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Public Service Commission

February 2, 2021

STAFF'S FIRST DATA REQUEST
VIA E-MAIL
Will.cox@fpl.com

William P. Cox, Esquire
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, Florida 33408

Re: Docket No. 20200257-EI - Petition for approval of 2020 nuclear decommissioning study.

Dear Mr. Cox:

By this letter, Commission staff requests the following information from Florida Power & Light Company (FPL or Company):

Nuclear Decommissioning Trust Fund

1. For the following requests, please refer to Florida Power & Light's (FPL) 2020 Nuclear Decommissioning Study (2020 Study), Section 4, Pages 1-3. Please provide a schedule detailing the nuclear decommissioning trust fund (NDT) performance (calculated net of administrative costs on an after-tax, time weighted rate of return basis as of 12/31/2020) relative to the CPI, as measured by the U.S. Bureau of Labor Statistics, for the past one year, two years, three years, five years, ten years, and since inception.¹
2. Should a minimum fund earnings rate be imposed by the Commission? If the response is yes, please explain how a minimum fund earnings rate should be determined.
3. Please explain FPL's investment strategy for its nuclear decommissioning trust. Please discuss in detail the objectives and guidelines governing the trust funds such as dollar/portfolio size limitations on issuers, and any other possible restrictions or constraints.

¹If actual fund earnings data is not yet known through December 31, 2020, please respond using the actual/estimated (estimated November and December 2020) data contained in the 2020 Study.

4. Please provide a detailed breakdown of the trust fund portfolio by type of securities held, maturity composition (average maturity), credit rating of any fixed income investments, and other relevant categories.

5. Please discuss the relationship FPL has with the trustee of its NDT funds from the inception of the trust through the present. Please include in this discussion an explanation of how the trustee was selected, whether or not the trustee is affiliated with the utility, and how the trustee or its role has changed over time.

6. Please discuss the relationship FPL has with the (fund) manager of its NDT funds from the inception of the trusts through the present. Please include in this discussion an explanation of how the fund manager was selected, whether or not the fund manager is affiliated with the utility, and how the fund manager or its role has changed over time.

7. Please provide a schedule detailing the trustee fee (all costs as a percentage of average asset balance as of 12/31/2020) for FPL's pension fund, employee savings fund, and NDT funds.² Please include an explanation of the differences, if any, in the trustee fees for each of these funds.

8. Please provide a schedule detailing the investment manager fee (all costs as a percentage of average asset balance as of 12/31/2020) for FPL's pension fund, employee savings fund, and NDT funds.³ Please include an explanation of the differences, if any, in the investment manager fees for each of these funds.

9. Please provide a schedule detailing the total administrative costs (all costs as a percentage of average asset balance as of 12/31/2020) for FPL's pension fund, employee savings fund, and NDT funds.⁴ Please include an explanation of the differences, if any, in the total administrative costs for each of these funds.

10. What are, if any, the legal investment constraints on the decommissioning fund? Does the company have any additional investment constraints? Please explain.

11. Please refer to FPL's 2020 Study, Support Schedule D, Page 1 of 1 for the following requests.

a. Please refer to "Note (2)" associated with Support Schedule D. Please provide detailed calculations which support the statement: "FPL remeasured its deferred tax assets to the new federal corporate tax rate of 21%, which resulted in a reduction of deferred tax assets by \$141 million."

b. Please refer to "Note (3)" associated with Support Schedule D. Please provide detailed calculations which support the statement: "[t]rust fund earnings are taxed at the current tax rate in effect, 4.458% for the periods of 2018 through 2021, while the deferred tax asset is recorded using 5.5% for the same period resulting in variances."

²If actual funds earnings data is not yet known through December 31, 2020, please respond using the most-current data to the month available.

³*Id.*

⁴*Id.*

c. Please verify that the deferred taxes associated with the Nuclear Decommissioning Reserve Funds were generated by the book tax timing differences associated with the annual amortization of the capitalized decommissioning liability because decommissioning expenses paid from the nonqualified fund cannot be deducted for tax purposes until actually incurred.

12. Please refer to the 2020 Study, Support Schedules G (for both the St. Lucie and Turkey Point estimates), Pages 1-8, for the following request.

a. Please define the all acronyms appearing in the row above the column titles of this table.

b. Regarding the determination of escalation rates, please discuss in detail the reasons why each of the individual inflation indices for labor, materials, shipping, and burial were selected.

c. Given that funding status is highly dependent on assumed escalation rates, please explain why FPL believes the assumed average escalation rates, ranging from 3.13 percent to 3.19 percent for all four nuclear units are appropriate for use in this proceeding.

13. Please explain how FPL's 2020 Study complies with the Nuclear Regulatory Commission's (NRC) rule on financial requirements for nuclear power reactors.

14. Please provide the NRC's minimum decommissioning trust fund requirements for Turkey Point Units 3 and 4, and St. Lucie Units 1 and 2, expressed in 2020 dollars.

15. Please explain how FPL is complying with NRC requirements as they pertain to control of the NDT funds.

16. Please explain how FPL is complying with NRC requirements as they pertain to management of the investments that comprise the NDT funds.

17. Please explain whether FPL has requested any exceptions to the NRC guidelines on decommissioning reserves. If so, please provide copies of any related correspondence to and from the NRC regarding this matter.

End of Life Material & Supplies

Please refer to FPL's 2020 Decommissioning Study for the St. Lucie Nuclear Unit Nos. 1 & 2, Section 7 (Support Schedule E, Page 1 of 1), the End-of-Life Materials and Supplies Inventory Expense (EOL M&S) Accrual Calculation to answer questions 18 - 26 below:

18. Support Schedule E, Page 1 of 1, reflects values prepared as of December 31, 2020. Please provide an updated version of Schedule E showing all values prepared as of the accrual date of January 1, 2022.

a. In the updated version of Schedule E, what is the resulting annual amortization from January 1, 2022 to the end of license?

b. What annual amortization expense associated with EOL M&S is FPL currently recording?

19. Please provide a spreadsheet (with formulas intact and cells unlocked) showing the development of the data appearing in response to Question number 18 above.

20. Please identify what assumptions are incorporated into the estimated value of the EOL M&S inventory (Schedule E) prepared as of the accrual date of January 1, 2022.

21. Please identify what EOL M&S assumptions, if any, were incorporated in the Energy Solutions study that are new, revised, or otherwise different and were not incorporated when EOL M&S was calculated for the 2015 Study.

22. Please identify the principle reasons or sources why the value of EOL M&S inventory in the 2020 Study (approximately \$33.9) is approximately 25 percent greater than the amount included in the 2015 Study (approximately \$27.1M)? Specify in your response what portion of the increase is attributable to actual M&S inventory amounts incurred to-date, and what portion is attributable to M&S inventory amounts in forecasted (e.g., projected) periods up to EOL.

23. Please identify the principle reasons or sources why the value of EOL M&S Salvage in the 2020 Study (approximately \$448 thousand) is approximately 172 percent greater than the amount in the 2015 Study (\$260K)? Specify in your response what portion of the increase is attributable to current M&S Salvage amounts versus what portion of the increase is attributable to forecasted amounts in projected periods up to EOL.

24. Generally speaking, does FPL expect that any EOL M&S at end of license at the St. Lucie Nuclear Station would be potentially useful at the Turkey Point Nuclear Station? Why or why not?

25. In descending order, please identify the top 3 highest value items in the EOL M&S inventory at the St. Lucie Nuclear Station.

26. For the purposes of the following requests, please refer to FPL's 2020 Decommissioning Study - St. Lucie Nuclear Units 1 & 2, Section 2 – Assumptions, page 8 of 11. FPL states that the Florida Public Service Commission (Commission) authorized it to begin recording the amortization of estimated end of life materials and supplies (EOL M&S) costs as a base rate fuel expense with a credit to a separate unfunded sub-account of Reserve Account 228. However, page 25 of Order No. PSC-02-0055-PAA-EI indicates that the Commission found, in part, that “the amortization expense associated with EOL M&S inventories should be accounted for as a debit to nuclear maintenance expense,” and not as a base rate fuel expense. Please explain how FPL has been accounting for the annual EOL M&S amortization expenses for the St. Lucie Unit, and whether its accounting treatment complies with the Commission's Order.

27. On January 11, 2021, a docket was established regarding a petition for rate increase (Docket No. 20210015-EI). Although issues have not been identified yet for Docket No. 20210015-EI, will FPL propose an issue(s) in that case to include EOL M&S inventories as a base rate component? Please explain your response.

Please refer to FPL's 2020 Decommissioning Study for the Turkey Point Nuclear Unit Nos. 3 & 4, Section 7 (Support Schedule E, Page 1 of 1), the End-of-Life Materials and Supplies Inventory Expense (EOL M&S) Accrual Calculation to answer questions 28 - 34 below:

28. Schedule E, Page 1 of 1, reflects values prepared as of December 31, 2020. Please provide an updated version of Schedule E showing all values prepared as of the accrual date of January 1, 2022.

a. In the updated version of Schedule E, what is the resulting annual amortization from January 1, 2022 to the end of license?

b. What annual amortization expense associated with EOL M&S is FPL currently recording?

29. Please provide a spreadsheet (with formulas intact and cells unlocked) showing the development of the data appearing in response to Question number 28 above.

30. Please identify what assumptions are incorporated into the estimated value of the EOL M&S inventory prepared as of the accrual date of January 1, 2022.

31. Please identify what assumptions were incorporated in the Energy Solutions study that are new, revised, or otherwise different and were not incorporated when EOL M&S was calculated for the 2015 Study.

32. Please identify the principle reasons or sources why the value of EOL M&S inventory in the 2020 Study (approximately \$43.7) is approximately 19 percent greater than the amount included in the 2015 Study (approximately \$36.7)? Specify in your response what portion of the increase is attributable to actual M&S inventory amounts incurred to-date, and what portion is attributable to M&S inventory amounts in forecasted (e.g., projected) periods up to EOL.

33. Please identify the principle reasons why the value of EOL M&S Salvage inventory in the 2020 Study (approximately \$913K) is approximately 160 percent greater than the amount included in the 2015 Study (approximately \$352K)? Specify in your response what portion of the increase is attributable to current M&S Salvage amounts versus what portion of the increase is attributable to forecasted amounts in projected periods up to EOL.

34. In descending order, please identify the top 3 highest value items in the EOL M&S inventory at the Turkey Point Nuclear Station.

35. For the purposes of the following request, please refer to the Assumptions tab of the 2020 Decommissioning Study, page 6 of 9 for Turkey Point Units 3 & 4. FPL states that the Florida Public Service Commission (Commission) authorized it to begin recording the amortization of estimated end of life materials and supplies (EOL M&S) costs as a base rate fuel expense with a credit to a separate unfunded sub-account of Reserve Account 228. However, page 25 of Order No. PSC-02-0055-PAA-EI indicates that the Commission found, in part, that "the amortization expense associated with EOL M&S inventories should be accounted for as a debit to nuclear maintenance expense," and not as a base rate fuel expense. Please explain how FPL has been accounting for the annual EOL M&S amortization expenses for the Turkey Point Unit, and whether its accounting treatment complies with the Commission's Order.

End of Life Nuclear Fuel (Last Core)

Please refer to FPL's 2020 Decommissioning Study for the St. Lucie Nuclear Unit Nos. 1 & 2, Section 8 (Support Schedule F, Page 1 of 1), the End-of-Life Unamortized Nuclear Fuel expense calculation in FPL's 2020 Decommissioning Study for the St. Lucie Nuclear Unit to answer questions 36-37 below:

36. Please identify the principle reasons why the Remaining Amount to be Recovered for St. Lucie Unit 1 in the 2020 Study (approximately \$16.2 million) is about 74 percent lower, compared to the amount in the 2015 Study (approximately \$64.3 million)?

37. Please identify the principle reasons why the Remaining Amount to be Recovered for St. Lucie Unit 2 in the 2020 Study (approximately \$23.2 million) is over 71 percent lower, compared to the amount in the 2015 Study (approximately 80.8 million)?

38. Please refer to FPL's 2020 Decommissioning Study for St. Lucie Nuclear Units 1 & 2: Section 7 (Support Schedule F - End-of-Life Unamortized Nuclear Fuel Accrual Calculation) with values prepared as of December 31, 2020. Please provide an updated version of Schedule F showing all values prepared as of the accrual date of January 1, 2022.

39. Please provide a spreadsheet (with formulas intact and cells unlocked) showing the development of the data appearing in response to Question number 38 above.

40. Please identify what assumptions are incorporated into the estimated values shown in the updated Schedule F prepared as of the accrual date of January 1, 2022.

41. Please identify what assumptions, if any, appearing in response to Question 40 above and incorporated in the Energy Solutions study are new, revised, or otherwise different and were not incorporated in the 2015 Study?

42. What will be the remaining amount of End of Life Nuclear Fuel to be recovered by FPL as of January 1, 2022?

43. What is the resulting annual amortization of End of Life Nuclear Fuel from January 1, 2022 to the end of license?

44. What annual amortization expense associated with Last Core is FPL currently recording?

Please refer to FPL's 2020 Decommissioning Study for the Turkey Point Nuclear Unit Nos. 3 & 4, Section 8 (Support Schedule F, Page 1 of 1), the End-of-Life Unamortized Nuclear Fuel expense calculation in FPL's 2020 Decommissioning Study for Turkey Point Nuclear Unit to answer questions 45-46 below:

45. Please identify the principle reasons why the Remaining Amount to be Recovered for Turkey Point Unit 3 in the 2020 Study (approximately \$27 million) is over 36 percent lower, compared to the amount in the 2015 Study (approximately \$42.3 million)?

46. Please identify the principle reasons why the Remaining Amount to be Recovered for Turkey Point Unit 4 in the 2020 Study (approximately \$30 million) is over 27 percent lower, compared to the amount in the 2015 Study (approximately \$41.6 million)?
47. Please refer to FPL's 2020 Decommissioning Study for Turkey Point Nuclear Units 3 & 4: Section 7 (Support Schedule F - End-of-Life Unamortized Nuclear Fuel Accrual Calculation) with values prepared as of December 31, 2020. Please provide an updated version of Schedule F showing all values prepared as of the accrual date of January 1, 2022.
48. Please provide a spreadsheet (with formulas intact and cells unlocked) showing the development of the data appearing in response to Question number 47 above.
49. Please identify what assumptions are incorporated into the estimated values shown in the updated Schedule F prepared as of the accrual date of January 1, 2022.
50. Please identify what assumptions, if any, appearing in response to Question 49 above and incorporated in the Energy Solutions study are new, revised, or otherwise different and were not incorporated in the 2015 Study?
51. What will be the remaining amount of End of Life Nuclear Fuel to be recovered by FPL as of January 1, 2022?
52. What is the resulting annual amortization of End of Life Nuclear Fuel from January 1, 2022 to the end of license?
53. What annual amortization expense associated with Last Core is FPL currently recording?
54. Please identify any research being undertaken or developing technologies FPL is aware of that may serve to minimize the amount of unburned fuel remaining at shutdown and reduce the associated costs.
55. Has there been any change to FPL's methodology for determining the cost of unburned fuel remaining in the reactor at the end of plant life since the 2015 Cost Study?
56. Please refer to Section 8 (Support Schedule F, Page 1 of 1), the End-of-Life Unamortized Nuclear Fuel Accrual Calculation, in FPL's 2020 Decommissioning Studies for St. Lucie Units 1 & 2 and Turkey Point Units 3 & 4. Please explain the principle reason(s) why the estimated cost of the Last Core for the St. Lucie Units decreased by approximately 40 percent, while the estimated cost of the Last Core for the Turkey Point Units did not change by significant amounts. For ease of reference, the Table below ("FPL Estimated Cost of Last Core") shows a comparison of estimated cost of Last Core from the 2015 and 2020 Cost Studies.

FPL Estimated Cost of Last Core			
	2015 Study	2020 Study	Percent Change
SL1	\$ 89,300,000	\$ 56,900,000	-36.3%
SL2	\$ 98,700,000	\$ 55,700,000	-43.6%
TP3	\$ 67,500,000	\$ 65,300,000	-3.3%
TP4	\$ 62,700,000	\$ 63,800,000	1.8%

57. Please refer to the Turkey Point and St. Lucie Decommissioning Study, Section 2, Page 2. In the first paragraph titled "Decommissioning Methods," it is written that "Decommissioning also includes the dismantlement, disposal and site restoration activities associated with the non-contaminated portion of the facilities. These activities are not required for termination of the operating license but are required to address other non-radiological requirements associated with the release of the site." Please identify what specific requirements are being referred to in this passage.

58. Has the AIF/NESP-036 report, "Guidelines for Producing Commercial Nuclear Power Plant Decommissioning Cost Estimates" been changed or updated since 2015? If not, is the version relied upon for the 2015 analysis the same version FPL utilized for its 2020 Turkey Point and St. Lucie decommissioning estimates?

59. Please refer to the St. Lucie Decommissioning Study, Section 11, Page 31 and the Turkey Point Decommissioning Study, Section 10, Page 35. Please confirm that both the Turkey Point and St. Lucie Decommissioning Cost Estimate assumed no net positive salvage value (decommissioning cost offset) for scrap metals.

60. Please refer to the St. Lucie and Turkey Point Decommissioning Study, Section 11, Page 7. Please refer to Page 7 of the Comparison Report for both Turkey Point and St. Lucie, "Property Taxes", which states that the "2020 Decommissioning Cost Estimate assumes land only taxes will be paid post shutdown..." Please explain how this differs from the property tax calculation in the 2015 Decommissioning Study.

61. Please refer to the St. Lucie Decommissioning Study, Section 11, Page 34 and the Turkey Point Decommissioning Study, Section 10, Page 35. Number 47 for St. Lucie and number 44 for Turkey Point states that severance costs were not included in the Decommissioning Cost Estimate.

a. Will severance costs be incurred by FPL as a result of Units 1 and 2 being shut down?

b. If the answer to part A is yes, how does FPL anticipate severance costs be recovered by FPL?

62. Please refer to the St. Lucie Decommissioning Study, Section 11, Page 34, No. 49, and the Turkey Point Decommissioning Cost Estimate, Section 10, Page 35, No. 46. Each of the studies states “The most recent NRC requirements for Security, Emergency Response, Fukushima, Cyber Security and any other regulatory changes have been included.” Please elaborate on how each of these requirements differ from the 2015 Study and what the impact was on overall costs.

Site Restoration

63. Please refer to the St. Lucie Decommissioning Study, Section 12, Page 3 and the Turkey Point Decommissioning Study, Section 11, Page 3. Paragraph 5 of the Summary, referencing cost associated with License Termination activities, states that, “The primary driver is EnergySolutions’ methodology of minimizing inefficient decontamination activity and removing buildings/structures as radiological in lieu of clean. Our experience has shown this method to reduce personnel to dose, increase general site safety, and provide schedule certainty.”

- a. Please elaborate on EnergySolutions’ experience with this methodology.
- b. Please provide any analysis EnergySolutions conducted that shows the proven savings associated with this methodology.

64. Please explain the Nuclear Regulatory Commission (NRC) requirements, if any, regarding site restoration.

65. Please describe, if known, FPL's future plans for the St. Lucie and Turkey Point sites after decommissioning.

66. Please generally describe the security measures that will be in place during plant decommissioning periods through the conclusion of ISFSI operational/ISFSI decommissioning periods.

67. Please refer to the St. Lucie Decommissioning Study, Section 11, Page 35, and the Turkey Point Decommissioning Study, Section 10, Page 35. Please elaborate as to why the INPO and Electric Power Research Institute fees are not included in the 2020 Decommissioning Study when they were included in the 2015 Study.

68. Please refer to the St. Lucie Decommissioning Study, Section 12, Page 6, and the Turkey Point Decommissioning Study, Section 11, Page 6. Please refer to Page 6 of the Comparison Report, Section 12 for St. Lucie, and Section 11 for Turkey Point. Under Florida LLRW Inspection Fees, please elaborate on what is meant by “the change in methodology.”

69. Please refer to the St. Lucie Decommissioning Study, Section 12, Page 6, and the Turkey Point Decommissioning Study, Section 11, Page 6. Under Insurance & Regulatory Fees, please elaborate on each of the “multiple decommissioning milestones” that lead to the insurance premiums being reduced.

General

70. For the purposes of the following requests, please refer to FPL's 2020 St. Lucie Decommissioning Study, Section 12, Page 5 of 10, Table 2 as well as FPL's 2020 Turkey Point Decommissioning Study, Section 11, Page 5 of 10, Table 2.

a. Please explain in more each of the cost elements listed in these summary tables, including a sample listing of what each cost element contains.

b. Please identify which aggregate category – NRC License Termination, Spent Fuel Management, or Site Restoration – that each of the cost elements identified in 1a. was assigned to.

c. Please explain how the Corporate Support (fixed overhead) charges shown in this summary table were developed.

d. Please identify the Corporate Support (fixed overhead) percent used in the decommissioning cost studies.

Spent Nuclear Fuel

71. For the following requests, please refer to FPL's 2020 St. Lucie Decommissioning Study, Section 2, Page 11 of 11, as well as FPL's 2020 Turkey Point Decommissioning Study, Section 2, Page 9 of 9.

a. Since Florida Power & Light's (FPL) 2015 Decommissioning Study, has the company received any additional Spent Nuclear Fuel (SNF) reimbursements from the Federal Government as a result of the 2009 Settlement Agreement? If yes, please identify the cost and the date each cost was incurred, as well as the associated reimbursement amount and the date each associated reimbursement was received (Please present the reimbursement amounts as incremental to the total of \$233,328,195 provided in Order No. PSC-16-0250-PAA-EI, page 9).

b. Please specify when these reimbursements detailed in 2a. have been/will be credited to ratepayers and through what mechanism.

c. Please identify the projected costs and associated DOE recovery amounts for both St. Lucie and Turkey Point Nuclear Units, as well as the time period for when these costs and cost recovery from DOE will be incurred.

d. Are there any cost recovery amounts currently being litigated, or has the 2009 Settlement Agreement eliminated any and all related litigation for the time being?

e. Please explain the basis for segregating DOE recoverable SNF management costs (as specified in FPL's St. Lucie Decommissioning Study, Section 2, Page 11 of 11 and in FPL's 2020 Turkey Point Decommissioning Study Section 2, Page 9 of 9) and DOE nonrecoverable costs of SNF management. Refer to FPL's Total SNF costs in FPL's St. Lucie Decommissioning Study, Section 11, Page 36 of 45, Table 6-1 and in FPL's 2020 Turkey Point Decommissioning Study, Section 10, Page 36 of 45, Table 6-1.

72. FPL stated in its last Decommissioning Study that it was unaware of any state jurisdictions that have not allowed utilities to include SNF settlements in their decommissioning funding analyses (Dkt. 20150265-EI, Document No. 01157-2016, Request No. 2, Page 1 of 1). Does FPL have any update to this response? If so, please include the respective order numbers with the decisions.

73. In FPL's 2015 Decommissioning Study, the company states that its assumed projected date for the DOE to begin any transfers/pick up of commercial SNF was 2030. (Dkt. 20150265-

EI, Document No. 07868-2015, Section 3, Page 53 of 60). However, in FPL's 2020 Decommissioning Study, FPL adjusts this projected date to 2033. Please explain the basis for FPL's change in the expected date for DOE to begin any transfers/pick up of commercial SNF.

ISFSI Decommissioning

74. Please refer to FPL's St. Lucie Decommissioning Study, Section 11, Page 32-35 of 45 and FPL's 2020 Turkey Point Decommissioning Study, Section 10, Page 32-35 of 45 for the following requests.

a. Please explain why EnergySolutions not include ISFSI expansion costs in their cost estimate (per assumption No. 37 for St. Lucie, assumption No. 35 for Turkey Point) despite its recognition that such an expansion may be required?

b. The narratives on Page 10 of 11 of Section 2 of FPL's St. Lucie Decommissioning Study and Page 8 of 9 of Section 2 of FPL's 2020 Turkey Point Decommissioning Study, read, "This updated 2020 decommissioning study includes the costs relating to the construction, operation, and dismantlement of an on-site independent spent fuel storage installation (ISFSI) that is required to accommodate the timely decommissioning of the St. Lucie (Turkey Point) units." Have all such referenced ISFSI construction costs already been incurred? Please explain.

c. What is the available capacity of the existing ISFSIs and when does FPL anticipate the ISFSI's may reach capacity?

d. What is FPL's inventory of dry casks and other dry storage containment structures and materials at the St. Lucie and Turkey Point nuclear units, and when does FPL anticipate that these inventories will be placed into service?

75. Please refer to FPL's St. Lucie Decommissioning Study, Section 11, Appendix B-1 and FPL's Turkey Point Decommissioning Study, Section 10, Appendix B-1. Please explain why EnergySolutions has differing DOE transfer timing expectations for wet fuel (2034) versus dry fuel (2047).

76. Please identify the annual pre-shutdown spent fuel management costs (historical and projected) associated with the spent fuel pools and the ISFSIs for St. Lucie and Turkey Point Nuclear Units. Further, please also identify how and when such costs have been/will be recovered from FPL customers, and the amount and timing of related DOE reimbursements.

Dry Fuel/GTCC Storage and Transfer

77. Please refer to FPL's 2020 St. Lucie Decommissioning Study, Section 12, Page 8 and 9 of 10, and FPL's 2020 Turkey Point Decommissioning Study, Section 11, Page 8 and 9 of 10. Please explain how/where the Greater than Class C (GTCC) packaging costs were accounted for in the 2015 Decommissioning Cost Estimate (DCE) compared to the 2020 DCE for both St. Lucie and Turkey Point.

78. In the Decommissioning Cost Analysis sections of FPL's 2020 St. Lucie and Turkey Point Decommissioning Studies (Section 11, Page 15 of 45 and Section 10, Page 15 of 45, respectively) the narrative states "[a]lthough courts have held that DOE is obligated to accept and dispose of GTCC, issues regarding potential costs remain potentially unsettled. Therefore,

EnergySolutions conservatively estimates a GTCC waste disposal cost.” Please elaborate on these “unsettled issues” regarding potential GTCC disposal costs and why EnergySolutions, LLC deemed it necessary to include a conservative GTCC disposal cost in their cost analysis at this time.

Spent Fuel Management

79. Please refer to FPL’s 2020 St. Lucie Decommissioning Study, Section 12, Page 7 of 10 and FPL’s 2020 Turkey Point Decommissioning Study, Section 11, Page 7 of 10. Under Spent Fuel Management, the narrative states that a portion of the 49.2% decrease in the Spent Fuel Management Costs estimate from the 2015 Decommissioning Study is attributed to “the anticipated savings by FPL of 25% for the container material and equipment due to bulk purchasing.” Please list any other factors that may have contributed to this 49.2% estimated decrease in Spent Fuel Management Costs.

Transportation

80. Please refer to FPL’s St. Lucie Decommissioning Study, Section 11, Page 14 of 45 and FPL’s 2020 Turkey Point Decommissioning Study, Section 10, Page 14 of 45. The narrative states, “Transportation costs for the selected routes and modes are obtained from vendor quotes or published tariffs whenever possible.” Please identify the source the EnergySolutions used to develop their transportation cost estimates.

Document Requests - Nuclear Decommissioning Trust Fund

81. Please provide the most recent status report FPL submitted to the NRC regarding its decommissioning funds. Please also note when the next status report due to the NRC.

82. Please provide a copy of The U.S. Economy, 30-Year Focus, August 2020, published by Global Insight.

83. If other than August 2020, please provide a copy of the most-recent edition of The U.S. Economy, 30-Year Focus, published by Global Insight.

84. Please provide an electronic copy of the spreadsheets (in MS Excel format with all formulas intact) of Schedules G, Pages 7-8, for both the 2020 Turkey Point and St. Lucie decommissioning cost estimates.

85. Please refer to the Decommissioning Study for St. Lucie, Section 11, Page 34. Please provide a copy of the local labor rate schedule used for estimating the cost of decommissioning FPL’s St. Lucie Nuclear Units.

86. Please refer to the Decommissioning Study for Turkey Point, Section 10, Page 34. Please provide a copy of the local labor rate schedule used for estimating the cost of FPL’s Turkey Point Nuclear Units.

87. This request is associated with Data Request No. 58. Please refer to the Decommissioning Cost Study, Page 16, Section 3.6 for both St. Lucie and Turkey Point. If the

William P. Cox, Esq.

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AIF/NESP-036 study report, "Guidelines for Producing Commercial Nuclear Power Plant Decommissioning Cost Estimates" upon which contingency values were based has been updated or changed since 2015, please provide a copy. If the report has not changed and the version used for this Study is the same version as the one FPL utilized for its 2015 Decommissioning Study, please simply so state and no copy of the report is necessary.

Please file all responses electronically no later than March 4, 2021, via the Commission's Electronic Filing Web Form. Please contact me at sbrownle@psc.state.fl.us or at (850) 413-6218 if you have any questions or need any further information regarding this matter.

Very truly yours,

Suzanne Brownless
Special Counsel

cc: Commission Clerk