DUKE ENERGY® FLORIDA

Stephanie A. Cuello
SENIOR COUNSEL

March 31, 2025

VIA ELECTRONIC FILING

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

Re: *Environmental Cost Recovery Clause; Docket No. 20250007-EI*

Dear Mr. Teitzman:

On behalf of Duke Energy Florida, LLC ("DEF"), please find enclosed for electronic filing in the above-referenced docket, DEF's 2024 Final True-Up Report. The filing includes the following:

- DEF's Petition for Approval of Environmental Cost Recovery Final True-Up for the period January 2024 to December 2024 and Approval of New Project for Recovery;
- Direct Testimony of Gary P. Dean and Exhibit No. (GPD-1);
- Direct Testimony of Eric Szkolnyj;
- Direct Testimony of Reggie Anderson; and
- Direct Testimony of Patricia West and Exhibit No. (PQW-1).

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/mh
Enclosures

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Environmental Cost Recovery Clause	Docket No. 20250007-EI
	Filed: March 31, 2025

DUKE ENERGY FLORIDA'S PETITION FOR APPROVAL OF ENVIRONMENTAL COST RECOVERY CLAUSE FINAL TRUE-UP FOR THE PERIOD JANUARY 2024 - DECEMBER 2024

Duke Energy Florida, LLC ("DEF" or "the Company"), hereby petitions for approval of DEF's final end-of-the period Environmental Cost Recovery Clause ("ECRC") True-Up amount of an over-recovery of $4,879,758, and an over-recovery of $2,943,654 as the adjusted net true-up for the period January 2024 through December 2024. In support of this Petition, DEF states:

1. The actual end-of-period ECRC true-up over-recovery amount of $4,879,758 for the period January 2024 through December 2024 was calculated in accordance with the methodology set forth in Form 42-2A of Exhibit No. __ (GPD-1) accompanying the direct testimony of DEF witness Gary P. Dean, which is being filed together with this Petition and incorporated herein. Additional cost information for specific ECRC programs for the period January 2024 through December 2024 are presented in the direct testimonies of Reginald Anderson, Eric Szkolnyj, and Patricia West filed with this Petition and incorporated herein.

2. In Order No. PSC-2024-0482-FOF-EI, the Commission approved an over-recovery of $1,936,104 as the actual/estimated ECRC true-up for the period January 2024 through December 2024.

3. As reflected on Form 42-1A, Line 3, of Exhibit No. __ (GPD-1) to Mr. Dean's testimony, the adjusted net true-up for the period January 2024 through December 2024 is an over-

recovery of $2,943,654, which is the difference between the actual true-up over-recovery of $4,879,758 and the actual/estimate true-up over-recovery of $1,936,104.

WHEREFORE, DEF respectfully requests that the Commission approve the Company's final 2024 end-of-period Environmental Cost Recovery True-Up amount of an over-recovery amount of $4,879,758, and an over-recovery of $2,943,654 as the adjusted net true-up for the period January 2024 through December 2024.

RESPECTFULLY SUBMITTED this 31st day of March 2025.

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

CERTIFICATE OF SERVICE

Docket No. 20250007-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic mail to the following this 31st day of March 2025.

s/ Stephanie Cuello
Attorney

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DIRECT TESTIMONY OF

GARY P. DEAN

ON BEHALF OF

DUKE ENERGY FLORIDA, LLC

DOCKET NO. 20250007-EI

March 31, 2025

Q. Please state your name and business address.

A. My name is Gary P. Dean. My business address is 299 First Avenue North, St. Petersburg, FL 33701.

Q. By whom are you employed and in what capacity?

A. I am employed by Duke Energy Florida, LLC ("DEF" or the "Company"), as Rates and Regulatory Strategy Manager.

Q. What are your responsibilities in that position?

A. I am responsible for regulatory planning and cost recovery for DEF. These responsibilities include completion of regulatory financial reports and analysis of state, federal and local regulations, and their impacts on DEF. In this capacity, I am responsible for DEF's Final True-Up, Actual/Estimated Projection and Projection Filings in the Fuel Adjustment Clause, Capacity Cost Recovery Clause, and Environmental Cost Recovery Clause ("ECRC").

Q. Please describe your educational background and professional experience.

A. I joined DEF on April 27, 2020, as the Rates and Regulatory Strategy Manager. Prior to working at DEF, I was the Senior Manager, Optimization for Chesapeake Utilities Corporation ("CUC"). In this role, I was responsible for all pricing related to the company's natural gas retail business. Prior to working at CUC, I was the General Manager, Electric Operations for South Jersey Energy Company ("SJEC"). In that capacity I held P&L and strategic development responsibility for the company's electric retail book. Prior to working at SJEC I had various positions associated with rates and regulatory affairs. In these positions I was responsible for all rate and regulatory matters, including tariff and rate design, financial modeling, and analysis, and ensuring accurate rates for billing. I received a Master of Business Administration from Rutgers University and a Bachelor of Science degree in Commerce and Engineering, majoring in Finance, from Drexel University.

Q. Have you previously filed testimony before this Commission in connection with DEF's Environmental Cost Recovery Clause ("ECRC")?

A. Yes.

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to present for Commission review and approval DEF's actual true-up costs associated with environmental compliance activities for the period January 2024 - December 2024.

Q. Are you sponsoring any exhibits in support of your testimony?

A. Yes. I am sponsoring Exhibit No. (GPD-1), that consists of nine forms.

Exhibit No. (GPD-1) consists of the following:

- Form 42-1A: Final true-up for the period January 2024 - December 2024;
- Form 42-2A: Final true-up calculation for the period;
- Form 42-3A: Calculation of the interest provision for the period;
- Form 42-4A: Calculation of variances between actual and actual/estimated costs for O&M Activities;
- Form 42-5A: Summary of actual monthly costs for the period for O&M Activities;
- Form 42-6A: Calculation of variances between actual and actual/estimated costs for Capital Investment Projects;
- Form 42-7A: Summary of actual monthly costs for the period for Capital Investment Projects;
- Form 42-8A, pages 1-11: Calculation of return on capital investment, depreciation expense and property tax expense for each project recovered through the ECRC; and
- Form 42-9A: DEF's capital structure and cost rates.

These exhibits were developed under my supervision, and they are true and accurate to the best of my knowledge and belief.

Q. What is the source of the data that you will present in testimony and exhibits in this proceeding?

A. Unless otherwise indicated, the actual data is taken from the books and records of the Company. The books and records are kept in the regular course of DEF's business in accordance with generally accepted accounting principles and practices, and provisions of the Uniform System of Accounts as prescribed by the Federal Energy Regulatory Commission, and any accounting rules and orders established by this Commission. The Company relies on the information included in this testimony and exhibits in the conduct of its affairs.

Q. What is the final true-up amount DEF is requesting for the period January 2024 - December 2024?

A. DEF requests approval of an actual over-recovery amount of $4,879,758 for the year ending December 31, 2024. This amount is shown on Form 42-1A, Line 1.

Q. What is the net true-up amount DEF is requesting for the period January 2024 - December 2024 to be applied in the calculation of the environmental cost recovery factors to be refunded/recovered in the next projection period?

A. DEF requests approval of an adjusted net true-up over-recovery amount of $2,943,654 for the period January 2024 - December 2024 reflected on Line 3 of Form 42-1A. This amount is the difference between an actual over-recovery amount of $4,879,758 reflected on Line 1 and an actual/estimated over-recovery of $1,936,104 reflected on Line 2 for the period January 2024 - December 2024, as approved in Order PSC-2024-0482-FOF-EI.

Q. Are all costs listed on Forms 42-1A through 42-8A attributable to environmental compliance projects approved by the Commission?

A. Yes.

Q. How did actual O&M expenditures for January 2024 - December 2024 compare with DEF's actual/estimated projections as presented in previous testimony and exhibits?

A. Form 42-4A shows a total O&M project variance of $2,621,184 or 29% lower than projected. Individual O&M project variances are on Form 42-4A.

Q. How did actual capital recoverable expenditures for January 2024 - December 2024 compare with DEF's estimated/actual projections as presented in previous testimony and exhibits?

A. Form 42-6A shows a total capital investment recoverable cost variance of $36,981 or 1% lower than projected. Individual project variances are on Form 42-6A. Return on capital investment, depreciation, and property taxes for each project for the period are provided on Form 42-8A, pages 1-11.

Q. Please explain the variance between actual project expenditures and the Actual/Estimated projections for the SO_2/NOx Emissions Allowance (Project 5).

A. The O&M variance is $1,477 or 8% higher than projected. This is due to higher-than-expected SO_2 Allowance expense.

Q. Does this conclude your testimony?

A. Yes.

DUKE ENERGY FLORIDA, LLC
Environmental Cost Recovery Clause
Commission Forms 42-1A Through 42-9A

January 2024 - December 2024
Final True-Up
Docket No. 20250007-EI

DUKE ENERGY FLORIDA, LLC
Environmental Cost Recovery Clause
Final True-Up
January 2024 - December 2024
(in Dollars)

Line		Period Amount
1	Over/(Under) Recovery for the Period January 2024 - December 2024 (Form 42-2A, Line 5 + 6 + 10)	$ 4,879,758
2	Actual/Estimated True-Up Amount Approved for the Period January 2024 - December 2024 (Order No. PSC-2024-0482-FOF-EI)	1,936,104
3	Final True-Up Amount to be Refunded/(Recovered) in the Projection Period January 2026 to December 2026 (Lines 1 - 2)	$ 2,943,654

DUKE ENERGY FLORIDA, LLC
Environmental Cost Recovery Clause
Final True-Up
January 2024 - December 2024

End-of-Period True-Up Amount
(in Dollars)

Form 42-2A

Docket No. 20250007-EI
Duke Energy Florida
Witness: G. P. Dean
Exhibit No. GPD-1
Page 3 of 20

Line	Description		Actual Jan-24	Actual Feb-24	Actual Mar-24	Actual Apr-24	Actual May-24	Actual Jun-24	Actual Jul-24	Actual Aug-24	Actual Sep-24	Actual Oct-24	Actual Nov-24	Actual Dec-24	End of Period Total
1	ECRC Revenues (net of Revenue Taxes)		$1,308,980	$1,256,793	$1,202,866	$1,254,677	$1,556,040	$1,810,004	$1,900,835	$1,912,349	$1,849,925	$1,584,266	$1,372,331	$1,254,044	18,263,112
2	True-Up Provision	(2,781,842)	(231,820)	(231,820)	(231,820)	(231,820)	(231,820)	(231,820)	(231,820)	(231,820)	(231,820)	(231,820)	(231,820)	(231,820)	(2,781,842)
	(Order No. PSC-2023-0344-FOF-EI)														
3	ECRC Revenues Applicable to Period (Lines 1 + 2)		$1,077,160	1,024,973	971,046	1,022,857	1,324,220	1,578,184	1,669,015	1,680,529	1,618,105	1,352,446	1,140,511	1,022,224	15,481,270
4	Jurisdictional ECRC Costs														
	a. O & M Activities (Form 42-5A, Line 9)		$670,259	$204,649	$200,218	$337,799	$763,993	$1,641,527	$941,582	$325,290	$718,317	($348,543)	$231,053	$517,467	$6,203,611
	b. Capital Investment Projects (Form 42-7A, Line 9)		378,359	377,425	377,816	374,185	370,436	372,674	374,113	374,992	374,973	373,456	370,836	376,710	4,495,976
	c. Other (A)		0	0	0	0	0	0	0	0	0	0	0	0	0
	d. Total Jurisdictional ECRC Costs		$1,048,618	$582,074	$578,034	$711,984	$1,134,429	$2,014,201	$1,315,695	$700,282	$1,093,290	$24,913	$601,889	$894,177	$10,699,587
5	Over/(Under) Recovery (Line 3 - Line 4d)		$28,542	$442,899	$393,012	$310,873	$189,790	($436,017)	$353,320	$980,247	$524,815	$1,327,533	$538,622	$128,047	$4,781,683
6	Interest Provision (Form 42-3A, Line 10)		(4,887)	(2,831)	29	2,615	4,752	5,277	6,132	10,026	13,856	17,954	21,932	23,220	98,075
7	Beginning Balance True-Up & Interest Provision		(2,781,842)	(2,526,367)	(1,854,480)	(1,229,618)	(684,310)	(257,948)	(456,868)	134,404	1,356,498	2,126,989	3,704,297	4,496,670	(2,781,842)
	a. Deferred True-Up - January 2023 - December 2023														
	(2023 TU filing dated April 1, 2024)		1,548,518	1,548,518	1,548,518	1,548,518	1,548,518	1,548,518	1,548,518	1,548,518	1,548,518	1,548,518	1,548,518	1,548,518	1,548,518
8	True-Up Collected/(Refunded) (see Line 2)		231,820	231,820	231,820	231,820	231,820	231,820	231,820	231,820	231,820	231,820	231,820	231,820	2,781,842
9	End of Period Total True-Up (Lines 5+6+7+7a+8)		($977,850)	($305,962)	$318,899	$864,208	$1,290,570	$1,091,650	$1,682,922	$2,905,016	$3,675,507	$5,252,814	$6,045,188	$6,428,275	$6,428,275
10	Adjustments to Period Total True-Up Including Interest		0	0	0	0	0	0	0	0	0	0	0	0	0
11	End of Period Total True-Up Over/(Under) (Lines 9 + 10)		($977,850)	($305,962)	$318,899	$864,208	$1,290,570	$1,091,650	1,682,922	$2,905,016	$3,675,507	$5,252,814	$6,045,188	$6,428,275	$6,428,275

Notes:
(A) N/A

DUKE ENERGY FLORIDA, LLC
Environmental Cost Recovery Clause
Final True-Up
January 2024 - December 2024

Interest Provision
(in Dollars)

Form 42-3A

Docket No. 20250007-EI
Duke Energy Florida
Witness: G. P. Dean
Exhibit No. GPD-1
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Line	Description	Actual Jan-24	Actual Feb-24	Actual Mar-24	Actual Apr-24	Actual May-24	Actual Jun-24	Actual Jul-24	Actual Aug-24	Actual Sep-24	Actual Oct-24	Actual Nov-24	Actual Dec-24	End of Period Total
1	Beginning True-Up Amount (Form 42-2A, Line 7 + 7a + 10)	($1,233,324)	($977,850)	($305,962)	$318,899	$864,208	$1,290,570	$1,091,650	$1,682,922	$2,905,016	$3,675,507	$5,252,814	$6,045,188	
2	Ending True-Up Amount Before Interest (Line 1 + Form 42-2A, Lines 5 + 8)	(972,963)	(303,131)	318,870	861,593	1,285,818	1,086,373	1,676,790	2,894,990	3,661,651	5,234,860	6,023,256	6,405,055	
3	Total of Beginning & Ending True-Up (Lines 1 + 2)	(2,206,287)	(1,280,980)	12,909	1,180,492	2,150,026	2,376,943	2,768,440	4,577,912	6,566,667	8,910,367	11,276,071	12,450,244	
4	Average True-Up Amount (Line 3 x 1/2)	(1,103,144)	(640,490)	6,455	590,246	1,075,013	1,188,472	1,384,220	2,288,956	3,283,334	4,455,184	5,638,036	6,225,122	
5	Interest Rate (First Business Day of Current Month)	5.32%	5.32%	5.29%	5.33%	5.30%	5.30%	5.35%	5.31%	5.21%	4.91%	4.75%	4.58%	
6	Interest Rate (First Business Day of Subsequent Month)	5.32%	5.29%	5.33%	5.30%	5.30%	5.35%	5.28%	5.21%	4.91%	4.75%	4.58%	4.36%	
7	Total of Beginning & Ending Interest Rates (Lines 5 + 6)	10.64%	10.61%	10.62%	10.63%	10.60%	10.65%	10.63%	10.52%	10.12%	9.66%	9.33%	8.94%	
8	Average Interest Rate (Line 7 x 1/2)	5.320%	5.305%	5.310%	5.315%	5.300%	5.325%	5.315%	5.260%	5.060%	4.830%	4.665%	4.470%	
9	Monthly Average Interest Rate (Line 8 x 1/12)	0.443%	0.442%	0.443%	0.443%	0.442%	0.444%	0.443%	0.438%	0.422%	0.403%	0.389%	0.373%	
10	Interest Provision for the Month (Line 4 x Line 9)	($4,887)	($2,831)	$29	$2,615	$4,752	$5,277	$6,132	$10,026	$13,856	$17,954	$21,932	$23,220	$98,075

DUKE ENERGY FLORIDA, LLC
Environmental Cost Recovery Clause
Final True-Up
January 2024 - December 2024

Variance Report of O&M Activities
(In Dollars)

Line		(1) YTD Actual	(2) Actual/ Estimated	(3) Variance Amount	(4) Variance Percent
1	Description of O&M Activities - System				
1	Transmission Substation Environmental Investigation, Remediation, and Pollution Prevention	$0	$0	$0	0%
1a	Distribution Substation Environmental Investigation, Remediation, and Pollution Prevention	0	0	0	0%
2	Distribution System Environmental Investigation, Remediation, and Pollution Prevention	0	0	0	0%
3	Pipeline Integrity Management - Bartow /Anclote Pipeline - Intm	0	0	0	0%
4	Above Ground Tank Secondary Containment	0	0	0	0%
5	SO2/NOx Emissions Allowances - Energy	18,886	17,409	1,477	8%
6	Phase II Cooling Water Intake 316(b) - Base	190,408	231,260	(40,852)	-18%
6a	Phase II Cooling Water Intake 316(b) - Intm	16,945	157,442	(140,497)	-89%
7.2	CAIR/CAMR - Peaking - Demand	0	0	0	0%
7.4	CAIR/CAMR Crystal River - Base	0	0	0	0%
7.4	CAIR/CAMR Crystal River - Energy	5,440,863	7,881,705	(2,440,842)	-31%
7.4	CAIR/CAMR Crystal River - A&G	0	0	0	0%
7.4	CAIR/CAMR Crystal River - Conditions of Certification - Energy	0	0	0	0%
7.5	Best Available Retrofit Technology (BART) - Energy	0	0	0	0%
7.6	National Emission Standards for Hazardous Air Pollutants (NESHAP) - Base	22,525	21,246	1,279	6%
8	Arsenic Groundwater Standard - Base	26,284	23,932	2,351	10%
9	Sea Turtle - Coastal Street Lighting - Distrib	0	0	0	0%
11	Modular Cooling Towers - Base	0	0	0	0%
12	Greenhouse Gas Inventory and Reporting - Energy	0	0	0	0%
13	Mercury Total Daily Maximum Loads Monitoring - Energy	0	0	0	0%
14	Hazardous Air Pollutants (HAPs) ICR Program - Energy	0	0	0	0%
15	Effluent Limitation Guidelines ICR Program - Energy	0	0	0	0%
15.1	Effluent Limitation Guidelines Program CRN - Energy	0	0	0	0%
16	National Pollutant Discharge Elimination System (NPDES) - Energy	59,517	64,576	(5,059)	-8%
17	Mercury & Air Toxic Standards (MATS) CR4 & CR5 - Energy	232,333	232,704	(371)	0%
17.1	Mercury & Air Toxic Standards (MATS) Anclote Gas Conversion - Energy	0	0	0	0%
17.2	Mercury & Air Toxic Standards (MATS) CR1 & CR2 - Energy	0	0	0	0%
18	Coal Combustion Residual (CCR) Rule - Energy	499,929	484,825	15,104	3%
19	Reclaimed Water Interconnection - Energy	0	0	0	0%
20	Lead and Copper Rule - Base	16,015	29,789	(13,774)	-46%
21	CCC Water Treatment System - Base	0	0	0	0%
2	Total O&M Activities - Recoverable Costs	$6,523,705	$9,144,889	($2,621,184)	-29%
3	Recoverable Costs Allocated to Energy	6,251,528	8,681,220	(2,429,692)	-28%
4	Recoverable Costs Allocated to Demand	272,177	463,669	(191,492)	-41%

Notes:

Column (1) End of Period Totals on Form 42-5A
Column (2) 2024 Actual/Estimated Filing (7/26/2024)
Column (3) = Column (1) - Column (2)
Column (4) = Column (3) / Column (2)

DUKE ENERGY FLORIDA, LLC
Environmental Cost Recovery Clause
Final True-Up
January 2024 - December 2024

O&M Activities
(in Dollars)

Line		Description	Actual Jan-24	Actual Feb-24	Actual Mar-24	Actual Apr-24	Actual May-24	Actual Jun-24	Actual Jul-24	Actual Aug-24	Actual Sep-24	Actual Oct-24	Actual Nov-24	Actual Dec-24	End of Period Total
1		Description of O&M Activities													
	1	Transmission Substation Environmental Investigation, Remediation, and Pollution Prevention	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
	1a	Distribution Substation Environmental Investigation, Remediation, and Pollution Prevention	0	0	0	0	0	0	0	0	0	0	0	0	0
	2	Distribution System Environmental Investigation, Remediation, and Pollution Prevention	0	0	0	0	0	0	0	0	0	0	0	0	0
	3	Pipeline Integrity Management - Bartow/Anclote Pipeline - Intm	0	0	0	0	0	0	0	0	0	0	0	0	0
	4	Above Ground Tank Secondary Containment - Peaking	0	0	0	0	0	0	0	0	0	0	0	0	0
	5	SO2/NOx Emissions Allowances - Energy	0	0	0	0	0	15,180	390	887	830	610	524	465	18,886
	6	Phase II Cooling Water Intake 316(b) - Base	20,933	16,619	7,130	0	22,578	15,459	33,540	12,868	0	24,099	27,932	9,250	190,408
	6a	Phase II Cooling Water Intake 316(b) - Intm	0	0	0	0	0	0	0	0	4,895	9,114	2,936	0	16,945
	7.2	CAIR/CAMR - Peaking	0	0	0	0	0	0	0	0	0	0	0	0	0
	7.4	CAIR/CAMR Crystal River - Base	0	0	0	0	0	0	0	0	0	0	0	0	0
	7.4	CAIR/CAMR Crystal River - Energy	637,859	97,935	109,966	280,331	641,406	1,592,842	898,136	296,890	689,170	(428,369)	138,503	486,195	5,440,863
	7.4	CAIR/CAMR Crystal River - A&G	0	0	0	0	0	0	0	0	0	0	0	0	0
	7.4	CAIR/CAMR Crystal River - Conditions of Certification - Energy	0	0	0	0	0	0	0	0	0	0	0	0	0
	7.5	Best Available Retrofit Technology (BART) - Energy	0	0	0	0	0	0	0	0	0	0	0	0	0
	7.6	National Emission Standards for Hazardous Air Pollutants (NESHAP) - Base	0	0	(1,138)	0	0	22,384	1,279	0	0	0	0	0	22,525
	8	Arsenic Groundwater Standard - Base	0	2,553	3,632	1,477	0	10,271	0	0	1,020	(5,793)	11,539	1,585	26,284
	9	Sea Turtle - Coastal Street Lighting - Distrib	0	0	0	0	0	0	0	0	0	0	0	0	0
	11	Modular Cooling Towers - Base	0	0	0	0	0	0	0	0	0	0	0	0	0
	12	Greenhouse Gas Inventory and Reporting - Energy	0	0	0	0	0	0	0	0	0	0	0	0	0
	13	Mercury Total Daily Maximum Loads Monitoring - Energy	0	0	0	0	0	0	0	0	0	0	0	0	0
	14	Hazardous Air Pollutants (HAPs) ICR Program - Energy	0	0	0	0	0	0	0	0	0	0	0	0	0
	15	Effluent Limitation Guidelines ICR Program - Energy	0	0	0	0	0	0	0	0	0	0	0	0	0
	15.1	Effluent Limitation Guidelines ICR Program CRN - Energy	0	0	0	0	0	0	0	0	0	0	0	0	0
	16	National Pollutant Discharge Elimination System (NPDES) - Energy	0	25,995	(477)	2,048	0	5,126	6,625	12,400	0	0	5,146	2,654	59,517
	17	Mercury & Air Toxic Standards (MATS) CR4 & CR5 - Energy	0	42,934	35,555	22,799	92,428	38,989	0	(371)	0	0	0	0	232,333
	17.1	Mercury & Air Toxic Standards (MATS) Anclote Gas Conversion - Energy	0	0	0	0	0	0	0	0	0	0	0	0	0
	17.2	Mercury & Air Toxic Standards (MATS) CR1 & CR2 - Energy	0	0	0	0	0	0	0	0	0	0	0	0	0
	18	Coal Combustion Residual (CCR) Rule - Energy	28,811	24,214	49,060	46,074	70,966	39,172	50,047	19,103	53,264	29,258	60,161	29,798	499,929
	19	Reclaimed Water Interconnection - Energy	0	0	0	0	0	0	0	0	0	0	0	0	0
	20	Lead and Copper Rule - Base	0	0	0	1,409	1,380	1,314	3,864	1,144	2,288	3,861	756	0	16,015
	21	CCC Water Treatment System - Base	0	0	0	0	0	0	0	0	0	0	0	0	0
2		Total of O&M Activities	$687,603	$210,249	$203,729	$354,138	$828,758	$1,740,737	$993,880	$342,921	$751,467	($367,221)	$247,496	$529,948	$6,523,705
3		Recoverable Costs Allocated to Energy	666,670	191,077	194,105	351,252	804,801	1,691,310	955,197	328,909	743,264	(398,502)	204,333	519,113	6,251,528
4		Recoverable Costs Allocated to Demand - Transm	0	0	0	0	0	0	0	0	0	0	0	0	0
		Recoverable Costs Allocated to Demand - Distrib	0	0	0	0	0	0	0	0	0	0	0	0	0
		Recoverable Costs Allocated to Demand - Prod-Base	20,933	19,172	9,624	2,885	23,958	49,428	38,683	14,012	3,308	22,167	40,227	10,836	255,232
		Recoverable Costs Allocated to Demand - Prod-Intm	0	0	0	0	0	0	0	0	4,895	9,114	2,936	0	16,945
		Recoverable Costs Allocated to Demand - Prod-Peaking	0	0	0	0	0	0	0	0	0	0	0	0	0
		Recoverable Costs Allocated to Demand - A&G	0	0	0	0	0	0	0	0	0	0	0	0	0
5		Retail Energy Jurisdictional Factor	0.97480	0.97330	0.98320	0.95370	0.92030	0.94210	0.94630	0.94750	0.95600	0.95000	0.92570	0.97650	
6		Retail Transmission Demand Jurisdictional Factor	0.72042	0.72042	0.72042	0.72042	0.72042	0.72042	0.72042	0.72042	0.72042	0.72042	0.72042	0.72042	
		Retail Distribution Demand Jurisdictional Factor	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	
		Retail Production Demand Jurisdictional Factor - Base	0.97403	0.97403	0.97403	0.97403	0.97403	0.97403	0.97403	0.97403	0.97403	0.97403	0.97403	0.97403	
		Retail Production Demand Jurisdictional Factor - Intm	0.92637	0.92637	0.92637	0.92637	0.92637	0.92637	0.92637	0.92637	0.92637	0.92637	0.92637	0.92637	
		Retail Production Demand Jurisdictional Factor - Peaking	0.95110	0.95110	0.95110	0.95110	0.95110	0.95110	0.95110	0.95110	0.95110	0.95110	0.95110	0.95110	
		Retail Production Demand Jurisdictional Factor - A&G	0.96779	0.96779	0.96779	0.96779	0.96779	0.96779	0.96779	0.96779	0.96779	0.96779	0.96779	0.96779	
7		Jurisdictional Energy Recoverable Costs (A)	649,870	185,975	190,844	334,989	740,658	1,593,383	903,903	311,642	710,560	(378,577)	189,151	506,913	5,939,311
8		Jurisdictional Demand Recoverable Costs - Transm (B)	0	0	0	0	0	0	0	0	0	0	0	0	0
		Jurisdictional Demand Recoverable Costs - Distrib (B)	0	0	0	0	0	0	0	0	0	0	0	0	0
		Jurisdictional Demand Recoverable Costs - Prod-Base (B)	20,389	18,674	9,374	2,810	23,335	48,144	37,679	13,648	3,222	21,591	39,182	10,554	248,602
		Jurisdictional Demand Recoverable Costs - Prod-Intm (B)	0	0	0	0	0	0	0	0	4,535	8,443	2,720	0	15,698
		Jurisdictional Demand Recoverable Costs - Prod-Peaking (B)	0	0	0	0	0	0	0	0	0	0	0	0	0
		Jurisdictional Demand Recoverable Costs - A&G (B)	0	0	0	0	0	0	0	0	0	0	0	0	0
9		Total Jurisdictional Recoverable Costs for O&M Activities (Lines 7 + 8)	$670,259	$204,649	$200,218	$337,799	$763,993	$1,641,527	$941,582	$325,290	$718,317	($348,543)	$231,053	$517,467	$6,203,611

Notes:

(A) Line 3 x Line 5
(B) Line 4 x Line 6

DUKE ENERGY FLORIDA, LLC
Environmental Cost Recovery Clause
Final True-Up
January 2024 - December 2024

Variance Report of Capital Investment Activities
(In Dollars)

Line			(1) Total Year Actual	(2) Actual/ Estimated	(3) Variance Amount	(4) Variance Percent
1	Description of Capital Investment Activities					
	3.1	Pipeline Integrity Management - Bartow/Anclote Pipeline	$0	$0	$0	0%
	4.x	Above Ground Tank Secondary Containment	0	0	0	0%
	5	SO2/NOx Emissions Allowances	258,605	257,999	606	0%
	6	Phase II Cooling Water Intake 316(b)	1,498,666	1,502,768	(4,102)	0%
	7.x	CAIR/CAMR	512,276	493,813	18,463	4%
	9	Sea Turtle - Coastal Street Lighting	0	0	0	0%
	10.x	Underground Storage Tanks	0	0	0	0%
	11	Modular Cooling Towers	0	0	0	0%
	11.1	Crystal River Thermal Discharge Compliance Project	0	0	0	0%
	15.1	Effluent Limitation Guidelines CRN (ELG)	306,509	306,092	417	0%
	16	National Pollutant Discharge Elimination System (NPDES)	1,193,017	1,194,135	(1,118)	0%
	17x	Mercury & Air Toxics Standards (MATS)	403,842	403,308	534	0%
	18	Coal Combustion Residual (CCR) Rule	515,212	514,472	740	0%
	19	Reclaimed Water Interconnection	4,300	5,616	(1,316)	-23%
	21	CCC Water Treatment System	5,943	46,905	(40,962)	-87%
2	Total Capital Investment Activities - Recoverable Costs		$4,688,127	$4,725,108	($36,981)	-1%
3	Recoverable Costs Allocated to Energy		1,174,723	1,155,120	$19,603	2%
4	Recoverable Costs Allocated to Demand		$3,513,404	$3,569,988	($56,584)	-2%

Notes:

Column (1) End of Period Totals on Form 42-7A
Column (2) 2024 Actual/Estimated Filing (7/26/2024)
Column (3) = Column (1) - Column (2)
Column (4) = Column (3) / Column (2)

DUKE ENERGY FLORIDA, LLC
Environmental Cost Recovery Clause
Final True-Up
January 2024 - December 2024

Capital Investment Projects-Recoverable Costs
(in Dollars)

Form 42-7A

Docket No. 20250007-EI
Duke Energy Florida
Witness: G. P. Dean
Exhibit No. GPD-1
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Line		Description	Actual Jan-24	Actual Feb-24	Actual Mar-24	Actual Apr-24	Actual May-24	Actual Jun-24	Actual Jul-24	Actual Aug-24	Actual Sep-24	Actual Oct-24	Actual Nov-24	Actual Dec-24	End of Period Total
1		Description of Investment Projects (A)													
	3.1	Pipeline Integrity Management - Bartow/Anclote Pipeline - Intermediate	$0	$0	$0	$0	$0	$0	0	$0	$0	$0	$0	$0	$0
	4.1	Above Ground Tank Secondary Containment - Peaking	0	0	0	0	0	0	0	0	0	0	0	0	0
	4.2	Above Ground Tank Secondary Containment - Base	0	0	0	0	0	0	0	0	0	0	0	0	0
	4.3	Above Ground Tank Secondary Containment - Intermediate	0	0	0	0	0	0	0	0	0	0	0	0	0
	5	SO2/NOX Emissions Allowances - Energy	21,612	21,612	21,612	21,612	21,612	21,561	21,509	21,505	21,499	21,494	21,490	21,487	258,605
	6	Phase II Cooling Water Intake 316(b) - Base	125,209	124,923	124,637	124,352	124,066	123,780	123,494	123,209	122,923	122,637	122,352	122,067	1,483,649
	6.1	Phase II Cooling Water Intake 316(b) - Base - Bartow	761	976	1,175	1,197	1,209	1,238	1,257	1,258	1,258	1,260	1,563	1,865	15,017
	6.2	Phase II Cooling Water Intake 316(b) - Intermediate - Anclote	0	0	0	0	0	0	0	0	0	0	0	0	0
	7.1	CAIR/CAMR Anclote- Intermediate	0	0	0	0	0	0	0	0	0	0	0	0	0
	7.2	CAIR/CAMR - Peaking	0	0	0	0	0	0	0	0	0	0	0	0	0
	7.3	CAMR Crystal River - Base	0	0	0	0	0	0	0	0	0	0	0	0	0
	7.4	CAIR/CAMR Crystal River AFUDC - Base	0	0	0	0	0	0	0	0	0	0	0	0	0
	7.4	CAIR/CAMR Crystal River AFUDC - Energy	41,254	41,034	41,058	41,019	41,058	41,669	43,393	44,900	44,627	44,033	43,902	44,329	512,276
	7.5	Best Available Retrofit Technology (BART) - Energy	0	0	0	0	0	0	0	0	0	0	0	0	0
	9	Sea Turtle - Coastal Street Lighting -Distribution	0	0	0	0	0	0	0	0	0	0	0	0	0
	10.1	Underground Storage Tanks - Base	0	0	0	0	0	0	0	0	0	0	0	0	0
	10.2	Underground Storage Tanks - Intermediate	0	0	0	0	0	0	0	0	0	0	0	0	0
	11	Modular Cooling Towers - Base	0	0	0	0	0	0	0	0	0	0	0	0	0
	15.1	Effluent Limitation Guidelines CRN (RLG) - Base	25,943	25,871	25,798	25,725	25,652	25,579	25,507	25,434	25,361	25,288	25,215	25,136	306,509
	16	National Pollutant Discharge Elimination System (NPDES) - Intermediate	100,702	100,468	100,235	100,001	99,768	99,535	99,301	99,068	98,835	98,601	98,368	98,135	1,193,017
	17	Mercury & Air Toxic Standards (MATS) CR4 & CR5 - Energy	34,219	34,116	34,013	33,911	33,808	33,705	33,602	33,499	33,396	33,293	33,190	33,090	403,842
	17.1	Mercury & Air Toxic Standards (MATS) Anclote Gas Conversion - Energy	0	0	0	0	0	0	0	0	0	0	0	0	0
	17.2	Mercury & Air Toxic Standards (MATS) CR1 & CR2 - Energy	0	0	0	0	0	0	0	0	0	0	0	0	0
	18	Coal Combustion Residual (CCR) Rule - Demand	43,598	43,477	43,356	43,236	43,116	42,994	42,874	42,754	42,633	42,513	42,392	42,272	515,212
	19	Reclaimed Water Interconnection - Peaking	0	0	0	0	131	262	268	312	396	729	1,012	1,190	4,300
	21	CCC Water Treatment System - Base	0	0	0	17	100	342	552	627	730	845	968	1,762	5,943
2		Total Investment Projects - Recoverable Costs	$393,298	$392,477	$391,884	$391,070	$390,520	$390,665	$391,757	$392,566	$391,658	$390,693	$390,452	$391,333	$4,698,370
3		Recoverable Costs Allocated to Energy	97,085	96,762	96,683	96,542	96,478	96,935	98,504	99,904	99,522	98,820	98,582	98,906	1,174,723
		Recoverable Costs Allocated to Distribution Demand	0	0	0	0	0	0	0	0	0	0	0	0	0
4		Recoverable Costs Allocated to Demand - Production - Base	195,511	195,247	194,966	194,527	194,143	193,933	193,684	193,282	192,905	192,543	192,490	193,102	2,326,330
		Recoverable Costs Allocated to Demand - Production - Intermediate	100,702	100,468	100,235	100,001	99,768	99,535	99,301	99,068	98,835	98,601	98,368	98,135	1,193,017
		Recoverable Costs Allocated to Demand - Production - Peaking	0	0	0	0	131	262	268	312	396	729	1,012	1,190	4,300
5		Retail Energy Jurisdictional Factor	0.97480	0.97330	0.98320	0.95370	0.92030	0.94210	0.94630	0.94750	0.95600	0.95000	0.92570	0.97650	
		Retail Distribution Demand Jurisdictional Factor	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	
6		Retail Demand Jurisdictional Factor - Production - Base	0.97403	0.97403	0.97403	0.97403	0.97403	0.97403	0.97403	0.97403	0.97403	0.97403	0.97403	0.97403	
		Retail Demand Jurisdictional Factor - Production - Intermediate	0.92637	0.92637	0.92637	0.92637	0.92637	0.92637	0.92637	0.92637	0.92637	0.92637	0.92637	0.92637	
		Retail Demand Jurisdictional Factor - Production - Peaking	0.95110	0.95110	0.95110	0.95110	0.95110	0.95110	0.95110	0.95110	0.95110	0.95110	0.95110	0.95110	
7		Jurisdictional Energy Recoverable Costs (B)	94,638	94,178	95,059	92,072	88,789	91,322	93,214	94,659	95,143	93,879	91,257	96,582	1,120,793
		Jurisdictional Demand Recoverable Costs - Distribution (B)	0	0	0	0	0	0	0	0	0	0	0	0	0
8		Jurisdictional Demand Recoverable Costs - Production - Base (C)	190,433	190,176	189,903	189,475	189,101	188,896	188,654	188,262	187,895	187,542	187,491	188,087	2,265,915
		Jurisdictional Demand Recoverable Costs - Production - Intermediate (C)	93,288	93,071	92,855	92,638	92,422	92,206	91,990	91,774	91,558	91,341	91,125	90,910	1,105,178
		Jurisdictional Demand Recoverable Costs - Production - Peaking (C)	0	0	0	0	125	249	255	297	377	693	963	1,132	4,090
9		Total Jurisdictional Recoverable Costs for Investment Projects (Lines 7 + 8)	$378,359	$377,425	$377,816	$374,185	$370,436	$372,674	$374,113	$374,992	$374,973	$373,456	$370,836	$376,710	$4,495,976

Notes:

(A) Each project's Total System Recoverable Expenses on Form 42-8A, Line 9; Form 42-8A, Line 5 for Projects 5 - Emission Allowances and Project 7. 4 - Reagents
(B) Line 3 x Line 5
(C) Line 4 x Line 6

DUKE ENERGY FLORIDA, LLC
Environmental Cost Recovery Clause
Final True-Up
January 2024 - December 2024

Docket No. 20250007-EI
Duke Energy Florida
Witness: G. P. Dean
Exhibit No. GPD-1
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SO2 and NOx EMISSIONS ALLOWANCES - Energy (Project 5)
(in Dollars)

Line	Description		Beginning of Period Amount	Actual Jan-24	Actual Feb-24	Actual Mar-24	Actual Apr-24	Actual May-24	Actual Jun-24	Actual Jul-24	Actual Aug-24	Actual Sep-24	Actual Oct-24	Actual Nov-24	Actual Dec-24	End of Period Total
1	Working Capital Dr (Cr)															
	a. 0158150 SO2 Emission Allowance Inventory		$3,210,153	$3,210,153	$3,210,153	$3,210,153	$3,210,153	$3,210,153	$3,194,974	$3,194,584	$3,193,697	$3,192,866	$3,192,256	$3,191,732	$3,191,267	$3,191,267
	b. 0254020 Auctioned SO2 Allowance		0	0	0	0	0	0	0	0	0	0	0	0	0	$0
	c. 0158170 NOx Emission Allowance Inventory		0	0	0	0	0	0	0	0	0	0	0	0	0	0
	d. Other (A)		0	0	0	0	0	0	0	0	0	0	0	0	0	0
2	Total Working Capital		$3,210,153	$3,210,153	$3,210,153	$3,210,153	$3,210,153	$3,210,153	$3,194,974	$3,194,584	$3,193,697	$3,192,866	$3,192,256	$3,191,732	$3,191,267	$3,191,267
3	Average Net Investment			$3,210,153	$3,210,153	$3,210,153	$3,210,153	$3,210,153	$3,202,564	$3,194,779	$3,194,140	$3,193,282	$3,192,561	$3,191,994	$3,191,500	
4	Return on Average Net Working Capital Balance (B)															
	a. Debt Component	1.89%		5,061	5,061	5,061	5,061	5,061	5,049	5,037	5,036	5,035	5,034	5,033	5,032	60,561
	b. Equity Component Grossed Up For Taxes	6.19%		16,551	16,551	16,551	16,551	16,551	16,512	16,472	16,469	16,464	16,460	16,457	16,455	198,044
5	Total Return Component (C)			$21,612	$21,612	$21,612	$21,612	$21,612	$21,561	$21,509	$21,505	$21,499	$21,494	$21,490	$21,487	258,605
6	Expense Dr (Cr)															
	a. 0509030 SO_2 Allowance Expense			$0	$0	$0	$0	$0	$15,180	$390	$887	$830	$610	$524	$465	$18,886
	b. 0407426 Amortization Expense			0	0	0	0	0	0	0	0	0	0	0	0	0
	c. 0509212 NOx Allowance Expense			0	0	0	0	0	0	0	0	0	0	0	0	0
	d. Other			0	0	0	0	0	0	0	0	0	0	0	0	0
7	Net Expense (D)			0	0	0	0	0	15,180	390	887	830	610	524	465	18,886
8	Total System Recoverable Expenses (Lines 5 + 7 + 8)			$21,612	$21,612	$21,612	$21,612	$21,612	$36,741	$21,899	$22,392	$22,329	$22,104	$22,014	$21,952	277,491
	a. Recoverable Costs Allocated to Energy			21,612	21,612	21,612	21,612	21,612	36,741	21,899	22,392	22,329	22,104	22,014	21,952	277,491
	b. Recoverable Costs Allocated to Demand			$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	0
9	Energy Jurisdictional Factor			0.97480	0.97330	0.98320	0.95370	0.92030	0.94210	0.94630	0.94750	0.95600	0.95000	0.92570	0.97650	
10	Demand Jurisdictional Factor			N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
11	Retail Energy-Related Recoverable Costs (E)			$21,067	$21,035	$21,249	$20,611	$19,890	$34,613	$20,723	$21,217	$21,347	$20,999	$20,379	$21,436	264,565
12	Retail Demand-Related Recoverable Costs (F)			$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	0
13	Total Jurisdictional Recoverable Costs (Lines 12 + 13)			$21,067	$21,035	$21,249	$20,611	$19,890	$34,613	$20,723	$21,217	$21,347	$20,999	$20,379	$21,436	$264,565

Notes:

(A) N/A
(B) Line 3 x 8.08% x 1/12. Based on ROE of 10.10%, weighted cost of equity component of capital structure of 4.56% and statutory tax rate of 25.345% (inc tax multiplier = 1.3394950).
(C) Line 5 is reported on Capital Schedule
(D) Line 7 is reported on O&M Schedule
(E) Line 8a x Line 9
(F) Line 8b x Line 10

DUKE ENERGY FLORIDA, LLC
Environmental Cost Recovery Clause
Final True-Up
January 2024 - December 2024

Return on Capital Investments, Depreciation and Taxes
For Project: Phase II Cooling Water Intake 316(b) - Base (Project 6)
(in Dollars)

Line	Description	Beginning of Period Amount	Actual Jan-24	Actual Feb-24	Actual Mar-24	Actual Apr-24	Actual May-24	Actual Jun-24	Actual Jul-24	Actual Aug-24	Actual Sep-24	Actual Oct-24	Actual Nov-24	Actual Dec-24	End of Period Total
1	Investments														
	a. Expenditures/Additions		$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
	b. Clearings to Plant		0	0	0	0	0	0	0	0	0	0	0	0	
	c. Retirements		0	0	0	0	0	0	0	0	0	0	0	0	
	d. Other (A)		0	0	0	0	0	0	0	0	0	0	0	0	
2	Plant-in-Service/Depreciation Base	$13,196,239	13,196,239	13,196,239	13,196,239	13,196,239	13,196,239	13,196,239	13,196,239	13,196,239	13,196,239	13,196,239	13,196,239	13,196,239	
3	Less: Accumulated Depreciation	(881,683)	(924,111)	(966,539)	(1,008,967)	(1,051,395)	(1,093,823)	(1,136,251)	(1,178,679)	(1,221,107)	(1,263,535)	(1,305,963)	(1,348,391)	(1,390,819)	
4	CWIP - Non-Interest Bearing	0	0	0	0	0	0	0	0	0	0	0	0	0	
5	Net Investment (Lines 2 + 3 + 4)	$12,314,556	$12,272,128	$12,229,700	$12,187,272	$12,144,844	$12,102,416	$12,059,988	$12,017,560	$11,975,132	$11,932,704	$11,890,276	$11,847,848	$11,805,420	
6	Average Net Investment		$12,293,342	$12,250,914	$12,208,486	$12,166,058	$12,123,630	$12,081,202	$12,038,774	$11,996,346	$11,953,918	$11,911,490	$11,869,062	$11,826,634	
7	Return on Average Net Investment (B)														
	a. Debt Component 1.89%		19,383	19,316	19,249	19,182	19,115	19,048	18,981	18,914	18,847	18,780	18,714	18,647	228,176
	b. Equity Component Grossed Up For Taxes 6.19%		63,383	63,164	62,945	62,727	62,508	62,289	62,070	61,852	61,633	61,414	61,195	60,977	746,157
	c. Other		0	0	0	0	0	0	0	0	0	0	0	0	0
8	Investment Expenses														
	a. Depreciation (C) 3.8582%		42,428	42,428	42,428	42,428	42,428	42,428	42,428	42,428	42,428	42,428	42,428	42,428	509,136
	b. Amortization		0	0	0	0	0	0	0	0	0	0	0	0	0
	c. Dismantlement		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	d. Property Taxes (D) 0.0014%		15	15	15	15	15	15	15	15	15	15	15	15	180
	e. Other		0	0	0	0	0	0	0	0	0	0	0	0	0
9	Total System Recoverable Expenses (Lines 7 + 8)		$125,209	$124,923	$124,637	$124,352	$124,066	$123,780	$123,494	$123,209	$122,923	$122,637	$122,352	$122,067	1,483,649
	a. Recoverable Costs Allocated to Energy		0	0	0	0	0	0	0	0	0	0	0	0	0
	b. Recoverable Costs Allocated to Demand		$125,209	$124,923	$124,637	$124,352	$124,066	$123,780	$123,494	$123,209	$122,923	$122,637	$122,352	$122,067	1,483,649
10	Energy Jurisdictional Factor		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
11	Demand Jurisdictional Factor - Production (Base)		0.97403	0.97403	0.97403	0.97403	0.97403	0.97403	0.97403	0.97403	0.97403	0.97403	0.97403	0.97403	
12	Retail Energy-Related Recoverable Costs (E)		$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
13	Retail Demand-Related Recoverable Costs (F)		121,957	121,679	121,400	121,123	120,844	120,565	120,287	120,009	119,731	119,452	119,175	118,897	1,445,119
14	Total Jurisdictional Recoverable Costs (Lines 12 + 13)		$121,957	$121,679	$121,400	$121,123	$120,844	$120,565	$120,287	$120,009	$119,731	$119,452	$119,175	$118,897	$1,445,119

Notes:
(A) N/A
(B) Line 6 x 8.08% x 1/12. Based on ROE of 10.10%, weighted cost of equity component of capital structure of 4.56% and statutory tax rate of 25.345% (inc tax multiplier = 1.3394950).
(C) Line 2 x rate x 1/12. Depreciation rate based on approved rates in Order PSC-2021-0202-AS-EI.
(D) Line 2 x rate x 1/12. Based on 2024 Effective Tax Rate on original cost.
(E) Line 9a x Line 10
(F) Line 9b x Line 11

DUKE ENERGY FLORIDA, LLC
Environmental Cost Recovery Clause
Final True-Up
January 2024 - December 2024

Docket No. 20250007-EI
Duke Energy Florida
Witness: G. P. Dean
Exhibit No. GPD-1
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Return on Capital Investments, Depreciation and Taxes
For Project: Phase II Cooling Water Intake 316(b) - Base - Bartow (Project 6.1)
(in Dollars)

Line	Description		Beginning of Period Amount	Actual Jan-24	Actual Feb-24	Actual Mar-24	Actual Apr-24	Actual May-24	Actual Jun-24	Actual Jul-24	Actual Aug-24	Actual Sep-24	Actual Oct-24	Actual Nov-24	Actual Dec-24	End of Period Total
1	Investments															
	a. Expenditures/Additions			$10,380	$53,390	$5,707	$999	$2,517	$5,815	$152	$0	$0	$603	$89,566	$0	$169,129
	b. Clearings to Plant			0	0	0	0	0	0	0	0	0	0	0	0	
	c. Retirements			0	0	0	0	0	0	0	0	0	0	0	0	
	d. Other (A)			0	0	0	0	0	0	0	0	0	0	0	0	
2	Plant-in-Service/Depreciation Base		$0	0	0	0	0	0	0	0	0	0	0	0	0	
3	Less: Accumulated Depreciation		0	0	0	0	0	0	0	0	0	0	0	0	0	
4	CWIP - Non-Interest Bearing		107,892	118,272	171,662	177,369	178,368	180,885	186,700	186,852	186,852	186,852	187,454	277,021	277,021	
5	Net Investment (Lines 2 + 3 + 4)		$107,892	$118,272	$171,662	$177,369	$178,368	$180,885	$186,700	$186,852	$186,852	$186,852	$187,454	$277,021	$277,021	
6	Average Net Investment			$113,082	$144,967	$174,515	$177,869	$179,626	$183,792	$186,776	$186,852	$186,852	$187,153	$232,237	$277,021	
7	Return on Average Net Investment (B)															
	a. Debt Component	1.89%		178	229	275	280	283	290	294	295	295	295	366	437	3,517
	b. Equity Component Grossed Up For Taxes	6.19%		583	747	900	917	926	948	963	963	963	965	1,197	1,428	11,500
	c. Other			0	0	0	0	0	0	0	0	0	0	0	0	0
8	Investment Expenses															
	a. Depreciation (C)	3.8582%		0	0	0	0	0	0	0	0	0	0	0	0	0
	b. Amortization			0	0	0	0	0	0	0	0	0	0	0	0	0
	c. Dismantlement			N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	d. Property Taxes (D)	0.0014%		0	0	0	0	0	0	0	0	0	0	0	0	0
	e. Other			0	0	0	0	0	0	0	0	0	0	0	0	0
9	Total System Recoverable Expenses (Lines 7 + 8)			$761	$976	$1,175	$1,197	$1,209	$1,238	$1,257	$1,258	$1,258	$1,260	$1,563	$1,865	15,017
	a. Recoverable Costs Allocated to Energy			0	0	0	0	0	0	0	0	0	0	0	0	0
	b. Recoverable Costs Allocated to Demand			$761	$976	$1,175	$1,197	$1,209	$1,238	$1,257	$1,258	$1,258	$1,260	$1,563	$1,865	15,017
10	Energy Jurisdictional Factor			N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
11	Demand Jurisdictional Factor - Production (Base)			0.97403	0.97403	0.97403	0.97403	0.97403	0.97403	0.97403	0.97403	0.97403	0.97403	0.97403	0.97403	
12	Retail Energy-Related Recoverable Costs (E)			$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
13	Retail Demand-Related Recoverable Costs (F)			741	951	1,144	1,166	1,178	1,206	1,224	1,225	1,225	1,227	1,522	1,817	14,627
14	Total Jurisdictional Recoverable Costs (Lines 12 + 13)			$741	$951	$1,144	$1,166	$1,178	$1,206	$1,224	$1,225	$1,225	$1,227	$1,522	$1,817	$14,627

Notes:

(A) N/A

(B) Line 6 x 8.08% x 1/12. Based on ROE of 10.10%, weighted cost of equity component of capital structure of 4.56% and statutory tax rate of 25.345% (inc tax multiplier = 1.3394950).

(C) Line 2 x rate x 1/12. Depreciation rate based on approved rates in Order PSC-2021-0202-AS-EI.

(D) Line 2 x rate x 1/12. Based on 2024 Effective Tax Rate on original cost.

(E) Line 9a x Line 10

(F) Line 9b x Line 11

DUKE ENERGY FLORIDA, LLC
Environmental Cost Recovery Clause
Final True-Up
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Docket No. 20250007-EI
Duke Energy Florida
Witness: G. P. Dean
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Return on Capital Investments, Depreciation and Taxes
For Project: Phase II Cooling Water Intake 316(b) - Intermediate - Anclote (Project 6.2)
(in Dollars)

Line	Description	Beginning of Period Amount	Actual Jan-24	Actual Feb-24	Actual Mar-24	Actual Apr-24	Actual May-24	Actual Jun-24	Actual Jul-24	Actual Aug-24	Actual Sep-24	Actual Oct-24	Actual Nov-24	Actual Dec-24	End of Period Total
1	Investments														
	a. Expenditures/Additions		$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
	b. Clearings to Plant		0	0	0	0	0	0	0	0	0	0	0	0	
	c. Retirements		0	0	0	0	0	0	0	0	0	0	0	0	
	d. Other (A)		0	0	0	0	0	0	0	0	0	0	0	0	
2	Plant-in-Service/Depreciation Base	$0	0	0	0	0	0	0	0	0	0	0	0	0	
3	Less: Accumulated Depreciation	0	0	0	0	0	0	0	0	0	0	0	0	0	
4	CWIP - Non-Interest Bearing	0	0	0	0	0	0	0	0	0	0	0	0	0	
5	Net Investment (Lines 2+ 3 + 4)	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	
6	Average Net Investment		$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	
7	Return on Average Net Investment (B)														
	a. Debt Component 1.89%		0	0	0	0	0	0	0	0	0	0	0	0	0
	b. Equity Component Grossed Up For Taxes 6.19%		0	0	0	0	0	0	0	0	0	0	0	0	0
	c. Other		0	0	0	0	0	0	0	0	0	0	0	0	0
8	Investment Expenses														
	a. Depreciation (C)		0	0	0	0	0	0	0	0	0	0	0	0	0
	b. Amortization		0	0	0	0	0	0	0	0	0	0	0	0	0
	c. Dismantlement		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	d. Property Taxes (D) 0.0014%		0	0	0	0	0	0	0	0	0	0	0	0	0
	e. Other		0	0	0	0	0	0	0	0	0	0	0	0	0
9	Total System Recoverable Expenses (Lines 7 + 8)		$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	0
	a. Recoverable Costs Allocated to Energy		0	0	0	0	0	0	0	0	0	0	0	0	0
	b. Recoverable Costs Allocated to Demand		0	0	0	0	0	0	0	0	0	0	0	0	0
10	Energy Jurisdictional Factor		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
11	Demand Jurisdictional Factor - Production (Intermediate)		0.92637	0.92637	0.92637	0.92637	0.92637	0.92637	0.92637	0.92637	0.92637	0.92637	0.92637	0.92637	
12	Retail Energy-Related Recoverable Costs (E)		$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
13	Retail Demand-Related Recoverable Costs (F)		0	0	0	0	0	0	0	0	0	0	0	0	0
14	Total Jurisdictional Recoverable Costs (Lines 12 + 13)		$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0

Notes:
(A) N/A
(B) Line 6 x 8.08% x 1/12. Based on ROE of 10.10%, weighted cost of equity component of capital structure of 4.56% and statutory tax rate of 25.345% (inc tax multiplier = 1.3394950).
(C) Line 2 x rate x 1/12. Depreciation rate based on approved rates in Order PSC-2021-0202-AS-EI.
(D) Line 2 x rate x 1/12. Based on 2024 Effective Tax Rate on original cost.
(E) Line 9a x Line 10
(F) Line 9b x Line 11

DUKE ENERGY FLORIDA, LLC
Environmental Cost Recovery Clause
Final True-Up
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Docket No. 20250007-EI
Duke Energy Florida
Witness: G. P. Dean
Exhibit No. GPD-1
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Schedule of Amortization and Return
For Project: CAIR/CAMR - Energy (Project 7.4 - Reagents and By-Products)
(in Dollars)

Line	Description		Beginning of Period Amount	Actual Jan-24	Actual Feb-24	Actual Mar-24	Actual Apr-24	Actual May-24	Actual Jun-24	Actual Jul-24	Actual Aug-24	Actual Sep-24	Actual Oct-24	Actual Nov-24	Actual Dec-24	End of Period Total
1	Working Capital Dr (Cr)															
	a. 0154401 Ammonia Inventory		$4,439,007	$4,468,193	$4,520,398	$4,520,804	$4,561,532	$4,578,363	$4,651,856	$4,818,552	$4,873,894	$4,877,289	$4,877,289	$4,890,129	$4,863,722	4,863,722
	b. 0154200 Limestone Inventory (F)		1,729,661	1,618,196	1,582,959	1,572,918	1,530,048	1,527,151	1,621,022	1,799,208	1,846,426	1,659,589	1,666,319	1,608,176	1,806,657	1,806,657
2	Total Working Capital		$6,168,668	6,086,389	6,103,357	6,093,722	6,091,580	6,105,514	6,272,877	6,617,760	6,720,320	6,536,878	6,543,608	6,498,304	6,670,380	6,670,380
3	Average Net Investment			6,127,528	6,094,873	6,098,539	6,092,651	6,098,547	6,189,196	6,445,319	6,669,040	6,628,599	6,540,243	6,520,956	6,584,342	
4	Return on Average Net Working Capital Balance (A)															
	a. Debt Component (F)	1.89%		9,661	9,610	9,615	9,606	9,615	9,758	10,162	10,515	10,451	10,312	10,281	10,381	$119,967
	b. Equity Component Grossed Up For Taxes	6.19%		31,593	31,424	31,443	31,413	31,443	31,911	33,231	34,385	34,176	33,721	33,621	33,948	392,309
5	Total Return Component (B)			41,254	41,034	41,058	41,019	41,058	41,669	43,393	44,900	44,627	44,033	43,902	44,329	512,276
6	Expense Dr (Cr)															
	a. 502030 Ammonia Expense			165,032	86,172	61,107	108,220	149,059	277,661	285,442	175,020	239,844	0	37,025	152,700	1,737,282
	b. 502040 Limestone Expense			360,921	149,447	190,120	287,674	334,300	603,964	584,319	450,539	445,412	0	61,447	221,539	3,689,680
	c. 502050 Dibasic Acid Expense			0	0	0	0	0	0	0	0	0	0	0	0	0
	d. 502070 Gypsum Disposal/Sale			(129,289)	(249,185)	(237,328)	(297,108)	(175,726)	350,818	(375,486)	(644,507)	(441,206)	(428,369)	(21,484)	(64,022)	(2,712,894)
	e. 502040 Hydrated Lime Expense			241,195	106,578	96,067	181,546	204,725	360,400	403,861	315,838	311,797	0	61,515	175,979	2,459,502
	f. 502300 Caustic Expense (F)			0	4,922	0	0	129,049	0	0	0	133,323	0	0	0	267,294
7	Net Expense (C)			637,859	97,935	109,966	280,331	641,406	1,592,842	898,136	296,890	689,170	(428,369)	138,503	486,195	5,440,863
8	Total System Recoverable Expenses (Lines 5 + 7)			$679,113	$138,969	$151,024	$321,350	$682,464	$1,634,511	$941,529	$341,790	$733,797	($384,336)	$182,405	$530,524	$5,953,139
	a. Recoverable Costs Allocated to Energy			679,113	138,969	151,024	321,350	682,464	1,634,511	941,529	341,790	733,797	(384,336)	182,405	530,524	$5,953,139
	b. Recoverable Costs Allocated to Demand			$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
9	Energy Jurisdictional Factor			0.97480	0.97330	0.98320	0.95370	0.92030	0.94210	0.94630	0.94750	0.95600	0.95000	0.92570	0.97650	
10	Demand Jurisdictional Factor			N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
11	Retail Energy-Related Recoverable Costs (D)			$661,999	$135,258	$148,487	$306,472	$628,072	$1,539,873	$890,969	$323,846	$701,510	($365,120)	$168,852	$518,057	$5,658,275
12	Retail Demand-Related Recoverable Costs (E)			0	0	0	0	0	0	0	0	0	0	0	0	0
13	Total Jurisdictional Recoverable Costs (Lines 11 + 12)			$661,999	$135,258	$148,487	$306,472	$628,072	$1,539,873	$890,969	$323,846	$701,510	($365,120)	$168,852	$518,057	$5,658,275

Notes:

(A) Line 3 x 8.08% x 1/12. Based on ROE of 10.10%, weighted cost of equity component of capital structure of 4.56% and statutory tax rate of 25.345% (inc tax multiplier = 1.3394950).
(B) Line 5 is reported on Capital Schedule
(C) Line 7 is reported on O&M Schedule
(D) Line 8a x Line 9
(E) Line 8b x Line 10

DUKE ENERGY FLORIDA, LLC
Environmental Cost Recovery Clause
Final True-Up
January 2024 - December 2024

Return on Capital Investments, Depreciation and Taxes
For Project: Effluent Limitation Guidelines CRN - Base (Project 15.1)
(in Dollars)

Line	Description		Beginning of Period Amount	Actual Jan-24	Actual Feb-24	Actual Mar-24	Actual Apr-24	Actual May-24	Actual Jun-24	Actual Jul-24	Actual Aug-24	Actual Sep-24	Actual Oct-24	Actual Nov-24	Actual Dec-24	End of Period Total
1	Investments															
	a. Expenditures/Additions			$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
	b. Clearings to Plant			0	0	0	0	0	0	0	0	0	0	0	0	
	c. Retirements			0	0	0	0	0	0	0	0	0	0	0	0	
	d. Other (A)			0	0	0	0	0	0	0	0	0	0	0	0	
2	Plant-in-Service/Depreciation Base		$2,612,979	$2,612,979	$2,612,979	$2,612,979	$2,612,979	$2,612,979	$2,612,979	$2,612,979	$2,612,979	$2,612,979	$2,612,979	$2,612,979	$2,612,979	
3	Less: Accumulated Depreciation		(362,087)	(372,910)	(383,733)	(394,556)	(405,379)	(416,202)	(427,025)	(437,848)	(448,671)	(459,494)	(470,317)	(481,140)	(491,963)	
4	CWIP - Non-Interest Bearing		0	0	0	0	0	0	0	0	0	0	0	0	0	
5	Net Investment (Lines 2 + 3 + 4)		$2,250,892	$2,240,069	$2,229,246	$2,218,423	$2,207,600	$2,196,777	$2,185,954	$2,175,131	$2,164,308	$2,153,485	$2,142,662	$2,131,839	$2,121,016	
6	Average Net Investment			$2,245,481	$2,234,658	$2,223,835	$2,213,012	$2,202,189	$2,191,366	$2,180,543	$2,169,720	$2,158,897	$2,148,074	$2,137,251	$2,126,428	
7	Return on Average Net Investment (B)															
	a. Debt Component	1.89%		3,540	3,523	3,506	3,489	3,472	3,455	3,438	3,421	3,404	3,387	3,370	3,347	41,352
	b. Equity Component Grossed Up For Taxes	6.19%		11,577	11,522	11,466	11,410	11,354	11,298	11,243	11,187	11,131	11,075	11,019	10,963	135,245
	c. Other			0	0	0	0	0	0	0	0	0	0	0	0	0
8	Investment Expenses															
	a. Depreciation (C)	4.9707%		10,823	10,823	10,823	10,823	10,823	10,823	10,823	10,823	10,823	10,823	10,823	10,823	129,876
	b. Amortization			0	0	0	0	0	0	0	0	0	0	0	0	0
	c. Dismantlement			N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	d. Property Taxes (D)	0.0014%		3	3	3	3	3	3	3	3	3	3	3	3	36
	e. Other			0	0	0	0	0	0	0	0	0	0	0	0	0
9	Total System Recoverable Expenses (Lines 7 + 8)			$25,943	$25,871	$25,798	$25,725	$25,652	$25,579	$25,507	$25,434	$25,361	$25,288	$25,215	$25,136	306,509
	a. Recoverable Costs Allocated to Energy			0	0	0	0	0	0	0	0	0	0	0	0	0
	b. Recoverable Costs Allocated to Demand			$25,943	$25,871	$25,798	$25,725	$25,652	$25,579	$25,507	$25,434	$25,361	$25,288	$25,215	$25,136	306,509
10	Energy Jurisdictional Factor			N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
11	Demand Jurisdictional Factor - Production (Base)			0.97403	0.97403	0.97403	0.97403	0.97403	0.97403	0.97403	0.97403	0.97403	0.97403	0.97403	0.97403	
12	Retail Energy-Related Recoverable Costs (E)			$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	0
13	Retail Demand-Related Recoverable Costs (F)			25,269	25,199	25,128	25,057	24,986	24,915	24,845	24,773	24,702	24,631	24,560	24,483	298,549
14	Total Jurisdictional Recoverable Costs (Lines 12 + 13)			$25,269	$25,199	$25,128	$25,057	$24,986	$24,915	$24,845	$24,773	$24,702	$24,631	$24,560	$24,483	$298,549

Notes:

(A) N/A

(B) Line 6 x 8.08% x 1/12. Based on ROE of 10.10%, weighted cost of equity component of capital structure of 4.56% and statutory tax rate of 25.345% (inc tax multiplier = 1.3394950).

(C) Line 2 x rate x 1/12. Depreciation rate based on approved rates in Order No. PSC-2021-0202-AS-EI.

(D) Line 2 x rate x 1/12. Based on 2024 Effective Tax Rate on original cost.

(E) Line 9a x Line 10

(F) Line 9b x Line 11

DUKE ENERGY FLORIDA, LLC
Environmental Cost Recovery Clause
Final True-Up
January 2024 - December 2024

Docket No. 20250007-EI
Duke Energy Florida
Witness: G. P. Dean
Exhibit No. GPD-1
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Return on Capital Investments, Depreciation and Taxes
For Project: NPDES - Intermediate (Project 16)
(in Dollars)

Line	Description		Beginning of Period Amount	Actual Jan-24	Actual Feb-24	Actual Mar-24	Actual Apr-24	Actual May-24	Actual Jun-24	Actual Jul-24	Actual Aug-24	Actual Sep-24	Actual Oct-24	Actual Nov-24	Actual Dec-24	End of Period Total
1	Investments															
	a. Expenditures/Additions			$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
	b. Clearings to Plant			0	0	0	0	0	0	0	0	0	0	0	0	
	c. Retirements			0	0	0	0	0	0	0	0	0	0	0	0	
	d. Other (A)			0	0	0	0	0	0	0	0	0	0	0	0	
2	Plant-in-Service/Depreciation Base		$12,841,870	$12,841,870	$12,841,870	$12,841,870	$12,841,870	$12,841,870	$12,841,870	$12,841,870	$12,841,870	$12,841,870	$12,841,870	$12,841,870	$12,841,870	
3	Less: Accumulated Depreciation		(3,832,710)	(3,867,377)	(3,902,044)	(3,936,711)	(3,971,378)	(4,006,045)	(4,040,712)	(4,075,379)	(4,110,046)	(4,144,713)	(4,179,380)	(4,214,047)	(4,248,714)	
4	CWIP - Non-Interest Bearing		$0	0	0	0	0	0	0	0	0	0	0	0	0	
5	Net Investment (Lines 2 + 3 + 4)		$9,009,160	$8,974,493	$8,939,826	$8,905,159	$8,870,492	$8,835,825	$8,801,158	$8,766,491	$8,731,824	$8,697,157	$8,662,490	$8,627,823	$8,593,156	
6	Average Net Investment			$8,991,827	$8,957,160	$8,922,493	$8,887,826	$8,853,159	$8,818,492	$8,783,825	$8,749,158	$8,714,491	$8,679,824	$8,645,157	$8,610,490	
7	Return on Average Net Investment (B)															
	a. Debt Component	1.89%		14,177	14,122	14,068	14,013	13,958	13,904	13,849	13,795	13,740	13,685	13,631	13,576	166,518
	b. Equity Component Grossed Up For Taxes	6.19%		46,361	46,182	46,003	45,824	45,646	45,467	45,288	45,109	44,931	44,752	44,573	44,395	544,531
	c. Other			0	0	0	0	0	0	0	0	0	0	0	0	0
8	Investment Expenses															
	a. Depreciation (C)	3.2394%		34,667	34,667	34,667	34,667	34,667	34,667	34,667	34,667	34,667	34,667	34,667	34,667	416,004
	b. Amortization			0	0	0	0	0	0	0	0	0	0	0	0	0
	c. Dismantlement			N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	d. Property Taxes (D)	0.5137%		5,497	5,497	5,497	5,497	5,497	5,497	5,497	5,497	5,497	5,497	5,497	5,497	65,964
	e. Other			0	0	0	0	0	0	0	0	0	0	0	0	0
9	Total System Recoverable Expenses (Lines 7 + 8)			$100,702	$100,468	$100,235	$100,001	$99,768	$99,535	$99,301	$99,068	$98,835	$98,601	$98,368	$98,135	1,193,017
	a. Recoverable Costs Allocated to Energy			0	0	0	0	0	0	0	0	0	0	0	0	0
	b. Recoverable Costs Allocated to Demand			$100,702	$100,468	$100,235	$100,001	$99,768	$99,535	$99,301	$99,068	$98,835	$98,601	$98,368	$98,135	1,193,017
10	Energy Jurisdictional Factor			N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
11	Demand Jurisdictional Factor - Production (Intermediate)			0.92637	0.92637	0.92637	0.92637	0.92637	0.92637	0.92637	0.92637	0.92637	0.92637	0.92637	0.92637	
12	Retail Energy-Related Recoverable Costs (E)			$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	0
13	Retail Demand-Related Recoverable Costs (F)			93,288	93,071	92,855	92,638	92,422	92,206	91,990	91,774	91,558	91,341	91,125	90,910	1,105,178
14	Total Jurisdictional Recoverable Costs (Lines 12 + 13)			$93,288	$93,071	$92,855	$92,638	$92,422	$92,206	$91,990	$91,774	$91,558	$91,341	$91,125	$90,910	$1,105,178

Notes:

(A) N/A

(B) Line 6 x 8.08% x 1/12. Based on ROE of 10.10%, weighted cost of equity component of capital structure of 4.56% and statutory tax rate of 25.345% (inc tax multiplier = 1.3394950).

(C) Line 2 x rate x 1/12. Depreciation rate based on approved rates in Order No. PSC-2021-0202-AS-EI.

(D) Line 2 x rate x 1/12. Based on 2024 Effective Tax Rate on original cost.

(E) Line 9a x Line 10

(F) Line 9b x Line 11

DUKE ENERGY FLORIDA, LLC
Environmental Cost Recovery Clause
Final True-Up
January 2024 - December 2024

Docket No. 20250007-EI
Duke Energy Florida
Witness: G. P. Dean
Exhibit No. GPD-1
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Return on Capital Investments, Depreciation and Taxes
For Project: MERCURY & AIR TOXIC STANDARDS (MATS) - CRYSTAL RIVER UNITS 4 & 5 - Energy (Project 17)
(in Dollars)

Line	Description		Beginning of Period Amount	Actual Jan-24	Actual Feb-24	Actual Mar-24	Actual Apr-24	Actual May-24	Actual Jun-24	Actual Jul-24	Actual Aug-24	Actual Sep-24	Actual Oct-24	Actual Nov-24	Actual Dec-24	End of Period Total
1	Investments															
	a. Expenditures/Additions			$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
	b. Clearings to Plant			0	0	0	0	0	0	0	0	0	0	0	0	
	c. Retirements			0	0	0	0	0	0	0	0	0	0	0	0	
	d. Other (A)			0	0	0	0	0	0	0	0	0	0	0	0	
2	Plant-in-Service/Depreciation Base		$3,690,187	$3,690,187	$3,690,187	$3,690,187	$3,690,187	$3,690,187	$3,690,187	$3,690,187	$3,690,187	$3,690,187	$3,690,187	$3,690,187	$3,690,187	
3	Less: Accumulated Depreciation		(870,786)	(886,071)	(901,356)	(916,641)	(931,926)	(947,211)	(962,496)	(977,781)	(993,066)	(1,008,351)	(1,023,636)	(1,038,921)	(1,054,207)	
4	CWIP - Non-Interest Bearing		$0	0	0	0	0	0	0	0	0	0	0	0	0	
5	Net Investment (Lines 2 + 3 + 4)		$2,819,401	$2,804,116	$2,788,831	$2,773,546	$2,758,261	$2,742,976	$2,727,691	$2,712,406	$2,697,121	$2,681,836	$2,666,551	$2,651,266	$2,635,980	
6	Average Net Investment			$2,811,758	$2,796,473	$2,781,188	$2,765,903	$2,750,618	$2,735,333	$2,720,048	$2,704,763	$2,689,478	$2,674,193	$2,658,908	$2,643,623	
7	Return on Average Net Investment (B)															
	a. Debt Component	1.89%		4,433	4,409	4,385	4,361	4,337	4,313	4,289	4,265	4,240	4,216	4,192	4,166	51,606
	b. Equity Component Grossed Up For Taxes	6.19%		14,497	14,418	14,339	14,261	14,182	14,103	14,024	13,945	13,867	13,788	13,709	13,634	168,767
	c. Other			0	0	0	0	0	0	0	0	0	0	0	0	0
8	Investment Expenses															
	a. Depreciation (C)	4.9707%		15,285	15,285	15,285	15,285	15,285	15,285	15,285	15,285	15,285	15,285	15,285	15,286	183,421
	b. Amortization			0	0	0	0	0	0	0	0	0	0	0	0	0
	c. Dismantlement			N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	d. Property Taxes (D)	0.0014%		4	4	4	4	4	4	4	4	4	4	4	4	48
	e. Other			0	0	0	0	0	0	0	0	0	0	0	0	0
9	Total System Recoverable Expenses (Lines 7 + 8)			$34,219	$34,116	$34,013	$33,911	$33,808	$33,705	$33,602	$33,499	$33,396	$33,293	$33,190	$33,090	403,842
	a. Recoverable Costs Allocated to Energy			34,219	34,116	34,013	33,911	33,808	33,705	33,602	33,499	33,396	33,293	33,190	33,090	403,842
	b. Recoverable Costs Allocated to Demand			$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	0
10	Energy Jurisdictional Factor			0.97480	0.97330	0.98320	0.95370	0.92030	0.94210	0.94630	0.94750	0.95600	0.95000	0.92570	0.97650	
11	Demand Jurisdictional Factor			N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
12	Retail Energy-Related Recoverable Costs (E)			$33,357	$33,205	$33,442	$32,341	$31,114	$31,753	$31,798	$31,740	$31,927	$31,628	$30,724	$32,312	385,340
13	Retail Demand-Related Recoverable Costs (F)			0	0	0	0	0	0	0	0	0	0	0	0	0
14	Total Jurisdictional Recoverable Costs (Lines 12 + 13)			$33,357	$33,205	$33,442	$32,341	$31,114	$31,753	$31,798	$31,740	$31,927	$31,628	$30,724	$32,312	$385,340

Notes:
(A) N/A
(B) Line 6 x 8.08% x 1/12. Based on ROE of 10.10%, weighted cost of equity component of capital structure of 4.56% and statutory tax rate of 25.345% (inc tax multiplier = 1.3394950).
(C) Line 2 x rate x 1/12. Depreciation rate based on approved rates in Order No. PSC-2021-0202-AS-EI.
(D) Line 2 x rate x 1/12. Based on 2024 Effective Tax Rate on original cost.
(E) Line 9a x Line 10
(F) Line 9b x Line 11

DUKE ENERGY FLORIDA, LLC
Environmental Cost Recovery Clause
Final True-Up
January 2024 - December 2024

Return on Capital Investments, Depreciation and Taxes
For Project: COAL COMBUSTION RESIDUAL (CCR) RULE - Base (Project 18)
(in Dollars)

Line	Description		Beginning of Period Amount	Actual Jan-24	Actual Feb-24	Actual Mar-24	Actual Apr-24	Actual May-24	Actual Jun-24	Actual Jul-24	Actual Aug-24	Actual Sep-24	Actual Oct-24	Actual Nov-24	Actual Dec-24	End of Period Total
1	Investments															
	a. Expenditures/Additions			$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
	b. Clearings to Plant			0	0	0	0	0	0	0	0	0	0	0	0	
	c. Retirements			0	0	0	0	0	0	0	0	0	0	0	0	
	d. Other (A)			0	0	0	0	0	0	0	0	0	0	0	0	
2	Plant-in-Service/Depreciation Base		$4,321,533	4,321,533	4,321,533	4,321,533	4,321,533	4,321,533	4,321,533	4,321,533	4,321,533	4,321,533	4,321,533	4,321,533	4,321,533	
3	Less: Accumulated Depreciation		(496,581)	(514,481)	(532,382)	(550,283)	(568,184)	(586,085)	(603,985)	(621,886)	(639,787)	(657,688)	(675,588)	(693,489)	(711,390)	
4	CWIP - Non-Interest Bearing		0	0	0	0	0	0	0	0	0	0	0	0	0	
5	Net Investment (Lines 2 + 3 + 4)		$3,824,952	$3,807,052	$3,789,151	$3,771,250	$3,753,349	$3,735,448	$3,717,548	$3,699,647	$3,681,746	$3,663,845	$3,645,945	$3,628,044	$3,610,143	
6	Average Net Investment			$3,816,002	$3,798,101	$3,780,200	$3,762,300	$3,744,399	$3,726,498	$3,708,597	$3,690,697	$3,672,796	$3,654,895	$3,636,994	$3,619,093	
7	Return on Average Net Investment (B)															
	a. Debt Component	1.89%		6,017	5,988	5,960	5,932	5,904	5,875	5,847	5,819	5,791	5,763	5,734	5,706	70,336
	b. Equity Component Grossed Up For Taxes	6.19%		19,675	19,583	19,490	19,398	19,306	19,213	19,121	19,029	18,936	18,844	18,752	18,660	230,007
	c. Other			0	0	0	0	0	0	0	0	0	0	0	0	0
8	Investment Expenses															
	a. Depreciation (C)	4.9707%		17,901	17,901	17,901	17,901	17,901	17,901	17,901	17,901	17,901	17,901	17,901	17,901	214,809
	b. Amortization			0	0	0	0	0	0	0	0	0	0	0	0	0
	c. Dismantlement			N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	d. Property Taxes (D)	0.0014%		5	5	5	5	5	5	5	5	5	5	5	5	60
	e. Other			0	0	0	0	0	0	0	0	0	0	0	0	0
9	Total System Recoverable Expenses (Lines 7 + 8)			$43,598	$43,477	$43,356	$43,236	$43,116	$42,994	$42,874	$42,754	$42,633	$42,513	$42,392	$42,272	515,212
	a. Recoverable Costs Allocated to Energy			0	0	0	0	0	0	0	0	0	0	0	0	0
	b. Recoverable Costs Allocated to Demand			$43,598	$43,477	$43,356	$43,236	$43,116	$42,994	$42,874	$42,754	$42,633	$42,513	$42,392	$42,272	515,215
10	Energy Jurisdictional Factor			N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
11	Demand Jurisdictional Factor			0.97403	0.97403	0.97403	0.97403	0.97403	0.97403	0.97403	0.97403	0.97403	0.97403	0.97403	0.97403	
12	Retail Energy-Related Recoverable Costs (E)			$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
13	Retail Demand-Related Recoverable Costs (F)			42,466	42,348	42,230	42,113	41,996	41,877	41,761	41,644	41,526	41,409	41,291	41,174	501,835
14	Total Jurisdictional Recoverable Costs (Lines 12 + 13)			$42,466	$42,348	$42,230	$42,113	$41,996	$41,877	$41,761	$41,644	$41,526	$41,409	$41,291	$41,174	$501,835

Notes:

(A) N/A

(B) Line 6 x 8.08% x 1/12. Based on ROE of 10.10%, weighted cost of equity component of capital structure of 4.56% and statutory tax rate of 25.345% (inc tax multiplier = 1.3394950).

(C) Line 2 x rate x 1/12. Depreciation rate based on approved rates in Order No. PSC-2021-0202-AS-EI.

(D) Line 2 x rate x 1/12. Based on 2024 Effective Tax Rate on original cost.

(E) Line 9a x Line 10

(F) Line 9b x Line 11

DUKE ENERGY FLORIDA, LLC
Environmental Cost Recovery Clause
Final True-Up
January 2024 - December 2024

Return on Capital Investments, Depreciation and Taxes
For Project: RECLAIMED WATER INTERCONNECTION - Peaking (Project 19)
(in Dollars)

Line	Description		Beginning of Period Amount	Actual Jan-24	Actual Feb-24	Actual Mar-24	Actual Apr-24	Actual May-24	Actual Jun-24	Actual Jul-24	Actual Aug-24	Actual Sep-24	Actual Oct-24	Actual Nov-24	Actual Dec-24	End of Period Total
1	Investments															
	a. Expenditures/Additions			$0	$0	$0	$0	$38,913	$50	$1,486	$11,798	$12,876	$86,221	($2,198)	$55,100	$204,245
	b. Clearings to Plant			0	0	0	0	0	0	0	0	0	0	0	0	
	c. Retirements			0	0	0	0	0	0	0	0	0	0	0	0	
	d. Other (A)			0	0	0	0	0	0	0	0	0	0	0	0	
2	Plant-in-Service/Depreciation Base		$0	0	0	0	0	0	0	0	0	0	0	0	0	
3	Less: Accumulated Depreciation		0	0	0	0	0	0	0	0	0	0	0	0	0	
4	CWIP - Non-Interest Bearing		0	0	0	0	0	38,913	38,963	40,448	52,246	65,122	151,343	149,145	204,245	
5	Net Investment (Lines 2 + 3 + 4)		$0	$0	$0	$0	$0	$38,913	$38,963	$40,448	$52,246	$65,122	$151,343	$149,145	$204,245	
6	Average Net Investment			$0	$0	$0	$0	$19,456	$38,938	$39,705	$46,347	$58,684	$108,232	$150,244	$176,695	
7	Return on Average Net Investment (B)															
	a. Debt Component	1.89%		0	0	0	0	31	61	63	73	93	171	237	279	1,008
	b. Equity Component Grossed Up For Taxes	6.19%		0	0	0	0	100	201	205	239	303	558	775	911	3,292
	c. Other			0	0	0	0	0	0	0	0	0	0	0	0	0
8	Investment Expenses															
	a. Depreciation (C)	1.1188%		0	0	0	0	0	0	0	0	0	0	0	0	0
	b. Amortization			0	0	0	0	0	0	0	0	0	0	0	0	0
	c. Dismantlement			N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	d. Property Taxes (D)	1.5193%		0	0	0	0	0	0	0	0	0	0	0	0	0
	e. Other			0	0	0	0	0	0	0	0	0	0	0	0	0
9	Total System Recoverable Expenses (Lines 7 + 8)			$0	$0	$0	$0	$131	$262	$268	$312	$396	$729	$1,012	$1,190	4,300
	a. Recoverable Costs Allocated to Energy			0	0	0	0	0	0	0	0	0	0	0	0	0
	b. Recoverable Costs Allocated to Demand			$0	$0	$0	$0	$131	$262	$268	$312	$396	$729	$1,012	$1,190	4,300
10	Energy Jurisdictional Factor			N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
11	Demand Jurisdictional Factor - Production (Peaking)			0.95110	0.95110	0.95110	0.95110	0.95110	0.95110	0.95110	0.95110	0.95110	0.95110	0.95110	0.95110	
12	Retail Energy-Related Recoverable Costs (E)			$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
13	Retail Demand-Related Recoverable Costs (F)			0	0	0	0	125	249	255	297	377	693	963	1,132	4,090
14	Total Jurisdictional Recoverable Costs (Lines 12 + 13)			$0	$0	$0	$0	$125	$249	$255	$297	$377	$693	$963	$1,132	$4,090

Notes:

(A) N/A

(B) Line 6 x 8.08% x 1/12. Based on ROE of 10.10%, weighted cost of equity component of capital structure of 4.56% and statutory tax rate of 25.345% (inc tax multiplier = 1.3394950).

(C) Line 2 x rate x 1/12. Depreciation rate based on approved rates in Order No. PSC-2021-0202-AS-EI.

(D) Line 2 x rate x 1/12. Based on 2024 Effective Tax Rate on original cost.

(E) Line 9a x Line 10

(F) Line 9b x Line 11

DUKE ENERGY FLORIDA, LLC
Environmental Cost Recovery Clause
Final True-Up
January 2024 - December 2024

Return on Capital Investments, Depreciation and Taxes
For Project: CCC Water Treatment System - Base (Project 21)
(in Dollars)

Line	Description		Beginning of Period Amount	Actual Jan-24	Actual Feb-24	Actual Mar-24	Actual Apr-24	Actual May-24	Actual Jun-24	Actual Jul-24	Actual Aug-24	Actual Sep-24	Actual Oct-24	Actual Nov-24	Actual Dec-24	End of Period Total
1	Investments															
	a. Expenditures/Additions			$0	$0	$0	$5,201	$19,324	$52,573	$9,755	$12,673	$17,720	$16,394	$20,322	$215,338	$369,299
	b. Clearings to Plant			0	0	0	0	0	0	0	0	0	0	0	0	
	c. Retirements			0	0	0	0	0	0	0	0	0	0	0	0	
	d. Other (A)			0	0	0	0	0	0	0	0	0	0	0	0	
2	Plant-in-Service/Depreciation Base		$0	0	0	0	0	0	0	0	0	0	0	0	0	
3	Less: Accumulated Depreciation		0	0	0	0	0	0	0	0	0	0	0	0	0	
4	CWIP - Non-Interest Bearing		0	0	0	0	5,201	24,525	77,098	86,853	99,526	117,247	133,640	153,962	369,299	
5	Net Investment (Lines 2 + 3 + 4)		$0	$0	$0	$0	$5,201	$24,525	$77,098	$86,853	$99,526	$117,247	$133,640	$153,962	$369,299	
6	Average Net Investment			$0	$0	$0	$2,600	$14,863	$50,812	$81,976	$93,190	$108,387	$125,443	$143,801	$261,630	
7	Return on Average Net Investment (B)															
	a. Debt Component	1.89%		0	0	0	4	23	80	129	147	171	198	227	413	1,392
	b. Equity Component Grossed Up For Taxes	6.19%		0	0	0	13	77	262	423	480	559	647	741	1,349	4,551
	c. Other			0	0	0	0	0	0	0	0	0	0	0	0	0
8	Investment Expenses															
	a. Depreciation (C)	2.6935%		0	0	0	0	0	0	0	0	0	0	0	0	0
	b. Amortization			0	0	0	0	0	0	0	0	0	0	0	0	0
	c. Dismantlement			N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	d. Property Taxes (D)	0.0014%		0	0	0	0	0	0	0	0	0	0	0	0	0
	e. Other			0	0	0	0	0	0	0	0	0	0	0	0	0
9	Total System Recoverable Expenses (Lines 7 + 8)			$0	$0	$0	$17	$100	$342	$552	$627	$730	$845	$968	$1,762	5,943
	a. Recoverable Costs Allocated to Energy			0	0	0	0	0	0	0	0	0	0	0	0	0
	b. Recoverable Costs Allocated to Demand			$0	$0	$0	$17	$100	$342	$552	$627	$730	$845	$968	$1,762	5,943
10	Energy Jurisdictional Factor			N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
11	Demand Jurisdictional Factor			0.97403	0.97403	0.97403	0.97403	0.97403	0.97403	0.97403	0.97403	0.97403	0.97403	0.97403	0.97403	
12	Retail Energy-Related Recoverable Costs (E)			$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
13	Retail Demand-Related Recoverable Costs (F)			0	0	0	17	97	333	538	611	711	823	943	1,716	5,789
14	Total Jurisdictional Recoverable Costs (Lines 12 + 13)			$0	$0	$0	$17	$97	$333	$538	$611	$711	$823	$943	$1,716	$5,789

Notes:
(A) N/A
(B) Line 6 x 8.08% x 1/12. Based on ROE of 10.10%, weighted cost of equity component of capital structure of 4.56% and statutory tax rate of 25.345% (inc tax multiplier = 1.3394950).
(C) Line 2 x rate x 1/12. Depreciation rate based on approved rates in Order No. PSC-2021-0202-AS-EI.
(D) Line 2 x rate x 1/12. Based on 2024 Effective Tax Rate on original cost.
(E) Line 9a x Line 10
(F) Line 9b x Line 11

		(1) Jurisdictional Rate Base Adjusted Retail ($000s)	(2) Cap Ratio	(3) Cost Rate	(4) Weighted Cost	(5) Revenue Requirement Rate	(6) Monthly Revenue Requirement Rate
1	Common Equity	$ 8,714,529	45.15%	10.10%	4.56%	6.11%	0.5092%
2	Long Term Debt	7,459,078	38.65%	4.61%	1.78%	1.78%	0.1483%
3	Short Term Debt	268,355	1.39%	5.25%	0.07%	0.07%	0.0058%
4	Cust Dep Active	140,572	0.73%	2.61%	0.02%	0.02%	0.0017%
5	Cust Dep Inactive	905	0.00%			0.00%	0.0000%
6	Invest Tax Cr	196,643	1.02%	7.57%	0.08%	0.10%	0.0083%
7	Deferred Inc Tax	2,519,987	13.06%			0.00%	0.0000%
8	**Total**	**$ 19,300,068**	**100.00%**		**6.51%**	**8.08%**	**0.6733%**

	ITC split between Debt and Equity**:		Ratio	Cost Rate	Ratio	Ratio	Deferred Inc Tax	Weighted ITC	After Gross-up
9	Common Equity	8,714,529	54%	10.10%	5.44%	71.9%	0.08%	0.058%	0.077%
10	Preferred Equity	-	0%				0.08%	0.000%	0.000%
11	Long Term Debt	7,459,078	46%	4.61%	2.13%	28.1%	0.08%	0.022%	0.022%
12		16,173,607	100%		7.57%			0.080%	0.100%

	Breakdown of Revenue Requirement Rate of Return between Debt and Equity:	
13	Total Equity Component (Lines 1 and 9)	6.187%
14	Total Debt Component (Lines 2, 3 , 4 , and 11)	1.892%
15	**Total Revenue Requirement Rate of Return**	**8.079%**

Notes:

Effective Tax Rate: 25.345%

Column:

(1) Per Order No. PSC-2020-0165-PAA-EU, issued May 20, 2020, approving amended joint motion modifying WACC methodology

(2) Column (1) / Total Column (1)

(3) Per Order No. PSC-2020-0165-PAA-EU, issued May 20, 2020, approving amended joint motion modifying WACC methodology and Order PSC-2022-0357-FOF-EI approving return on equity trigger.
Line 6 and Line 12, the cost rate of ITC's is determined under Treasury Regulation section 1.46-6(b)(3)(ii).

(4) Column (2) x Column (3)

(5) For equity components: Column (4) / (1-effective income tax rate/100)

* For debt components: Column (4)

** Line 6 is the pre-tax ITC components from Lines 9 and 11

(6) Column (5) / 12

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DIRECT TESTIMONY OF

ERIC SZKOLNYJ

ON BEHALF OF

DUKE ENERGY FLORIDA, LLC.

DOCKET NO. 20250007-EI

March 31, 2025

Q. Please state your name and business address.

A. My name is Eric Szkolnyj. My business address is 525 South Tryon Street, Charlotte, NC 28202.

Q: By whom are you employed and in what capacity?

A: I am employed by Duke Energy Corporation ("Duke Energy") as General Manager for the Coal Combustion Products ("CCP") Group - Operations & Maintenance. Duke Energy Florida, LLC ("DEF" or the "Company") is a fully owned subsidiary of Duke Energy.

Q: What are your responsibilities in that position?

A: I am responsible for oversight of the operation and maintenance of the majority of CCP facilities in the Carolinas and Florida, including the CCP facility at the Crystal River Energy Center. This includes operating and maintaining all CCP facilities in compliance with state and federal regulations. The Operations and Maintenance group at each station maintains accountability for overall CCP

facility performance which requires close collaboration with other Duke Energy CCP organizations such as Project Implementation, Engineering, and Facility Closure. The Company relies on my opinions and information I provide when making decisions regarding the CCP facilities under my supervision.

Q: Please describe your educational background and professional experience.

A: I have a Bachelor of Science degree in Mechanical Engineering from North Carolina State University. I have 19 years of experience in the power generation industry including positions as a Nuclear Control Room Supervisor, Lead Engineer, and Nuclear Oversight Lead Assessor within Duke Energy's Nuclear fleet at Harris Nuclear Plant, and as the Director of Operational Excellence Assessments & Oversight for Duke Energy's Enterprise. Prior to joining Duke Energy, I was employed by the Department of Defense as a civilian Shift Test Engineer for the U.S. Navy. In June of 2021, I began my current role as CCP Regional General Manager.

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to explain material variances between actual and actual/estimated project expenditures for environmental compliance costs associated with DEF's Coal Combustion Residual ("CCR") Rule for the period January 2024 - December 2024. DEF did not have any material variances for the period January 2024 – December 2024.

Q. How did actual O&M project expenditures for the period January 2024 – December 2024 compare to actual/estimated O&M projections for the CCR Rule (Project 18)?

A. The CCR Rule O&M variance is $15,104 or 3% higher than projected.

Q. Does this conclude your testimony?

A. Yes.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DIRECT TESTIMONY OF

REGINALD ANDERSON

ON BEHALF OF

DUKE ENERGY FLORIDA, LLC

DOCKET NO. 20250007-EI

March 31, 2025

Q. Please state your name and business address.

A. My name is Reginald Anderson. My business address is 299 First Avenue North, St. Petersburg, FL 33701.

Q. By whom are you employed and in what capacity?

A. I am employed by Duke Energy Florida, LLC ("DEF" or the "Company") as Vice President – Florida Generation.

Q. What are your responsibilities in that position?

A. As Vice President of DEF's Generation organization, my responsibilities include overall leadership and strategic direction of DEF's power generation fleet. My responsibilities include strategic and tactical planning to operate and maintain DEF's non-nuclear generation fleet; generation fleet project and addition recommendations; major maintenance programs; outage and project management; generation facilities retirement; asset allocation; workforce

planning and staffing; organizational alignment and design; continuous business improvement; retention and inclusion; succession planning; and oversight of numerous employees and hundreds of millions of dollars in assets and capital and O&M budgets.

Q. Please describe your educational background and professional experience.

A. I earned a Bachelor of Science degree in Electrical Engineering Technology and Master of Business from the University of Central Florida in 1996 and 2008 respectively. I have 27 years of power plant production experience at DEF in various operational, managerial and leadership positions in fossil steam and combustion turbine plant operations. I also managed the new construction and O&M projects team. I have contract negotiation and management experience. My prior experience includes leadership roles in municipal utilities, manufacturing, and the United States Marine Corps.

Q. Have you previously filed testimony before this Commission in connection with DEF's Environmental Cost Recovery Clause ("ECRC")?

A. Yes.

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to explain material variances between actual and actual/estimated project expenditures for environmental compliance costs associated with DEF's Integrated Clean Air Compliance Program (Project 7.4),

Mercury and Air Toxics Standards (MATS) – Crystal River (CR) 4&5 (Project 17), Mercury and Air Toxics Standards ("MATS") - Anclote Gas Conversion Project (Project 17.1), and Mercury & Air Toxics Standards (MATS) – CR 1&2 (Project 17.2) for the period January 2024 - December 2024.

Q. Please explain the O&M variance between actual project expenditures and actual/estimated projections for the CAIR Crystal River Project – Energy (Reagents) (Project 7.4) for January 2024 - December 2024?

A. O&M costs for CAIR Crystal River Project – Energy (Reagents) were $2,440,842 or 31% lower than projected. The lower expenses were due to a Gypsum Sales credit of $675k (33%) greater than forecasted, $328k (16%) lower for Ammonia expense, $1,350k (27%) lower for Limestone Expense, $126k (32%) lower for Caustic Expense, and $39k (1%) higher for Hydrated Lime Expense.

Q. Does this conclude your testimony?

A. Yes.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DIRECT TESTIMONY OF

PATRICIA Q. WEST

ON BEHALF OF

DUKE ENERGY FLORIDA, LLC

DOCKET NO. 20250007-EI

March 31, 2025

Q. Please state your name and business address.

A. My name is Patricia Q. West. My business address is 299 First Avenue North, St. Petersburg, FL 33701.

Q. By whom are you employed and in what capacity?

A. I am employed by Duke Energy Florida, LLC ("DEF" or the "Company") as Director Environmental Field Support – Florida.

Q. What are your responsibilities in that position?

A. My responsibilities include managing the work of environmental field professionals who are responsible for environmental, technical, and regulatory support during the development and implementation of environmental compliance strategies for regulated power generation facilities and electrical transmission and distribution facilities in Florida. This includes daily compliance activities in support of operations.

Q. Please describe your educational background and professional experience.

A. I obtained my Bachelor of Arts degree in Biology from New College of the University of South Florida in 1983. I was employed by the Polk County Health Department between 1983 and 1986 and by the Florida Department of Environmental Protection ("FDEP") from 1986 - 1990. At the FDEP, I was involved in compliance and enforcement efforts associated with petroleum storage facilities. I joined Florida Power Corporation in 1990 as an Environmental Project Manager and then held progressively more responsible positions through the merger with Carolina Power and Light, and more recently through the merger with Duke Energy in my role as the Director Environmental Field Support – FL.

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to explain material variances between actual and actual/estimated project expenditures for environmental compliance costs associated with FPSC-approved programs under my responsibility. These programs include the T&D Substation Environmental Investigation, Remediation and Pollution Prevention Program (Projects 1 & 1a), Distribution Environmental Investigation, Remediation and Pollution Prevention Program (Project 2), Pipeline Integrity Management ("PIM") Program (Project 3), Above Ground Storage Tanks ("AST") Program (Project 4), Phase II Cooling Water Intake 316(b) Program (Project 6), CAIR/CAMR Continuous Mercury Monitoring System ("CMMS") Program (Projects 7.2 & 7.3), Best Available Retrofit

Technology ("BART") Program (Project 7.5), National Emission Standards for Hazardous Air Pollutants ("NESHAP") – Base (Project 7.6), Arsenic Groundwater Standard Program (Project 8), Sea Turtle – Coastal Street Lighting Program (Project 9), Underground Storage Tanks ("UST") Program (Project 10), Modular Cooling Towers (Project 11), Thermal Discharge Permanent Compliance (Project 11.1), Greenhouse Gas Inventory and Reporting (Project 12), Mercury Total Maximum Loads Monitoring ("TMDL") (Project 13), Hazardous Air Pollutants ("HAPs") Information Collection Request ("ICR") (Project 14), Effluent Limitation Guidelines CRN (Project 15.1), National Pollutant Discharge Elimination System ("NPDES") Program (Project 16), Reclaimed Water Interconnection (Project 19), Lead and Copper Rule (Project 20), and Citrus Combined Cycle Water Treatment System (Project 21).

Q. How did actual O&M expenditures for January 2024 - December 2024 compare with DEF's actual/estimated projections for the Phase II Cooling Water Intake - 316(b) Project (Projects 6 & 6a)?

A. The Phase II Cooling Water Intake - 316(b) (Projects 6 & 6a) O&M variance is 47%, or $181,349 lower than projected.

Project 6, Phase II Cooling Water Intake - 316(b) (Base) O&M variance is 18%, or $41k lower than projected. This variance is primarily due to Crystal River's reduced runtimes which reduced the number of cleanings the intake screens required for the year.

Project 6a, Phase II Cooling Water Intake - 316(b) (Intermediate) O&M variance is 89%, or $140k lower than projected. This variance is primarily due to the delay in permit issuance by the FDEP. Original projections assumed the permit would be issued earlier in 2024.

Q. How did actual Capital expenditures for January 2024 - December 2024 compare with DEF's actual/estimated projections for the Cooling Water Intake - 316(b) Bartow Project (Project 6.1)?

A. The Cooling Water Intake - 316(b) (Bartow) capital variance is 66% or $323,864 lower than projected. This variance is predominantly due to a delay in the selection of the intake screen vendor, which caused some delay in the evaluations to determine the new organism return flume location. The location of the flume was dependent on the selected screen vendor and technology, and detailed engineering, including hydraulic analysis.

Q. How did actual O&M expenditures for January 2024 - December 2024 compare with DEF's actual/estimated projections for the Arsenic Groundwater Project (Project 8)?

A. The Arsenic Groundwater Project (Project 8) O&M variance is 10% or $2,351 higher than projected. This variance is primarily due to the need to address FDEP's Office of General Counsel comments on the draft Declaration of Restrictive Covenants ("DRC") that was submitted to the agency in 2024. The

comments required additional consultant labor and subcontractor expenses to revise the draft DRC.

Q. How did actual O&M expenditures for January 2024 - December 2024 compare with DEF's actual/estimated projections for the Lead and Copper Rule (Project 20)?

A. The Lead and Copper Rule (Project 20) O&M variance is 46% or $13,774 lower than projected. This variance is primarily due to eliminating the need for field work.

Q. How did actual Capital expenditures for January 2024 - December 2024 compare with DEF's actual/estimated projections for the CCC Water Treatment System (Project 21)?

A. The CCC Water Treatment System capital variance is 80% or $1,450,034 lower than projected. This variance is a timing issue predominantly due to delays in obtaining, reviewing, and approving quotes for materials, as well as issuing the contracts once the material venders were selected.

Q. In Order No. PSC-2010-0683-FOF-EI issued in Docket No. 20100007-EI on November 15, 2010, the Commission directed DEF to file as part of its ECRC true-up testimony a yearly review of the efficacy of its Plan D and the cost-effectiveness of DEF's retrofit options for each generating unit in relation to

expected changes in environmental regulations. Has DEF conducted such a review?

A. Yes. DEF's yearly review of the Integrated Clean Air Compliance Plan is provided as Exhibit No. (PQW-1).

Q. What is the status of the Clean Water Rule?

A. On June 29, 2015, the Environmental Protection Agency ("EPA") and the Army Corps of Engineers ("Corps") published the final Clean Water Rule that significantly expanded the definition of the Waters of the United States ("WOTUS"). On October 9, 2015, the U.S. Court of Appeals for the Sixth Circuit granted a nationwide stay of the rule effective through the conclusion of the judicial review process. On February 22, 2016 the Sixth Circuit issued an opinion that it has jurisdiction and is the appropriate venue to hear the merits of legal challenges to the rule; however, that decision was contested, and on January 22, 2018, the U.S. Supreme Court issued its decision stating federal district courts, instead of federal appellate courts, have jurisdiction over challenges to the rule defining waters of the United States Consistent with the U.S. Supreme Court decision, the U.S. Court of Appeals for the Sixth Circuit lifted its nationwide stay on February 28, 2018. The stay issued by the North Dakota District Court remains in effect, but only within the thirteen counties within the North Dakota District. On February 28, 2017, President Trump signed an executive order laying out a new policy direction for how "Waters of the United States" should be defined and directing the EPA and the Corps to initiate a rulemaking to either

rescind or revise the 2015 Clean Water Rule developed by the Obama administration. Subsequently, the EPA Administrator signed a pre-publication notice reflecting the intent to move forward with rulemaking in response to this directive. In addition, the executive order seeks to have the Department of Justice determine the path forward on the Clean Water Rule litigation as a result of the new policy direction.

On January 31, 2018, the EPA and Corps announced a final rule adding an applicability date to the 2015 rule defining "Waters of the United States," thereby deferring implementation of the 2015 WOTUS Rule until early 2020. This rule has no immediate impact to Duke Energy, and the agencies will continue to apply the pre-existing WOTUS definition in place prior to the 2015 rule until 2020.

On February 14, 2019, the EPA and the Corps published in the Federal Register, the "Revised Definition of 'Waters of the United States,'" which proposed to narrow the extent of the Clean Water Act jurisdiction as compared to the 2015 definition adopted by the Obama Administration (Proposed Rule). On January 23, 2020, the EPA and the Corps released a pre-publication version of *The Navigable Waters Protection Rule: Definition of "Waters of the United States." (NWPR Rule)*. On April 21, 2020, the EPA and the Corps published the modified definition of the WOTUS in the Federal Register. DEF has reviewed the final rule and determined there are no impacts associated with the 2020 WOTUS Rule with respect to the operation of our existing generation facilities.

On January 20, 2021, through Executive Order 13990, the Biden Administration directed the EPA and the Corps to review the NWPR Rule. The US District Court for the District of Arizona vacated and remanded the NWPR Rule on August 30, 2021, which vacated and remanded the rule nationwide. The EPA and the Corps announced on September 3, 2021, that efforts to implement the NWPR Rule had ceased and on December 7, 2021, the EPA published a proposed rule to officially repeal the NWPR Rule and replace it with the 1986 WOTUS rule. The public comment period for this proposed rule closed on February 7, 2022. On January 18, 2023, the EPA and Corps published in the Federal Register the final rule revising the definition of "Waters of the United States" (the "WOTUS Final Rule"). The WOTUS Final Rule sets forth which surface waters and wetlands are jurisdictional for section 404 wetland permitting, NPDES, and other Clean Water Act ("CWA") regulatory programs. The WOTUS Final Rule became effective on March 20, 2023.

On May 25, 2023, the U.S. Supreme Court (the Court) unanimously rejected the significant nexus test as a basis for determining whether "adjacent" wetlands are considered waters of the United States (WOTUS). On June 26, 2023, EPA announced that they and the Corps would promulgate a new WOTUS rule based on the Court's decision. This final rule was published on September 8, 2023, was effective immediately and amended the previous 2023 definition of WOTUS. As a result of ongoing litigation on the January 2023 rule, the agencies are implementing the January 2023 rule. In Florida the agencies are interpreting

WOTUS consistent with the pre-2015 definition and the Court's decision until further notice. The Corps reconfirmed this interpretation on their official website on September 24, 2024.

DEF will continue to monitor the status of the rule and any proposed changes to ascertain any further compliance steps that may be required.

Q. Does this conclude your testimony?

A. Yes.

Duke Energy Florida, LLC

Review of Integrated Clean Air Compliance Plan

Submitted to the
Florida Public Service Commission

March 31, 2025

I. Table of Contents

Acronyms

BART – Best Available Retrofit Technology

CAIR – Clean Air Interstate Rule

CAVR – Clean Air Visibility Rule

CCR - Coal Combustion Residuals

CO_2 – Carbon Dioxide

CPP – Clean Power Plan

CSAPR – Cross-State Air Pollution Rule

DEF – Duke Energy Florida

ECRC – Environmental Cost Recovery Clause

EPA – Environmental Protection Agency

EGU – Electric Generating Unit

ELG - Effluent Limitation Guidelines

ESP – Electrostatic Precipitator

FDEP – Florida Department of Environmental Protection

FGD – Flue Gas Desulfurization

GHG – Greenhouse Gas

MATS – Mercury and Air Toxic Standards

MWh – Megawatt Hour

NO_x – Nitrogen Oxides

NPDES – National Pollutant Discharge Elimination System

NSPS - New Source Performance Standards

PAC – Powdered Activated Carbon

Plan D – DEF Integrated Clean Air Compliance Plan

ppb – Parts per billion

SCR – Selective Catalytic Reduction

SO_2 – Sulfur Dioxide

Executive Summary

In the 2007 Environmental Cost Recovery Clause ("ECRC") Docket No. 20070007-EI, the Florida Public Service Commission ("FPSC" or "the Commission") approved Duke Energy Florida's ("DEF") updated Integrated Clean Air Compliance Plan ("Plan D" or "the Plan") as a reasonable and prudent means to comply with the requirements of the Clean Air Interstate Rule ("CAIR") (subsequently replaced by the Cross-State Air Pollution Rule ("CSAPR"), Clean Air Mercury Rule ("CAMR") (subsequently replaced by the Mercury and Air Toxics Standards ("MATS" rule), Clean Air Visibility Rule ("CAVR"), and related regulatory requirements[1]. In its 2007 Final Order, the Commission also directed DEF to file as part of its ECRC true-up testimony "a yearly review of the efficacy of its Plan D and the cost-effectiveness of DEF's retrofit options for each generating unit in relation to expected changes in environmental regulations." This report provides the required review for 2025.

The primary original components of DEF's 2006 Compliance Plan D included:

Sulfur Dioxide ("SO_2")

- Installation of flue gas desulfurization ("FGD") systems on Crystal River ("CR") Units 4 and 5
- Fuel switching at CR Units 1 and 2 to burn low sulfur coal
- Fuel switching at Anclote Units 1 and 2 to burn low sulfur oil and natural gas
- Purchases of SO_2 allowances

Nitrogen Oxides ("NO_x")

- Installation of low NO_x burners ("LNBs") and selective catalytic reduction ("SCR") systems on CR Units 4 and 5
- Installation of LNBs and separated over-fire air ("SOFA") or alternative NO_x controls at Anclote Units 1 and 2
- Purchase of annual and ozone season NO_x allowances

Mercury

- Installation of FGD and SCR systems at CR Units 4 and 5

[1] Order No. PSC-2007-0922-FOF-EI ("Final Order" or "2007 Final Order")

- Installation of powdered activated carbon ("PAC") injection on CR Unit 2

As detailed in Docket No. 20070007-EI, DEF decided on Plan D based on a quantitative and qualitative evaluation of the ability of alternative plans to meet environmental requirements, while managing risks and controlling costs. That evaluation demonstrated that Plan D is DEF's most cost-effective alternative to meet applicable regulatory requirements. The Plan was designed to strike a balance between reducing emissions, primarily through the installation of controls on DEF's largest and newest coal units (CR Units 4 and 5) and making strategic use of emission allowance markets.

In accordance with the Commission's Final Order in Docket No. 20070007-EI, DEF has continued to review the efficacy of Plan D and the cost-effectiveness of retrofit options in relation to expected changes in environmental regulations. With regard to efficacy, Plan D remains the cornerstone of DEF's efforts to comply with applicable air quality regulations in a cost-effective manner.

As indicated in previous ECRC filings, the U.S. Court of Appeals for the District of Columbia ("D.C. Circuit") stayed the effect of CSAPR (proposed by the U.S. Environmental Protection Agency ("EPA") to replace CAIR) leaving CAIR in effect until the court completed its review of CSAPR. In August 2012, the D.C. Circuit vacated CSAPR in its entirety, and in January 2013, the court denied the EPA's petition for rehearing. On April 29, 2014, the U.S. Supreme Court reversed the D.C. Circuit's decision and upheld the CSAPR. The EPA subsequently petitioned the D.C. Circuit to reinstate CSAPR, making it effective January 1, 2015. The court agreed with the EPA and approved its petition. On September 7, 2016, the EPA finalized its CSAPR update rule and eliminated Florida, South Carolina, and North Carolina from the CSAPR ozone season program based on modeling which shows that NO_x emissions from these states do not significantly contribute to ozone nonattainment in any downwind state. Duke Energy sources in Florida are no longer subject to any CSAPR NO_x emission limitations, as of the beginning of 2017.

Additionally, on February 16, 2012, the EPA issued MATS to replace the vacated CAMR for emissions from coal- and oil-fired electric generating units ("EGUs"), including, DEF's

Anclote Units 1 and 2, Suwannee Units 1, 2, and 3, and CR Units 1, 2, 4, and 5. The following summarizes the results of DEF's MATS compliance analyses for these units:

Anclote Units 1 & 2: DEF determined that the most cost-effective option for Anclote Units 1 and 2 was conversion to fire 100% natural gas rather than installation of emission controls to comply with MATS. The Commission approved DEF's petition for ECRC recovery of costs associated with the Anclote Conversion Project in Docket No. 20120103-EI.

Suwannee Units 1, 2 & 3: DEF determined that no further modifications were needed on Suwannee Units 1, 2 and 3 as these units were already capable of operating on 100% natural gas.

CR Units 4 & 5: DEF determined that the existing electrostatic precipitators ("ESPs"), FGDs, and SCRs at CR Units 4 and 5 would provide sufficient control for MATS compliance under typical conditions. DEF also determined that chemical injection systems would be required to mitigate mercury re-emissions from the FGDs. On December 15, 2014, DEF requested a one-year extension to allow time for installation of additional mercury control systems. On March 12, 2015, the Florida Department of Environmental Protection ("FDEP") authorized a one-year extension (to April 16, 2016) for all mercury-related MATS requirements on CR Units 4 and 5; the units have operated in compliance with the Standards since that time.

CR Units 1 & 2: DEF determined that the use of alternative coals (along with dry sorbent injection, PAC injection, and ESP enhancements) was a feasible and cost-effective strategy to allow these units to continue running for a limited period of time in compliance with MATS and Best Available Retrofit Technology ("BART") requirements until new generation could be built. This plan was approved by the Commission in Order No. PSC-2014-0173-PAA-EI (April 17, 2014). On February 6, 2014, the FDEP granted a one-year extension (to April 16, 2016) for all MATS requirements on CR Units 1 and 2; the units were operated in compliance with the Standards since that time. CR Units 1 and 2 were retired from service on December 31, 2018.

DEF is confident that the emission controls installed pursuant to Plan D, along with compliance strategies discussed further in this Plan, continue to enable the Company to achieve and maintain compliance with all applicable environmental regulations in a cost-effective manner.

I. Introduction

In its Final Order in the 2007 ECRC Docket, the Commission approved DEF's updated Integrated Clean Air Compliance Plan (Plan D) as a reasonable and prudent means to comply with the requirements of CAIR, CAMR, CAVR and related regulatory requirements. In the 2007 Final Order, p. 8, the Commission specifically found that "PEF's [now DEF's] updated Integrated Clean Air Compliance Plan represents the most cost-effective alternative for achieving and maintaining compliance with CAIR, CAMR, and CAVR, and related regulatory requirements, and it is reasonable and prudent for DEF to recover prudently incurred costs to implement the plan." *Id.* The Commission also directed DEF to file as part of its ECRC true-up testimony "a yearly review of the efficacy of its Plan D and the cost-effectiveness of [DEF's] retrofit options for each generating unit in relation to expected changes in environmental regulations." *Id.* The purpose of this report is to provide the required review for 2025.

II. Regulatory Background

No changes have occurred since previous filing of the Integrated Clean Air Compliance Plan, Docket No. 20240007.

A. Status of CAIR and CSAPR

No changes have occurred since previous filing of the Integrated Clean Air Compliance Plan, Docket No. 20240007.

B. Mercury Air Toxics Standards (MATS)

On February 16, 2012, the EPA published the final MATS rule which established limits for emissions of hazardous air pollutants ("HAP"), including various metals, such as mercury, and acid gases from both coal- and oil-fired EGUs. Compliance generally was required to be achieved within three years of the EPA's adoption of MATS (i.e., April 16, 2015), although the Clean Air Act authorizes permitting authorities to grant one-year compliance extensions in certain circumstances.

In *Michigan v. EPA, (*June 29, 2015), the U.S. Supreme Court remanded the MATS rule to the D.C. Circuit, finding that the EPA insufficiently considered costs in determining that it is

"appropriate and necessary" to regulate mercury from power plants. On December 15, 2015, the D.C. Circuit remanded the MATS rule to the EPA without vacatur, and the EPA committed to completing its consideration of cost by April 16, 2016. On April 14, 2016, the EPA issued a final finding that it is appropriate and necessary to set standards for emissions of air toxics from coal and oil-fired power plants.

On May 22, 2020, in response to the U.S. Supreme Court decision in *Michigan v. EPA,* the EPA published a reconsideration of the appropriate and necessary finding for the MATS, correcting flaws in the 2016 supplemental cost finding. However, the EPA did not remove coal- and oil-fired EGUs from the list of affected source categories for regulation under section 112 of the Clean Air Act ("CAA"), so the MATS rule remains in effect.

On March 20, 2023, the EPA revoked the 2020 finding that it is not appropriate and necessary to regulate coal- and oil-fired power plants under CAA section 112 and affirmed the previous appropriate and necessary finding reaffirming the determination that it is appropriate and necessary to regulate hazardous air pollutants HAP, including mercury, from power plants after considering cost. Additionally, on May 7, 2024, EPA published in the *Federal Register* a final rule amending the MATS rule, which included a significant reduction of the surrogate filterable particulate matter standard from current levels, among other revisions. The final rule became effective on July 8, 2024. The reduction in the limit for filterable matter standard will reduce the effective limit on Crystal River Units 4 and 5, reducing it to from 0.030 lbs/MMBtu to 0.010 lbs/MMBtu, beginning July 2027. On February 20, 2025, the U.S. Court of Appeals for the D.C. Circuit granted EPA's unopposed request for a 90-day abeyance of challenges to EPA's final rule to revise the MATS to allow new EPA leadership to reevaluate the rule, since "prior positions taken by the Agency with respect to the 2024 Rule may not necessarily reflect its ultimate conclusions after that review is complete."

In the 2011 ECRC docket, the Commission recognized that the EPA's adoption of MATS for EGUs would require the Company to modify its Integrated Clean Air Compliance Plan. See Order No. PSC-2011-0553-FOF-EI, at 11. Accordingly, consistent with the Commission's expectation that utilities "take steps to control the level of costs that must be incurred for environmental compliance," Order No. PSC-2008-0775-FOF-EI, at 7, the Commission approved

the Company's request to recover costs incurred to assess the EPA's proposed rule, prepare comments to the EPA, and develop compliance strategies within the aggressive regulatory timeframes proposed by the EPA.

C. Greenhouse Gas Regulation

In 2007, then-Governor Crist issued Executive Order 07-127 directing the FDEP to promulgate regulations requiring reductions in utility CO_2 emissions. In addition, the 2008 Florida Legislature enacted legislation authorizing the FDEP to adopt rules establishing a cap-and-trade program and requiring the FDEP to submit any such rules for legislative review and ratification. However, the FDEP did not adopt any cap-and-trade rules, and the Legislature subsequently repealed the 2008 law. Likewise, although a number of bills that would regulate GHG emissions have been introduced to Congress over the past several years, none have become law. In the meantime, the EPA began implementing a regulatory approach to reducing GHG emissions through the Clean Air Act. At this time, however, there are no GHG emission standards applicable to DEF's existing generating units.

On August 3, 2015, the EPA released the final new source performance standards for CO_2 emissions from new, modified and reconstructed fossil fuel-fired EGUs. The rule included emission limits of 1,400 lb. CO_2/MWh for new coal-fired units and 1,000 lb. CO_2/MWh for new natural gas combined-cycle units. Approximately nine years later, on May 9, 2024, EPA published final rules in the *Federal Register* to regulate greenhouse gas emissions from new natural gas-fired and existing coal-fired power plants under Section 111 of the CAA, which are applicable to several DEF coal and natural gas combustion turbine units. On July 19, 2024, the U.S. Court of Appeals for the D.C. Circuit (D.C. Circuit) unanimously denied petitioners' attempt to stay the rules and ordered an expedited briefing schedule. Subsequently, on October 16, 2024, the U.S. Supreme Court rejected a request to stay the rules, recognizing that the D.C. Circuit's final decision was pending but noting that the lower court should proceed "with dispatch." On December 6, 2024, the D.C. Circuit heard oral argument from EPA and the petitioners. There is no specific date set for the court to issue its decision; however, on February 5, 2025, EPA filed a motion requesting the D.C. Circuit to withhold issuing an opinion and place the case in a 60-day abeyance to allow

time for new EPA leadership to review the issues and underlying rules and determine how they wish to proceed. The D.C. Circuit granted EPA's motion on February 19, 2025. Importantly, putting the case in abeyance does not stay the effectiveness of the rules. DEF will continue to monitor the status of the rules and associated litigation and any applicable requirements to the DEF emission units.

D. Status of BART Requirements under CAVR

No changes have occurred since previous filing of the Integrated Clean Air Compliance Plan, Docket No. 20240007.

E. Status of National Ambient Air Quality Standards (NAAQS)

No changes have occurred since previous filing of the Integrated Clean Air Compliance Plan, Docket No. 20240007.

F. Status of Combustion Turbine MACT

In March of 2004, the Environmental Protection Agency ("EPA") promulgated National Emission Standards for Hazardous Air Pollutants ("NESHAP") for stationary combustion turbines ("CTs") that are located at major sources of hazardous air pollutants ("HAPs") and are constructed after January 14, 2003. The NESHAP, subpart YYYY, implements section 112(d) of the Clean Air Act ("CAA") by requiring all major combustion turbine sources to meet HAP emission standards reflecting the application of the maximum achievable control technology ("MACT"). In April 2004, the EPA stayed the effectiveness of the rule for the lean premix and diffusion flame gas-fired sub-categories of stationary combustion turbines. The EPA concluded that a stay was necessary to avoid unnecessary expenditures on compliance as they evaluated a delisting petition for these two sub-categories of turbines.

On March 9, 2022, the EPA published in the *Federal Register*, at 87 Fed. Reg.13,183, a final rule to remove the stay for natural gas-fired stationary CTs. As a result of the final rule, lean premix and diffusion flame gas-fired turbines that were constructed or reconstructed at major sources of HAP emissions after January 14, 2003, must comply with emission and operating limitations beginning March 9, 2022, or upon startup of future affected units. Owners/operators

will then have 180 days to demonstrate compliance with the formaldehyde standard, i.e., September 5, 2022. *See* 40 C.F.R. §63.6110(a).

Under the EPA's definition of major source, DEF's Citrus County Combined Cycle units (Units 1A, 1B, 2A, 2B) are subject to the rule and associated compliance requirements. Hines Energy Complex and Bartow Combined Cycle were successfully reclassified as area sources and are therefore no longer subject to the rule.

In response to a petition for reconsideration filed by Earthjustice regarding the EPA's decision not to set limits for unregulated HAPs, the agency announced it would issue a proposed rule that will (1) review existing emission standards for formaldehyde and other HAPs from stationary combustion turbines and (2) propose to establish emission standards for stationary combustion turbines that are not located at a major source for HAPs. The EPA's Fall 2024 Unified Agenda of Federal Regulatory and Deregulatory Actions released on December 13, 2024, indicates the agency anticipates issuing a proposed rule in May 2025; however, in light of the change in administration, no further related regulatory changes are expected at this time.

III. DEF's Integrated Clean Air Compliance Plan

No changes have occurred since previous filing of the Integrated Clean Air Compliance Plan, Docket No. 20240007.

A. Visibility Requirements

No changes have occurred since previous filing of the Integrated Clean Air Compliance Plan, Docket No. 20240007.

IV. Efficacy of DEF's Plan

A. Project Milestones

No changes have occurred since previous filing of the Integrated Clean Air Compliance Plan, Docket No. 20240007.

B. Projects

No changes have occurred since previous filing of the Integrated Clean Air Compliance Plan, Docket No. 20240007.

V. Conclusion

DEF has completed installation of the emission controls contemplated in its approved Plan D on time and within budget. The FGD and SCR systems at CR Units 4 and 5 have enabled DEF to comply with CAIR, and subsequently the CSAPR requirements and will continue to be the cornerstone of DEF's integrated air quality compliance strategy for years to come. DEF is confident that Plan D, along with the other compliance strategies discussed in the document, has enabled the Company to achieve and maintain compliance with applicable regulations, including MATS, in a cost-effective manner.