text{ kW} * \$4.17/\text{kW} * 12$).

11 **Q. IN YOUR ILLUSTRATION, IF THE DEMAND-RELATED COSTS WERE RECOVERED ON AN**
12 **ENERGY BASIS, WHAT WOULD THE PER KWH CHARGE BE?**

13 A. If customers were charged on a per kWh basis, the energy charge would be 1.27 cents
14 per kWh ($\$2,000 / 157,860 \text{ kWh}$), where the \$2,000 is the total cost, and 157,860 kWh
15 represents the total annual energy sales.

16 **Q. IN YOUR ILLUSTRATION, WHAT WOULD EACH CUSTOMER PAY UNDER THE PER KWH**
17 **CHARGE OF 1.27 CENTS PER KWH?**

18 A. Customer 1, the customer with the higher load factor of 60 percent, would pay \$1,333
19 ($\$0.0127/\text{kWh} * 105,120 \text{ kWh}$). Customer 2, the customer that has the lower load
20 factor would pay \$667 ($\$0.0127/\text{kWh} * 52,560 \text{ kWh}$).

1 **Q. ARE THE RESULTING ENERGY BASED CHARGES IN YOUR ILLUSTRATION**
2 **REPRESENTATIVE OF THE UNDERLYING COSTS?**

3 A. No. As the example makes clear, if a utility recovers its demand-related costs through
4 energy-based charges, it will over-collect from one customer and under-collect from
5 the other. The fixed costs are equally incurred by Customer 1 and Customer 2;
6 however, under the per kWh scenario, the utility would recover \$333 more from
7 Customer 1 (a higher load factor customer) than its cost responsibility and \$333 less
8 from Customer 2 (a lower load factor customer) than its cost responsibility. In other
9 words, Customer 1 would be subsidizing one-third of Customer 2's cost responsibility.

10 **Q. WOULD THE RECOVERY OF SPP REVENUE REQUIREMENT THROUGH THE DEMAND**
11 **CHARGE BE BENEFICIAL TO DEF?**

12 A. Yes. By recovering a large percentage of a class revenue requirement through energy
13 charges, a utility subjects itself to under and over-recovery of its revenue requirement
14 due to fluctuations in customer usage. As such, issues such as weather and the
15 economy will have a greater impact on the utility's cost recovery versus a rate design
16 in which an appropriate amount of revenue requirement is collected through the
17 demand charge.

18 **Q. WHAT IS WALMART'S RECOMMENDATION TO THE COMMISSION ON THIS ISSUE?**

19 A. The Commission should reject DEF's proposed and settlement-based rate design,
20 which recovers SPP costs from demand-metered customers through a \$/kWh energy
21 charge. Instead, the Commission should require DEF to charge demand-metered
22 customers on a demand, or \$/kW, charge.

1 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

2 A. Yes.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Storm Protection Plan Cost Recovery Clause. : DOCKET NO. 20200092-EI
:
:

EXHIBITS OF
STEVE W. CHRISS
ON BEHALF OF
WALMART INC.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Storm Protection Plan Cost Recovery Clause. : DOCKET NO. 20200092-EI
:
:

EXHIBIT SWC-1 OF
STEVE W. CHRISS
ON BEHALF OF
WALMART INC.

Steve W. Chriss

Walmart Inc.

Business Address: 2608 SE J Street, Bentonville, Arkansas 72716

EXPERIENCE

July 2007 – Present

Walmart Inc., Bentonville, AR

Director, Energy Services (October 2018 – Present)

Director, Energy and Strategy Analysis (October 2016 – October 2018)

Senior Manager, Energy Regulatory Analysis (June 2011 – October 2016)

Manager, State Rate Proceedings (July 2007 – June 2011)

June 2003 – July 2007

Public Utility Commission of Oregon, Salem, OR

Senior Utility Analyst (February 2006 – July 2007)

Economist (June 2003 – February 2006)

January 2003 - May 2003

North Harris College, Houston, TX

Adjunct Instructor, Microeconomics

June 2001 - March 2003

Econ One Research, Inc., Houston, TX

Senior Analyst (October 2002 – March 2003)

Analyst (June 2001 – October 2002)

EDUCATION

2001	Louisiana State University	M.S., Agricultural Economics
1997-1998	University of Florida	Graduate Coursework, Agricultural Education and Communication
1997	Texas A&M University	B.S., Agricultural Development B.S., Horticulture

PRESENT MEMBERSHIPS

Arizona Independent Scheduling Administrators Association, Board

Arizonans for Electric Choice & Competition, Chairman

Edison Electric Institute National Key Accounts Program, Customer Advisory Group

Florida Advisory Council for Climate and Energy

Renewable Energy Buyers Alliance, Advisory Board

PAST MEMBERSHIPS

Southwest Power Pool, Corporate Governance Committee, 2019

TESTIMONY BEFORE REGULATORY COMMISSIONS

2020

North Carolina Docket No. E-2, Sub 1219: Application of Duke Energy Progress, LLC for Adjustment of Rates and Charges Applicable to Electric Service in North Carolina.

Florida Public Service Commission Docket No. 20200092-EI
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Missouri Case No. ER-2019-0374: In the Matter of the Empire District Electric Company's Request for Authority to File Tariffs Increasing Rates for Electric Service Provided to Customers in its Missouri Service Area.

North Carolina Docket No. E-7, Sub 1214: In the Matter of Application of Duke Energy Carolinas, LLC for Adjustment of Rates and Charges Applicable to Electric Service in North Carolina.

Texas Docket No. 49831: Application of Southwestern Public Service Company for Authority to Change Rates.

2019

Missouri Case No. ER-2019-0335: In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Decrease its Revenues for Electric Service.

Michigan Case No. U-20561: In the Matter of the Application of DTE Electric Company for Authority to Increase its Rates, Amend its Rate Schedules and Rules Governing the Distribution and Supply of Electric Energy, and for Miscellaneous Accounting Authority.

Indiana Cause No. 45253: Petition of Duke Energy Indiana, LLC Pursuant to Ind. Code §§ 8-1-2-42.7 and 8-1-2-61, For (1) Authority to Modify its Rates and Charges for Electric Utility Service Through a Step-In of New Rates and Charges Using a Forecasted Test Period; (2) Approval of New Schedules of Rates and Charges, General Rules and Regulations, and Riders; (3) Approval of a Federal Mandate Certificate Under Ind. Code § 8-1-8.4-1; (4) Approval of Revised Electric Depreciation Rates Applicable to its Electric Plant in Service; (5) Approval of Necessary and Appropriate Accounting Deferral Relief; and (6) Approval of a Revenue Decoupling Mechanism for Certain Customer Classes.

Arizona Docket No. E-01933A-19-0228: In the Matter of the Application of Tucson Electric Power Company for the Establishment of Just and Reasonable Rates and Charges Designed to Realize a Reasonable Rate of Return on the Fair Value of the Properties of Tucson Electric Power Company Devoted to its Operations Throughout the State of Arizona and for Related Approvals.

Georgia Docket No. 42516: In Re: Georgia Power's 2019 Rate Case.

Colorado Proceeding No. 19AL-0268E: Re: In the Matter of Advice No. 1797-Electric of Public Service Company of Colorado to Revise its Colorado P.U.C. No. 8-Electric Tariff to Implement Rate Changes Effective on Thirty Days' Notice.

New York Case No. 19-E-0378: Proceeding on the Motion of the Commission as to the Rates, Charges, Rules, and Regulations of New York State Electric & Gas Corporation for Electric Service.

New York Case No. 19-E-0380: Proceeding on the Motion of the Commission as to the Rates, Charges, Rules, and Regulations of Rochester Gas & Electric Corporation for Electric Service.

Maryland Case No. 9610: In the Matter of the Application of Baltimore Gas and Electric Company for Adjustments to its Electric and Gas Base Rates.

Nevada Docket No. 19-06002: In the Matter of the Application by Sierra Pacific Power Company, D/B/A NV Energy, Filed Pursuant to NRS 704.110(3) and NRS 704.110(4), Addressing its Annual Revenue Requirement for General Rates Charged to All Classes of Electric Customers.

Florida Public Service Commission Docket No. 20200092-EI
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Florida Docket No. 20190061-EI: In Re: Petition of Florida Power & Light Company for Approval of FPL SolarTogether Program and Tariff.

Wisconsin Docket No. 6690-UR-126: Application of Wisconsin Public Service Corporation for Authority to Adjust Electric and Natural Gas Rates – Test Year 2020.

Wisconsin Docket No. 5-UR-109: Joint Application of Wisconsin Electric Power Company and Wisconsin Gas LLC for Authority to Adjust Electric, Natural Gas, and Steam Rates – Test Year 2020.

New Mexico Case No. 19-00158-UT: In the Matter of the Application of Public Service Company of New Mexico for Approval of PNM Solar Direct Voluntary Renewable Energy Program, Power Purchase Agreement, and Advice Notice Nos. 560 and 561.

Indiana Cause No. 45235: Petition of Indiana Michigan Power Company, and Indiana Corporation, for Authority to Increase its Rates and Charges for Electric Utility Service through a Phase In Rate Adjustment; and for Approval of Related Relief Including: (1) Revised Depreciation Rates; (2) Accounting Relief; (3) Inclusion in Rate Base of Qualified Pollution Control Property and Clean Energy Project; (4) Enhancements to the Dry Sorbent Injection System; (5) Advanced Metering Infrastructure; (6) Rate Adjustment Mechanism Proposals; and (7) New Schedules of Rates, Rules and Regulations.

Iowa Docket No. RPU-2019-0001: In Re: Interstate Power and Light Company.

Texas Docket No. 49494: Application of AEP Texas Inc. for Authority to Change Rates.

Arkansas Docket No. 19-008-U: In the Matter of the Application of Southwestern Electric Power Company for Approval of a General Change in Rates and Tariffs.

Virginia Case No. PUR-2019-00050: Application of Virginia Electric and Power Company for Determination of the Fair Rate of Return on Common Equity Pursuant to § 56-585.1:1 of the Code of Virginia.

Indiana Docket No. 45159: Petition of Northern Indiana Public Service Company LLC Pursuant to Indiana Code §§ 8-1-2-42.7, 8-1-2-61 and Indiana Code §§ 1-2.5-6 for (1) Authority to Modify its Rates and Charges for Electric Utility Service Through a Phase In of Rates; (2) Approval of New Schedules of Rates and Charges, General Rules and Regulations, and Riders; (3) Approval of Revised Common and Electric Depreciation Rates Applicable to its Electric Plant in Service; (4) Approval of Necessary and Appropriate Accounting Relief; and (5) Approval of a New Service Structure for Industrial Rates.

Texas Docket No. 49421: Application of Centerpoint Energy Houston Electric, LLC for Authority to Change Rates.

Nevada Docket No. 18-11015: Re: Application of Nevada Power Company d/b/a NV Energy, Filed Under Advice No. 491, to Implement NV Greenenergy 2.0 Rider Schedule No. NGR 2.0 to Allow Eligible Commercial Bundled Service Customers to Voluntarily Contract with the Utility to Increase Their Use of Reliance on Renewable Energy at Current Market-Based Fixed Prices.

Nevada Docket No. 18-11016: Re: Application of Sierra Pacific Power Company d/b/a NV Energy, Filed Under Advice No. 614-E, to Implement NV Greenenergy 2.0 Rider Schedule No. NGR 2.0 to Allow Eligible Commercial Bundled Service Customers to Voluntarily Contract with the Utility to Increase Their Use of Reliance on Renewable Energy at Current Market-Based Fixed Prices.

Florida Public Service Commission Docket No. 20200092-EI
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Georgia Docket No. 42310: In Re: Georgia Power Company's 2019 Integrated Resource Plan and Application for Certification of Capacity From Plant Scherer Unit 3 and Plant Goat Rock Units 9-12 and Application for Decertification of Plant Hammond Units 1-4, Plant McIntosh Unit 1, Plant Langdale Units 5-6, Plant Riverview Units 1-2, and Plant Estatoah Unit 1.

Wyoming Docket Nos. 20003-177-ET-18: In the Matter of the Application of Cheyenne Light, Fuel and Power Company D/B/A Black Hills Energy For Approval to Implement a Renewable Ready Service Tariff.

South Carolina Docket No. 2018-318-E: In the Matter of the Application of Duke Energy Progress, LLC For Adjustments in Electric Rate Schedules and Tariffs.

Montana Docket No. D2018.2.12: Application for Authority to Increase Retail Electric Utility Service Rates and for Approval of Electric Service Schedules and Rules and Allocated Cost of Service and Rate Design.

Louisiana Docket No. U-35019: In Re: Application of Entergy Louisiana, LLC for Authorization to Make Available Experimental Renewable Option and Rate Schedule ERO.

Arkansas Docket No. 18-037-TF: In the Matter of the Petition of Entergy Arkansas, Inc. For Its Solar Energy Purchase Option.

2018

South Carolina Docket No. 2017-370-E: Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Inc., for Review and Approval of a Proposed Business Combination Between SCANA Corporation and Dominion Energy, Inc., as may be Required, and for a Prudency Determination Regarding the Abandonment of the V.C. Summer Units 2 & 3 Project and Associated Customer Benefits and Cost Recovery Plans.

Kansas Docket No. 18-KCPE-480-RTS: In the Matter of the Application of Kansas City Power & Light Company to Make Certain Changes in its Charges for Electric Service.

Virginia Case No. PUR-2017-00173: Petition of Wal-Mart Stores East, LP and Sam's East, Inc. for Permission to Aggregate or Combine Demands of Two or More Individual Nonresidential Retail Customers of Electric Energy Pursuant to § 56-577 A 4 of the Code of Virginia.

Virginia Case No. PUR-2017-00174: Petition of Wal-Mart Stores East, LP and Sam's East, Inc. for Permission to Aggregate or Combine Demands of Two or More Individual Nonresidential Retail Customers of Electric Energy Pursuant to § 56-577 A 4 of the Code of Virginia.

Oregon Docket No. UM 1953: In the Matter of Portland General Electric Company, Investigation into Proposed Green Tariff.

Virginia Case No. PUR-2017-00179: Application of Appalachian Power Company for Approval of an 100% Renewable Energy Rider Pursuant to § 56-577.A.5 of the Code of Virginia.

Missouri Docket No. ER-2018-0145: In the Matter of Kansas City Power & Light Company's Request for Authority to Implement a General Rate Increase for Electric Service.

Missouri Docket No. ER-2018-0146: In the Matter of KCP&L Greater Missouri Operations Company's Request for Authority to Implement a General Rate Increase for Electric Service.

Florida Public Service Commission Docket No. 20200092-EI
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Kansas Docket No. 18-WSEE-328-RTS: In the Matter of the Joint Application of Westar Energy, Inc. and Kansas Gas and Electric Company for Approval to Make Certain Changes in their Charges for Electric Service.

Oregon Docket No. UE 335: In the Matter of Portland General Electric Company, Request for a General Rate Revision.

North Dakota Case No. PU-17-398: In the Matter of the Application of Otter Tail Power Company for Authority to Increase Rates for Electric Utility Service in North Dakota.

Virginia Case No. PUR-2017-00179: Application of Appalachian Power Company for Approval of an 100 Percent Renewable Energy Rider Pursuant to § 56-577 A 5 of the Code of Virginia.

Missouri Case No. ET-2018-0063: In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri for Approval of 2017 Green Tariff.

New Mexico Case No. 17-00255-UT: In the Matter of Southwestern Public Service Company's Application for Revision of its Retail Rates Under Advice Notice No. 272.

Virginia Case No. PUR-2017-00157: Application of Virginia Electric and Power Company for Approval of 100 Percent Renewable Energy Tariffs for Residential and Non-Residential Customers.

Kansas Docket No. 18-KCPE-095-MER: In the Matter of the Application of Great Plains Energy Incorporated, Kansas City Power & Light Company, and Westar Energy, Inc. for Approval of the Merger of Westar Energy, Inc. and Great Plains Energy Incorporated.

North Carolina Docket No. E-7, Sub 1146: In the Matter of the Application of Duke Energy Carolinas, LLC for Adjustment of Rates and Charges Applicable to Electric Service in North Carolina.

Louisiana Docket No. U-34619: In Re: Application for Expedited Certification and Approval of the Acquisition of Certain Renewable Resources and the Construction of a Generation Tie Pursuant to the 1983 and/or/1994 General Orders.

Missouri Case No. EM-2018-0012: In the Matter of the Application of Great Plains Energy Incorporated for Approval of its Merger with Westar Energy, Inc.

2017

Arkansas Docket No. 17-038-U: In the Matter of the Application of Southwestern Electric Power Company for Approval to Acquire a Wind Generating Facility and to Construct a Dedicated Generation Tie Line.

Texas Docket No. 47461: Application of Southwestern Electric Power Company for Certificate of Convenience and Necessity Authorization and Related Relief for the Wind Catcher Energy Connection Project.

Oklahoma Cause No. PUD 201700267: Application of Public Service Company of Oklahoma for Approval of the Cost Recovery of the Wind Catcher Energy Connection Project; A Determination There is Need for the Project; Approval for Future Inclusion in Base Rates Cost Recovery of Prudent Costs Incurred by PSO for the Project; Approval of a Temporary Cost Recovery Rider; Approval of Certain Accounting Procedures Regarding Federal Production Tax Credits; Waiver of OAC 165:35-38-5(E); And Such Other Relief the Commission Deems PSO is Entitled.

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Nevada Docket No. 17-06003: In the Matter of the Application of Nevada Power Company, d/b/a NV Energy, Filed Pursuant to NRS 704.110(3) and (4), Addressing Its Annual Revenue Requirement for General Rates Charged to All Classes of Customers.

North Carolina Docket No. E-2, Sub 1142: In the Matter of the Application of Duke Energy Progress, LLC for Adjustment of Rates and Charges Applicable to Electric Service in North Carolina.

Oklahoma Cause No. PUD 201700151: Application of Public Service Company of Oklahoma, an Oklahoma Corporation, for an Adjustment in its Rates and Charges and the Electric Service Rules, Regulations and Conditions of Service for Electric Service in the State of Oklahoma.

Kentucky Case No. 2017-00179: Electronic Application of Kentucky Power Company for (1) a General Adjustment of its Rates for Electric Service; (2) an Order Approving its 2017 Environmental Compliance Plan; (3) an Order Approving its Tariffs and Riders; (4) an Order Approving Accounting Practices to Establish Regulatory Assets and Liabilities; and (5) an Order Granting All Other Requested Relief.

New York Case No. 17-E-0238: Proceeding on Motion of the Commission as to the Rates, Charges, Rules, and Regulations of Niagara Mohawk Power Corporation for Electric and Gas Service.

Virginia Case No. PUR-2017-00060: Application of Virginia Electric and Power Company for Approval of 100 Percent Renewable Energy Tariffs Pursuant to §§ 56-577 A 5 and 56-234 of the Code of Virginia.

New Jersey Docket No. ER17030308: In the Matter of the Petition of Atlantic City Electric Company for Approval of Amendments to its Tariff to Provide for an Increase in Rates and Charges for Electric Service Pursuant to N.J.S.A. 48:2-21 and N.J.S.A. 48:2-21.1, for Approval of a Grid Resiliency Initiative and Cost Recovery Related Thereto, and for Other Appropriate Relief.

Texas Docket No. 46831: Application of El Paso Electric Company to Change Rates.

Oregon Docket No. UE 319: In the Matter of Portland General Electric Company, Request for a General Rate Revision.

New Mexico Case No. 16-00276-UT: In the Matter of the Application of Public Service Company of New Mexico for Revision of its Retail Electric Rates Pursuant to Advice No. 533.

Minnesota Docket No. E015/GR-16-664: In the Matter of the Application of Minnesota Power for Authority to Increase Rates for Electric Service in Minnesota.

Ohio Case No. 16-1852-EL-SSO: In the Matter of the Application of Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to §4928.143, Ohio Rev. Code, In the Form of an Electric Security Plan.

Texas Docket No. 46449: Application of Southwestern Electric Power Company for Authority to Change Rates.

Arkansas Docket No. 16-052-U: In the Matter of the Application of Oklahoma Gas and Electric Company for Approval of a General Change in Rates, Charges, and Tariffs.

Missouri Case No. EA-2016-0358: In the Matter of the Application of Grain Belt Express Clean Line LLC for a Certificate of Convenience and Necessity Authorizing it to Construct, Own, Operate, Control, Manage

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and Maintain a High Voltage, Direct Current Transmission Line and an Associated Converter Station Providing an Interconnection on the Maywood-Montgomery 345 kV Transmission Line.

Florida Docket No. 160186-Ei: In Re: Petition for Increase in Rates by Gulf Power Company.

2016

Missouri Case No. ER-2016-0179: In the Matter of Union Electric Company d/b/a Ameren Missouri Tariffs to Increase its Revenues for Electric Service.

Kansas Docket No. 16-KCPE-593-ACQ: In the Matter of the Joint Application of Great Plains Energy Incorporated, Kansas City Power & Light Company, and Westar Energy, Inc. for Approval of the Acquisition of Westar Energy, Inc. by Great Plains Energy Incorporated.

Missouri Case No. EA-2016-0208: In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri for Permission and Approval and a Certificate of Public Convenience and Necessity Authorizing it to Offer a Pilot Distributed Solar Program and File Associated Tariff.

Utah Docket No. 16-035-T09: In the Matter of Rocky Mountain Power's Proposed Electric Service Schedule No. 34, Renewable Energy Tariff.

Pennsylvania Public Utility Commission Docket No. R-2016-2537359: Pennsylvania Public Utility Commission v. West Penn Power Company.

Pennsylvania Public Utility Commission Docket No. R-2016-2537352: Pennsylvania Public Utility Commission v. Pennsylvania Electric Company.

Pennsylvania Public Utility Commission Docket No. R-2016-2537355: Pennsylvania Public Utility Commission v. Pennsylvania Power Company.

Pennsylvania Public Utility Commission Docket No. R-2016-2537349: Pennsylvania Public Utility Commission v. Metropolitan Edison Company.

Michigan Case No. U-17990: In the Matter of the Application of Consumers Energy Company for Authority to Increase its Rates for the Generation and Distribution of Electricity and for Other Relief.

Florida Docket No. 160021-EI: In Re: Petition for Rate Increase by Florida Power & Light Company.

Minnesota Docket No. E-002/GR-15-816: In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Electric Service in the State of Minnesota.

Colorado Public Utilities Commission Docket No. 16AL-0048E: Re: In the Matter of Advice Letter No. 1712-Electric Filed by Public Service Company of Colorado to Replace Colorado PUC No.7-Electric Tariff with Colorado PUC No. 8-Electric Tariff.

Colorado Public Utilities Commission Docket No. 16A-0055E: Re: In the Matter of the Application of Public Service Company of Colorado for Approval of its Solar*Connect Program.

Missouri Public Service Commission Case No. ER-2016-0023: In the Matter of the Empire District Electric Company of Joplin, Missouri for Authority to File Tariffs Increasing Rates for Electric Service Provided to Customers in the Missouri Service Area of the Company.

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Georgia Public Service Commission Docket No. 40161: In Re: Georgia Power Company's 2016 Integrated Resource Plan and Application for Decertification of Plant Mitchell Units 3, 4A and 4B, Plant Kraft Unit 1 CT, and Intercession City CT.

Oklahoma Corporation Commission Cause No. PUD 201500273: In the Matter of Oklahoma Gas and Electric Company for an Order of the Commission Authorizing Applicant to Modify its Rates, Charges, and Tariffs for Retail Electric Service in Oklahoma.

New Mexico Case No. 15-00261-UT: In the Matter of the Application of Public Service Company of New Mexico for Revision of its Retail Electric Rates Pursuant to Advice Notice No. 513.

2015

Indiana Utility Regulatory Commission Cause No. 44688: Petition of Northern Indiana Public Service Company for Authority to Modify its Rates and Charges for Electric Utility Service and for Approval of: (1) Changes to its Electric Service Tariff Including a New Schedule of Rates and Charges and Changes to the General Rules and Regulations and Certain Riders; (2) Revised Depreciation Accrual Rates; (3) Inclusion in its Basic Rates and Charges of the Costs Associated with Certain Previously Approved Qualified Pollution Control Property, Clean Coal Technology, Clean Energy Projects and Federally Mandated Compliance Projects; and (4) Accounting Relief to Allow NIPSCO to Defer, as a Regulatory Asset or Liability, Certain Costs for Recovery in a Future Proceeding.

Public Utility Commission of Texas Docket No. 44941: Application of El Paso Electric Company to Change Rates.

Arizona Corporation Commission Docket No. E-04204A-15-0142: In the matter of the Application of UNS Electric, Inc. for the Establishment of Just and Reasonable Rates and Charges Designed to Realized a Reasonable Rate of Return on the Fair Value of the Properties of UNS Electric, Inc. Devoted to its Operations Throughout the State of Arizona, and for Related Approvals.

Rhode Island Public Utilities Commission Docket No. 4568: In Re: National Grid's Rate Design Plan.

Oklahoma Corporation Commission Cause No. PUD 201500208: Application of Public Service Company of Oklahoma, an Oklahoma Corporation, for an Adjustment in its Rates and Charges and the Electric Service Rules, Regulations and Conditions of Service for Electric Service in the State of Oklahoma.

Public Service Commission of Wisconsin Docket No. 4220-UR-121: Application of Northern States Power Company, A Wisconsin Corporation, for Authority to Adjust Electric and Natural Gas Rates.

Arkansas Public Service Commission Docket No. 15-015-U: In the Matter of the Application of Entergy Arkansas, Inc. for Approval of Changes in Rates for Retail Electric Service.

New York Public Service Commission Case No. 15-E-0283: Proceeding on Motion of the Commission as to the Rates, Charges, Rules, and Regulations of New York State Electric & Gas Corporation for Electric Service.

New York Public Service Commission Case No. 15-G-0284: Proceeding on Motion of the Commission as to the Rates, Charges, Rules, and Regulations of New York State Electric & Gas Corporation for Gas Service.

New York Public Service Commission Case No. 15-E-0285: Proceeding on Motion of the Commission as to the Rates, Charges, Rules, and Regulations of Rochester Gas & Electric Corporation for Electric Service.

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New York Public Service Commission Case No. 15-G-0286: Proceeding on Motion of the Commission as to the Rates, Charges, Rules, and Regulations of Rochester Gas & Electric Corporation for Gas Service.

Public Utilities Commission of Ohio Case No. 14-1693-EL-RDR: In the Matter of the Application Seeking Approval of Ohio Power Company's Proposal to Enter Into an Affiliate Power Purchase Agreement for Inclusion in the Power Purchase Agreement Rider.

Public Service Commission of Wisconsin Docket No. 6690-UR-124: Application of Wisconsin Public Service Corporation for Authority to Adjust Electric and Natural Gas Rates.

Arkansas Public Service Commission Docket No. 15-034-U: In the Matter of an Interim Rate Schedule of Oklahoma Gas and Electric Company Imposing a Surcharge to Recover All Investments and Expenses Incurred Through Compliance with Legislative or Administrative Rules, Regulations, or Requirements Relating to the Public Health, Safety or the Environment Under the Federal Clean Air Act for Certain of its Existing Generation Facilities.

Kansas Corporation Commission Docket No. 15-WSEE-115-RTS: In the Matter of the Application of Westar Energy, Inc. and Kansas Gas and Electric Company to Make Certain Changes in their Charges for Electric Service.

Michigan Public Service Commission Case No. U-17767: In the Matter of the Application of DTE Electric Company for Authority to Increase its Rates, Amend its Rate Schedules and Rules Governing the Distribution and Supply of Electric Energy, and for Miscellaneous Accounting Authority.

Public Utility Commission of Texas Docket No. 43695: Application of Southwestern Public Service Company for Authority to Change Rates.

Kansas Corporation Commission Docket No. 15-KCPE-116-RTS: In the Matter of the Application of Kansas City Power & Light Company to Make Certain Changes in its Charges for Electric Service.

Michigan Case No. U-17735: In the Matter of the Application of the Consumers Energy Company for Authority to Increase its Rates for the Generation and Distribution of Electricity and for Other Relief.

Kentucky Public Service Commission Case No. 2014-00396: Application of Kentucky Power Company for a General Adjustment of its Rates for Electric Service; (2) an Order Approving its 2014 Environmental Compliance Plan; (3) an Order Approving its Tariffs and Riders; and (4) an Order Granting All Other Required Approvals and Relief.

Kentucky Public Service Commission Case No. 2014-00371: In the Matter of the Application of Kentucky Utilities Company for an Adjustment of its Electric Rates.

Kentucky Public Service Commission Case No. 2014-00372: In the Matter of the Application of Louisville Gas and Electric Company for an Adjustment of its Electric and Gas Rates.

2014

Ohio Public Utilities Commission Case No. 14-1297-EL-SSO: In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company and the Toledo Edison Company for Authority to Provide for a Standard Service Offer Pursuant to R.C. 4928.143 in the Form of an Electric Security Plan.

West Virginia Case No. 14-1152-E-42T: Appalachian Power Company and Wheeling Power Company, Both d/b/a American Electric Power, Joint Application for Rate Increases and Changes in Tariff Provisions.

Florida Public Service Commission Docket No. 20200092-EI
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Oklahoma Corporation Commission Cause No. PUD 201400229: In the Matter of the Application of Oklahoma Gas and Electric Company for Commission Authorization of a Plan to Comply with the Federal Clean Air Act and Cost Recovery; and for Approval of the Mustang Modernization Plan.

Missouri Public Service Commission Case No. ER-2014-0258: In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariff to Increase its Revenues for Electric Service.
Pennsylvania Public Utility Commission Docket No. R-2014-2428742: Pennsylvania Public Utility Commission v. West Penn Power Company.

Pennsylvania Public Utility Commission Docket No. R-2014-2428743: Pennsylvania Public Utility Commission v. Pennsylvania Electric Company.

Pennsylvania Public Utility Commission Docket No. R-2014-2428744: Pennsylvania Public Utility Commission v. Pennsylvania Power Company.

Pennsylvania Public Utility Commission Docket No. R-2014-2428745: Pennsylvania Public Utility Commission v. Metropolitan Edison Company.

Washington Utilities and Transportation Commission Docket No. UE-141368: In the Matter of the Petition of Puget Sound Energy to Update Methodologies Used to Allocate Electric Cost of Service and For Electric Rate Design Purposes.

Washington Utilities and Transportation Commission Docket No. UE-140762: 2014 Pacific Power & Light Company General Rate Case.

West Virginia Public Service Commission Case No. 14-0702-E-42T: Monongahela Power Company and the Potomac Edison Company Rule 42T Tariff Filing to Increase Rates and Charges.

Ohio Public Utilities Commission Case No. 14-841-EL-SSO: In the Matter of the Application of Duke Energy Ohio for Authority to Establish a Standard Service Offer Pursuant to Section 4928.143, Revised Code, in the Form of Case No. 14-841-EL-SSO an Electric Security Plan, Accounting Modifications and Tariffs for Generation Service.

Colorado Public Utilities Commission Docket No. 14AL-0660E: Re: In the Matter of the Advice Letter No. 1672-Electric Filed by Public Service Company of Colorado to Revise its Colorado PUC No. 7-Electric Tariff to Implement a General Rate Schedule Adjustment and Other Rate Changes Effective July 18, 2014.

Maryland Case No. 9355: In the Matter of the Application of Baltimore Gas and Electric Company for Authority to Increase Existing Rates and Charges for Electric and Gas Service.

Mississippi Public Service Commission Docket No. 2014-UN-132: In Re: Notice of Intent of Entergy Mississippi, Inc. to Modernize Rates to Support Economic Development, Power Procurement, and Continued Investment.

Nevada Public Utilities Commission Docket No. 14-05004: Application of Nevada Power Company d/b/a NV Energy for Authority to Increase its Annual Revenue Requirement for General Rates Charged to All Classes of Electric Customers and for Relief Properly Related Thereto.

Utah Public Service Commission Docket No. 14-035-T02: In the Matter of Rocky Mountain Power's Proposed Electric Service Schedule No. 32, Service From Renewable Energy Facilities.

Florida Public Service Commission Docket No. 20200092-EI
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Florida Public Service Commission Docket No. 140002-EG: In Re: Energy Conservation Cost Recovery Clause.

Public Service Commission of Wisconsin Docket No. 6690-UR-123: Application of Wisconsin Public Service Corporation for Authority to Adjust Electric and Natural Gas Rates.

Connecticut Docket No. 14-05-06: Application of the Connecticut Light and Power Company to Amend its Rate Schedules.

Virginia Corporation Commission Case No. PUE-2014-00026: Application of Appalachian Power Company for a 2014 Biennial Review for the Provision of Generation, Distribution and Transmission Services Pursuant to § 56-585.1 A of the Code of Virginia.

Virginia Corporation Commission Case No. PUE-2014-00033: Application of Virginia Electric and Power Company to Revise its Fuel Factor Pursuant to Va. Code § 56-249.6.

Arizona Corporation Commission Docket No. E-01345A-11-0224 (Four Corners Phase): In the Matter of Arizona Public Service Company for a Hearing to Determine the Fair Value of Utility Property of the Company for Ratemaking Purposes, to Fix and Just and Reasonable Rate of Return Thereon, to Approve Rate Schedules Designed to Develop Such Return.

Minnesota Public Utilities Commission Docket No. E-002/GR-13-868: In the Matter of the Application of Northern States Power Company, for Authority to Increase Rates for Electric Service in Minnesota.

Utah Public Service Commission Docket No. 13-035-184: In the Matter of the Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates in Utah and for Approval of its Proposed Electric Service Schedules and Electric Service Regulations.

Missouri Public Service Commission Case No. EC-2014-0224: In the Matter of Noranda Aluminum, Inc.'s Request for Revisions to Union Electric Company d/b/a Ameren Missouri's Large Transmission Service Tariff to Decrease its Rate for Electric Service.

Oklahoma Corporation Commission Cause No. PUD 201300217: Application of Public Service Company of Oklahoma to be in Compliance with Order No. 591185 Issued in Cause No. PUD 201100106 Which Requires a Base Rate Case to be Filed by PSO and the Resulting Adjustment in its Rates and Charges and Terms and Conditions of Service for Electric Service in the State of Oklahoma.

Public Utilities Commission of Ohio Case No. 13-2386-EL-SSO: In the Matter of the Application of Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to §4928.143, Ohio Rev. Code, in the Form of an Electric Security Plan.

2013

Oklahoma Corporation Commission Cause No. PUD 201300201: Application of Public Service Company of Oklahoma for Commission Authorization of a Standby and Supplemental Service Rate Schedule.

Georgia Public Service Commission Docket No. 36989: Georgia Power's 2013 Rate Case.

Florida Public Service Commission Docket No. 130140-EI: Petition for Rate Increase by Gulf Power Company.

Florida Public Service Commission Docket No. 20200092-EI
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Public Utility Commission of Oregon Docket No. UE 267: In the Matter of PACIFICORP, dba PACIFIC POWER, Transition Adjustment, Five-Year Cost of Service Opt-Out.

Illinois Commerce Commission Docket No. 13-0387: Commonwealth Edison Company Tariff Filing to Present the Illinois Commerce Commission with an Opportunity to Consider Revenue Neutral Tariff Changes Related to Rate Design Authorized by Subsection 16-108.5 of the Public Utilities Act.

Iowa Utilities Board Docket No. RPU-2013-0004: In Re: MidAmerican Energy Company.

South Dakota Public Utilities Commission Docket No. EL12-061: In the Matter of the Application of Black Hills Power, Inc. for Authority to Increase its Electric Rates. (filed with confidential stipulation)

Kansas Corporation Commission Docket No. 13-WSEE-629-RTS: In the Matter of the Applications of Westar Energy, Inc. and Kansas Gas and Electric Company for Approval to Make Certain Changes in their Charges for Electric Service.

Public Utility Commission of Oregon Docket No. UE 263: In the Matter of PACIFICORP, dba PACIFIC POWER, Request for a General Rate Revision.

Arkansas Public Service Commission Docket No. 13-028-U: In the Matter of the Application of Entergy Arkansas, Inc. for Approval of Changes in Rates for Retail Electric Service.

Virginia State Corporation Commission Docket No. PUE-2013-00020: Application of Virginia Electric and Power Company for a 2013 Biennial Review of the Rates, Terms, and Conditions for the Provision of Generation, Distribution, and Transmission Services Pursuant to § 56-585.1 A of the Code of Virginia.

Florida Public Service Commission Docket No. 130040-EI: Petition for Rate Increase by Tampa Electric Company.

South Carolina Public Service Commission Docket No. 2013-59-E: Application of Duke Energy Carolinas, LLC, for Authority to Adjust and Increase Its Electric Rates and Charges.

Public Utility Commission of Oregon Docket No. UE 262: In the Matter of PORTLAND GENERAL ELECTRIC COMPANY, Request for a General Rate Revision.

New Jersey Board of Public Utilities Docket No. ER12111052: In the Matter of the Verified Petition of Jersey Central Power & Light Company For Review and Approval of Increases in and Other Adjustments to Its Rates and Charges For Electric Service, and For Approval of Other Proposed Tariff Revisions in Connection Therewith; and for Approval of an Accelerated Reliability Enhancement Program (“2012 Base Rate Filing”)

North Carolina Utilities Commission Docket No. E-7, Sub 1026: In the Matter of the Application of Duke Energy Carolinas, LLC for Adjustment of Rates and Charges Applicable to Electric Service in North Carolina.

Public Utility Commission of Oregon Docket No. UE 264: PACIFICORP, dba PACIFIC POWER, 2014 Transition Adjustment Mechanism.

Public Utilities Commission of California Docket No. 12-12-002: Application of Pacific Gas and Electric Company for 2013 Rate Design Window Proceeding.

Florida Public Service Commission Docket No. 20200092-EI
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Public Utilities Commission of Ohio Docket Nos. 12-426-EL-SSO, 12-427-EL-ATA, 12-428-EL-AAM, 12-429-EL-WVR, and 12-672-EL-RDR: In the Matter of the Application of the Dayton Power and Light Company Approval of its Market Offer.

Minnesota Public Utilities Commission Docket No. E-002/GR-12-961: In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Electric Service in Minnesota.

North Carolina Utilities Commission Docket E-2, Sub 1023: In the Matter of Application of Progress Energy Carolinas, Inc. For Adjustment of Rates and Charges Applicable to Electric Service in North Carolina.

2012

Public Utility Commission of Texas Docket No. 40443: Application of Southwestern Electric Power Company for Authority to Change Rates and Reconcile Fuel Costs.

South Carolina Public Service Commission Docket No. 2012-218-E: Application of South Carolina Electric & Gas Company for Increases and Adjustments in Electric Rate Schedules and Tariffs and Request for Mid-Period Reduction in Base Rates for Fuel.

Kansas Corporation Commission Docket No. 12-KCPE-764-RTS: In the Matter of the Application of Kansas City Power & Light Company to Make Certain Changes in its Charges for Electric Service.

Kansas Corporation Commission Docket No. 12-GIMX-337-GIV: In the Matter of a General Investigation of Energy-Efficiency Policies for Utility Sponsored Energy Efficiency Programs.

Florida Public Service Commission Docket No. 120015-EI: In Re: Petition for Rate Increase by Florida Power & Light Company.

California Public Utilities Commission Docket No. A.11-10-002: Application of San Diego Gas & Electric Company (U 902 E) for Authority to Update Marginal Costs, Cost Allocation, and Electric Rate Design.

Utah Public Service Commission Docket No. 11-035-200: In the Matter of the Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates in Utah and for Approval of its Proposed Electric Service Schedules and Electric Service Regulations.

Virginia State Corporation Commission Case No. PUE-2012-00051: Application of Appalachian Power Company to Revise its Fuel Factor Pursuant to § 56-249.6 of the Code of Virginia.

Public Utilities Commission of Ohio Case Nos. 11-346-EL-SSO, 11-348-EL-SSO, 11-349-EL-AAM, and 11-350-EL-AAM: In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to Section 4928.143, Revised Code, in the Form on an Electric Security Plan and In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company for Approval of Certain Accounting Authority.

New Jersey Board of Public Utilities Docket No. ER11080469: In the Matter of the Petition of Atlantic City Electric for Approval of Amendments to Its Tariff to Provide for an Increase in Rates and Charges for Electric Service Pursuant to N.J.S.A. 48:2-21 and N.J.S.A. 48:2-21.1 and For Other Appropriate Relief.

Public Utility Commission of Texas Docket No. 39896: Application of Entergy Texas, Inc. for Authority to Change Rates and Reconcile Fuel Costs.

Florida Public Service Commission Docket No. 20200092-EI
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Missouri Public Service Commission Case No. EO-2012-0009: In the Matter of KCP&L Greater Missouri Operations Notice of Intent to File an Application for Authority to Establish a Demand-Side Programs Investment Mechanism.

Colorado Public Utilities Commission Docket No. 11AL-947E: In the Matter of Advice Letter No. 1597-Electric Filed by Public Service Company of Colorado to Revise its Colorado PUC No. 7-Electric Tariff to Implement a General Rate Schedule Adjustment and Other Changes Effective December 23, 2011.

Illinois Commerce Commission Docket No. 11-0721: Commonwealth Edison Company Tariffs and Charges Submitted Pursuant to Section 16-108.5 of the Public Utilities Act.

Public Utility Commission of Texas Docket No. 38951: Application of Entergy Texas, Inc. for Approval of Competitive Generation Service tariff (Issues Severed from Docket No. 37744).

California Public Utilities Commission Docket No. A.11-06-007: Southern California Edison's General Rate Case, Phase 2.

2011

Arizona Corporation Commission Docket No. E-01345A-11-0224: In the Matter of Arizona Public Service Company for a Hearing to Determine the Fair Value of Utility Property of the Company for Ratemaking Purposes, to Fix and Just and Reasonable Rate of Return Thereon, to Approve Rate Schedules Designed to Develop Such Return.

Oklahoma Corporation Commission Cause No. PUD 201100087: In the Matter of the Application of Oklahoma Gas and Electric Company for an Order of the Commission Authorizing Applicant to Modify its Rates, Charges, and Tariffs for Retail Electric Service in Oklahoma.

South Carolina Public Service Commission Docket No. 2011-271-E: Application of Duke Energy Carolinas, LLC for Authority to Adjust and Increase its Electric Rates and Charges.

Pennsylvania Public Utility Commission Docket No. P-2011-2256365: Petition of PPL Electric Utilities Corporation for Approval to Implement Reconciliation Rider for Default Supply Service.

North Carolina Utilities Commission Docket No. E-7, Sub 989: In the Matter of Application of Duke Energy Carolinas, LLC for Adjustment of Rates and Charges Applicable to Electric Service in North Carolina.

Florida Public Service Commission Docket No. 110138: In Re: Petition for Increase in Rates by Gulf Power Company.

Public Utilities Commission of Nevada Docket No. 11-06006: In the Matter of the Application of Nevada Power Company, filed pursuant to NRS 704.110(3) for authority to increase its annual revenue requirement for general rates charged to all classes of customers to recover the costs of constructing the Harry Allen Combined Cycle plant and other generating, transmission, and distribution plant additions, to reflect changes in the cost of capital, depreciation rates and cost of service, and for relief properly related thereto.

North Carolina Utilities Commission Docket Nos. E-2, Sub 998 and E-7, Sub 986: In the Matter of the Application of Duke Energy Corporation and Progress Energy, Inc., to Engage in a Business Combination Transaction and to Address Regulatory Conditions and Codes of Conduct.

Florida Public Service Commission Docket No. 20200092-EI
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Public Utilities Commission of Ohio Case Nos. 11-346-EL-SSO, 11-348-EL-SSO, 11-349-EL-AAM, and 11-350-EL-AAM: In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to Section 4928.143, Revised Code, in the Form on an Electric Security Plan and In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company for Approval of Certain Accounting Authority.

Virginia State Corporation Commission Case No. PUE-2011-00037: In the Matter of Appalachian Power Company for a 2011 Biennial Review of the Rates, Terms, and Conditions for the Provision of Generation, Distribution, and Transmission Services Pursuant to § 56-585.1 A of the Code of Virginia.

Illinois Commerce Commission Docket No. 11-0279 and 11-0282 (cons.): Ameren Illinois Company Proposed General Increase in Electric Delivery Service and Ameren Illinois Company Proposed General Increase in Gas Delivery Service.

Virginia State Corporation Commission Case No. PUE-2011-00045: Application of Virginia Electric and Power Company to Revise its Fuel Factor Pursuant to § 56-249.6 of the Code of Virginia.

Utah Public Service Commission Docket No. 10-035-124: In the Matter of the Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates in Utah and for Approval of its Proposed Electric Service Schedules and Electric Service Regulations.

Maryland Public Utilities Commission Case No. 9249: In the Matter of the Application of Delmarva Power & Light for an Increase in its Retail Rates for the Distribution of Electric Energy.

Minnesota Public Utilities Commission Docket No. E002/GR-10-971: In the Matter of the Application of Northern States Power Company d/b/a Xcel Energy for Authority to Increase Rates for Electric Service in Minnesota.

Michigan Public Service Commission Case No. U-16472: In the Matter of the Detroit Edison Company for Authority to Increase its Rates, Amend its Rate Schedules and Rules Governing the Distribution and Supply of Electric Energy, and for Miscellaneous Accounting Authority.

2010

Public Utilities Commission of Ohio Docket No. 10-2586-EL-SSO: In the Matter of the Application of Duke Energy Ohio for Approval of a Market Rate Offer to Conduct a Competitive Bidding Process for Standard Service Offer Electric Generation Supply, Accounting Modifications, and Tariffs for Generation Service.

Colorado Public Utilities Commission Docket No. 10A-554EG: In the Matter of the Application of Public Service Company of Colorado for Approval of a Number of Strategic Issues Relating to its DSM Plan, Including Long-Term Electric Energy Savings Goals, and Incentives.

Public Service Commission of West Virginia Case No. 10-0699-E-42T: Appalachian Power Company and Wheeling Power Company Rule 42T Application to Increase Electric Rates.

Oklahoma Corporation Commission Cause No. PUD 201000050: Application of Public Service Company of Oklahoma, an Oklahoma Corporation, for an Adjustment in its Rates and Charges and Terms and Conditions of Service for Electric Service in the State of Oklahoma.

Georgia Public Service Commission Docket No. 31958-U: In Re: Georgia Power Company's 2010 Rate Case.

Florida Public Service Commission Docket No. 20200092-EI
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Washington Utilities and Transportation Commission Docket No. UE-100749: 2010 Pacific Power & Light Company General Rate Case.

Colorado Public Utilities Commission Docket No. 10M-254E: In the Matter of Commission Consideration of Black Hills Energy's Plan in Compliance with House Bill 10-1365, "Clean Air-Clean Jobs Act."

Colorado Public Utilities Commission Docket No. 10M-245E: In the Matter of Commission Consideration of Public Service Company of Colorado Plan in Compliance with House Bill 10-1365, "Clean Air-Clean Jobs Act."

Public Service Commission of Utah Docket No. 09-035-15 *Phase II*: In the Matter of the Application of Rocky Mountain Power for Approval of its Proposed Energy Cost Adjustment Mechanism.

Public Utility Commission of Oregon Docket No. UE 217: In the Matter of PACIFICORP, dba PACIFIC POWER Request for a General Rate Revision.

Mississippi Public Service Commission Docket No. 2010-AD-57: In Re: Proposal of the Mississippi Public Service Commission to Possibly Amend Certain Rules of Practice and Procedure.

Indiana Utility Regulatory Commission Cause No. 43374: Verified Petition of Duke Energy Indiana, Inc. Requesting the Indiana Utility Regulatory Commission to Approve an Alternative Regulatory Plan Pursuant to Ind. Code § 8-1-2.5-1, *ET SEQ.*, for the Offering of Energy Efficiency Conservation, Demand Response, and Demand-Side Management Programs and Associated Rate Treatment Including Incentives Pursuant to a Revised Standard Contract Rider No. 66 in Accordance with Ind. Code §§ 8-1-2.5-1 *ET SEQ.* and 8-1-2-42 (a); Authority to Defer Program Costs Associated with its Energy Efficiency Portfolio of Programs; Authority to Implement New and Enhanced Energy Efficiency Programs, Including the Powershare® Program in its Energy Efficiency Portfolio of Programs; and Approval of a Modification of the Fuel Adjustment Clause Earnings and Expense Tests.

Public Utility Commission of Texas Docket No. 37744: Application of Entergy Texas, Inc. for Authority to Change Rates and to Reconcile Fuel Costs.

South Carolina Public Service Commission Docket No. 2009-489-E: Application of South Carolina Electric & Gas Company for Adjustments and Increases in Electric Rate Schedules and Tariffs.

Kentucky Public Service Commission Case No. 2009-00459: In the Matter of General Adjustments in Electric Rates of Kentucky Power Company.

Virginia State Corporation Commission Case No. PUE-2009-00125: For acquisition of natural gas facilities Pursuant to § 56-265.4:5 B of the Virginia Code.

Arkansas Public Service Commission Docket No. 10-010-U: In the Matter of a Notice of Inquiry Into Energy Efficiency.

Connecticut Department of Public Utility Control Docket No. 09-12-05: Application of the Connecticut Light and Power Company to Amend its Rate Schedules.

Arkansas Public Service Commission Docket No. 09-084-U: In the Matter of the Application of Entergy Arkansas, Inc. For Approval of Changes in Rates for Retail Electric Service.

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Missouri Public Service Commission Docket No. ER-2010-0036: In the Matter of Union Electric Company d/b/a AmerenUE for Authority to File Tariffs Increasing Rates for Electric Service Provided to Customers in the Company's Missouri Service Area.

Public Service Commission of Delaware Docket No. 09-414: In the Matter of the Application of Delmarva Power & Light Company for an Increase in Electric Base Rates and Miscellaneous Tariff Charges.

2009

Virginia State Corporation Commission Case No. PUE-2009-00030: In the Matter of Appalachian Power Company for a Statutory Review of the Rates, Terms, and Conditions for the Provision of Generation, Distribution, and Transmission Services Pursuant to § 56-585.1 A of the Code of Virginia.

Public Service Commission of Utah Docket No. 09-035-15 *Phase I*: In the Matter of the Application of Rocky Mountain Power for Approval of its Proposed Energy Cost Adjustment Mechanism.

Public Service Commission of Utah Docket No. 09-035-23: In the Matter of the Application of Rocky Mountain Power for Authority To Increase its Retail Electric Utility Service Rates in Utah and for Approval of Its Proposed Electric Service Schedules and Electric Service Regulations.

Colorado Public Utilities Commission Docket No. 09AL-299E: Re: The Tariff Sheets Filed by Public Service Company of Colorado with Advice Letter No. 1535 – Electric.

Arkansas Public Service Commission Docket No. 09-008-U: In the Matter of the Application of Southwestern Electric Power Company for Approval of a General Change in Rates and Tariffs.

Oklahoma Corporation Commission Docket No. PUD 200800398: In the Matter of the Application of Oklahoma Gas and Electric Company for an Order of the Commission Authorizing Applicant to Modify its Rates, Charges, and Tariffs for Retail Electric Service in Oklahoma.

Public Utilities Commission of Nevada Docket No. 08-12002: In the Matter of the Application by Nevada Power Company d/b/a NV Energy, filed pursuant to NRS §704.110(3) and NRS §704.110(4) for authority to increase its annual revenue requirement for general rates charged to all classes of customers, begin to recover the costs of acquiring the Bighorn Power Plant, constructing the Clark Peak, Environmental Retrofits and other generating, transmission and distribution plant additions, to reflect changes in cost of service and for relief properly related thereto.

New Mexico Public Regulation Commission Case No. 08-00024-UT: In the Matter of a Rulemaking to Revise NMPRC Rule 17.7.2 NMAC to Implement the Efficient Use of Energy Act.

Indiana Utility Regulatory Commission Cause No. 43580: Investigation by the Indiana Utility Regulatory Commission, of Smart Grid Investments and Smart Grid Information Issues Contained in 111(d) of the Public Utility Regulatory Policies Act of 1978 (16 U.S.C. § 2621(d)), as Amended by the Energy Independence and Security Act of 2007.

Louisiana Public Service Commission Docket No. U-30192 *Phase II (February 2009)*: Ex Parte, Application of Entergy Louisiana, LLC for Approval to Repower Little Gypsy Unit 3 Electric Generating Facility and for Authority to Commence Construction and for Certain Cost Protection and Cost Recovery.

South Carolina Public Service Commission Docket No. 2008-251-E: In the Matter of Progress Energy Carolinas, Inc.'s Application For the Establishment of Procedures to Encourage Investment in Energy

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Efficient Technologies; Energy Conservation Programs; And Incentives and Cost Recovery for Such Programs.

2008

Colorado Public Utilities Commission Docket No. 08A-366EG: In the Matter of the Application of Public Service Company of Colorado for approval of its electric and natural gas demand-side management (DSM) plan for calendar years 2009 and 2010 and to change its electric and gas DSM cost adjustment rates effective January 1, 2009, and for related waivers and authorizations.

Public Service Commission of Utah Docket No. 07-035-93: In the Matter of the Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates in Utah and for Approval of its Proposed Electric Service Schedules and Electric Service Regulations, Consisting of a General Rate Increase of Approximately \$161.2 Million Per Year, and for Approval of a New Large Load Surcharge.

Indiana Utility Regulatory Commission Cause No. 43374: Petition of Duke Energy Indiana, Inc. Requesting the Indiana Utility Regulatory Commission Approve an Alternative Regulatory Plan for the Offering of Energy Efficiency, Conservation, Demand Response, and Demand-Side Management.

Public Utilities Commission of Nevada Docket No. 07-12001: In the Matter of the Application of Sierra Pacific Power Company for authority to increase its general rates charged to all classes of electric customers to reflect an increase in annual revenue requirement and for relief properly related thereto.

Louisiana Public Service Commission Docket No. U-30192 *Phase II*: Ex Parte, Application of Entergy Louisiana, LLC for Approval to Repower Little Gypsy Unit 3 Electric Generating Facility and for Authority to Commence Construction and for Certain Cost Protection and Cost Recovery.

Colorado Public Utilities Commission Docket No. 07A-420E: In the Matter of the Application of Public Service Company of Colorado For Authority to Implement and Enhanced Demand Side Management Cost Adjustment Mechanism to Include Current Cost Recovery and Incentives.

2007

Louisiana Public Service Commission Docket No. U-30192: Ex Parte, Application of Entergy Louisiana, LLC for Approval to Repower Little Gypsy Unit 3 Electric Generating Facility and for Authority to Commence Construction and for Certain Cost Protection and Cost Recovery.

Public Utility Commission of Oregon Docket No. UG 173: In the Matter of PUBLIC UTILITY COMMISSION OF OREGON Staff Request to Open an Investigation into the Earnings of Cascade Natural Gas.

2006

Public Utility Commission of Oregon Docket No. UE 180/UE 181/UE 184: In the Matter of PORTLAND GENERAL ELECTRIC COMPANY Request for a General Rate Revision.

Public Utility Commission of Oregon Docket No. UE 179: In the Matter of PACIFICORP, dba PACIFIC POWER AND LIGHT COMPANY Request for a general rate increase in the company's Oregon annual revenues.

Public Utility Commission of Oregon Docket No. UM 1129 *Phase II*: Investigation Related to Electric Utility Purchases From Qualifying Facilities.

2005

Public Utility Commission of Oregon Docket No. UM 1129 *Phase I Compliance*: Investigation Related to Electric Utility Purchases From Qualifying Facilities.

Public Utility Commission of Oregon Docket No. UX 29: In the Matter of QWEST CORPORATION Petition to Exempt from Regulation Qwest's Switched Business Services.

2004

Public Utility Commission of Oregon Docket No. UM 1129 *Phase I*: Investigation Related to Electric Utility Purchases From Qualifying Facilities.

TESTIMONY BEFORE LEGISLATIVE BODIES

2020

Regarding Missouri Senate Joint Resolution 34: Written testimony submitted to the Missouri Senate Transportation, Infrastructure and Public Safety Committee, January 30, 2020.

2019

Regarding North Carolina Senate Bill 559: Written testimony submitted to the North Carolina Committee on Agriculture/Environment/Natural Resources, April 17, 2019.

Regarding Missouri Senate Joint Resolution 25: Written testimony submitted to the Missouri Senate Committee on Judiciary, March 28, 2019.

Regarding South Carolina House Bill 3659: Written testimony submitted to the South Carolina Senate Committee on Judiciary, March 14, 2019.

Regarding Kansas Senate Bill 69: Written testimony submitted to the Kansas Committee on Utilities, February 19, 2019.

2018

Regarding Missouri Senate Bill 564: Testimony before the Missouri Senate Committee on Commerce, Consumer Protection, Energy and the Environment, January 10, 2018.

2017

Regarding Missouri Senate Bill 190: Testimony before the Missouri Senate Committee on Commerce, Consumer Protection, Energy and the Environment, January 25, 2017.

2016

Regarding Missouri House Bill 1726: Testimony before the Missouri House Energy and Environment Committee, April 26, 2016.

2014

Regarding Kansas House Bill 2460: Testimony Before the Kansas House Standing Committee on Utilities and Telecommunications, February 12, 2014.

2012

Regarding Missouri House Bill 1488: Testimony Before the Missouri House Committee on Utilities, February 7, 2012.

2011

Regarding Missouri Senate Bills 50, 321, 359, and 406: Testimony Before the Missouri Senate Veterans' Affairs, Emerging Issues, Pensions, and Urban Affairs Committee, March 9, 2011.

AFFIDAVITS

2015

Supreme Court of Illinois, Docket No. 118129, Commonwealth Edison Company et al., respondents, v. Illinois Commerce Commission et al. (Illinois Competitive Energy Association et al., petitioners). Leave to appeal, Appellate Court, First District.

2011

Colorado Public Utilities Commission Docket No. 11M-951E: In the Matter of the Petition of Public Service Company of Colorado Pursuant to C.R.S. § 40-6-111(1)(d) for Interim Rate Relief Effective on or before January 21, 2012.

ENERGY INDUSTRY PUBLICATIONS AND PRESENTATIONS

Panelist, Expanding Future Procurement Options, REBA Connect: Virtual Member Summit 2020, May 13, 2020.

Panelist, Renewable Energy Options for Large Utility Customers, NARUC Center for Partnership & Innovation Webinar Series, January 16, 2020.

Panelist, Pathways to Integrating Customer Clean Energy Demand in Utility Planning, REBA: Market Innovation webinar, January 13, 2020.

Panelist, Should Full Electrification of Energy Systems be Our Goal? If it's No Longer Business as Usual, What Does That Mean for Consumers?, National Association of State Utility Consumer Advocates 2019 Annual Meeting, San Antonio, Texas, November 18, 2019.

Panelist, Fleet Electrification, Federal Utility Partnership Working Group Seminar, Washington, DC, November 8, 2019.

Panelist, Tackling the Challenges of Extreme Weather, Edison Electric Institute Fall National Key Accounts Workshop, Las Vegas, Nevada, October 8, 2019.

Panelist, Fleet Electrification: Tackling the Challenges and Seizing the Opportunities for Electric Trucks, Powering the People 2019, Washington, D.C., September 24, 2019.

Panelist, From the Consumer Perspective, Mid-American Regulatory Conference 2019 Annual Meeting, Des Moines, Iowa, August 13, 2019.

Panelist, Redefining Resiliency: Emerging Technologies Benefiting Customers and the Grid, EPRI 2019 Summer Seminar, Chicago, Illinois, August 12, 2019.

Panelist, Energy Policies for Economic Growth, 2019 Energy Policy Summit, NCSL Legislative Summit, Nashville, Tennessee, August 5, 2019.

Panelist, Gateway to Energy Empowerment for Customers, Illumination Energy Summit, Columbus, Ohio, May 15, 2019.

Panelist, Advancing Clean Energy Solutions Through Stakeholder Collaborations, 2019 State Energy Conference of North Carolina, Raleigh, North Carolina, May 1, 2019.

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Panelist, Fleet Electrification: Getting Ready for the Transition, Edison Electric Institute Spring National Key Accounts Workshop, Seattle, Washington, April 8, 2019.

Panelist, Where the Fleet Meets the Pavement, Which Way to Electrification of the U.S. Transportation System?, Washington, D.C., April 4, 2019.

Panelist, Improving Renewable Energy Offerings: What Have We Learned?, Advanced Energy Economy Webinar, March 26, 2019.

Speaker, National Governors Association Southeast Regional Transportation Electrification Workshop, Nashville, Tennessee, March 11, 2019.

Speaker, Walmart Spotlight: A Day in the Life of a National Energy Manager, Touchstone Energy Cooperatives Net Conference 2019, San Diego, California, February 12, 2019.

Panelist, National Accounts: The Struggle is Real, American Public Power Association Customer Connections Conference, Orlando, Florida, November 6, 2018.

Panelist, Getting in Front of Customers Getting Behind the Meter Solutions, American Public Power Association Customer Connections Conference, Orlando, Florida, November 6, 2018.

Panelist, Sustainable Fleets: The Road Ahead for Electrifying Fleet Operations, EEI National Key Accounts 2018 Fall Workshop, San Antonio, Texas, October 23, 2018.

Panelist, Meeting Corporate Clean Energy Requirements in Virginia, Renewable Energy Buyers Alliance Summit, Oakland, California, October 15, 2018.

Panelist, What Are the Anticipated Impacts on Pricing and Reliability in the Changing Markets?, Southwest Energy Conference, Phoenix, Arizona, September 21, 2018.

Speaker, Walmart's Project Gigaton – Driving Renewable Energy Sourcing in the Supply Chain, Smart Energy Decisions Webcast Series, July 11, 2018.

Panelist, Customizing Energy Solutions, Edison Electric Institute Annual Convention, San Diego, California, June 7, 2018.

Powering Ohio Report Release, Columbus, Ohio, May 29, 2018.

Panelist, The Past, Present, and Future of Renewable Energy: What Role Will PURPA, Mandates, and Collaboration Play as Renewables Become a Larger Part of Our Energy Mix?, 36th National Regulatory Conference, Williamsburg, Virginia, May 17, 2018.

Panelist, Sustainability Milestone Deep Dive Session, Walmart Global Sustainability Leaders Summit, Bentonville, Arkansas, April 18, 2018.

Panelist, The Customer's Voice, Tennessee Valley Authority Distribution Marketplace Forum, Murfreesboro, Tennessee, April 3, 2018.

Panelist, Getting to Yes with Large Customers to Meet Sustainability Goals, The Edison Foundation Institute for Electric Innovation Powering the People, March 7, 2018.

Florida Public Service Commission Docket No. 20200092-EI
Witness Qualification Statement
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Panelist, The Corporate Quest for Renewables, 2018 NARUC Winter Policy Summit, Washington, D.C., February 13, 2018.

Panelist, Solar and Renewables, Touchstone Energy Cooperatives NET Conference 2018, St. Petersburg, Florida, February 6, 2018.

Panelist, Missouri Public Service Commission November 20, 2017 Workshop in File No. EW-2017-0245.

Panelist, Energy and Climate Change, 2017-18 Arkansas Law Review Symposium: Environmental Sustainability and Private Governance, Fayetteville, Arkansas, October 27, 2017.

Panelist, Customer – Electric Company – Regulator Panel, Edison Electric Institute Fall National Key Accounts Workshop, National Harbor, Maryland, October 12, 2017.

Panelist, What Do C&I Buyers Want, Solar Power International, Las Vegas, Nevada, September 12, 2017.

Panelist, Partnerships for a Sustainable Future, American Public Power Association National Conference, Orlando, Florida, June 20, 2017.

Panelist, Corporate Renewable Energy Buyers in the Southeast, SEARUC 2017, Greensboro, Georgia, June 12, 2017.

Panelist, Transitioning Away from Traditional Utilities, Utah Association of Energy Users Annual Conference, Salt Lake City, Utah, May 18, 2017.

Panelist, Regulatory Approaches for Integrating and Facilitating DERs, New Mexico State University Center for Public Utilities Advisory Council Current Issues 2017, Santa Fe, New Mexico, April 25, 2017.

Presenter, Advancing Renewables in the Midwest, Columbia, Missouri, April 24, 2017.

Panelist, Leveraging New Energy Technologies to Improve Service and Reliability, Edison Electric Institute Spring National Key Accounts Workshop, Phoenix, Arizona, April 11, 2017.

Panelist, Private Sector Demand for Renewable Power, Vanderbilt Law School, Nashville, Tennessee, April 4, 2017.

Panelist, Expanding Solar Market Opportunities, 2017 Solar Power Colorado, Denver, Colorado, March 15, 2017.

Panelist, Renewables: Are Business Models Keeping Up?, Touchstone Energy Cooperatives NET Conference 2017, San Diego, California, January 30, 2017.

Panelist, The Business Case for Clean Energy, Minnesota Conservative Energy Forum, St. Paul, Minnesota, October 26, 2016.

Panelist, M-RETS Stakeholder Summit, Minneapolis, Minnesota, October 5, 2016.

Panelist, 40th Governor's Conference on Energy & the Environment, Kentucky Energy and Environment Cabinet, Lexington, Kentucky, September 21, 2016.

Florida Public Service Commission Docket No. 20200092-EI
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Panelist, Trends in Customer Expectations, Wisconsin Public Utility Institute, Madison, Wisconsin, September 6, 2016.

Panelist, The Governor's Utah Energy Development Summit 2015, May 21, 2015.

Mock Trial Expert Witness, The Energy Bar Association State Commission Practice and Regulation Committee and Young Lawyers Committee and Environment, Energy and Natural Resources Section of the D.C. Bar, Mastering Your First (or Next) State Public Utility Commission Hearing, February 13, 2014.

Panelist, Customer Panel, Virginia State Bar 29th National Regulatory Conference, Williamsburg, Virginia, May 19, 2011.

Chriss, S. (2006). "Regulatory Incentives and Natural Gas Purchasing – Lessons from the Oregon Natural Gas Procurement Study." Presented at the 19th Annual Western Conference, Center for Research in Regulated Industries Advanced Workshop in Regulation and Competition, Monterey, California, June 29, 2006.

Chriss, S. (2005). "Public Utility Commission of Oregon Natural Gas Procurement Study." Public Utility Commission of Oregon, Salem, OR. Report published in June, 2005. Presented to the Public Utility Commission of Oregon at a special public meeting on August 1, 2005.

Chriss, S. and M. Radler (2003). "Report from Houston: Conference on Energy Deregulation and Restructuring." USAEE Dialogue, Vol. 11, No. 1, March, 2003.

Chriss, S., M. Dwyer, and B. Pulliam (2002). "Impacts of Lifting the Ban on ANS Exports on West Coast Crude Oil Prices: A Reconsideration of the Evidence." Presented at the 22nd USAEE/IAEE North American Conference, Vancouver, BC, Canada, October 6-8, 2002.

Contributed to chapter on power marketing: "Power System Operations and Electricity Markets," Fred I. Denny and David E. Dismukes, authors. Published by CRC Press, June 2002.

Contributed to "Moving to the Front Lines: The Economic Impact of the Independent Power Plant Development in Louisiana," David E. Dismukes, author. Published by the Louisiana State University Center for Energy Studies, October 2001.

Dismukes, D.E., D.V. Mesyanzhinov, E.A. Downer, S. Chriss, and J.M. Burke (2001). "Alaska Natural Gas In-State Demand Study." Anchorage: Alaska Department of Natural Resources.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Storm Protection Plan Cost Recovery Clause. : DOCKET NO. 20200092-EI
:
:

EXHIBIT SWC-2 OF
STEVE W. CHRISS
ON BEHALF OF
WALMART INC.

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Review of 2020-2029 Storm : DOCKET NO. 20200067-EI
Protection Plan pursuant to Rule 25-6.030, :
F.A.C., Tampa Electric Company. :

In re: Review of 2020-2029 Storm : DOCKET NO. 20200069-EI
Protection Plan pursuant to Rule 25-6.030, :
F.A.C., Duke Energy Florida, LLC. :

In re: Review of 2020-2029 Storm : DOCKET NO. 20200070-EI
Protection Plan pursuant to Rule 25-6.030, :
F.A.C., Gulf Power Company. :

In re: Review of 2020-2029 Storm : DOCKET NO. 20200071-EI
Protection Plan pursuant to Rule 25-6.030, :
F.A.C., Florida Power & Light Company. : Filed: July 20, 2020

STIPULATION

WHEREAS, Walmart Inc. ("Walmart"), Tampa Electric Company ("TECO"), Duke Energy Florida, LLC ("DEF"), Gulf Power Company ("Gulf"), and Florida Power & Light Company ("FPL") (collectively, "Companies") have signed this Stipulation;

WHEREAS, on April 29, 2020, Walmart submitted Petitions to Intervene in the four Storm Protection Plan ("SPP") Dockets: 20200067-EI (TECO); 20200069-EI (DEF); 20200070 (Gulf); and 20200071 (FPL) (collectively, "SPP Dockets");

WHEREAS, on July 13 2020, Walmart submitted its proposed Issues to the parties for inclusion in Staff's Issues list for the Hearing, which Issues were supported by Walmart's pre-filed Direct Testimony of its witnesses Steve W. Chriss and Lisa V. Perry, filed May 26, 2020;

WHEREAS, one of the proposed Issues that Walmart submitted was as follows:

Issue No. 1 Should the Commission reject the proposed illustrative SPP rate designs of DEF and Gulf, which recover SPP costs from demand-metered customers through a \$/kWh energy charge or defer that issue to the SPP Clause Docket, 20200092-EI?;

WHEREAS, on July 16, 2020, the parties participated in an Informal Conference during which the Companies and Staff opined that Walmart's proposed Issue No. 1 was an issue for the SPP Clause Docket, 20200092-EI;

WHEREAS, following the Informal Conference, Walmart contacted all interested parties regarding their position on its proposed Stipulation. The Office of Public Counsel and Florida Industrial Power Users Group indicated that they do not take a position. White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate – White Springs has not responded as of the time of this filing; and

WHEREAS, based upon the Companies' agreement to defer the Issue, Walmart agrees to defer proposed Issue No. 1 to the SPP Clause Docket, 20200092-EI, upon entry of a Stipulation to that effect.

THEREFORE, Walmart hereby stipulates that its Issue No. 1 may be withdrawn from the SPP Dockets and deferred for the Commission's consideration in the SPP Clause Docket, 20200092-EI, and agrees that the parties may offer revisions to the phrasing of the issue in that Docket in accordance with the standard issue identification process.

July 20, 2020

By /s/Stephanie U. Eaton

Stephanie U. Eaton (FL State Bar No. 165610)

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By /s/Malcolm N. Means

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By /s/Matthew R. Bernier

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Counsel to Duke Energy Florida, LLC

By /s/Christopher T. Wright _____

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By /s/Christopher T. Wright _____

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Counsel to Florida Power & Light Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail to the following parties this 20th day of July, 2020.

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Certificate of Service

Docket Nos. 20200067-EI, 20200069-EI, 20200070-EI, and 20200071-EI

Stipulation

Page 2

Exhibit SWC-2, Page 9 of 9

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/s/ Stephanie U. Eaton
Stephanie U. Eaton

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Storm Protection Plan Cost Recovery Clause. : DOCKET NO. 20200092-EI
:
:

EXHIBIT SWC-3 OF
STEVE W. CHRISS
ON BEHALF OF
WALMART INC.

Florida Public Service Commission Docket No. 20200092-EI
DEF's Resp. to Walmart's First Set of Interrogatories, Int. No. 3, and POD No. 1
Exhibit SWC-3, Page 1 of 3
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Storm Protection Plan Cost
Recovery Clause

Docket No. 20200092-EI

Dated: August 26, 2020

DUKE ENERGY FLORIDA, LLC'S RESPONSE TO
WALMART INC.'S FIRST SET OF INTERROGATORIES (NOS. 1-4)

Duke Energy Florida, LLC ("DEF") responds to Walmart Inc.'s ("Walmart") First Set of Interrogatories to DEF (Nos. 1-4) as follows:

INTERROGATORIES

1. Under the proposed Settlement Agreement among DEF, the Florida Industrial Power Users Group ("FIPUG"), White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate – White Springs ("PCS"), and Office of Public Counsel ("OPC") in the Storm Protection Plan ("SPP") Cost Recovery Clause Docket, 20200092-EI, is DEF's intent is to recover from ratepayers the cost of its SPP programs in 2021 through an energy charge?

Response:

Yes. The first Settlement Agreement filed on July 17, 2020 in Paragraph 7(b) addresses the allocation of costs. Under the second proposed Settlement Agreement filed on August 10, 2020 in Docket No. 20200092-EI the Parties agree that DEF should implement the SPPCRC rate factors as shown on DEF exhibit TGF-1, page 14, for 2021, but that such rates shall not be deemed precedential for future SPPCRC purposes.

FIPUG was not a signatory but counsel for FIPUG indicated they take no position on the motions.

2. Is it DEF's position that using an energy charge instead of a demand charge adequately reflects cost causation on an intra-class basis? If so, please explain?

Response:

Yes. Please refer to Witness Foster's rebuttal testimony in Docket 20200069-EI, filed on July 1, 2020, generally Section IV discusses DEF's billing methodology, and specifically DEF's position on this question is discussed on Page 10 lines 15-21.

3. Is DEF aware if the other Florida Investor-Owned Utilities ("IOUs") – Florida Power & Light Company ("FPL"), Gulf Power Company ("Gulf"), and Tampa Electric Company ("TECO") – intend to recover the cost of their respective SPP programs in 2021 through a demand charge?

Response:

Florida Public Service Commission Docket No. 20200092-EI
DEF's Resp. to Walmart's First Set of Interrogatories, Int. No. 3, and POD No. 1
Exhibit SWC-3, Page 2 of 3

DEF is without specific knowledge of the other companies' specific intent; it appears from the filings the other companies have agreed to bill on a demand basis from demand customers in 2021.

4. Is DEF aware if the other Florida IOUs – FPL, Gulf, and TECO – intend to recover the cost of their respective SPP programs after 2021 through a demand charge?

Response:

DEF is without specific knowledge of the other companies' future intentions and the agreements filed by each company speak for themselves.

Florida Public Service Commission Docket No. 20200092-EI
DEF's Resp. to Walmart's First Set of Interrogatories, Int. No. 3, and POD No. 1
Exhibit SWC-3, Page 3 of 3
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Storm Protection Plan Cost
Recovery Clause

Docket No. 20200092-EI

Dated: August 25, 2020

DUKE ENERGY FLORIDA, LLC'S RESPONSE TO
WALMART INC.'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NO. 1)

Duke Energy Florida, LLC ("DEF") responds to Walmart Inc.'s ("Walmart") First Request for Production of Documents (No. 1) as follows:

REQUEST FOR PRODUCTION OF DOCUMENTS

1. Please produce all documents relied upon to respond to these Interrogatories.

Response:

DEF has no responsive documents other than those publicly available in this docket. For Interrogatory 1.1, please see the 2020 SPP/SPPCRC Agreement Filed July 17, 2020 and the Settlement Agreement filed August 10, 2020. For Interrogatory 1.2, please see Geoff Foster's prefiled direct testimony and for Interrogatory 1.3, please see the filings/testimonies/settlement agreements filed by FPL, Gulf Power, and TECO in this docket.

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Summary Of Projected Period Recovery Amount.
Projected Period: January 2021 Through December 2021.
(Exhibit TGF-1)

Filed July 24, 2020

Docket No. 20200092-EI

FLORIDA PUBLIC SERVICE COMMISSION
DOCKET: 20200069-EI EXHIBIT: 8
PARTY: STAFF HEARING EXHIBITS
DESCRIPTION: Thomas G. Foster

Duke Energy Florida
Storm Protection Plan Cost Recovery Clause
Initial Projection
Projected Period: January 2021 through December 2021

Docket No. 2020092-EI
Duke Energy Florida, LLC
Witness: T.G. Foster
Exh. No. __ (TGF-1) Page 1 of 15
Form 1P

Summary of Projected Period Recovery Amount
(in Dollars)

<u>Line</u>	<u>Energy (\$)</u>	<u>Demand (\$)</u>	<u>Total (\$)</u>
1. Total Jurisdictional Revenue Requirements for the Projected Period			
a. Overhead Distribution Hardening Programs (SPPCRC Form 2P, Line 11 + SPPCRC Form 3P, Line 5)	\$ -	\$ 6,947,193	\$ 6,947,193
b. Overhead Transmission Hardening Programs (SPPCRC Form 2P, Line 12 + SPPCRC Form 3P, Line 6)	-	3,031,649	3,031,649
c. Vegetation Management Programs (SPPCRC Form 2P, Line 13 + SPPCRC Form 3P, Line 7)	-	-	-
d. Legal, Accounting, and Administrative (SPPCRC Form 2P, Line 14)	-	-	-
e. Total Projected Period Rev. Req.	<u>\$ -</u>	<u>\$ 9,978,842</u>	<u>\$ 9,978,842</u>
2. Estimated True up of Over/(Under) Recovery for the Current Period (N/A)	\$ -	\$ -	\$ -
3. Final True Up of Over/(Under) Recovery for the Prior Period (N/A)	\$ -	\$ -	\$ -
4. Jurisdictional Amount to be Recovered/(Refunded) (Line 1e - Line 2 - Line 3)	\$ -	\$ 9,978,842	\$ 9,978,842
5. Total Projected Jurisdictional Amount Adjusted for Taxes (Line 4 x Revenue Tax Multiplier of 1.00072)	<u>\$ -</u>	<u>\$ 9,986,027</u>	<u>\$ 9,986,027</u>

Duke Energy Florida
Storm Protection Plan Cost Recovery Clause
Initial Projection
Projected Period: January 2021 through December 2021

Docket No. 2020092-EI
Duke Energy Florida, LLC
Witness: T.G. Foster
Exh. No. ___ (TGF-1) Page 2 of 15
Form 2P
Page 1 of 3

Calculation of Annual Revenue Requirements for O&M Programs
(in Dollars)

Line	O&M Activities	T/D	Projected January	Projected February	Projected March	Projected April	Projected May	Projected June	Projected July	Projected August	Projected September	Projected October	Projected November	Projected December	End of Period Total
1.	Overhead: Distribution														
1.1	Feeder Hardening - Distribution	D	\$ 217,111	\$ 249,491	\$ 272,429	\$ 274,500	\$ 283,734	\$ 278,362	\$ 243,284	\$ 190,951	\$ 144,103	\$ 92,563	\$ 69,944	\$ 67,054	\$ 2,383,525
1.a	Adjustments														0
1.b	Subtotal of Overhead O&M Programs - Distribution		217,111	249,491	272,429	274,500	283,734	278,362	243,284	190,951	144,103	92,563	69,944	67,054	2,383,525
2	Overhead: Transmission														
2.1	Structure Hardening - Trans - Pole Replacements	T	\$ 378,781	\$ 369,212	\$ 384,115	\$ 397,658	\$ 329,214	\$ 249,468	\$ 302,323	\$ 260,067	\$ 280,165	\$ 452,901	\$ 217,458	\$ 144,586	\$ 3,765,949
2.2	Structure Hardening - Trans - Tower Replacements	T	0	0	0	2,537	7,611	7,611	2,537	0	0	0	0	0	20,296
2.3	Structure Hardening - Trans - Cathodic Protection	T	0	0	0	0	0	49,890	56,542	66,520	39,912	0	0	0	212,864
2.4	Structure Hardening - Trans - Drone Inspections	T	0	0	0	0	0	35,100	35,100	34,800	0	0	0	0	105,000
2.a	Adjustments (Remove Base O&M for Pole Replacements)		(155,019)	(155,019)	(155,019)	(155,019)	(155,019)	(155,019)	(155,019)	(155,019)	(155,019)	(155,019)	(155,019)	(155,019)	(1,860,228)
2.b	Subtotal of Overhead O&M Programs - Transmission		\$ 223,762	\$ 214,193	\$ 229,096	\$ 245,176	\$ 181,806	\$ 187,050	\$ 241,483	\$ 206,368	\$ 165,058	\$ 297,882	\$ 62,439	\$ (10,433)	\$ 2,243,881
3	Veg. Management O&M Programs														
3.1	Vegetation Management - Distribution	D	0	0	0	0	0	0	0	0	0	0	0	0	0
3.2	Vegetation Management - Transmission	T	0	0	0	0	0	0	0	0	0	0	0	0	0
3.a	Adjustments		0	0	0	0	0	0	0	0	0	0	0	0	0
3.b	Subtotal of Vegetation Management O&M Programs		0	0	0	0	0	0	0	0	0	0	0	0	0
4	Legal, Accounting, and Administrative O&M	A&G	0	0	0	0	0	0	0	0	0	0	0	0	0
5	Total of O&M Programs		\$ 440,873	\$ 463,684	\$ 501,524	\$ 519,676	\$ 465,540	\$ 465,412	\$ 484,767	\$ 397,319	\$ 309,161	\$ 390,446	\$ 132,383	\$ 56,621	\$ 4,627,405
6	Allocation of O&M Costs														
a.	Distribution O&M Allocated to Energy		0	0	0	0	0	0	0	0	0	0	0	0	0
b.	Distribution O&M Allocated to Demand		217,111	249,491	272,429	274,500	283,734	278,362	243,284	190,951	144,103	92,563	69,944	67,054	2,383,525
c.	Transmission O&M Allocated to Energy		0	0	0	0	0	0	0	0	0	0	0	0	0
d.	Transmission O&M Allocated to Demand		223,762	214,193	229,096	245,176	181,806	187,050	241,483	206,368	165,058	297,882	62,439	(10,433)	2,243,881
e.	Legal, Accounting, and Administrative O&M Allocated to Energy		0	0	0	0	0	0	0	0	0	0	0	0	0
7	Retail Jurisdictional Factors														
a.	Distribution Energy Jurisdictional Factor	D	0.9500000	0.9500000	0.9500000	0.9500000	0.9500000	0.9500000	0.9500000	0.9500000	0.9500000	0.9500000	0.9500000	0.9500000	0.9500000
b.	Distribution Demand Jurisdictional Factor	D	0.9956100	0.9956100	0.9956100	0.9956100	0.9956100	0.9956100	0.9956100	0.9956100	0.9956100	0.9956100	0.9956100	0.9956100	0.9956100
c.	Transmission Energy Jurisdictional Factor	T	0.9500000	0.9500000	0.9500000	0.9500000	0.9500000	0.9500000	0.9500000	0.9500000	0.9500000	0.9500000	0.9500000	0.9500000	0.9500000
d.	Transmission Demand Jurisdictional Factor	T	0.7020300	0.7020300	0.7020300	0.7020300	0.7020300	0.7020300	0.7020300	0.7020300	0.7020300	0.7020300	0.7020300	0.7020300	0.7020300
e.	Administrative & General Jurisdictional Factor	A&G	0.9322100	0.9322100	0.9322100	0.9322100	0.9322100	0.9322100	0.9322100	0.9322100	0.9322100	0.9322100	0.9322100	0.9322100	0.9322100
8	Jurisdictional Energy Revenue Requirements		-	-	-	-	-	-	-	-	-	-	-	-	-
9	Jurisdictional Demand Revenue Requirements		373,246	398,765	432,065	445,416	410,121	408,455	411,744	334,989	259,346	301,280	113,471	59,435	3,948,333
10	Total Jurisdictional O&M Revenue Requirements		373,246	398,765	432,065	445,416	410,121	408,455	411,744	334,989	259,346	301,280	113,471	59,435	3,948,333
O&M Revenue Requirements by Category of Activity															
11	Overhead: Distribution Hardening O&M Programs (System)		\$ 217,111	\$ 249,491	\$ 272,429	\$ 274,500	\$ 283,734	\$ 278,362	\$ 243,284	\$ 190,951	\$ 144,103	\$ 92,563	\$ 69,944	\$ 67,054	\$ 2,383,525
a.	Allocated to Energy (Retail)		0	0	0	0	0	0	0	0	0	0	0	0	0
b.	Allocated to Demand (Retail)		\$ 216,158	\$ 248,395	\$ 271,233	\$ 273,295	\$ 282,488	\$ 277,140	\$ 242,216	\$ 190,113	\$ 143,470	\$ 92,157	\$ 69,637	\$ 66,760	\$ 2,373,061
12	Overhead: Transmission O&M Programs (System)		\$ 223,762	\$ 214,193	\$ 229,096	\$ 245,176	\$ 181,806	\$ 187,050	\$ 241,483	\$ 206,368	\$ 165,058	\$ 297,882	\$ 62,439	\$ (10,433)	\$ 2,243,881
a.	Allocated to Energy (Retail)		0	0	0	0	0	0	0	0	0	0	0	0	0
b.	Allocated to Demand (Retail)		\$ 157,088	\$ 150,370	\$ 160,832	\$ 172,121	\$ 127,633	\$ 131,315	\$ 169,528	\$ 144,877	\$ 115,876	\$ 209,122	\$ 43,834	\$ (7,324)	\$ 1,575,271
13	Veg. Management O&M Programs (System)		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
a.	Allocated to Energy (Retail)		0	0	0	0	0	0	0	0	0	0	0	0	0
b.	Allocated to Demand (Retail)		0	0	0	0	0	0	0	0	0	0	0	0	0
14	Legal, Accounting, and Administrative O&M (System)		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
a.	Allocated to Energy (Retail)		0	0	0	0	0	0	0	0	0	0	0	0	0
b.	Allocated to Demand (Retail)		0	0	0	0	0	0	0	0	0	0	0	0	0

Footnote:

- (1) In 2021 DEF is not requesting vegetation management costs through the SPPCRC. This may change after expiration of the 2017 Settlement.
- (2) For the 2021 Projection filing DEF has not attempted to forecast Legal, Accounting, and Administrative O&M but as projects are implemented and the need for these incremental costs are incurred they will be included in future recovery requests.

Duke Energy Florida
Storm Protection Plan Cost Recovery Clause
Initial Projection
Projected Period: January 2021 through December 2021
Project Listing by Each O&M Program

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Line	O&M Activities	OH or UG
1.	Distribution	
1.1	Feeder Hardening - Distribution	
	Substation	Feeder
		Operations Center
		OH / UG
1.1.1	Maitland	W0087 FL Longwood Ops OH
1.1.2	Deltona	W4564 FL Deland Ops OH
1.1.3	Deland	W0806 FL Deland Ops OH
1.1.4	Deland	W0808 FL Deland Ops OH
1.1.5	Port Richey West	C209 FL Seven Springs Ops OH
1.1.6	Tarpon Springs	C308 FL Seven Springs Ops OH
1.1.7	Port St Joe Ind	N202 FL Monticello Ops OH
1.1.8	Taft	K1028 FL SE Orlando Ops OH
1.1.9	Northridge	K1822 FL Lake Wales Ops OH
1.1.10	Winter Garden	K203 FL Winter Garden Ops OH
1.1.11	Winter Garden	K206 FL Winter Garden Ops OH
1.1.12	Ocoee	M1095 FL Winter Garden Ops OH
1.1.13	Seminole	J895 FL Walsingham Ops OH
1.1.14	Ulmerton	J240 FL Walsingham Ops OH
1.1.15	Highlands	C2808 FL Clearwater Ops OH
1.1.16	East Clearwater	C902 FL Clearwater Ops OH
1.1.17	Pasadena	X211 FL St Pete Ops OH
2.	Transmission	
2.1	Structure Hardening - Pole Replacements	Line ID
		OH / UG
2.1.1	Please refer to Form 2P page 3 of 3	
2.2	Structure Hardening - Tower Replacements	
2.2.1	Bayview - Tri City	(HD-2) OH
2.2.2	East Clearwater - Safety Harbor	(HD-4) OH
2.2.3	Tri City - Ulmerton	(HD-8) OH
2.2.4	Holopaw - West Lake Wales	(WLXF-3) OH
2.3	Structure Hardening - Cathodic Protection	
2.3.1	Crystal River - Central Florida	(CCF) OH
2.3.2	Crystal River - Curlew	(CC) OH
2.4	Structure Hardening - Drone Inspections	
2.4.1	Crystal River - Lake Tarpon 500kV	(CLT) OH
2.4.2	Crystal River - Central Florida - 500kV	(CRCF) OH
2.4.3	Central Florida - Kathleen - 500kV	(CFK) OH

Duke Energy Florida
Storm Protection Plan Cost Recovery Clause
Initial Projection
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Line	O&M Activities	Line ID	OH or UG
2.	Transmission		
2.1	Structure Hardening - Pole Replacements	Line ID	OH / UG
2.2.1	Avon Park PI - South Polk	(AF-1)	OH
2.2.2	Fisheating Creek - Sun N Lakes	(ALP-SUC-1)	OH
2.2.3	Apopka South – Clarcona	(ASC-1)	OH
2.2.4	Bayboro - Central Plaza	(BCP-1)	OH
2.2.5	Bushnell East - Center Hill Radial	(BW-1)	OH
2.2.6	Brookridge - Brooksville West (BW X CKT)	(BW X-1)	OH
2.2.7	Brookridge - FI Crushed Stone Cogen PI	(BW X-2)	OH
2.2.8	Zephyrhills North - Dade City (TECO)	(BZ-6)	OH
2.2.9	Bronson – Newberry	(CF-2)	OH
2.2.10	Ft White – Newberry	(CF-3)	OH
2.2.11	Belleview - Maricamp	(CFO-SSB-1)	OH
2.2.12	Florida Gas Transmission - St Marks East	(CP-3)	OH
2.2.13	Monticello - Boston (Ga Pwr)	(DB-2)	OH
2.2.14	Disston - Kenneth	(DK-1)	OH
2.2.15	Taylor Ave - Walsingham	(DL-LTW-1)	OH
2.2.16	Seminole - Starkey Road	(DLW-5)	OH
2.2.17	Davenport - West Davenport Radial	(DWD-1)	OH
2.2.18	Palm Harbor - Tarpon Springs	(ECTW-4)	OH
2.2.19	Deland - Deland West	(ED-1)	OH
2.2.20	Ft White - High Springs	(FH-1)	OH
2.2.21	Clearwater - Highlands	(HCL-1)	OH
2.2.22	Higgins PI - Curlew CKT #2	(HGC-1)	OH
2.2.23	Alderman - Tarpon Springs	(HTW-2)	OH
2.2.24	Cypresswood - Haines City	(ICLW-2)	OH
2.2.25	Dundee - Lake Wales	(ICLW-3)	OH
2.2.26	Ft White – Jasper	(JF-1)	OH
2.2.27	Jackson Bluff - Tallahassee	(JT-1)	OH
2.2.28	Cross Bayou - GE Pinellas	(LD-2)	OH
2.2.29	Clearwater - East Clearwater	(LECW-3)	OH
2.2.30	Largo - Taylor Ave	(LTW-1)	OH
2.2.31	Altamonte - North Longwood CKT #2	(NLA-1)	OH
2.2.32	Atwater - Quincy	(QX-1)	OH
2.2.33	Lake Wales - West Lake Wales CKT #2	(WLL-1)	OH
2.2.34	Altamonte – Maitland	(WO-1)	OH
2.2.35	Altamonte - North Longwood CKT #1	(WO-2)	OH
2.2.36	Lockwood Tap	-	OH
2.2.37	Miccosukee Tap (TEC)	-	OH

Duke Energy Florida
Storm Protection Plan Cost Recovery Clause
Initial Projection
Projected Period: January 2021 through December 2021

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Duke Energy Florida, LLC
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Calculation of Annual Revenue Requirements for Capital Investment Programs
(in Dollars)

Line	Capital Investment Activities	E/D	Projected January	Projected February	Projected March	Projected April	Projected May	Projected June	Projected July	Projected August	Projected September	Projected October	Projected November	Projected December	End of Period Total
1.	Overhead: Distribution														
1.1	Feeder Hardening - Distribution	D	33,630	95,333	164,646	238,175	312,820	386,151	455,469	514,037	557,275	587,739	606,952	621,905	4,574,132
1.a	Adjustments (N/A)	D	0	0	0	0	0	0	0	0	0	0	0	0	0
1.b	Subtotal of Overhead Distribution Feeder Hardening Capital Programs		33,630	95,333	164,646	238,175	312,820	386,151	455,469	514,037	557,275	587,739	606,952	621,905	4,574,132
2.	Overhead: Transmission														
2.1	Structure Hardening - Trans - Pole Replacements	D	17,351	40,832	54,023	70,026	99,012	104,013	114,907	119,271	131,258	165,393	184,005	244,822	1,344,914
2.2	Structure Hardening - Trans - Tower Replacements	D	0	0	105	1,215	4,332	8,079	10,130	10,543	10,534	10,806	11,359	11,913	79,016
2.3	Structure Hardening - Trans - Cathodic Protection	D	0	0	0	0	0	805	2,538	4,280	5,884	6,321	6,314	6,306	32,448
2.4	Structure Hardening - Trans - Drone Inspections	D	0	0	0	0	0	0	0	0	0	0	0	0	0
2.a	Adjustments (A)	D	0	0	0	0	0	0	0	0	0	0	0	0	0
2.b	Subtotal of Overhead Transmission Structure Hardening Capital Programs		17,351	40,832	54,129	71,241	103,344	112,897	127,576	134,094	147,675	182,520	201,678	263,041	1,456,377
3.	Veg. Management Programs														
3.1	Vegetation Management - Distribution	D	0	0	0	0	0	0	0	0	0	0	0	0	0
3.2	Vegetation Management - Transmission	D	0	0	0	0	0	0	0	0	0	0	0	0	0
3.a	Adjustments (N/A)	D	0	0	0	0	0	0	0	0	0	0	0	0	0
3.b	Subtotal of Vegetation Management Capital Invest. Programs		0	0	0	0	0	0	0	0	0	0	0	0	0
4a	a Jurisdictional Energy Revenue Requirements		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
4b	b Jurisdictional Demand Revenue Requirements		\$ 50,981	\$ 136,165	\$ 218,775	\$ 309,416	\$ 416,165	\$ 499,048	\$ 583,044	\$ 648,131	\$ 704,950	\$ 770,259	\$ 808,630	\$ 884,946	\$ 6,030,509
Capital Revenue Requirements (B)															
5.	Overhead: Distribution Hardening Capital Programs		\$ 33,630	\$ 95,333	\$ 164,646	\$ 238,175	\$ 312,820	\$ 386,151	\$ 455,469	\$ 514,037	\$ 557,275	\$ 587,739	\$ 606,952	\$ 621,905	\$ 4,574,132
a.	Allocated to Energy		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
b.	Allocated to Demand		\$ 33,630	\$ 95,333	\$ 164,646	\$ 238,175	\$ 312,820	\$ 386,151	\$ 455,469	\$ 514,037	\$ 557,275	\$ 587,739	\$ 606,952	\$ 621,905	\$ 4,574,132
6.	Overhead: Transmission Capital Programs		\$ 17,351	\$ 40,832	\$ 54,129	\$ 71,241	\$ 103,344	\$ 112,897	\$ 127,576	\$ 134,094	\$ 147,675	\$ 182,520	\$ 201,678	\$ 263,041	\$ 1,456,377
a.	Allocated to Energy		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
b.	Allocated to Demand		\$ 17,351	\$ 40,832	\$ 54,129	\$ 71,241	\$ 103,344	\$ 112,897	\$ 127,576	\$ 134,094	\$ 147,675	\$ 182,520	\$ 201,678	\$ 263,041	\$ 1,456,377
7.	Veg. Management Capital Programs		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
a.	Allocated to Energy		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
b.	Allocated to Demand		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -

Notes:
(A) Any necessary adjustments are shown within the calculations on the detailed Form 4P
(B) Jurisdictional Energy and Demand Revenue Requirements are calculated on the detailed Form 4P

Duke Energy Florida
Storm Protection Plan Cost Recovery Clause
Initial Projection
Projected Period: January 2021 through December 2021
Project Listing by Each Capital Program

Docket No. 20200092-EI
 Duke Energy Florida, LLC
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Line	Capital Activities	OH or UG
1.	Overhead: Distribution	
1.1	Feeder Hardening - Distribution	
1.1.1	Please refer to Form 2P for Project Details	OH
2.	Transmission	
2.1	Structure Hardening - Pole Replacements	
2.1.1	Please refer to Form 2P for Project Details	OH
2.2	Structure Hardening - Tower Replacements	
2.2.1	Please refer to Form 2P for Project Details	OH
2.3	Structure Hardening - Cathodic Protection	
2.3.1	Please refer to Form 2P for Project Details	OH
2.4	Structure Hardening - Drone Inspections	
2.4.1	N/A - No Capital Expenditures Associated with this Activity	N/A

Duke Energy Florida
Storm Protection Plan Cost Recovery Clause
Calculation of Projected Period Amount
January 2021 - December 2021

Docket No. 20200092-EI
Duke Energy Florida, LLC
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Return on Capital Investments, Depreciation and Taxes
For Project: Feeder Hardening - Distribution - Pole Replacement
(in Dollars)

Line	Description	Beginning of Period Amount	Projected January	Projected February	Projected March	Projected April	Projected May	Projected June	Projected July	Projected August	Projected September	Projected October	Projected November	Projected December	End of Period Total
1	Investments														
	a. Expenditures/Additions	2,107,220	\$4,604,163	\$5,346,439	\$5,912,194	\$6,077,240	\$6,296,836	\$6,179,717	\$5,415,629	\$4,233,425	\$3,160,897	\$1,982,415	\$1,545,787	\$1,518,182	\$54,380,143
	b. Clearings to Plant		0	5,130,968	5,873,244	6,438,998	6,604,044	6,296,836	6,179,717	5,415,629	3,811,488	2,738,960	1,560,479	1,123,851	51,174,215
	c. Retirements		0	0	0	0	0	0	0	0	0	0	0	0	
	d. Other		0	0	0	0	0	0	0	0	0	0	0	0	
2	Plant-in-Service/Depreciation Base		0	5,130,968	11,004,212	17,443,211	24,047,255	30,344,091	36,523,808	41,939,437	45,750,925	48,489,885	50,050,364	51,174,215	
3	Less: Accumulated Depreciation		0	(17,958)	(56,473)	(117,524)	(201,690)	(307,894)	(435,727)	(582,515)	(742,644)	(912,358)	(1,087,535)	(1,266,644)	
4	CWIP - Non-Interest Bearing		6,711,383	6,926,854	6,965,803	6,604,044	6,296,836	6,179,717	5,415,629	4,233,425	3,582,833	2,826,289	2,811,597	3,205,928	
5	Net Investment (Lines 2 + 3 + 4)		\$2,107,220	\$6,711,383	\$12,039,864	\$17,913,543	\$23,929,731	\$30,142,402	\$36,215,914	\$41,503,710	\$45,590,346	\$48,591,115	\$50,403,816	\$51,774,427	\$53,113,499
6	Average Net Investment		\$4,409,301	\$9,375,623	\$14,976,703	\$20,921,637	\$27,036,066	\$33,179,158	\$38,859,812	\$43,547,028	\$47,090,731	\$49,497,465	\$51,089,121	\$52,443,963	
7	Return on Average Net Investment (A)	Jan-Dec													
	a. Debt Component	1.83%	\$6,714	\$14,276	\$22,804	\$31,857	\$41,167	\$50,521	\$59,170	\$66,307	\$71,703	\$75,368	\$77,792	\$79,854	597,534
	b. Equity Component Grossed Up For Taxes	6.10%	\$22,399	\$47,627	\$76,080	\$106,279	\$137,339	\$168,546	\$197,402	\$221,213	\$239,214	\$251,440	\$259,526	\$266,408	1,993,473
	c. Other		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	0
8	Investment Expenses														
	a. Depreciation	4.2%	\$0	\$17,958	\$38,515	\$61,051	\$84,165	\$106,204	\$127,833	\$146,788	\$160,128	\$169,715	\$175,176	\$179,110	1,266,644
	b. Amortization		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	0
	c. Dismantlement		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	d. Property Taxes	0.007651	\$0	\$3,271	\$7,016	\$11,121	\$15,332	\$19,346	\$23,286	\$26,739	\$29,169	\$30,915	\$31,910	\$32,627	230,731
	e. Other (D)	4.2%	0	(131)	(289)	(471)	(667)	(878)	(1,089)	(1,275)	(1,420)	(1,513)	(1,566)	(1,606)	(10,904)
9	Total System Recoverable Expenses (Lines 7 + 8)		\$29,113	\$83,002	\$144,126	\$209,837	\$277,336	\$343,739	\$406,604	\$459,772	\$498,795	\$525,925	\$542,837	\$556,393	\$4,077,478
	a. Recoverable Costs Allocated to Energy		0	0	0	0	0	0	0	0	0	0	0	0	0
	b. Recoverable Costs Allocated to Demand		\$29,113	\$83,002	\$144,126	\$209,837	\$277,336	\$343,739	\$406,604	\$459,772	\$498,795	\$525,925	\$542,837	\$556,393	\$4,077,478
10	Energy Jurisdictional Factor		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
11	Demand Jurisdictional Factor - Distribution		0.99561	0.99561	0.99561	0.99561	0.99561	0.99561	0.99561	0.99561	0.99561	0.99561	0.99561	0.99561	
12	Retail Energy-Related Recoverable Costs (B)		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
13	Retail Demand-Related Recoverable Costs (C)		28,985	82,637	143,493	208,916	276,119	342,230	404,819	457,754	496,605	523,616	540,454	553,950	4,059,578
14	Total Jurisdictional Recoverable Costs (Lines 12 + 13)		\$28,985	\$82,637	\$143,493	\$208,916	\$276,119	\$342,230	\$404,819	\$457,754	\$496,605	\$523,616	\$540,454	\$553,950	\$4,059,578

Notes:

- (A) Line (6 x 7)/12. Based on ROE of 10.5%, weighted cost of equity component of capital structure and statutory income tax rate of 24.522% (inc tax multiplier = 1.3249). Using the 2021 WACC methodology prescribed in Order No. PSC-2020-0165-PAA-EU Docket No. 20200118-EU.
- (B) Line 9a x Line 10
- (C) Line 9b x Line 11
- (D) Credit for depreciation expense related to rate base asset retirements resulting from this SPP Program

Duke Energy Florida
Storm Protection Plan Cost Recovery Clause
Calculation of Projected Period Amount
January 2021 - December 2021

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Duke Energy Florida, LLC
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Return on Capital Investments, Depreciation and Taxes
For Project: Feeder Hardening - Distribution : Overhead Wire Upgrade
(in Dollars)

Line	Description	Beginning of Period Amount	Projected January	Projected February	Projected March	Projected April	Projected May	Projected June	Projected July	Projected August	Projected September	Projected October	Projected November	Projected December	End of Period Total	
1	Investments															
	a. Expenditures/Additions	262,536	\$752,928	\$808,740	\$807,751	\$691,955	\$699,825	\$684,449	\$583,320	\$475,350	\$393,150	\$301,235	\$179,074	\$134,857	\$6,775,170	
	b. Clearings to Plant		0	818,563	874,374	873,385	757,589	699,825	684,449	583,320	422,781	340,581	248,666	126,505	6,430,039	
	c. Retirements		0	0	0	0	0	0	0	0	0	0	0	0	0	
	d. Other		0	0	0	0	0	0	0	0	0	0	0	0	0	
2	Plant-in-Service/Depreciation Base		0	818,563	1,692,937	2,566,321	3,323,911	4,023,736	4,708,185	5,291,505	5,714,286	6,054,867	6,303,534	6,430,039		
3	Less: Accumulated Depreciation		0	(1,842)	(5,651)	(11,425)	(18,904)	(27,957)	(38,551)	(50,457)	(63,314)	(76,937)	(91,120)	(105,588)		
4	CWIP - Non-Interest Bearing		1,015,465	1,005,642	939,019	757,589	699,825	684,449	583,320	475,350	445,718	406,372	336,780	345,131		
5	Net Investment (Lines 2 + 3 + 4)		\$262,536	\$1,015,465	\$1,822,363	\$2,626,305	\$3,312,486	\$4,004,832	\$4,680,228	\$5,252,954	\$5,716,398	\$6,096,691	\$6,384,302	\$6,549,193	\$6,669,582	
6	Average Net Investment		\$639,001	\$1,418,914	\$2,224,334	\$2,969,395	\$3,658,659	\$4,342,530	\$4,966,591	\$5,484,676	\$5,906,545	\$6,240,497	\$6,466,748	\$6,609,388		
7	Return on Average Net Investment (A)															
	a. Debt Component		1.83%	\$973	\$2,161	\$3,387	\$4,521	\$5,571	\$6,612	\$7,562	\$8,351	\$8,994	\$9,502	\$9,847	\$10,064	77,545
	b. Equity Component Grossed Up For Taxes		6.10%	\$3,246	\$7,208	\$11,299	\$15,084	\$18,585	\$22,059	\$25,230	\$27,861	\$30,004	\$31,701	\$32,850	\$33,575	258,704
	c. Other			\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	0	
8	Investment Expenses															
	a. Depreciation		2.7%	\$0	\$1,842	\$3,809	\$5,774	\$7,479	\$9,053	\$10,593	\$11,906	\$12,857	\$13,623	\$14,183	\$14,468	105,588
	b. Amortization			\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	0	
	c. Dismantlement			N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
	d. Property Taxes		0.007651	\$0	\$522	\$1,079	\$1,636	\$2,119	\$2,565	\$3,002	\$3,374	\$3,643	\$3,860	\$4,019	\$4,100	29,919
	e. Other (D)		2.7%	0	(124)	(260)	(401)	(525)	(656)	(788)	(901)	(992)	(1,057)	(1,104)	(1,129)	(7,939)
9	Total System Recoverable Expenses (Lines 7 + 8)		\$4,219	\$11,608	\$19,314	\$26,615	\$33,229	\$39,634	\$45,599	\$50,591	\$54,506	\$57,630	\$59,794	\$61,076	\$463,817	
	a. Recoverable Costs Allocated to Energy		0	0	0	0	0	0	0	0	0	0	0	0	0	
	b. Recoverable Costs Allocated to Demand		\$4,219	\$11,608	\$19,314	\$26,615	\$33,229	\$39,634	\$45,599	\$50,591	\$54,506	\$57,630	\$59,794	\$61,076	\$463,817	
10	Energy Jurisdictional Factor		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
11	Demand Jurisdictional Factor - Distribution		0.99561	0.99561	0.99561	0.99561	0.99561	0.99561	0.99561	0.99561	0.99561	0.99561	0.99561	0.99561		
12	Retail Energy-Related Recoverable Costs (B)		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
13	Retail Demand-Related Recoverable Costs (C)		4,200	11,557	19,229	26,498	33,083	39,460	45,399	50,369	54,267	57,377	59,532	60,808	461,781	
14	Total Jurisdictional Recoverable Costs (Lines 12 + 13)		\$4,200	\$11,557	\$19,229	\$26,498	\$33,083	\$39,460	\$45,399	\$50,369	\$54,267	\$57,377	\$59,532	\$60,808	\$461,781	

Notes:

- (A) Line (6 x 7)/12. Based on ROE of 10.5%, weighted cost of equity component of capital structure and statutory income tax rate of 24.522% (inc tax multiplier = 1.3249). Using the 2021 WACC methodology prescribed in Order No. PSC-2020-0165-PAA-EU Docket No. 20200118-EU.
- (B) Line 9a x Line 10
- (C) Line 9b x Line 11
- (D) Credit for depreciation expense related to rate base asset retirements resulting from this SPP Program

Duke Energy Florida
Storm Protection Plan Cost Recovery Clause
Calculation of Projected Period Amount
January 2021 - December 2021

Docket No. 20200092-EI
Duke Energy Florida, LLC
Witness: T.G. Foster
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Page 3 of 6

Return on Capital Investments, Depreciation and Taxes
For Project: Feeder Hardening - Distribution : Transformers, Capacitors, & Network Protection
(in Dollars)

Line	Description	Beginning of Period Amount	Projected January	Projected February	Projected March	Projected April	Projected May	Projected June	Projected July	Projected August	Projected September	Projected October	Projected November	Projected December	End of Period Total	
1	Investments															
	a. Expenditures/Additions	32,353	\$70,689	\$82,085	\$90,771	\$93,305	\$96,677	\$94,879	\$83,148	\$64,997	\$48,530	\$30,437	\$23,733	\$23,309	\$834,913	
	b. Clearings to Plant		0	78,777	90,174	98,860	101,394	96,677	94,879	83,148	58,519	42,052	23,958	17,255	785,691	
	c. Retirements		0	0	0	0	0	0	0	0	0	0	0	0	0	
	d. Other		0	0	0	0	0	0	0	0	0	0	0	0	0	
2	Plant-in-Service/Depreciation Base		0	78,777	168,951	267,810	369,204	465,881	560,760	643,907	702,426	744,478	768,437	785,691		
3	Less: Accumulated Depreciation		0	(190)	(599)	(1,246)	(2,138)	(3,264)	(4,619)	(6,175)	(7,873)	(9,672)	(11,529)	(13,428)		
4	CWIP - Non-Interest Bearing	\$32,352	103,041	106,349	106,947	101,393	96,677	94,878	83,147	64,996	55,008	43,392	43,167	49,221		
5	Net Investment (Lines 2 + 3 + 4)	\$32,352	\$103,041	\$184,936	\$275,299	\$367,958	\$463,742	\$557,495	\$639,288	\$702,729	\$749,561	\$778,199	\$800,074	\$821,485		
6	Average Net Investment		\$67,697	\$143,989	\$230,118	\$321,628	\$415,850	\$510,619	\$598,392	\$671,008	\$726,145	\$763,880	\$789,136	\$810,780		
7	Return on Average Net Investment (A)															
	a. Debt Component		1.83%	\$103	\$219	\$350	\$490	\$633	\$778	\$911	\$1,022	\$1,106	\$1,163	\$1,202	\$1,235	9,211
	b. Equity Component Grossed Up For Taxes		6.10%	\$344	\$731	\$1,169	\$1,634	\$2,112	\$2,594	\$3,040	\$3,409	\$3,689	\$3,880	\$4,009	\$4,119	30,729
	c. Other			\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	0	
8	Investment Expenses															
	a. Depreciation		2.9%	\$0	\$190	\$408	\$647	\$892	\$1,126	\$1,355	\$1,556	\$1,698	\$1,799	\$1,857	\$1,899	13,428
	b. Amortization			\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	0	
	c. Dismantlement			N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
	d. Property Taxes		0.007651	\$0	\$50	\$108	\$171	\$235	\$297	\$358	\$411	\$448	\$475	\$490	\$501	3,542
	e. Other (D)		2.9%	0	(47)	(103)	(169)	(239)	(314)	(390)	(457)	(508)	(542)	(561)	(575)	(3,904)
9	Total System Recoverable Expenses (Lines 7 + 8)		\$447	\$1,144	\$1,932	\$2,773	\$3,634	\$4,480	\$5,274	\$5,940	\$6,431	\$6,776	\$6,996	\$7,178	\$53,006	
	a. Recoverable Costs Allocated to Energy		0	0	0	0	0	0	0	0	0	0	0	0	0	
	b. Recoverable Costs Allocated to Demand		\$447	\$1,144	\$1,932	\$2,773	\$3,634	\$4,480	\$5,274	\$5,940	\$6,431	\$6,776	\$6,996	\$7,178	\$53,006	
10	Energy Jurisdictional Factor		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
11	Demand Jurisdictional Factor - Distribution		0.99561	0.99561	0.99561	0.99561	0.99561	0.99561	0.99561	0.99561	0.99561	0.99561	0.99561	0.99561		
12	Retail Energy-Related Recoverable Costs (B)		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
13	Retail Demand-Related Recoverable Costs (C)		445	1,139	1,924	2,761	3,618	4,460	5,251	5,914	6,403	6,746	6,966	7,146	52,774	
14	Total Jurisdictional Recoverable Costs (Lines 12 + 13)		\$445	\$1,139	\$1,924	\$2,761	\$3,618	\$4,460	\$5,251	\$5,914	\$6,403	\$6,746	\$6,966	\$7,146	\$52,774	

Notes:

- (A) Line (6 x 7)/12. Based on ROE of 10.5%, weighted cost of equity component of capital structure and statutory income tax rate of 24.522% (inc tax multiplier = 1.3249). Using the 2021 WACC methodology prescribed in Order No. PSC-2020-0165-PAA-EU Docket No. 20200118-EU.
- (B) Line 9a x Line 10
- (C) Line 9b x Line 11
- (D) Credit for depreciation expense related to rate base asset retirements resulting from this SPP Program

Duke Energy Florida
Storm Protection Plan Cost Recovery Clause
Calculation of Projected Period Amount
January 2021 - December 2021

Return on Capital Investments, Depreciation and Taxes
For Project: Structure Hardening - Transmission: Wood Pole Replacements
(in Dollars)

Docket No. 2020092-EI
Duke Energy Florida, LLC
Witness: T.G. Foster
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Line	Description	Beginning of Period Amount	Projected January	Projected February	Projected March	Projected April	Projected May	Projected June	Projected July	Projected August	Projected September	Projected October	Projected November	Projected December	End of Period Total
1	Investments														
	a. Expenditures/Additions	1,037,390	\$10,386,490	\$5,545,315	\$5,946,483	\$6,758,281	\$6,314,653	\$4,639,862	\$4,651,520	\$4,559,921	\$5,668,507	\$8,898,961	\$4,253,372	\$2,827,676	\$70,451,040
	b. Clearings to Plant		2,413,839	990,684	5,064,099	2,851,903	8,426,927	0	4,125,427	1,387,305	3,656,704	8,892,127	3,628,733	27,975,903	\$69,413,650
	c. Adjustments for Base Activity	(1,037,390)	(2,900,000)	(2,900,000)	(2,900,000)	(2,900,000)	(2,900,000)	(2,900,000)	(2,900,000)	(2,900,000)	(2,900,000)	(2,900,000)	(2,900,000)	(2,900,000)	(34,800,000)
	d. Monthly Amount of 2021 SPPCRC Investment (Lines 1a - 1c)		7,486,490	2,645,315	3,046,483	3,858,281	3,414,653	1,739,862	1,751,520	1,659,921	2,768,507	5,998,961	1,353,372	(72,324)	
	e. YTD Amount of 2021 SPPCRC Recoverable Investment		7,486,490	10,131,805	13,178,288	17,036,568	20,451,221	22,191,083	23,942,603	25,602,524	28,371,031	34,369,992	35,723,364	35,651,040	35,651,040
2	Plant-in-Service/Depreciation Base		0	0	0	0	5,247,451	2,347,451	3,572,878	2,060,183	2,816,887	8,809,014	9,537,747	34,613,650	
3	Less: Accumulated Depreciation		0	0	0	0	(14,430)	(20,886)	(30,711)	(36,377)	(44,123)	(68,348)	(94,577)	(189,764)	
4	CWIP - Non-Interest Bearing		7,486,490	10,131,805	13,178,288	17,036,568	15,203,770	19,843,632	20,369,725	23,542,341	25,554,144	25,560,978	26,185,617	1,037,390	
5	Net Investment (Lines 2 + 3 + 4)	\$0	\$7,486,490	\$10,131,805	\$13,178,288	\$17,036,568	\$20,436,790	\$22,170,197	\$23,911,892	\$25,566,147	\$28,326,907	\$34,301,644	\$35,628,787	\$35,461,275	
6	Average Net Investment		\$3,743,245	\$8,809,147	\$11,655,046	\$15,107,428	\$18,736,679	\$21,303,494	\$23,041,044	\$24,739,020	\$26,946,527	\$31,314,276	\$34,965,215	\$35,545,031	
7	Return on Average Net Investment (A)	Jan-Dec													
	a. Debt Component	1.83%	\$5,700	\$13,413	\$17,747	\$23,004	\$28,530	\$32,438	\$35,084	\$37,669	\$41,030	\$47,681	\$53,240	\$54,123	389,659
	b. Equity Component Grossed Up For Taxes	6.10%	\$19,015	\$44,749	\$59,206	\$76,744	\$95,180	\$108,219	\$117,045	\$125,671	\$136,885	\$159,072	\$177,618	\$180,564	1,299,968
	c. Other		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	0
8	Investment Expenses														
	a. Depreciation	3.3%	\$0	\$0	\$0	\$0	\$14,430	\$6,455	\$9,825	\$5,666	\$7,746	\$24,225	\$26,229	\$95,188	189,764
	b. Amortization		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	0
	c. Dismantlement		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	d. Property Taxes	0.007651	\$0	\$0	\$0	\$0	\$3,346	\$1,497	\$2,278	\$1,313	\$1,796	\$5,616	\$6,081	\$22,068	43,995
	e. Other (D)	3.3%	0	0	0	0	(449)	(449)	(553)	(424)	(489)	(1,001)	(1,064)	(3,208)	(7,637)
9	Total System Recoverable Expenses (Lines 7 + 8)		\$24,715	\$58,163	\$76,953	\$99,747	\$141,037	\$148,160	\$163,679	\$169,895	\$186,969	\$235,593	\$262,105	\$348,735	\$1,915,749
	a. Recoverable Costs Allocated to Energy		0	0	0	0	0	0	0	0	0	0	0	0	0
	b. Recoverable Costs Allocated to Demand		\$24,715	\$58,163	\$76,953	\$99,747	\$141,037	\$148,160	\$163,679	\$169,895	\$186,969	\$235,593	\$262,105	\$348,735	\$1,915,749
10	Energy Jurisdictional Factor		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
11	Demand Jurisdictional Factor - Distribution		0.70203	0.70203	0.70203	0.70203	0.70203	0.70203	0.70203	0.70203	0.70203	0.70203	0.70203	0.70203	
12	Retail Energy-Related Recoverable Costs (B)		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
13	Retail Demand-Related Recoverable Costs (C)		17,351	40,832	54,023	70,026	99,012	104,013	114,907	119,271	131,258	165,393	184,005	244,822	1,344,914
14	Total Jurisdictional Recoverable Costs (Lines 12 + 13)		\$17,351	\$40,832	\$54,023	\$70,026	\$99,012	\$104,013	\$114,907	\$119,271	\$131,258	\$165,393	\$184,005	\$244,822	\$1,344,914

Notes:

- (A) Line (6 x 7)/12. Based on ROE of 10.5%, weighted cost of equity component of capital structure and statutory income tax rate of 24.522% (inc tax multiplier = 1.3249). Using the 2021 WACC methodology prescribed in Order No. PSC-2020-0165-PAA-EU Docket No. 20200118-EU.
- (B) Line 9a x Line 10
- (C) Line 9b x Line 11
- (D) Credit for depreciation expense related to rate base asset retirements resulting from this SPP Program

Duke Energy Florida
Storm Protection Plan Cost Recovery Clause
Calculation of Projected Period Amount
January 2021 - December 2021

Docket No. 20200092-EI
 Duke Energy Florida, LLC
 Witness: T.G. Foster
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Return on Capital Investments, Depreciation and Taxes
For Project: Structure Hardening - Transmission: Tower Replacements
(in Dollars)

Line	Description	Beginning of Period Amount	Projected January	Projected February	Projected March	Projected April	Projected May	Projected June	Projected July	Projected August	Projected September	Projected October	Projected November	Projected December	End of Period Total
1	Investments														
	a. Expenditures/Additions	\$0	\$0	\$0	\$45,510	\$318,570	\$682,650	\$591,630	\$182,040	\$0	\$0	\$121,360	\$121,360	\$121,360	\$2,184,480
	b. Clearings to Plant		0	0	0	227,550	682,650	682,650	227,550	0	0	0	0	0	1,820,400
	c. Retirements		0	0	0	0	0	0	0	0	0	0	0	0	
	d. Other		0	0	0	0	0	0	0	0	0	0	0	0	
2	Plant-in-Service/Depreciation Base		0	0	0	227,550	910,200	1,592,850	1,820,400	1,820,400	1,820,400	1,820,400	1,820,400	1,820,400	
3	Less: Accumulated Depreciation		0	0	0	(247)	(1,233)	(2,958)	(4,930)	(6,902)	(8,874)	(10,847)	(12,819)	(14,791)	
4	CWIP - Non-Interest Bearing	0	0	0	45,510	136,530	136,530	45,510	0	0	0	121,360	242,720	364,080	
5	Net Investment (Lines 2 + 3 + 4)	\$0	\$0	\$0	\$45,510	\$363,833	\$1,045,497	\$1,635,402	\$1,815,470	\$1,813,498	\$1,811,526	\$1,930,913	\$2,050,301	\$2,169,689	
6	Average Net Investment		\$0	\$0	\$22,755	\$204,672	\$704,665	\$1,340,450	\$1,725,436	\$1,814,484	\$1,812,512	\$1,871,220	\$1,990,607	\$2,109,995	
7	Return on Average Net Investment (A)														
	a. Debt Component														
	b. Equity Component Grossed Up For Taxes														
	c. Other														
8	Investment Expenses														
	a. Depreciation														
	b. Amortization														
	c. Dismantlement														
	d. Property Taxes														
	e. Other (D)														
9	Total System Recoverable Expenses (Lines 7 + 8)		\$0	\$0	\$150	\$1,731	\$6,171	\$11,508	\$14,430	\$15,018	\$15,005	\$15,392	\$16,180	\$16,969	\$112,554
	a. Recoverable Costs Allocated to Energy		0	0	0	0	0	0	0	0	0	0	0	0	0
	b. Recoverable Costs Allocated to Demand		\$0	\$0	\$150	\$1,731	\$6,171	\$11,508	\$14,430	\$15,018	\$15,005	\$15,392	\$16,180	\$16,969	\$112,554
10	Energy Jurisdictional Factor		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
11	Demand Jurisdictional Factor - Distribution		0.70203	0.70203	0.70203	0.70203	0.70203	0.70203	0.70203	0.70203	0.70203	0.70203	0.70203	0.70203	
12	Retail Energy-Related Recoverable Costs (B)		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
13	Retail Demand-Related Recoverable Costs (C)		0	0	105	1,215	4,332	8,079	10,130	10,543	10,534	10,806	11,359	11,913	79,016
14	Total Jurisdictional Recoverable Costs (Lines 12 + 13)		\$0	\$0	\$105	\$1,215	\$4,332	\$8,079	\$10,130	\$10,543	\$10,534	\$10,806	\$11,359	\$11,913	\$79,016

Notes:

- (A) Line (6 x 7)/12. Based on ROE of 10.5%, weighted cost of equity component of capital structure and statutory income tax rate of 24.522% (inc tax multiplier = 1.3249). Using the 2021 WACC methodology prescribed in Order No. PSC-2020-0165-PAA-EU Docket No. 20200118-EU.
- (B) Line 9a x Line 10
- (C) Line 9b x Line 11
- (D) Credit for depreciation expense related to rate base asset retirements resulting from this SPP Program

Duke Energy Florida
Storm Protection Plan Cost Recovery Clause
Calculation of Projected Period Amount
January 2021 - December 2021

Docket No. 20200092-EI
Duke Energy Florida, LLC
Witness: T.G. Foster
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Return on Capital Investments, Depreciation and Taxes
For Project: Structure Hardening -Transmission: Cathodic Protection
(in Dollars)

Line	Description	Beginning of Period Amount	Projected January	Projected February	Projected March	Projected April	Projected May	Projected June	Projected July	Projected August	Projected September	Projected October	Projected November	Projected December	End of Period Total
1	Investments														
	a. Expenditures/Additions	\$0	\$0	\$0	\$0	\$0	\$0	\$240,000	\$272,000	\$320,000	\$192,000	\$0	\$0	\$0	\$1,024,000
	b. Clearings to Plant		0	0	0	0	0	160,000	352,000	240,000	272,000	0	0	0	1,024,000
	c. Retirements		0	0	0	0	0	0	0	0	0	0	0	0	0
	d. Other		0	0	0	0	0	0	0	0	0	0	0	0	0
2	Plant-in-Service/Depreciation Base		0	0	0	0	0	160,000	512,000	752,000	1,024,000	1,024,000	1,024,000	1,024,000	
3	Less: Accumulated Depreciation		0	0	0	0	0	(253)	(1,064)	(2,255)	(3,876)	(5,497)	(7,119)	(8,740)	
4	CWIP - Non-Interest Bearing	0	0	0	0	0	0	80,000	0	80,000	0	0	0	0	
5	Net Investment (Lines 2 + 3 + 4)	\$0	\$0	\$0	\$0	\$0	\$0	\$239,747	\$510,936	\$829,745	\$1,020,124	\$1,018,503	\$1,016,881	\$1,015,260	
6	Average Net Investment		\$0	\$0	\$0	\$0	\$0	\$119,873	\$375,341	\$670,341	\$924,935	\$1,019,313	\$1,017,692	\$1,016,071	
7	Return on Average Net Investment (A)														
	a. Debt Component							\$183	\$572	\$1,021	\$1,408	\$1,552	\$1,550	\$1,547	7,832
	b. Equity Component Grossed Up For Taxes							\$609	\$1,907	\$3,405	\$4,699	\$5,178	\$5,170	\$5,161	26,129
	c. Other							\$0	\$0	\$0	\$0	\$0	\$0	\$0	0
8	Investment Expenses														
	a. Depreciation		\$0	\$0	\$0	\$0	\$0	\$253	\$811	\$1,191	\$1,621	\$1,621	\$1,621	\$1,621	8,740
	b. Amortization		0	0	0	0	0	0	0	0	0	0	0	0	0
	c. Dismantlement		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	d. Property Taxes		0	0	0	0	0	102	326	479	653	653	653	653	3,519
	e. Other		0	0	0	0	0	0	0	0	0	0	0	0	0
9	Total System Recoverable Expenses (Lines 7 + 8)		\$0	\$0	\$0	\$0	\$0	\$1,147	\$3,615	\$6,096	\$8,381	\$9,004	\$8,994	\$8,983	\$46,220
	a. Recoverable Costs Allocated to Energy		0	0	0	0	0	0	0	0	0	0	0	0	0
	b. Recoverable Costs Allocated to Demand		\$0	\$0	\$0	\$0	\$0	\$1,147	\$3,615	\$6,096	\$8,381	\$9,004	\$8,994	\$8,983	\$46,220
10	Energy Jurisdictional Factor		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
11	Demand Jurisdictional Factor - Distribution		0.70203	0.70203	0.70203	0.70203	0.70203	0.70203	0.70203	0.70203	0.70203	0.70203	0.70203	0.70203	
12	Retail Energy-Related Recoverable Costs (B)		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
13	Retail Demand-Related Recoverable Costs (C)		0	0	0	0	0	805	2,538	4,280	5,884	6,321	6,314	6,306	32,448
14	Total Jurisdictional Recoverable Costs (Lines 12 + 13)		\$0	\$0	\$0	\$0	\$0	\$805	\$2,538	\$4,280	\$5,884	\$6,321	\$6,314	\$6,306	\$32,448

Notes:

- (A) Line (6 x 7)/12. Based on ROE of 10.5%, weighted cost of equity component of capital structure and statutory income tax rate of 24.522% (inc tax multiplier = 1.3249). Using the 2021 WACC methodology prescribed in Order No. PSC-2020-0165-PAA-EU Docket No. 20200118-EU.
- (B) Line 9a x Line 10
- (C) Line 9b x Line 11

Duke Energy Florida
Storm Protection Cost Recovery Clause
Calculation of the Energy & Demand Allocation % by Rate Class
January 2021 - December 2021

Docket No. 20200092-EI
Duke Energy Florida, LLC
Witness: T.G. Foster
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Rate Class	(1) 12 CP Load Factor at Meter (%)	(2) NCP Load Factor at Meter (%)	(3) Sales at Meter System Total (mWh)	(4) Sales at Meter Distrib. Total (mWh)	(5) Delivery Efficiency Factor	(6) Sales at Source System Total (mWh)	(7) Sales at Source Distrib. Total (mWh)	(8) 12 CP at Source System Total (MW)	(9) NCP at Source Distrib. Total (MW)	(10) mWh Sales at Source Energy Allocator (%)	(11) 12 CP Demand Transmission Allocator (%)	(12) NCP Distrib. Total Allocator (%)	(13) 12 CP & 1/13 AD Demand Allocator (%)
Residential													
RS-1, RST-1, RSL-1, RSL-2, RSS-1													
Secondary	0.5478	0.370	21,141,521	21,141,521	0.9307248	22,715,115	22,715,115	4,733.7	7,007.8	53.677%	61.440%	66.399%	60.843%
General Service Non-Demand													
GS-1, GST-1													
Secondary	0.576	0.451	2,057,599	2,057,599	0.9307248	2,210,749	2,210,749	438.4	559.4	5.224%	5.690%	5.300%	5.654%
Primary	0.576	0.451	14,043	14,043	0.9736607	14,423	14,423	2.9	3.6	0.034%	0.037%	0.035%	0.037%
Transmission	0.576	0.451	2,593		0.9836607	2,636		0.5	0.0	0.006%	0.007%	0.000%	0.007%
			<u>2,074,235</u>	<u>2,071,642</u>		<u>2,227,808</u>	<u>2,225,172</u>	<u>441.8</u>	<u>563.0</u>	<u>5.264%</u>	<u>5.734%</u>	<u>5.335%</u>	<u>5.698%</u>
General Service													
GS-2													
Secondary	1.000	1.000	194,563	194,563	0.9307248	209,044	209,044	23.9	23.9	0.494%	0.310%	0.226%	0.324%
General Service Demand													
GSD-1, GSDT-1													
Secondary	0.742	0.626	10,950,999	10,950,999	0.9307248	11,766,098	11,766,098	1,809.3	2,145.7	27.804%	23.483%	20.331%	23.815%
Primary	0.742	0.626	2,001,891	2,001,891	0.9736607	2,056,046	2,056,046	316.2	374.9	4.859%	4.104%	3.553%	4.162%
Secondary Del/ Primary Mtr	0.742	0.626	28,262	28,262	0.9736607	29,027	29,027	4.5	5.3	0.069%	0.058%	0.050%	0.059%
Transm Del/ Primary Mtr	0.742	0.626	0		0.9736607	0		0.0	0.0	0.000%	0.000%	0.000%	0.000%
Transmission	0.742	0.626	103,104		0.9836607	104,817		16.1	0.0	0.248%	0.209%	0.000%	0.212%
SS-1													
Primary	0.796	0.324	36,645	36,645	0.9736607	37,636	37,636	5.4	13.3	0.089%	0.070%	0.126%	0.072%
Transm Del/ Transm Mtr	0.796	0.324	5,412		0.9836607	5,502		0.8	0.0	0.013%	0.010%	0.000%	0.010%
Transm Del/ Primary Mtr	0.796	0.324	1,821		0.9736607	1,870		0.3	0.0	0.004%	0.003%	0.000%	0.004%
			<u>13,128,134</u>	<u>13,017,797</u>		<u>14,000,995</u>	<u>13,888,806</u>	<u>2,152.4</u>	<u>2,539.2</u>	<u>33.085%</u>	<u>27.938%</u>	<u>24.059%</u>	<u>28.334%</u>
Curtable													
CS-1, CST-1, CS-2, CST-2, SS-3													
Secondary	1.082	0.334	0	0	0.9307248	0	0	0.0	0.0	0.000%	0.000%	0.000%	0.000%
Primary	1.082	0.334	61,840	61,840	0.9736607	63,513	63,513	6.7	21.7	0.150%	0.087%	0.206%	0.092%
SS-3													
Primary	1.248	0.380	68,295	68,295	0.9736607	70,142	70,142	6.4	21.1	0.166%	0.083%	0.200%	0.090%
			<u>130,135</u>	<u>130,135</u>		<u>133,655</u>	<u>133,655</u>	<u>13.1</u>	<u>42.8</u>	<u>0.316%</u>	<u>0.170%</u>	<u>0.405%</u>	<u>0.181%</u>
Interruptible													
IS-1, IST-1, IS-2, IST-2													
Secondary	0.911	0.707	445,099	445,099	0.9307248	478,228	478,228	59.9	77.2	1.130%	0.778%	0.732%	0.805%
Sec Del/Primary Mtr	0.911	0.707	5,866	5,866	0.9736607	6,025	6,025	0.8	1.0	0.014%	0.010%	0.009%	0.010%
Primary Del / Primary Mtr	0.911	0.707	1,226,102	1,226,102	0.9736607	1,259,270	1,259,270	157.8	203.4	2.976%	2.048%	1.927%	2.119%
Primary Del / Transm Mtr	0.911	0.707	301	301	0.9836607	306	306	0.0	0.0	0.001%	0.000%	0.000%	0.001%
Transm Del/ Transm Mtr	0.911	0.707	459,412		0.9836607	467,043		58.5	0.0	1.104%	0.759%	0.000%	0.786%
Transm Del/ Primary Mtr	0.911	0.707	369,971		0.9736607	379,979		47.6	0.0	0.898%	0.618%	0.000%	0.639%
SS-2													
Primary	0.686	0.272	14,726	14,726	0.9736607	15,124	15,124	2.5	6.3	0.036%	0.033%	0.060%	0.033%
Transm Del/ Transm Mtr	0.686	0.272	3,450		0.9836607	3,507		0.6	0.0	0.008%	0.008%	0.000%	0.008%
Transm Del/ Primary Mtr	0.686	0.272	45,318		0.9736607	46,544		7.7	0.0	0.110%	0.101%	0.000%	0.101%
			<u>2,570,245</u>	<u>1,692,094</u>		<u>2,656,027</u>	<u>1,758,954</u>	<u>335.4</u>	<u>287.9</u>	<u>6.276%</u>	<u>4.353%</u>	<u>2.728%</u>	<u>4.501%</u>
Lighting													
LS-1 (Secondary)													
	10.191	0.479	349,344	349,344	0.9307248	375,347	375,347	4.2	89.5	0.887%	0.055%	0.848%	0.119%
			<u>39,588,176</u>	<u>38,597,095</u>		<u>42,317,991</u>	<u>41,306,092</u>	<u>7,705</u>	<u>10,554</u>	<u>100%</u>	<u>100%</u>	<u>100%</u>	<u>100%</u>

- Notes:
- (1) Average 12CP load factor based on load research study filed July 31, 2018
 - (2) NCP load factor based on load research study filed July 31, 2018
 - (3) Projected kWh sales for the period January 2021 to December 2021
 - (4) Projected kWh sales for the period January 2021 to December 2021 excluding transmission service
 - (5) Based on system average line loss analysis for 2019
 - (6) Column 3 / Column 5
 - (7) Column 6 excluding transmission service
 - (8) Calculated: (Column 3 / (8,760hours * Column 1)) x Column 5
 - (9) Calculated: (Column 4 / (8,760hours * Column 2)) x Column 5
 - (10) Column 6/ Total Column 6
 - (11) Column 8/ Total Column 8
 - (12) Column 9/ Total Column 9
 - (13) Column 10 x 1/13 + Column 11 x 12/13

Duke Energy Florida
Storm Protection Cost Recovery Clause
Calculation Rate Factors by Rate Class
January 2021 - December 2021

Docket No. 20200092-EI
Duke Energy Florida, LLC
Witness: T.G. Foster
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Form 6P

Rate Class	(1) mWh Sales at Source Energy Allocator (%)	(2) 12 CP Demand Transmission Allocator (%)	(3) NCP Distribution Total Allocator (%)	(4) 1/13 AD Demand Allocator (%)	(5) Energy- Related Costs (\$)	(6) Transmission Demand Costs (\$)	(7) Distribution Demand Costs (\$)	(8) Production Demand Costs (\$)	(9) Total SPP Costs (\$)	(10) Projected Effective Sales at Meter Level (mWh)	(11) SPP Factors (¢/kWh)
Residential											
RS-1, RST-1, RSL-1, RSL-2, RSS-1											
Secondary	53.677%	61.440%	66.399%	60.843%	\$0	\$1,862,658	\$4,612,877	\$0	\$6,475,536	21,141,521	0.031
General Service Non-Demand											
GS-1, GST-1											
Secondary	5.224%	5.690%	5.300%	5.654%	\$0	\$172,503	\$368,198		\$540,701	2,057,599	0.026
Primary	0.034%	0.037%	0.035%	0.037%	\$0	\$1,125	\$2,402		\$3,528	13,903	0.026
Transmission	0.006%	0.007%	0.000%	0.007%	\$0	\$206	\$0		\$206	2,541	0.025
TOTAL GS	5.264%	5.734%	5.335%	5.698%	\$0	\$173,834	\$370,600	\$0	\$544,435	2,074,042	
General Service											
GS-2											
Secondary	0.494%	0.310%	0.226%	0.324%	\$0	\$9,390	\$15,708	\$0.00	\$25,098	194,563	0.013
General Service Demand											
GSD-1, GSDT-1, SS-1											
Secondary	27.873%	23.541%	20.381%	23.874%	\$0	\$713,682	\$1,415,892		\$2,129,574	10,950,999	0.019
Primary	4.947%	4.174%	3.678%	4.233%	\$0	\$126,528	\$255,545		\$382,074	2,047,933	0.019
Transmission	0.265%	0.223%	0.000%	0.226%	\$0	\$6,758	\$0		\$6,758	106,346	0.019
TOTAL GSD	33.085%	27.938%	24.059%	28.334%	\$0	\$846,969	\$1,671,437	\$0	\$2,518,406	13,105,277	
Curtable											
CS-1, CST-1, CS-2, CST-2, CS-3, CST-3, SS-3											
Secondary	0.000%	0.000%	0.000%	0.000%	\$0	\$0	\$0		\$0	-	0.026
Primary	0.316%	0.170%	0.405%	0.181%	\$0	\$5,161	\$28,149		\$33,310	128,834	0.026
Transmission					\$0	\$0	\$0		\$0	-	0.025
TOTAL CS	0.316%	0.170%	0.405%	0.181%	\$0	\$5,161	\$28,149	\$0	\$33,310	128,834	
Interruptible											
IS-1, IST-1, IS-2, IST-2, SS-2											
Secondary	1.144%	0.787%	0.741%	0.815%	\$0	\$23,871	\$51,474		\$75,345	445,099	0.013
Primary	3.012%	2.081%	1.987%	2.152%	\$0	\$63,080	\$138,065		\$201,145	1,645,363	0.013
Transmission	2.120%	1.485%	0.000%	1.534%	\$0	\$45,031	\$0		\$45,031	453,900	0.013
TOTAL IS	6.276%	4.353%	2.728%	4.501%	\$0	\$131,982	\$189,539	\$0	\$321,521	2,544,362	
Lighting											
LS-1											
Secondary	0.887%	0.055%	0.848%	0.119%	\$0	\$1,654	\$58,882	\$0	\$60,536	349,344	0.017
	100.000%	100.000%	100.000%	100.000%	\$0	\$3,031,649	\$6,947,193	\$0	\$9,978,842	39,537,943	0.025

- Notes:
- (1) From Form 5P, Column 10
 - (2) From Form 5P, Column 11
 - (3) From Form 5P, Column 12
 - (4) From Form 5P, Column 13
 - (5) Column 1 x Total Energy Jurisdictional Dollars from Form 42-1P, line 5
 - (6) Column 2 x Total Transmission Demand Jurisdictional Dollars from Form 42-1P, line 5
 - (7) Column 3 x Total Distribution Demand Jurisdictional Dollars from Form 42-1P, line 5
 - (8) N/A
 - (9) Column 5 + Column 6 + Column 7 + Column 8
 - (10) From Form 5P, Column 3
 - (11) (Column 9 / Column 10)/10

Duke Energy Florida
Storm Protection Cost Recovery Clause
January 2021 - December 2021
Approved Capital Structure and Cost Rates

Docket No. 20200092-EI
Duke Energy Florida, LLC
Witness: T.G. Foster
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Form 7P

	System Per Sys Per Book	Proration Adjustment	System Per Books Adj'd	Retail Per Books	Pro Rata Adj	Specific Adj	Adjusted Retail	Cap Ratio	Cost Rate	Weighted Cost	Revenue Requirement Rate	Monthly Revenue Requirement Rate
1 Common Equity	\$7,823,047	\$ 652	\$ 7,823,699	\$ 7,015,615	\$ (360,480)	\$ (13,675)	\$ 6,641,460	43.82%	10.50%	4.60%	6.10%	0.51%
2 Long Term Debt	\$6,994,112	583	6,994,695	6,272,236	(322,283)		5,949,953	39.26%	4.37%	1.72%	1.72%	0.14%
3 Short Term Debt	(\$84,189)	(7)	(84,196)	(75,499)	3,879		(71,620)	-0.47%	1.80%	-0.01%	-0.01%	0.00%
4 Cust Dep Active	\$199,531	17	199,548	199,548	(10,253)		189,295	1.25%	2.37%	0.03%	0.03%	0.00%
5 Cust Dep Inactive	\$1,680	0	1,680	1,680	(86)		1,593	0.01%			0.00%	0.00%
6 Invest Tax Cr	\$211,684	18	211,702	189,836	(9,754)		180,082	1.19%	7.60%	0.09%	0.09%	0.01%
7 Deferred Inc Tax	\$2,959,469	(1,263)	2,958,206	2,652,663	(136,300)	(250,609)	2,265,754	14.95%			0.00%	0.00%
8 Total	\$ 18,105,334	\$ -	\$ 18,105,334	\$16,256,078	\$ (835,278)	\$ (264,283)	\$ 15,156,516	100.00%		6.43%	7.92%	0.66%

Proration Adjustment to Reflect Projected ADFIT Consistent with Projection Year:

	Month	ADIT Bal.	Deprec-Related ADFIT Bal.	Deprec-Related ADFIT Activity	Days to Prorate	Future Days in Period	Prorated Deprec-Related ADFIT Activity	Prorated Deprec-Related ADFIT Bal
9	Dec-20	\$ 2,968,806	\$ 2,090,218					\$ 2,090,218
10 projected	Jan-21	\$ 2,973,506	\$ 2,098,450	\$ 8,231	31	335	\$ 7,555	2,097,773
11 projected	Feb-21	\$ 2,974,118	\$ 2,102,838	4,388	31	304	3,655	2,101,428
12 projected	Mar-21	\$ 2,972,864	\$ 2,105,472	2,634	28	276	1,992	2,103,419
13 projected	Apr-21	\$ 2,974,157	\$ 2,110,499	5,028	31	245	3,375	2,106,794
14 projected	May-21	\$ 2,972,297	\$ 2,112,564	2,065	30	215	1,216	2,108,010
15 projected	Jun-21	\$ 2,951,032	\$ 2,096,388	(16,176)	31	184	(8,154)	2,099,856
16 projected	Jul-21	\$ 2,948,494	\$ 2,097,815	1,427	30	154	602	2,100,458
17 projected	Aug-21	\$ 2,946,321	\$ 2,099,585	1,771	31	123	597	2,101,055
18 projected	Sep-21	\$ 2,945,125	\$ 2,102,273	2,688	31	92	678	2,101,732
19 projected	Oct-21	\$ 2,945,908	\$ 2,106,822	4,549	30	62	773	2,102,505
20 projected	Nov-21	\$ 2,948,510	\$ 2,113,080	6,258	31	31	532	2,103,036
21 projected	Dec-21	\$ 2,951,965	\$ 2,120,141	7,060	30	1	19	2,103,056
22	13 Mo Avg Bal	\$ 2,959,469	\$ 2,104,319		365		\$ 12,837	\$ 2,103,056
23							13 Mo Avg Bal	2,104,319
24							Proration Adj.	\$ (1,263)

Breakdown of Revenue Requirement Rate of Return between Debt and Equity:

25	Total Debt Component (Lines 2,3,4, and 6)	1.83%	0.00152
26	Total Equity Component (Line 1)	6.10%	0.00508
27	Total Revenue Requirement Rate of Return	7.92%	0.00660

Notes:

Effective Tax Rate: 24.522%

2021 WACC methodology prescribed in Order No. PSC-2020-0165-PAA-EU Docket No. 20200118-EU.