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OFFICE OF THE GENERAL COUNSEL  
KEITH C. HETRICK  
GENERAL COUNSEL  
(850) 413-6199

# Public Service Commission

December 11, 2020

Russell A. Badders, Esquire  
Gulf Power Company  
One Energy Place  
Pensacola, FL 32520  
[Russell.Badders@nexteraenergy.com](mailto:Russell.Badders@nexteraenergy.com)

**STAFF'S THIRD DATA REQUEST**  
*via e-mail*

William P. Cox  
Gulf Power Company  
700 Universe Boulevard  
Juno Beach, FL 33408  
[will.p.cox@fpl.com](mailto:will.p.cox@fpl.com)

RE: Docket No. 20200242-EI – Petition for approval of regulatory assets related to the retirements of the coal generation assets at Plant Crist Units 4, 5, 6, and 7, by Gulf Power Company.

Dear Mr. Badders:

By this letter, the Commission staff requests that Gulf Power Company (Gulf) provide responses to the following data requests:

1. Please refer to paragraph 1 of the petition. Regarding the decision to convert Crist Units 4-7 to natural gas as the primary fuel type and retire the coal generation assets, please answer the following questions:
  - a. Please explain the approval process for the conversion, including the final date the decision was made.
  - b. Has the Commission reviewed or approved the conversion of Crist Units 4-7? If so, please identify the docket(s) included in this review, and any Order(s) approving this conversion.
2. Please refer to paragraph 3 of the petition. For Crist Units 4-7 provide, on a monthly basis for the historic period 2018 through 2020, in tons and dollars, the following:

- a. The amount of coal Gulf burned by unit.
  - b. The amount of coal inventory.
  - c. The amount of coal shipments, if any.
3. Please refer to paragraph 3 of the petition. For Crist Unit 4-7 provide, on a monthly basis for the projected period 2020 through 2021, in tons and dollars, the following if the coal generation assets had been repaired and returned to service after the damage due to Hurricane Sally and then economically dispatched.
  - a. The amount of coal Gulf burned by unit.
  - b. The amount of coal inventory.
  - c. The amount of coal shipments, if any.
4. Please refer to paragraph 3 of Gulf's petition. Explain whether the Company is contractually obligated to receive any additional coal shipments for Crist Units 4-7, and if so, please describe the volume and cost of those shipments.
5. Please refer to Exhibit 1, Attachment MG-1 of the petition in this docket, and Gulf witness Richard L. Hume's projection testimony filed on September 3, 2020 in Docket 20200001-EI. Please reconcile the differences, if any, in the assumptions of coal consumption for Crist Units 4-7.
6. Please refer to Exhibit 1 Attachment MG-1 of Gulf's petition. Explain how the repair costs for the coal generating assets of Crist Unit 4-7 were estimated.
7. Please refer to paragraph 3 of the petition. Specify how the remaining coal, or contractually obligated coal shipments to be received will be disposed of with the retirement of the coal generating assets, and provide the amount of net benefit/cost to the general body of ratepayers.
8. Please refer to paragraph 4 and Exhibit 1, Attachment MG-1 of the petition. Provide a breakdown of how the three scenario's assumptions were selected, specifically the amount of coal burned.
9. Please refer to Exhibit 1, Attachment MG-1 of the petition. Explain how each row's benefits/costs were determined for the repair and retire scenarios and provide a copy of the work papers used to calculate the values.

**Please refer to Attachment MG-1, pages 1-3, in Exhibit 1, of Gulf Power's Petition.**

10. Please provide the Excel file with formulas intact and unlocked for the CPVRR Analysis for scenarios one through three.

Please file all responses electronically no later than December 18, 2020 from the Commission's website at [www.floridapsc.com](http://www.floridapsc.com), by selecting the Clerk's Office tab and Electronic Filing Web Form. Please feel free to call me at (850) 413-6187 if you have any questions.

Sincerely,

**/s/ Shaw Stiller**

Shaw Stiller  
Senior Attorney

SS/lms

cc: Office of Commission Clerk