ACCEPTED FOR FILING BY
THE BOARD OF COUNTY
COMMISSIONERS AT ITS
MEETING ON

BCC Mtg. Date: Dec. 14, 2021

FILED 11/16/2021
DOCUMENT NO. 12747-2021
FPSC - COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Limited proceeding to consider Duke Energy Florida, LLC's unopposed motion to approve rate mitigation agreement.	DOCKET NO. 20210158-EI ORDER NO. PSC-2021-0425-FOF-EI ISSUED: November 16, 2021

The following Commissioners participated in the disposition of this matter:

GARY F. CLARK, Chairman
ART GRAHAM
ANDREW GILES FAY
MIKE LA ROSA
GABRIELLA PASSIDOMO

APPEARANCES:

MATTHEW BERNIER, ESQUIRE, 106 East College Avenue, Tallahassee, Florida 32301-7740; and DIANNE M. TRIPLETT, ESQUIRE, 299 First Avenue North, St. Petersburg, Florida 33701
On behalf of Duke Energy Florida, LLC (DEF)

RICHARD GENTRY, CHARLES REHWINKEL, and ANASTACIA PIRRELLO, ESQUIRES, Office of Public Counsel, c/o The Florida Legislature, 111 West Madison Street, Room 812, Tallahassee, Florida 32399-1400
On behalf of the Citizens of the State of Florida (OPC)

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On behalf of the Florida Industrial Power Users Group (FIPUG)

ROBERT SCHEFFEL WRIGHT, ESQUIRE, Gardner, Bist, Bowden, Dee, LaVia, Wright, Perry & Harper, PA, 1300 Thomaswood Drive, Tallahassee, Florida 32308
On behalf of Florida Retail Federation (FRF)

JAMES W. BREW and LAURA WYNN BAKER, ESQUIRES, Stone Mattheis Xenopoulos & Brew, PC, 1025 Thomas Jefferson St., NW, Eighth Floor, West Tower, Washington, DC 20007
On behalf of White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate – White Springs (PCS Phosphate)

MICHAEL K. LAVANGA, ESQUIRE, Stone Mattheis Xenopoulos & Brew, PC, 1025 Thomas Jefferson St., NW, Eighth Floor, West Tower, Washington, DC 20007

Received by: Clerk of BCC 11/17/2021 JK
c: County Mayor
Commissioner Districts 2, 3 & 6 only
County Administrator
Chief Sustainability and Resilience Officer Jeff Benavides
Utilities Department Director Ed Torres

On behalf of Nucor Steel Florida, Inc.

GEORGE CAVROS, ESQUIRE, Southern Alliance for Clean Energy, 120 E. Oakland Park Blvd., Suite 105, Fort Lauderdale, FL 33334
On behalf of Southern Alliance for Clean Energy (SACE).

STEPHANIE U. EATON, ESQUIRE, Spilman Thomas & Battle, PLLC, 110 Oakwood Drive, Suite 500, Winston-Salem, NC 27103
On behalf of Walmart, Inc. (Walmart).

JENNIFER CRAWFORD and RYAN SANDY, ESQUIRE, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850
On behalf of the Florida Public Service Commission (Staff)

MARY ANNE HELTON, ESQUIRE, Deputy General Counsel, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850
Advisor to the Florida Public Service Commission

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Florida Public Service Commission General Counsel

FINAL ORDER APPROVING RATE MITIGATION AGREEMENT

BY THE COMMISSION:

Background

On September 3, 2021, Duke Energy Florida, LLC (DEF) filed an Unopposed Motion to Approve Rate Mitigation Agreement (Motion), in Docket Nos. 20210001-EI, *In re: Fuel and purchased power cost recovery clause with generating performance incentive factor*, 20210010-EI, *In re: Storm protection plan cost recovery clause*, and 20210097-EI, *In re: Petition for limited proceeding for recovery of incremental storm restoration costs related to Hurricanes Eta and Isaias, by Duke Energy Florida, LLC*. Due to the continued increase in forecasted natural gas prices, DEF is projecting a $246.8 million under-recovery of fuel costs for 2021, that would otherwise be due from DEF's customers starting in 2022. Recognizing the impact these fuel price increases will have on DEF's customers, DEF states that it has worked collaboratively with a number of interested parties to develop a creative means to mitigate the rate impacts of this increase. The resulting Rate Mitigation Agreement (attached hereto as Attachment A) addresses issues or cost recovery associated with the three dockets referenced above, as well as some matters not previously raised in those dockets. Therefore, Docket No. 20210158-EI was opened to address DEF's Motion and the proposed Rate Mitigation Agreement.

DEF, the Office of Public Counsel, Florida Industrial Power Users Group, Florida Retail Federation, White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate, Southern Alliance for Clean Energy, and Nucor Steel Florida, Inc. are signatories to the Rate Mitigation Agreement. DEF represents that the signatories do not oppose granting DEF's Motion. DEF represents that Tampa Electric Company, Florida Power & Light Company, Gulf Power Company, and Florida Public Utilities Company, who are parties to Docket Nos. 20210001-EI and 20210010-EI, take no position on the Motion. Finally, DEF represents that Walmart Inc., which is a party to Docket No. 20210010-EI, does not oppose the granting of DEF's Motion.

Pursuant to Order No. PSC-2021-0371-PCO-EI, DEF's Motion and the proposed Rate Mitigation Agreement was scheduled for hearing on November 2, 2021. The purpose of the hearing was to consider whether it is in the public interest to approve the proposed Rate Mitigation Agreement. To promote transparency and access to this proceeding, all parties to Docket Nos. 20210001-EI, 20210010-EI, and 20210097-EI, as well as Florida Retail Federation and Southern Alliance for Clean Energy, were also made parties in Docket No. 20210158-EI.

At the November 2nd hearing, opening statements were taken by the parties, who either spoke in favor of the Rate Mitigation Agreement, or had no opposition to it being granted. DEF proffered witness Christopher Menendez, DEF's Director of Rates and Regulatory Planning, to answer questions regarding the Rate Mitigation Agreement. DEF's Motion, the Rate Mitigation Agreement, and DEF's responses to staff's data requests were entered into the record at hearing. An opportunity to provide public comment was also noticed for the hearing; however, no request for public comment was made.

We have jurisdiction pursuant to Sections 366.04, 366.05, 366.06, and 366.076, Florida Statutes (F.S.).

Decision

DEF's Rate Mitigation Agreement includes four major provisions to lessen the immediate impact of new 2022 customer rates. The total rate mitigation, on a residential 1,000 kWh bill, is $5.35 to $5.43 per month for January 2022 through April 2022, and $4.58 to $4.67 on average for 2022. The four major provisions are as follows:

- The first provision involves DEF recovering its estimated 2021 true-up under-recovery of $246.8 million over two years, beginning with January 2022 billing, with 50 percent of the balance, or approximately $123.4 million, recovered in 2022 rates and the remaining balance recovered in 2023 rates. This provision reduces the 2022 fuel portion of a typical residential bill (first 1,000 kWh) from $39.95 to $36.81, or by $3.14 per month.

- The second provision relates to true-up credits for certain DEF Solar Base Rate Adjustment plants. Specifically, DEF will reflect certain reductions in the capacity cost recovery clause (CCRC) to account for the true-ups associated with the Santa Fe and Twin Rivers solar plants. The credits will be applicable to January through April 2022 bills. The effect on the residential CCRC factor is a reduction of 0.078 cents per kWh (January 2022 – April 2022), or from 1.181 cents per kWh, to 1.103 cents per kWh. For a typical residential (monthly) bill of 1,000 kWh, this provision results in a reduction of $0.78 per month for January 2022 through April 2022.

- DEF's third provision relates to the recovery of storm costs. Starting with January 2022 bills, DEF will voluntarily forego collection of the storm surcharge associated with Hurricanes Eta and Isaias as approved by Order No. PSC-2021-0271-PCO-EI.[1] DEF will charge the remaining uncollected storm costs (estimated at $9.2 million) to DEF's storm reserve while reserving the right to collect the remainder of the unrecovered storm cost balance. The impact of this provision on a typical residential (monthly) bill of 1,000 kWh is valued at $0.55 per month. DEF is also voluntarily agreeing to forego its right to recover costs related to Hurricane Elsa through the storm surcharge and will instead charge those uncollected estimated storm costs to the storm reserve, reserving the right to collect the unrecovered storm costs at a future time. Preliminary cost estimates for Hurricane Elsa range from $15 million to $18 million. For a typical residential (monthly) bill of 1,000 kWh, this provision results in an estimated reduction of $0.45 to $0.53 per month.

- The fourth provision of the Rate Mitigation Agreement will accelerate cost savings resulting from the Federal Energy Regulatory Commission's (FERC) approval of DEF's petition to capitalize certain costs in FERC Operations & Maintenance Account 593, Maintenance of Overheard Lines. The approved waiver allows costs charged to Account 593 to be capitalized instead of expensed, for a period through 2032. These are costs incurred as part of DEF's Storm Protection Plan. DEF's approved Storm Protection Plan Cost Recovery Clause (SPPCRC) 2022 factors did not include the impact of the waiver, as FERC approval had not yet occurred when DEF prepared the SPPCRC filings.[2] Through the Rate Mitigation Agreement, DEF will prospectively update the SPPCRC 2022 factors to reflect the capitalization of the FERC 593 costs (approximately $9.2 million for 2022). For a typical residential (monthly) bill of 1,000 kWh, this provision results in a reduction of $0.29 per month, or from the currently-approved $3.29 to a revised $3.00.

The standard for approval of a settlement agreement is whether it is in the public interest.[3] A determination of public interest requires a case-specific analysis based on consideration of the proposed settlement taken as a whole.[4]

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[1] Issued July 28, 2021, in Docket No. 20210097-EI, *In re: Petition for limited proceeding for recovery of incremental storm restoration costs related to Hurricanes Eta and Isaias, by Duke Energy Florida, LLC.*

[2] Order No. PSC-2021-0324-FOF-EI, issued August 26, 2021, in Docket No. 20210010-EI, *In re: Storm protection plan cost recovery clause.*

[3] Order No. PSC-13-0023-S-EI, issued on January 14, 2013, in Docket No. 120015-EI, *In re: Petition for increase in rates by Florida Power & Light Company*; Order No. PSC-11-0089-S-EI, issued February 1, 2011, in Docket Nos. 080677 and 090130, *In re: Petition for increase in rates by Florida Power & Light Company* and *In re: 2009 depreciation and dismantlement study by Florida Power & Light Company*; Order No. PSC-10-0398-S-EI, issued June 18, 2010, in Docket Nos. 090079-EI, 090144-EI, 090145-EI, 100136-EI, *In re: Petition for increase in rates by*

Having reviewed the record in this matter, and having heard the arguments of the parties and witness testimony in this proceeding, we find that the Rate Mitigation Agreement, taken as a whole, is in the public interest, results in rates that are fair, just, and reasonable, and provides benefits to DEF's customers by mitigating the impact of increased costs to customers' rates. Therefore, the Rate Mitigation Agreement is hereby approved

Based on the foregoing, it is

ORDERED by the Florida Public Service Commission that the Rate Mitigation Agreement, attached hereto as Attachment A and incorporated by reference, is hereby approved, effective the date of our vote, November 2, 2021. It is further

ORDERED that this docket shall be closed.

By ORDER of the Florida Public Service Commission this 16th day of November, 2021.

ADAM J. TEITZMAN
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399
(850) 413-6770
www.floridapsc.com

Copies furnished: A copy of this document is provided to the parties of record at the time of issuance and, if applicable, interested persons.

JSC

Progress Energy Florida, Inc., In re: Petition for limited proceeding to include Bartow repowering project in base rates, by Progress Energy Florida, Inc., In re: Petition for expedited approval of the deferral of pension expenses, authorization to charge storm hardening expenses to the storm damage reserve, and variance from or waiver of Rule 25-6.0143(1)(c), (d), and (f), F.A.C., by Progress Energy Florida, Inc., and *In re: Petition for approval of an accounting order to record a depreciation expense credit, by Progress Energy Florida, Inc.*; Order No. PSC-05-0945-S-EI, issued September 28, 2005, in Docket No. 050078-EI, *In re: Petition for rate increase by Progress Energy Florida, Inc.*

[4] Order No. PSC-13-0023-S-EI, at p. 7.

NOTICE OF FURTHER PROCEEDINGS OR JUDICIAL REVIEW

The Florida Public Service Commission is required by Section 120.569(1), Florida Statutes, to notify parties of any administrative hearing or judicial review of Commission orders that is available under Sections 120.57 or 120.68, Florida Statutes, as well as the procedures and time limits that apply. This notice should not be construed to mean all requests for an administrative hearing or judicial review will be granted or result in the relief sought.

Any party adversely affected by the Commission's final action in this matter may request: 1) reconsideration of the decision by filing a motion for reconsideration with the Office of Commission Clerk, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, within fifteen (15) days of the issuance of this order in the form prescribed by Rule 25-22.060, Florida Administrative Code; or 2) judicial review by the Florida Supreme Court in the case of an electric, gas or telephone utility or the First District Court of Appeal in the case of a water and/or wastewater utility by filing a notice of appeal with the Office of Commission Clerk, and filing a copy of the notice of appeal and the filing fee with the appropriate court. This filing must be completed within thirty (30) days after the issuance of this order, pursuant to Rule 9.110, Florida Rules of Appellate Procedure. The notice of appeal must be in the form specified in Rule 9.900(a), Florida Rules of Appellate Procedure.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and purchased power cost recovery clause with generating performance incentive factor	Docket No. 20210001-EI
In re: Petition for Limited Proceeding for Recovery of Incremental Storm Restoration costs Related to Hurricane Eta and Isaias, by Duke Energy Florida, LLC	Docket No. 20210097-EI
In re: Storm Protection Plan Cost Recovery Clause	Docket No. 20210010-EI

AGREEMENT REGARDING DEF RATE MITIGATION

WHEREAS, Duke Energy Florida, LLC ("DEF"), the Office of Public Counsel ("OPC"), the Florida Industrial Power Users Group ("FIPUG"), the Florida Retail Federation ("FRF"), White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate ("White Springs"), the Southern Alliance for Clean Energy ("SACE"), Nucor Steel Florida, Inc. ("Nucor"), and Walmart, Inc. ("Walmart") (collectively referred to as "Parties") agree that it is in the public interest to proactively address the impact of fuel prices on customer rates; and

WHEREAS, forecasted natural gas prices have increased since DEF made its 2021 projected fuel filing in Docket Number 20200001-EI and its initial fuel filing in Docket Number 20210001-EI, such that DEF expects to be significantly under-recovered; and

WHEREAS, on August 3, 2021, the Commission authorized DEF to begin collecting a portion of the expected under-recovery amount from customers starting September 2021; and

WHEREAS, natural gas prices have continued to increase since the filing of DEF's petition for mid-course correction, such that DEF's latest fuel forecast projects a $246.8 million under-recovery for 2021 that would otherwise be due from DEF's customers starting in 2022; and

WHEREAS, DEF recognizes the significant impact these unexpected fuel price increases will have on its customers and desires to voluntarily undertake measures to mitigate the rate impacts of this increase; and

WHEREAS, the Parties recognize that these measures are voluntary and should have no precedential value in any future proceeding; and

WHEREAS, unless otherwise noted, all revenue requirement, rate and bill impacts below exclude gross receipts tax ("GRT") and regulatory assessment fees ("RAF") and that GRT and RAF impacts are reflected in paragraph 6 below.

NOW THEREFORE, the Parties agree to the following rate mitigation measures:

1. DEF has updated the 2021 fuel forecast and estimated true-up balance, since DEF's Actual/Estimated Filing was made on July 27, 2021. The updated true-up balance includes actual results for July 2021 and re-forecasted fuel expenses beginning in August 2021, using fuel prices as of July 21, 2021. As a result, DEF estimates the updated 2021 true-up balance to be an under-recovery of approximately $246.8 million. If recovered entirely in 2022 fuel rates, DEF estimates the 2022 fuel price for a Residential 1,000 kWh bill would be $39.95. In order to mitigate the bill impact to customers, DEF will file, in its 2022 Fuel Projection Filing due September 3, 2021 in Docket No. 20210001-EI, a request to recover the estimated 2021 true-up of $246.8 million over two years, beginning with the first billing cycle of January 2022, with 50% of the balance, or approximately $123.4 million, recovered in 2022 rates and the balance recovered in 2023 rates. By recovering the 2021 true-up over two years, DEF will reduce the 2022 fuel component of the Residential 1,000 kWh bill by $3.14 to $36.81. DEF agrees to collect interest at the commercial paper rate.
2. The Commission, in Order Number PSC-2021-0088-TRF-EI, pursuant to the 2017 Revised and Restated Settlement and Stipulation ("2017 Settlement"), approved the last tranche of DEF's Solar Base Rate Adjustment ("SoBRA") projects.
    a. The Santa Fe and Twin Rivers projects were approved as part of this final tranche and were placed in-service in March 2021 and into base rates beginning with April 2021 billing. DEF has prepared the final project cost true-up for these projects, consistent with paragraph 15g of the 2017 Settlement. As a result, DEF has

determined that the Santa Fe revenue requirement should be reduced by $386,921 annually, and the Twin Rivers revenue requirement should be reduced by $533,447 annually. The parties agree that instead of reflecting this reduction in base rates, DEF will apply these amounts as a credit in the Capacity Cost Recovery Clause ("CCRC") revenue requirement and resulting CCRC factors. The parties further agree that DEF will include these credits in the 2022 CCRC Projection Filing, to be made on September 3, 2021, and will continue to include these credits in CCRC through 2024, the end of the 2021 Settlement term. DEF further agrees to continue including these credits in CCRC until DEF's next base rate case, at which time the CCRC credits will cease.

b. The Charlie Creek and Sandy Creek projects ("the SoBRA projects") were also approved as part of this final tranche, and DEF originally projected that they would be in-service by the end of 2021. Therefore, DEF included the costs for the SoBRA projects in its 2022 base rates approved in the 2021 Settlement Agreement, approved by the Commission in Order No. PSC-2021-0202A-AS-EI. However, the in-service dates for the SoBRA projects have been delayed an estimated four months due to unforeseen permitting issues.

    i. The Parties agree that DEF will proactively credit the revenue requirement for the SoBRA projects in its CCRC September 3 projection filing and align this credit with January 2022 through April 2022 rates. DEF will include a credit equal to the monthly revenue requirement for the SoBRA projects; the amount of the credit is $1,846,525 per month or $7,386,099 in total for January through April 2022. DEF estimates the impact to the Residential CCRC rate is a reduction 0.078 cents/kWh for January 2022 – April 2022; a corresponding rate reduction would be calculated for all other CCRC rates. In the 2022 CCRC Projection Filing, DEF will propose to bill customers a CCRC rate, net of this credit, for January 2022 through April 2022. For example, if the Residential CCRC rate, excluding this SoBRA credit, is 1.181 cents/kWh and the credit is 0.078 cents/kWh, DEF will request approval to charge customers 1.103 cents/kWh (1.181 – 0.078) for January 2022 – April 2022. Beginning in May 2022, DEF agrees to request approval of the CCRC rate, excluding this SoBRA credit, or 1.181 cents/kWh.

ii. Should the actual in-service date of either of the SoBRA projects differ from the April 2022 date, DEF agrees to calculate the impact such that the cost of any affected unit will be included in rates the month following the actual unit in-service date, and will include that impact in the CCRC true-up balance to be included in the next applicable CCRC filing. DEF further agrees to submit a final true-up, if needed, to account for any changes in capital costs in either of the SoBRA projects, pursuant to paragraph 15 of the 2017 Settlement. DEF will reflect the project cost true-up impacts for the SoBRA projects in a similar manner to the one described in section 2.a above for Santa Fe and Twin Rivers.

3. The Parties acknowledge that DEF is currently recovering its storm recovery costs associated with Hurricanes Eta and Isaias through a storm surcharge approved by the Commission in Order No. PSC-2021-0271-PCO-EI. DEF is authorized to collect these charges through July 2022, per the terms of the 2017 Settlement. However, DEF is willing to forego collection of the remainder of this storm surcharge starting with the January 2022 bills, and charge the remaining uncollected storm costs (estimated at $9.2 million) to DEF's storm reserve. The impact is currently $0.55 on a Residential 1,000 kWh bill. Nothing in this paragraph affects DEF's obligations to demonstrate the reasonableness and prudence of costs ultimately submitted for recovery.

4. DEF also incurred storm recovery costs associated with Hurricane Elsa. DEF is authorized, under the 2017 Settlement, to request a storm surcharge to recover those costs. However, the Parties agree that DEF will forego its right to collect these charges through the storm surcharge and instead apply these charges to the storm reserve. Preliminary cost estimates for Hurricane Elsa range from $15 million to $18 million, which is an estimated $0.45 to $0.53 impact, respectively, on a Residential 1,000 kWh bill. The combined impact of paragraphs 3 and 4 will result in DEF's Storm Reserve being reduced to approximately $105 to $108 million from the $132 million authorized by the 2021 Settlement. DEF reserves the right to seek recovery of the amounts described in paragraphs 3 and 4 if and when the Storm Reserve returns to a debit balance in accordance with Rule 25-6.0143,

F.A.C. Nothing in this paragraph affects DEF's obligations to demonstrate the reasonableness and prudence of costs ultimately submitted for recovery.

5. On July 1, 2021, DEF filed a Petition for Limited Waiver of Account 593 with the Federal Energy Regulatory Commission ("FERC"). The FERC approved DEF's petition on July 29, 2021. DEF's petition follows similarly approved requests from Gulf Power Company and Florida Power & Light. The approved Account 593 waiver allows transfer costs that would normally be charged to FERC O&M account 593, Maintenance of overhead lines, to be capitalized instead. The approved waiver allows for the capitalization of these costs through 2032. These are costs incurred as part of DEF's approved Storm Protection Plan ("SPP"). DEF's approved Storm Protection Plan Cost Recovery Clause ("SPPCRC") 2022 revenue requirements and factors did not include the impact of this waiver, as FERC acceptance had not occurred when DEF prepared the SPPCRC filings. The Parties agree that DEF will proactively update the SPPCRC 2022 revenue requirements and factors to reflect the capitalization of the FERC 593 costs. DEF estimates this will reduce the 2022 SPPCRC revenue requirement by approximately $9.2 million. DEF estimates this will reduce the SPPCRC amount on a Residential 1,000 kWh bill by $0.29 from the currently approved $3.29 to a revised $3.00.
6. DEF estimates that the cumulative effect of the above mitigation measures will reduce GRT and RAF by approximately $0.13 per month for January 2022 through April 2022 and $0.12 on average for a 2022 Residential 1,000 kWh bill.
7. The Parties agree that the total rate mitigation, on a Residential 1,000 kWh bill, amounts to $5.35 to $5.43 per month for January 2022 through April 2022 and $4.58 to $4.67 on average for 2022.
8. The Parties agree that DEF will file a motion to approve this agreement in Docket Nos. 20210001-EI, 20210010-EI, and 20210097-EI.

[signature pages to follow]

Duke Energy Florida, LLC

By____________________

Melissa Seixas, President
299 1 Avenue North
St. Petersburg, FL

Florida Industrial Power Users Group

By________________ August 31, 2021
Jon C. Moyle, Jr., Esquire
Moyle Law Firm, PA
118 Gadsden Street
Tallahassee, FL 32301

Florida Retail Federation

By Robert Scheffel Wright

Robert Scheffel Wright, Esquire
Gardner, Bist, Bowden, Dee, LaVia, Wright, Perry & Harper, P.A.
1300 Thomaswood Drive
Tallahassee, FL 32301

Nucor Steel Florida, Inc.

By ____________________

Michael K. Lavanga, Esquire
Peter J. Mattheis, Esquire
Counsel to Nucor Steel Florida, Inc.
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1025 Thomas Jefferson Street, NW
Eighth Floor, West Tower
Washington, DC 20007

Office of Public Counsel

By

Richard Gentry, Public Counsel
Charles Rehwinkel, Esquire
Deputy Public Counsel
Anastacia Pirrello, Esquire
Associate Public Counsel
111 W. Madison Street, Room 812
Tallahassee, FL 32301

On behalf of all Customers of Duke Energy Florida, LLC

White Springs Agricultural Chemicals, Inc.
d/b/a PCS Phosphate

By

James W. Brew, Esquire
Stone, Matheis, Xenopoulos & Brew
1025 Thomas Jefferson Street, NW
Eighth Floor, West Tower
Washington , DC 20007

Southern Alliance for Clean Energy

By______________

George Cavros, Esquire
120 E. Oakland Park Blvd., Suite 105
Fort Lauderdale, FL 33334

Duke Energy Florida
Storm Protection Plan Cost Recovery Clause
Initial Projection
Projected Period: January 2022 through December 2022

Duke Energy Florida, LLC
RATE MITIGATION-Exhibit 8
Form 1P

Summary of Projected Period Recovery Amount
(in Dollars)

Line	Energy ($)	Demand ($)	Total ($)	Rate Mitigation Agreement Original ($)	Rate Mitigation Agreement Variance ($)
1. Total Jurisdictional Revenue Requirements for the Projected Period					
a. Overhead Distribution Hardening Programs (Form 2P, Line 12b + Form 3P, Line 1b)	$ -	$ 27,252,787	$ 27,252,787	$ 36,411,082	$ (9,158,295)
b. Overhead Transmission Hardening Programs (Form 2P, Line 13b + Form 3P, Line 2b)	-	11,197,441	11,197,441	11,197,441	0
c. Vegetation Management Distribution Programs (Form 2P, Line 14b + Form 3P, Line 3.1)	-	44,327,530	44,327,530	44,327,530	0
d. Vegetation Management Transmission Programs (Form 2P, Line 15b + Form 3P, Line 3.2)	-	8,692,446	8,692,446	8,692,446	0
e. Underground Distribution Hardening Programs (Form 2P, Line 16b + Form 3P, Line 4.b)	-	4,642,002	4,642,002	4,642,002	0
f. Legal, Accounting, and Administrative (Form 2P, Line 17b)	-	-	-	-	0
g. Total Projected Period Rev. Req.	$ -	$ 96,112,206	$ 96,112,206	105,270,501	$ (9,158,295)
2. Estimated True up of (Over)/Under Recovery for the Current Period (SPPCRC Form 1E, Line 4)	$ -	$ (966,652)	$ (966,652)	$ (966,652)	$ -
3. Final True Up of Over/(Under) Recovery for the Prior Period (N/A)	$ -	$ -	$ -	$ -	$ -
4. Jurisdictional Amount to be Recovered/(Refunded) (Line 1g + Line 2 + Line 3)	$ -	$ 95,145,554	$ 95,145,554	$ 104,303,849	$ (9,158,295)
5. Change in 2022 Revenue Requirement Based on implementation of FERC Account 593 Waiver*					$ (9,158,295)

Duke Energy Florida
Storm Protection Cost Recovery Clause
Calculation Rate Factors by Rate Class
January 2022 - December 2022

Duke Energy Florida, LLC
RATE MITIGATION-Exhibit B
Form 6P

Rate Class	(1) mWh Sales at Source Energy Allocator (%)	(2) 12 CP Demand Transmission Allocator (%)	(3) NCP Distribution Total Allocator (%)	(4) 12 CP & 25% AD Demand Allocator (%)	(5) Energy-Related Costs ($)	(6) Transmission Demand Costs ($)	(7) Distribution Demand Costs ($)	(8) Production Demand Costs ($)	(9) Total SPP Costs ($)	(10) Projected Effective Sales at Meter Level (mWh)	(11) Billing KW Load Factor (%)	(12) Projected Effective KW at Meter Level (kW)	(13) SPP Cost Recovery Factor ($/kW-mo)	(14) SPP Factors (¢/kWh)
Residential														
RS-1, RST-1, RSL-1, RSL-2, RSS-1														
Secondary	54.164%	62.337%	67.930%	60.294%	$0	$12,274,017	$51,256,725	$0	$63,530,743	21,211,130				0.300
General Service Non-Demand														
GS-1, GST-1														
Secondary	2.601%	2.848%	2.675%	2.786%	$0	$560,774	$2,018,358		$2,579,132	1,018,417				0.253
Primary	0.046%	0.050%	0.047%	0.049%	$0	$9,943	$35,786		$45,729	18,636				0.250
Transmission	0.006%	0.007%	0.000%	0.007%	$0	$1,394	$0		$1,394	2,613				0.248
TOTAL GS	2.653%	2.906%	2.722%	2.843%	$0	$572,111	$2,054,144	$0	$2,626,254	1,039,667				
General Service														
GS-2 Secondary	0.522%	0.329%	0.242%	0.378%	$0	$64,833	$182,885	$0	$247,718	204,533				0.121
General Service Demand														
GSD-1, GSDT-1, SS-1														
Secondary	29.730%	25.247%	22.040%	26.358%	$0	$4,971,083	$16,630,368		$21,601,452	11,642,447	46.61%	34,218,666	0.63	
Primary	4.195%	3.555%	3.188%	3.715%	$0	$700,013	$2,405,844		$3,105,857	1,695,388	46.61%	4,982,965	0.61	
Transmission	0.981%	0.833%	0.000%	0.870%	$0	$164,008	$0		$164,008	396,704	46.61%	1,165,966	0.14	
TOTAL GSD	34.906%	29.635%	25.228%	30.953%	$0	$5,835,104	$19,036,213	$0	$24,871,317	13,734,539	46.61%	40,367,597		
Curtailable														
CS-2, CST-2, CS-3, CST-3, SS-3														
Secondary	0.000%	0.000%	0.000%	0.000%	$0	$0	$0		$0	-	29.79%	-	0.59	
Primary	0.295%	0.161%	0.385%	0.194%	$0	$31,613	$290,581		$322,194	119,042	29.79%	547,431	0.58	
Transmission					$0	$0	$0		$0	-	29.79%	-	0.58	
TOTAL CS	0.295%	0.161%	0.385%	0.194%	$0	$31,613	$290,581	$0	$322,194	119,042	29.79%	547,431		
Interruptible														
IS-2, IST-2, SS-2														
Secondary	1.039%	0.719%	0.682%	0.799%	$0	$141,494	$514,503		$655,997	406,762	45.10%	1,235,450	0.53	
Primary	4.074%	2.851%	1.948%	3.157%	$0	$561,333	$1,469,519		$2,030,851	1,646,714	45.10%	5,001,524	0.41	
Transmission	1.456%	1.008%	0.000%	1.120%	$0	$198,489	$0		$198,489	588,548	45.10%	1,787,584	0.11	
TOTAL IS	6.569%	4.578%	2.629%	5.075%	$0	$901,316	$1,984,022	$0	$2,885,337	2,642,025	45.10%	8,024,557		
Lighting														
LS-1 Secondary	0.891%	0.055%	0.863%	0.264%	$0	$10,850	$651,141	$0	$661,991	348,815				0.190
	100.000%	100.000%	100.000%	100.000%	$0	$19,689,844	$75,455,710	$0	$95,145,554	39,299,751				0.242

Notes:

(1) From Form 5P, Column 10
(2) From Form 5P, Column 11
(3) From Form 5P, Column 12
(4) From Form 5P, Column 13
(5) Column 1 x Total Energy Jurisdictional Dollars from Form 1P, line 4 (Energy)
(6) Column 2 x Total Transmission Demand Jurisdictional Dollars from Form 1P, line 1b (Demand)
(7) Column 3 x Total Distribution Demand Jurisdictional Dollars from Form 1P, line 1a (Demand)
(8) N/A
(9) Column 5 + Column 6 + Column 7 + Column 8
(10) From Form 5P, Column 3
(11) Class Billing Load Factor
(12) Column 10 x 1000 / 8,760 / Column 11 x 12
(13) Column 9 / Column 12
(14) Column 9 / Column 10 /10

Calculation of Standby Service kW Charges			
	SPPCRC Cost	Effective kW	$/kW
Total GSD, CS, IS	$28,078,848	48,939,585	0.57
SS-1, 2, 3 - $/kW-mo	Secondary	Primary	Transmission
Monthly - $0.57/kW * 10%	0.057	0.056	0.056
Daily - $0.57/kW / 21	0.027	0.027	0.026