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Public Service Commission

January 13, 2023

Dianne M. Triplett
Duke Energy Florida, LLC
299 1st Avenue North
St. Petersburg, Florida 33701
Dianne.Triplett@duke-energy.com

**STAFF'S FIRST DATA REQUEST
VIA EMAIL**

Re: Docket No. 20220202-EI – Petition for approval of new clean energy impact program, a new renewable energy certificates (REC) buying program, by Duke Energy Florida, LLC.

Dear Ms. Triplett:

By this letter, Commission staff respectfully requests that Duke Energy Florida, LLC (DEF or Utility) provide responses to the following data requests regarding the above-referenced docket.

1. Please refer to page 1 of the proposed Clean Energy Impact (CEI) Tariff, the section titled "Availability," for the following questions.
 - a. Explain if the proposed program will reserve any portion of DEF's Renewable Energy Certificates (RECs) for any specific customer classes. If so, please identify the customer classes and provide the reserved amounts for each and how they were determined. If not, please explain how DEF will prevent a single customer or small number of customers from obtaining a majority of the RECs.
 - b. For each customer class (residential, commercial, industrial, et al.), explain how DEF intends to inform customers of the proposed CEI program.
 - c. Have any customer(s) contacted the Utility regarding the proposed CEI tariff? If so, what is the estimated REC usage of these customer(s) and what percentage is that amount of the total RECs available?
2. Please refer to page 1 of the proposed CEI Tariff, the section titled "Definitions" for the following questions.
 - a. Explain why DEF is restricting RECs to only those generated by Utility owned renewable generation resources tied to its transmission system. As a part of this response, explain if DEF intends to expand this in the future, such as including non-DEF owned or non-grid tied renewable resources, and if so,

explain what circumstances would cause this to occur (i.e., REC demand exceeding supply, etc.).

- b. Explain if DEF is currently receiving RECs from sources other than those defined in the tariff as Renewable Energy Resources, such as through power purchase agreements with renewable generation resources not owned by the Utility. If so, detail these resources, how DEF is handling these RECs and what effect, if any, these RECs will have on the proposed program.
3. Please refer to page 1 of the proposed CEI Tariff, the section titled “Rates,” for the following questions.
 - a. Detail which tradeable market(s) DEF has investigated.
 - b. Explain how DEF will decide which tradeable market(s) will be used in setting REC prices.
 - c. For each REC market DEF investigated, please discuss the frequency and volume of REC trading that occurs, and provide REC prices for the period 2019 to 2022.
 - d. Explain how DEF will ensure that it is using the most up-to-date price for RECs if the REC cost in the proposed tariff is set annually. As part of this response, detail the REC market price volatility that DEF has observed during 2022.
 - e. Explain if the tradeable market(s) DEF has investigated have any restrictions on the type of renewable energy resource used in REC generation. If so, detail these restrictions. As a part of this response, detail any difference in tradeable market(s) REC prices determined by the generation resource type (i.e., solar, wind, biomass, et al.).
 4. Please refer to page 1 of the proposed CEI Tariff, the section titled “Rates” for the following questions.
 - a. Provide the estimated administrative fee and annual administrative expenses for the years 2023 – 2028.
 - b. Explain if DEF has any intention to refund administrative expenses to either the general body of ratepayers or program participants if the revenue collected from fees are more than administrative expenses. If not, explain why not.
 - c. Explain what actions DEF would take if revenues collected from the administrative fees were less than administrative expenses.
 - d. Detail how administrative costs will be determined for the proposed program. As a part of this response, include if DEF intends to petition the Commission for administrative costs annually.

5. Please refer to page 1 of the proposed CEI Tariff, the sections titled “Rates” and “Special Provisions” for the following questions.
 - a. Provide the estimated monthly and annual bill impact for a program participant’s bill (1,000 kWh) for the years 2023 – 2028. The estimated bill impact provided should show the REC cost bill impact, the administrative fees bill impact and the total bill impact, assuming the purchase of one REC per month.
 - b. Explain how customers will be notified of the annual rates associated with the proposed program.
 - c. Provide the estimated cost of the stand-alone product with a purchase of 1,000 RECs for a non-residential customer.
 - d. Will customers be allowed to purchase more RECs than their electrical energy usage? If not, please explain how residential customers with less than 250 kWh/month or commercial customers with less than 1,000 MWh/year usage would be able to participate.

6. Please refer to the Utility’s Petition, paragraph 5 under the heading “Program Details,” for the following questions.
 - a. Provide the estimated monthly and annual bill impact to the general body of ratepayers for a residential customer’s bill (1,000 kWh) for the years 2023 – 2028. Include the net benefits of revenues minus program administrations expenses.
 - b. Provide the estimated annual total program revenue and net benefits to the general body of ratepayers for the program for the years 2023 – 2028, on a nominal and net present value basis.
 - c. Provide the estimated annual number of RECs generated for the years 2023 – 2028. As a part of this response, provide the estimated annual number of RECs sold through the program for the years 2023 – 2028.

Please file all responses no later than **February 3, 2023**, via the Commission’s website at www.floridapsc.com, by selecting the Clerk’s Office tab and Electronic Filing Web Form (reference Docket No. 20220202-EI). Please contact me by phone at (850) 413-6686 or by email OWooten@psc.fl.us, if you have any questions.

Sincerely,
/s/ Orlando Wooten
Orlando Wooten
Engineering Specialist III

OW:jp

cc: Office of Commission Clerk (Docket No. 20220202)