



Stephanie A. Cuello  
SENIOR COUNSEL

February 4, 2022

**VIA ELECTRONIC FILING**

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

Re: *Petition for Approval of a Plant Account and Depreciation Rate for Electric Vehicle DC Fast Charge Stations by Duke Energy Florida, LLC*; Docket No.

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Dear Mr. Teitzman:

Please find attached for electronic filing, Duke Energy Florida, LLC's ("DEF") Petition for Approval of a Plant Account and Depreciation Rate for Electric Vehicle DC Fast Charge Stations.

Thank you for your assistance in this matter and if you have any questions, please feel free to contact me at (850) 521-1425.

Sincerely,

*s/ Stephanie A. Cuello*

Stephanie A. Cuello

SAC/mw  
Attachment

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Duke Energy Florida, LLC's Petition  
for Approval of a Plant Account and Depreciation Rate  
for Electric Vehicle DC Fast Charge Stations

Docket No. \_\_\_\_\_

Filed: February 4, 2022

**DUKE ENERGY FLORIDA, LLC'S  
PETITION FOR APPROVAL OF A PLANT ACCOUNT AND DEPRECIATION RATE  
FOR ELECTRIC VEHICLE DC FAST CHARGE STATIONS**

Duke Energy Florida, LLC ("DEF"), pursuant to 366.06, Florida Statutes ("F.S."), Rule 25-6.0436(3)(b), Florida Administrative Code ("F.A.C."), and the 2021 Settlement Agreement approved by the Florida Public Service Commission ("Commission") in Orders No. PSC-2021-0202-AS-EI and PSC-2021-0202A-AS-EI (the "2021 Settlement"), hereby petitions the Florida Public Service Commission ("FPSC" or the "Commission") for approval of the use of FERC Account 370-Meters and a 10% depreciation rate for Company-owned electric vehicle DC Fast Charge Stations ("DCFC"), effective January 2022.

In support of this Petition, DEF states:

1. DEF is a Florida limited liability company with headquarters at 299 1st Avenue North, St. Petersburg, Florida 33701. DEF is an investor-owned utility operating under the jurisdiction of this Commission pursuant to the provisions of Chapter 366, Florida Statutes, and is a wholly-owned subsidiary of Duke Energy Corporation. DEF provides generation, transmission, and distribution service to approximately 1.9 million retail customers in Florida.

2. Any pleading, motion, notice, order, or other document required to be served upon DEF or filed by any party to this proceeding should be served upon the following individuals:

Dianne M. Triplett  
Duke Energy Florida, LLC  
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(850) 521-1425  
(850) 521-1437 (fax)

3. This Petition is being filed consistent with Rule 28-106.201, F.A.C. The agency affected is the Florida Public Service Commission, located at 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399. This case does not involve reversal or modification of an agency decision or an agency's proposed action. Therefore, subparagraph (c) and portions of subparagraphs (b), (e), (f), and (g) of subsection (2) of that rule are not applicable to this Petition. In compliance with subparagraph (d), DEF states that it is not known at this time which, if any, of the issues of material fact set forth in the body of this Petition may be disputed by any others who may plan to participate in this proceeding.

4. Pursuant to the 2021 Settlement, DEF is authorized to implement three (3) new Electric Vehicle Programs ("EV Programs"), effectively discontinuing DEF's 2017 EV Charging Station Pilot Program ("2017 EV Pilot"). However, DEF is authorized to continue operation and recovery of costs of the charging stations that were installed pursuant to the 2017 EV Pilot. Under the EV

Programs, DEF can continue installing Company-owned DCFC, and will offer a new tariff for a Fast Charge Fee (“FCF-1”) to be collected from electric vehicle drivers using Company-owned DCFC. The Fast Charge Fee included in FCF-1 is based on the average cost for fast charging provided by other fast charging operators across Florida.

5. DCFC under the 2017 EV Pilot was recorded in a regulatory asset to be amortized over four years. In order to properly account for the depreciation related to the new DCFC pursuant to the 2021 Settlement, effective January 2022, DEF requests authority to record the costs of these stations in a subaccount of FERC Account 370-Meters and to establish a depreciation rate of 10% for equipment so recorded. While there is no listing of electric vehicle charging stations under any plant account within the FERC Uniform System of Accounts (“USOA”), Account 370-Meters appears to be the most appropriate account for this type of equipment. Account 370-Meters is located in the Distribution Plant function, and since Company-owned DCFC will facilitate retail end-use customer access to a low voltage power supply, the Distribution Plant function is the appropriate function for these costs. Further, the USOA states the following with respect to Plant Account 370-Meters: “This account shall include the cost installed of meters or devices and appurtenances thereto, for use in measuring the electricity delivered to its users, whether actually in service or held in reserve.” DEF intends to create a subaccount under Plant Account 370-Meters, to which it will apply a 10% depreciation rate. This is the rate that was used to calculate the depreciation expense as part of the 2021 Settlement.

WHEREFORE, DEF respectfully requests that the Commission consider and approve Duke Energy Florida’s request for the use of a sub-account within FERC Account 370-Meters and a depreciation rate of 10% for Company-owned DCFC consistent with this petition, effective as of January, 2022.

RESPECTFULLY SUBMITTED this 4<sup>th</sup> day of February, 2022.

s/ Stephanie A. Cuello

**DIANNE M. TRIPLETT**

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