

STATE OF FLORIDA

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# Public Service Commission

December 15, 2020

Dianne Triplett, Esquire  
Duke Energy Florida, LLC  
299 1<sup>st</sup> Avenue N PEF-152  
St. Petersburg, FL 33701  
[Dianne.triplett@duke-energy.com](mailto:Dianne.triplett@duke-energy.com)

## STAFF'S FIRST DATA REQUEST

*via e-mail*

Matthew Bernier, Esquire  
Duke Energy Florida, LLC  
106 E. College Avenue, Ste 800  
Tallahassee, FL 32301  
[Matt.Bernier@duke-energy.com](mailto:Matt.Bernier@duke-energy.com)

RE: Docket No. 20200245-EI – Petition for a limited proceeding to approve third solar base rate adjustment, by Duke Energy Florida, LLC.

Dear Dianne:

By this letter, the Commission staff requests that Duke Energy Florida, LLC (DEF) provide responses to the following data requests:

1. Please refer to DEF witness Stout's direct testimony, page 4, lines 19 through 22. For the Twin Rivers project, please specify the amount of land used for the solar installation and adjacent facilities, land unused but suitable for future projects, and land not suitable for use. As part of this response, please explain why any land would be unsuitable for use.
2. Please refer to DEF witness Stout's direct testimony, page 6, lines 6 through 9. For the Santa Fe project, please specify the amount of land used for the solar installation and adjacent facilities, land unused but suitable for future projects, and land not suitable for use. As part of this response, please explain why any land would be unsuitable for use.
3. Please refer to DEF witness Stout's direct testimony, page 7, lines 15 through 17. For the Charlie Creek project, please specify the amount of land used for the solar installation and adjacent facilities, land unused but suitable for future projects, and land not suitable for use. As part of this response, please explain why any land would be unsuitable for use.

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4. Please refer to DEF witness Stout's direct testimony, page 8, lines 18 through 20. For the Duette project, please specify the amount of land used for the solar installation and adjacent facilities, land unused but suitable for future projects, and land not suitable for use. As part of this response, please explain why any land would be unsuitable for use.
5. Please refer to DEF witness Stout's direct testimony, page 9, lines 19 through 21. For the Sandy Creek project, please specify the amount of land used for the solar installation and adjacent facilities, land unused but suitable for future projects, and land not suitable for use. As part of this response, please explain why any land would be unsuitable for use.
6. Please refer to DEF witness Stout's direct testimony, page 9, lines 18 to 20. Please specify if the land for the Sandy Creek project has been or will be purchased by DEF.
7. Please refer to DEF witness Stout's direct testimony, page 15, line 12 through 14. For the Twin Rivers, Charlie Creek and Sandy Creek projects, please specify the amount of lease payments for the useful life of the facility. As part of this response, please also provide a net present value for all lease payments.
8. Please refer to DEF witness Stout's direct testimony, page 15, lines 12 through 14. Please specify the length of the lease and the expected useful life of the Twin Rivers, Charlie Creek and Sandy Creek projects.
  - a. Please compare the estimated lifespan of the solar facility to the duration of the lease.
  - b. Please explain whether or not DEF has the option to extend the lease[s], and if so, under what terms.
9. Please refer to DEF witness Borch's direct testimony, Exhibit BMHB-4. For the combined SoBRA projects, please provide the annual and cumulative values over the period 2020-2052 (in nominal and net present value) for each of the following categories: capital, incremental fixed O&M, and other cost(s) for the SoBRA projects, and avoided capital, fixed O&M, capacity purchases, fuel cost, emissions cost (excluding carbon), carbon emissions cost, variable O&M, and other cost(s) for the system as a whole. Please provide the response in electronic (Excel) format.
  - a. Please explain in detail the assumptions used to determine the value of each of the components evaluated in this analysis.
  - b. Explain whether DEF's emissions savings include carbon emissions. If so, provide a sensitivity analysis without those costs and provide the revised annual and cumulative values for each category in electronic format.
  - c. Please provide sensitivity analysis for each of the alternative fuel forecasts (high and low) included in the exhibit, with revised annual and cumulative values for each category in electronic (Excel) format.

10. Please refer to DEF witness Borch’s direct testimony, Exhibit BMHB-4. Please complete the table below providing the annual list of unit additions, retirements, and uprates/derates including the capacity used to determine the proposed savings for each scenario, with and without the proposed SoBRA projects.

Scenario	With SoBRA Units / Without SoBRA Units		
Year	Unit Additions (MW)	Retirements (MW)	Uprates/Downrates (MW)

11. Please refer to DEF witness Borch’s direct testimony, Exhibit BMHB-4. Please complete the table below providing the annual reserve margin for each scenario, with and without the proposed SoBRA projects.

Scenario	With SoBRA Units / Without SoBRA Units			
Year	Total Available Capacity (MW)	Net System Demand (MW)	Firm Reserve Margin (MW)	Reserve Margin (%)

12. Please refer to DEF witness Borch’s direct testimony, Exhibit BMHB-4. Please provide the monthly bill impact for a residential customer (1,000 kilowatt-hour usage) annually for the estimated life of the proposed SoBRA projects for each scenario, with and without the proposed

Scenario	With SoBRA Units / Without SoBRA Units
Year	Monthly Bill impact (\$/1,000-kWh)

13. Please refer to the Direct Testimony of Duke Energy Florida, LLC witness Thomas G. Foster, “Exhibit No. (TGF-1),” Pages 2-3, for the following request. Please further define or discuss what the “Jurisdictional Interest Expense” appearing on line 13 (both pages) is referring to or capturing.
14. Please refer to DEF witness Stout’s direct testimony, page 15, lines 12 through 14. Please provide copies of the land leases for the Twin Rivers and Charlie Creek projects.
15. Please refer to DEF witness Foster’s direct testimony, Exhibit TGF-1. Please provide a copy of the exhibit in electronic/spreadsheets format (MS Excel, cells unlocked and formulas intact).

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Please file all responses electronically no later than December 29, 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) 413-6584 if you have any questions.

Sincerely,

*/s/ Walt Trierweiler*

Walt Trierweiler  
Senior Attorney

WLT/nah

cc: Office of Commission Clerk