BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Duke Energy Florida, LLC, For limited proceeding for recovery of Incremental storm restoration costs related to Hurricanes Debby, Helene, and Milton	Docket No. 20240173-EI Dated: March 13, 2025

DUKE ENERGY FLORIDA'S RESPONSE IN OPPOSITION TO WHITE SPRINGS AGRICULTURAL CHEMICALS, INC. d/b/a PCS PHOSPHATE -WHITE SPRINGS' MOTION FOR RECONSIDERATION

Pursuant to Rule 28-106.204(1), F.A.C., Duke Energy Florida, LLC ("DEF" or the "Company") hereby files this Response in Opposition to White Springs Agricultural Chemical, Inc. d/b/a White Springs' ("PCS Phosphate") Motion for Reconsideration ("Motion"). PCS Phosphate has not identified any issue of fact or law the Commission overlooked or failed to consider that would justify reconsideration of the Order Approving Duke Energy Florida, LLC's Interim Storm Restoration Recovery Charge[1], ("Order"), and accordingly, PCS Phosphate's Motion should be denied.

In support, DEF states:

Background

1. On December 27, 2024, DEF filed its Petition for Limited Proceeding for Recovery of Incremental Storm Restoration Costs related to Hurricanes Debby, Helene, and Milton ("Petition"), requesting authorization to commence recovery of incremental storm restoration costs and interest related to Hurricanes Debby, Helene, and Milton (collectively, the "Storms"), and

[1] Order No. PSC-2025-0061-PCO-EI

replenishment of DEF's authorized storm reserve, for a total of approximately $1,089.6 million (jurisdictional), beginning with the first billing cycle of March 2025 and subject to final true-up.

2. In January 2025, counsel for PCS Phosphate reached out to counsel for DEF, inquiring about the cost allocation calculations and inclusion of transmission delivery voltage sales (MWh) in the calculation of the Distribution cost allocation factor. After review of the filing and conferral with PCS Phosphate, DEF updated the cost allocation calculations for the affected rate classes to correlate with previous storm cost recovery charges, as requested by PCS Phosphate. The updated calculations were provided to counsel for PCS Phosphate for review prior to filing. *See* Attachment A, Emails dated January 30th and 31st.

3. On January 31, 2025, DEF filed updated portions of Appendix A-DEF's Storm Cost Recovery Cost Summary and Appendix B-clean and legislative tariff sheets BA-1 to the Petition. The filing reflected updates made to correlate with previous storm cost recovery charges, such as those utilized in Docket No. 20230020-EI, Petition for limited proceeding for recovery of incremental storm restoration costs related to Hurricanes Elsa, Eta, Isaias, Ian, Nicole, and Tropical Storm Fred, by Duke Energy Florida, LLC. *See* Document No. 00628-2025.

4. The Commission held an Agenda Conference on February 4, 2025, to discuss and vote on Staff's Recommendation to approve DEF's Petition and the updated portions of Appendix A and Appendix B. No intervening parties, including PCS Phosphate, opposed the Staff Recommendation nor made any comments on the record. *See* Document No. 01135-2025, TRANSCRIPT - 2/4/25 Commission conference, Item 4.

5. On February 18th, PCS Phosphate served DEF its First Set of Interrogatories in this docket. *See* Document No. 01016-2025

6. On February 24, 2025, the Commission issued its Order Approving Duke Energy Florida, LLC's Interim Storm Restoration Recovery Charge. *See* Order No. PSC-2025-0061-PCO-EI.

7. On March 6th, PCS Phosphate filed its Motion for Reconsideration. In the Motion, PCS Phosphate requests the Commission reconsider a portion of its decision in the Order related to the allocation factors, alleging DEF's calculations in Appendix A do not accurately reflect the cost allocation factors utilized in the 2021 and 2024 Rate Settlements. *See* Motion, Document No. 01385-2025.

Motion for Reconsideration

8. "The standard for reconsideration is set forth in *Diamond Cab Co. of Miami v. King*, 146 So. 2d 889 (Fla. 1962). The court stated that: '[t] he purpose of a petition for rehearing is merely to bring to the attention of the trial court or, in this instance, the administrative agency, some point which it overlooked or failed to consider when it rendered its order in the first instance. (citations omitted) It is not intended as a procedure for rearguing the whole case merely because the losing party disagrees with the judgment or the order.' *Id.* at 891." *In Re: Investigation into Florida Public Service Commission jurisdiction over Southern States Utilities, Inc. in Florida*, Docket 1993045-WS, Order No. PSC-1993-0042-FOF-WS (Jan. 10, 1993) (denying SSU's motion for reconsideration and noting that "The Utility may not be permitted an opportunity to re-argue to the full Commission upon a motion for reconsideration issues already decided."); *see also In Re: Petition for Rate Increase by Florida Power & Light Company,* Docket No. 20160021-EI, Order No. PSC-2016-0231-PCO-EI (June 10, 2016), at pp. 13-14 (Commission denied OPC's request to modify a filing schedule in an OEP and stated: "Without a specific mistake of fact or

law, a motion for reconsideration must be denied, even when there is a 'feeling that a mistake may have been made' or when the reviewing body would have reached a different decision.").

9. PCS Phosphate asserts that the Commission's Order "did not consider th[e] mismatch between cost allocation methods." *See* Motion at p. 2. Specifically, PCS states that in the base rate settlements, DEF sub-functionalizes Distribution costs into Distribution – Primary and Distribution – Secondary, but it failed to do so in this docket, resulting in over-allocation of Distribution costs to rate classes with customers served at Transmission and Primary voltages. *See* Motion at p. 3. PCS Phosphate seeks to add a non-existent requirement to the 2021 and 2024 Settlement Agreements[2]. While PCS Phosphate accurately describes the allocation of base rates under the 2021 & 2024 Settlement Agreements, there is no requirement that storm recovery costs must be allocated under Paragraph 30(c) of the 2021 Settlement Agreement and Paragraph 29(c) of the 2024 Settlement Agreement using the same allocation utilized for base rates.[3] Indeed, the exhibits PCS Phosphate references to support the sub-functionalization of costs are exhibits used to calculate the base rate changes, not exhibits to calculate the storm costs referenced in Paragraphs 30(c) and 29(c) of the 2021 and 2024 Settlement Agreements. *See* Motion at p. 3. In compliance with the operative storm cost recovery paragraphs of the 2021 and 2024 Settlement Agreements, DEF made a filing, which detailed the methodology used to establish the rates, and the Commission approved the cost allocation method after a review of DEF's Petition, Appendices, and discovery responses to Staff. *See* Order. p. 2 – p. 4. Previous storm cost recovery filings used the same language, utilized the same treatment for distribution costs, and referenced the same

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[2] Docket No. 20210016-EI, Order No. PSC-2021-0202-AS-EI; Final Order Approving Settlement Agreement; and Order No. PSC-2021-0202A-AS-EI; Amendatory Order
Docket No. 20240025-EI, Order No. PSC-2024-0472-AS-EI; Final Order Approving Settlement Agreement

[3] A point NUCOR agrees with in its near-contemporaneously-filed Motion for Reconsideration. *See* Doc. No. 01375-2025 at p. 2 ("Both the 2021 and 2024 settlements allow DEF to recover certain storm expense via an interim surcharge, and Nucor does not dispute DEF's right in this regard. However, neither the 2021 nor the 2024 settlement prescribes the appropriate cost allocation and rate design for the storm cost recovery surcharge.").

controlling settlement agreements. *See* Docket No. 20230020-EI, document no. 00418-2023, p. 10-11, ¶ 27.

10. Furthermore, DEF does not sub-functionalize storm restoration costs between Distribution – Primary and Distribution – Secondary because costs are not tracked or recorded in a manner to facilitate that sub-functionalization. DEF's goal in storm recovery is to restore power to customers as safely and quickly as possible. Even if the 2021 and 2024 Settlement Agreements obligated DEF to sub-functionalize storm restoration costs (which they do not), DEF does not have the information necessary to perform such a calculation.

11. The cost allocation methodology presented in the Petition and Appendices is correct and consistent with the rate design approved in the 2021 and 2024 Settlement Agreements. It is the same allocation methodology used by DEF and approved by the Commission in previous storm filing dockets, specifically Dockets 20190222-EI, 20210097-EI, and 20230020-EI, and is the very same cost allocation methodology PCS Phosphate specifically reviewed and requested DEF to use when discussing the updates to IS rate calculations for Primary, Secondary, and Transmission levels in the current docket. *See* Document No. 00628-2025. To DEF's knowledge, PCS Phosphate did not object to the cost allocation methodology in those previous storm cost recovery dockets. PCS Phosphate takes issue with the cost allocation methodology for costs associated with three historic storms and requests the Commission change the allocation methodology to shift costs away from itself to residential customers.

12. Additionally, PCS Phosphate was given sufficient opportunity to review how DEF allocated the costs to be recovered through the interim storm cost recovery charge. PCS Phosphate only identified the issue referenced above in Paragraphs 2 & 3 and did not object to the remaining rate allocation methodology utilized in this docket. PCS Phosphate is requesting reconsideration

on an issue never brought before the Commission or to DEF and did not oppose approval of the rate allocation methodology at the Agenda Conference. *See* Document No. 01135-2025, TRANSCRIPT - 2/4/25 Commission conference, Item 4. Further, PCS Phosphate waited until February 18th, 14 days after the Agenda Conference, and 25 days after PCS Phosphate filed for intervention to serve any discovery on in this docket. *See* Document No. 01016-2025 and Document No. 00400-2025.

13. While PCS Phosphate may disagree with the Commission's conclusion, that is not a basis for reconsideration. *See* Order No. PSC-1993-0042-FOF-WS (reconsideration is "not intended as a procedure for rearguing the whole case merely because the losing party disagrees with the judgment or the order.") (quoting *Diamond Cab Co.*).

14. Because PCS Phosphate has failed to identify an issue of fact or law the Commission overlooked or failed to consider but has instead simply disagreed with the Commission's conclusions embodied in the Order, it has failed to meet the standard for reconsideration and the Motion should be denied.

WHEREFORE, DEF respectfully requests that the Commission deny PCS Phosphate's Motion.

Respectfully submitted this 13th day of March, 2025.

/s/ Stephanie A. Cuello
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Attorneys for Duke Energy Florida, LLC

CERTIFICATE OF SERVICE
Docket No. 20240173-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail this 13th day of March, 2025, to the following:

/s/ Stephanie A. Cuello
Stephanie A. Cuello

Daniel Dose Office of General Counsel Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 ddose@psc.state.fl.us	Walt Trierweiler / Charles J. Rehwinkel Office of Public Counsel 111 W. Madison St., Rm 812 Tallahassee, FL 32399 trierweiler.walt@leg.state.fl.us rehwinkel.charles@leg.state.fl.us
Peter J. Mattheis / Michael K. Lavanga Joseph R. Briscar Stone Mattheis Xenopoulos & Brew, PC NUCOR 1025 Thomas Jefferson Street, NW Suite 800 West Washington, DC 20007-5201 pjm@smxblaw.com mkl@smxblaw.com jrb@smxblaw.com	James W. Brew Laura Wynn Baker Sarah B. Newman Stone Mattheis Xenopoulos & Brew, PC PSC Phosphate - White Springs 1025 Thomas Jefferson Street, NW Suite 800 West Washington, DC 20007-5201 jwb@smxblaw.com lwb@smxblaw.com sbn@smxblaw.com
Corey Allain Nucor Steel Florida, Inc. 22 Nucor Drive Frostproof, FL 33843 corey.allain@nucor.com	

From: Menendez, Christopher
To: Cuello, Stephanie Anne
Subject: FW: DEF SCRS Factor Recalculation
Date: Monday, March 10, 2025 3:36:55 PM

From: Menendez, Christopher
Sent: Thursday, January 30, 2025 4:54 PM
To: Jay Brew <JWB@smxblaw.com>
Cc: Bernier, Matt <Matt.Bernier@duke-energy.com>
Subject: DEF SCRS Factor Recalculation

Jay,
Below are the re-calculated DEF storm cost recovery factors for the Interruptible class. Please let me know if you have any questions.

		(¢/kWh)
Interruptible		
IS-2, IST-2, SS-2		
	Secondary	0.996
	Primary	0.986
	Transmission	0.976

Best regards,
Chris

Chris Menendez
Director, DEF Rates & Regulatory Planning

phone	727.820.4602
email	christopher.menendez@duke-energy.com
address	299 1st Ave N, St. Petersburg, FL 33701

From: Menendez, Christopher
To: laura.baker@smxblaw.com
Cc: Bernier, Matt; Cuello, Stephanie Anne
Subject: DEF Milton Filing - Calculation
Date: Friday, January 31, 2025 11:08:29 AM

Good Morning Laura,
We've made the changes you discussed on the call this morning; I'm hoping we are now aligned on the rate calculations. Below are our updated IS rates (c/kWh). Please let me know if they match your calculation. I am happy to discuss/review on a call this morning if you'd like; my cell is 727-804-0037.

Interruptible

IS-2, IST-2, SS-2

Secondary	1.004
Primary	0.994
Transmission	0.984

Thank you,
Chris Menendez

Chris Menendez
Director, DEF Rates & Regulatory Planning

phone	727.820.4602
email	christopher.menendez@duke-energy.com
address	299 1st Ave N, St. Petersburg, FL 33701

From: Menendez, Christopher
To: laura.baker@smxblaw.com
Cc: Bernier, Matt; Cuello, Stephanie Anne
Subject: DEF - SCRC - Debby, Helene & Milton Estimate Filing - Revised-6P & 7P.xlsx
Date: Friday, January 31, 2025 12:12:09 PM
Attachments: DEF - SCRC - Debby, Helene & Milton Estimate Filing - Revised-6P & 7P.xlsx

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Laura,

Here is the draft of the updated file.

Thanks,

Chris

Duke Energy Florida, LLC
Storm Cost Recovery
Rate Factors by Rate Class Calculation

Line No.	Rate Class	(1) Average 12CP Load Factor at Meter (%)	(2) Sales at Meter (mWh)	(3) Average 12 CP at Meter (MW)	(4) NCP Class Max Load Factor	(5) Delivery Efficiency Factor	(6) Sales at Source Generation (mWh)	(7) Average 12 CP at Source (MW)	(8) Sales at Source (Distrib Svc Only) (mWh)	(9) Class Max MW at Source (Distrib Svc) (MW)	(10) Average Number of Billed Accts (#)	(11) mWh Sales at Source Energy Allocator (%)	(12) 12CP Demand Transmission Allocator (%)	(13) NCP Distribution Allocator (%)	(14) 12 CP & 25% AD Demand Allocator (%)	(15) Customer Service Allocator (%)
1	**Residential**															
2	**RS-1, RST-1, RSL-1, RSL-2**															
3	Secondary	0.534	21,637,165	4,623	0.423	0.9476928	22,831,412	4,879	22,831,412	6,154.4	1,789,077	53.107%	62.862%	64.352%	60.423%	87.423%
4																
5	**General Service Non-Demand**															
6	**GS-1, GST-1**															
7	Secondary	0.651	2,416,773	423.57	0.483	0.9476928	2,550,165	446.95	2,550,165	603.1		5.932%	5.759%	6.307%	5.802%	0.000%
8	Primary	0.651	31,511	5.52	0.483	0.9743973	32,339	5.67	32,339	7.6		0.075%	0.073%	0.080%	0.074%	0.000%
9	Sec Del/Primary Mtr	0.651	0	0.00	0.483	0.9743973	0	0.00	0	0.0		0.000%	0.000%	0.000%	0.000%	0.000%
9	Transmission	0.651	4,879	0.86	0.483	0.9843973	4,956	0.87		0.0		0.012%	0.011%	0.000%	0.011%	0.000%
10											128,830	6.019%	5.843%	6.387%	5.887%	6.295%
11	**General Service**															
12	**GS-2** Secondary	1.000	211,225	24.11	1.000	0.9476928	222,883	25.44	222,883	25.4	14,700	0.518%	0.328%	0.266%	0.375%	0.718%
13																
14	**General Service Demand**															
15	**GSD-1, GSDT-1**															
16	Secondary	0.777	11,096,634	1,630.38	0.634	0.9476928	11,709,104	1,720.37	11,709,104	2,109.3		27.236%	22.168%	22.055%	23.435%	0.000%
17	Primary	0.777	1,718,265	252.46	0.634	0.9743973	1,763,413	259.09	1,763,413	317.7		4.102%	3.338%	3.322%	3.529%	0.000%
18	Sec Del/Primary Mtr	0.777	24,724	3.63	0.634	0.9743973	25,373	3.73	25,373	4.6		0.059%	0.048%	0.048%	0.051%	0.000%
	Primary Del/Secondary Mtr	0.777	5,343	0.79	0.634	0.9476928	5,638	0.83	5,638	1.0		0.013%	0.011%	0.011%	0.011%	0.000%
19	Transm Del/ Primary Mtr	0.777	0	0.00	0.634	0.9743973	0	0.00		0.0		0.000%	0.000%	0.000%	0.000%	0.000%
20	Transmission	0.777	531,744	78.13	0.634	0.9843973	540,172	79.37		0.0		1.256%	1.023%	0.000%	1.081%	0.000%
21	**SS-1** Primary	0.985	45,745	5.30	0.345	0.9743973	46,947	5.44	46,947	15.5		0.109%	0.070%	0.163%	0.080%	0.000%
22	Transmission	0.985	5,336	0.62	0.345	0.9843973	5,421	0.63		0.0		0.013%	0.008%	0.000%	0.009%	0.000%
23	Transm Del/Primary Mtr	0.985	4,030	0.47	0.345	0.9743973	4,135	0.48		0.0		0.010%	0.006%	0.000%	0.007%	0.000%
24											50,441	32.798%	26.672%	25.598%	28.203%	2.465%
25	**Curtailable**															
26	**CS-2, CST-2, CS-3, CST-3**															
27	Secondary	1.002	0	0.00	0.778	0.9476928	0	0.00	0	0.0		0.000%	0.000%	0.000%	0.000%	0.000%
28	Primary	1.002	62,233	7.09	0.778	0.9743973	63,868	7.28	63,868	9.4		0.149%	0.094%	0.098%	0.107%	0.000%
29	**SS-3** Primary	1.207	0	0.00	0.576	0.9743973	0	0.00	0	0.0		0.000%	0.000%	0.000%	0.000%	0.000%
30											3	0.149%	0.094%	0.098%	0.107%	0.000%
31	**Interruptible**															
32	**IS-2, IST-2**															
33	Secondary	1.012	390,930	44.09	0.740	0.9476928	412,507	46.52	412,507	63.6		0.960%	0.599%	0.665%	0.689%	0.000%
34	Sec Del/Primary Mtr	1.012	-	0.00	0.740	0.9743973	0	0.00	0	0.0		0.000%	0.000%	0.000%	0.000%	0.000%
35	Primary	1.012	1,046,773	118.05	0.740	0.9743973	1,074,277	121.15	1,074,277	165.7		2.499%	1.561%	1.732%	1.796%	0.000%
36	Primary Del /Transm Mtr	1.012	-	0.00	0.740	0.9843973	0	0.00	0	0.0		0.000%	0.000%	0.000%	0.000%	0.000%
37	Trans Del/Trans Mtr	1.012	1,038,821	117.15	0.740	0.9843973	1,055,287	119.01		0.0		2.455%	1.534%	0.000%	1.764%	0.000%
38	Transm Del/ Primary Mtr	1.012	226,841	25.58	0.740	0.9743973	232,801	26.25		0.0		0.542%	0.338%	0.000%	0.389%	0.000%
39	**SS-2** Primary	0.838	13,902	1.89	0.237	0.9743973	14,267	1.94	14,267	6.9		0.033%	0.025%	0.072%	0.027%	0.000%
40	Trans Del/Trans Mtr	0.838	6,277	0.86	0.237	0.9843973	6,377	0.87		0.0		0.015%	0.011%	0.000%	0.012%	0.000%
41	Transm Del/ Primary Mtr	0.838	55,524	7.57	0.237	0.9743973	56,983	7.77		0.0		0.133%	0.100%	0.000%	0.108%	0.000%
42											150	6.635%	4.169%	2.469%	4.785%	0.007%
43	**Lighting**															
44	**LS-1** (Secondary)	14.969	315,704	2.41	0.479	0.9476928	333,129	2.54	333,129	79.4	63,256	0.775%	0.033%	0.830%	0.218%	3.091%
45	**Total**		40,890,378	7,373.87			42,991,455	7,760.72	41,085,324	9,563.6	2,046,456	100.000%	100.000%	100.000%	100.000%	100.000%

Notes:

(1) Average 12CP load factor based on load research study filed April 28, 202
(2) Projected kWh sales for the period March 2025 to February 202
(3) Calculated: Column 2 / (8,760 hours x Column 1
(4) NCP load factor based on load research study filed April 28, 202
(5) Based on system average line loss analysis for 202
(6) Column 2 / Column 5
(7) Column 3 / Column 5
(8) Column 6 excluding transmission delivery
(9) Column 8 / 8,760 hours / Column 4
(10) Projected # of billed accounts for the period Mar 2025 - Feb 202
(11) Column 6 / Total Column 6
(12) Column 7 / Total Column 7
(13) Column 9 / Total Column 9
(14) (Column 11 x .25) + (Column 12 x .75
(15) Column 10 / Total Column 10

Duke Energy Florida, LLC
Storm Cost Recovery
Rate Factors by Rate Class Calculation

Line No.	Rate Class	(1) mWh Sales at Source Energy Allocator (%)	(2) 12CP Transmission Demand Allocator (%)	(3) NCP Distribution Demand Allocator (%)	(4) 12 CP & 25% AD Production Allocator (%)	(5) Customer Service Allocator (%)	(6) Transmission Demand Costs ($)	(7) Distribution Demand Costs ($)	(8a) Generation Demand Costs ($)	(8b) Solar Demand Costs ($)	(9) Customer Service Costs ($)	(10) Total Storm Costs ($)	(11) Projected Effective Sales at Meter (mWh)	(12) Storm Cost Recovery Factors (¢/kWh)
1	**Residential**													
2	**RS-1, RST-1, RSL-1, RSL-2**													
3	Secondary	53.107%	62.862%	64.352%	60.423%	87.423%	$24,678,296	$672,629,057	$649,729	$791,516	$2,290,677	$701,039,275	21,637,165	**3.240**
4														
5	**General Service Non-Demand**													
6	**GS-1, GST-1**													
7	Secondary												2,416,773	**2.828**
8	Primary												31,196	**2.800**
9	Transmission												4,782	**2.771**
10	Total GS	6.019%	5.843%	6.387%	5.887%	6.295%	$2,293,971	$66,755,254	$63,304	$77,119	$164,950	$69,354,598	**2,452,751**	
11														
12	**General Service**													
13	**GS-2** Secondary	0.518%	0.328%	0.266%	0.375%	0.718%	$126,706	$2,780,767	$4,038	$4,919	$18,821	$2,937,252	211,225	**1.391**
14														
15	**General Service Demand**													
16	**GSD-1, GSDT-1, SS-1**													
17	Secondary												11,096,634	**2.081**
18	Primary												1,774,835	**2.060**
19	Transmission												526,338	**2.039**
20	Total GSD	32.798%	26.672%	25.598%	28.203%	2.465%	$10,470,849	$267,558,532	$303,270	$369,451	$64,583	$278,766,686	**13,397,807**	
21														
22	**Curtailable**													
23	**CS-2, CST-2, CS-3, CST-3, SS-3**													
24	Secondary												-	**1.727**
25	Primary												61,610	**1.710**
26	Transmission												-	**1.692**
27	Total CS	0.149%	0.094%	0.098%	0.107%	0.0002%	$36,824	$1,024,435	$1,156	$1,408	$4	$1,063,827	**61,610**	
28														
29	**Interruptible**													
30	**IS-2, IST-2, SS-2**													
31	Secondary												390,930	**1.004**
32	Primary												1,329,609	**0.994**
33	Transmission												1,024,196	**0.984**
34	Total IS	6.635%	4.169%	2.469%	4.785%	0.007%	$1,636,543	$25,807,468	$51,456	$62,685	$192	$27,558,345	**2,744,735**	
35														
36	**Lighting**													
37	**LS-1** Secondary	0.775%	0.033%	0.830%	0.218%	3.091%	$12,851	$8,676,888	$2,347	$2,859	$80,991	$8,775,936	315,704	**2.780**
38														
39	**Total**	100.000%	100.000%	100.000%	100.000%	100.000%	$39,258,042	$1,045,232,401	$1,075,301	$1,309,957	$2,620,218	$1,089,495,919	40,820,998	**2.669**

Notes:
(1) From Page 6, Column 11
(2) From Page 6, Column 12
(3) From Page 6, Column 13
(4) From Page 6, Column 14
(6) - (9) Total Retail Storm Recovery Amount on Page 1, Line 10 allocated by function
(10) Sum of Columns 6 through 9
(11) From Page 6, Column 2, then adjusted by voltage factors
(12) (Column 10 / Column 11) / 10