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August 26, 2021

VIA ELECTRONIC FILING

Mr. Adam Teitzman
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Re: Docket No. 20210015-EI

Dear Mr. Teitzman:

I enclose for filing in the above referenced docket Florida Power & Light Company's ("FPL") response to Request No. 2 of the Staff of the Florida Public Service Commission's ("Staff") Fifth Data Request (Nos. 1-23), which is being filed consistent with the two-day extension agreed upon by FPL and Staff. Under this cover, FPL is also filing its amended response to Staff's Fifth Data Request, No. 19.

Please contact me if you or your Staff has any questions regarding this filing.

Sincerely,

/s/ Maria Jose Moncada

Maria Jose Moncada
Senior Attorney
Fla. Bar No. 0773301

Enclosures

CERTIFICATE OF SERVICE

20210015-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail this 26th day of August 2021 to the following parties:

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Rates, Inc.**

By: /s/ Maria Jose Moncada
Maria Jose Moncada
Fla. Bar No. 0773301

QUESTION:

Please provide an MFR schedule E-8 showing how the Settlement increase was allocated to the rate classes.

RESPONSE:

Please see Attachment 1 for Test Year 2022 Settlement MFR E-8 and Attachment 2 for Subsequent Year 2023 Settlement MFR E-8.

COMPANY-PROPOSED ALLOCATION OF THE RATE INCREASE BY RATE CLASS

FLORIDA PUBLIC SERVICE COMMISSION EXPLANATION Provide a schedule which shows the company-proposed increase in revenue by rate schedule and the present and company-proposed class rates of return under the proposed cost of service study. Provide justification for every class not left at the system rate of return. If the increase from service charges by rate class does not equal that shown on Schedule E-13b or if the increase from sales of electricity does not equal that shown on Schedule E-13a, provide an explanation.

Type of Data Shown:
 Projected Test Year Ended: 12/31/22
 Prior Year Ended: __/__/__
 Historical Test Year Ended: __/__/__

COMPANY: FLORIDA POWER & LIGHT COMPANY AND SUBSIDIARIES (CONSOLIDATED)

DOCKET NO.: 20210015-EI

Witness: Tiffany C. Cohen

(\$000 WHERE APPLICABLE)

Line No.	(1) Rate Class	(2) Present ROR	(3) Present Index	(4) Present Class Operating Revenue	(5) Increase from Service Charges	(6) Increase from Sales of Electricity	(7) Increase from Unbilled	(8) Total Increase	(9) Company Proposed ROR	(10) Company Proposed Index	(11) % Increase With Adjustment Clauses	(12) % Increase Without Adjustment Clauses
1	CILC-1D	4.78%	89%	108,148	-	9,483	(2)	9,482	7.16%	112%	4.7%	8.8%
2	CILC-1G	4.87%	91%	5,213	-	488	(0)	488	7.38%	115%	5.2%	9.4%
3	CILC-1T	4.22%	79%	42,484	-	2,987	(1)	2,986	5.24%	82%	3.0%	7.0%
4	GS(T)-1	5.55%	104%	596,149	7,226	66,126	(5)	73,346	6.50%	102%	7.9%	12.3%
5	GSCU-1	7.44%	139%	4,441	-	392	(0)	392	4.93%	77%	5.6%	8.8%
6	GSD(T)-1	4.48%	84%	1,448,892	-	127,768	(18)	127,750	6.86%	107%	5.0%	8.8%
7	GSLD(T)-1	3.13%	58%	465,475	-	40,100	(6)	40,094	5.56%	87%	4.6%	8.6%
8	GSLD(T)-2	2.61%	49%	138,107	-	11,842	(2)	11,840	4.89%	76%	4.2%	8.6%
9	GSLD(T)-3	2.49%	47%	24,937	-	2,455	(1)	2,455	3.90%	61%	4.0%	9.8%
10	MET	5.00%	93%	4,198	-	373	(0)	373	7.53%	118%	5.0%	8.9%
11	OL-1	7.41%	138%	15,366	-	1,175	(0)	1,175	4.41%	69%	6.4%	7.6%
12	OS-2	4.57%	85%	1,102	-	97	(0)	97	13.17%	206%	6.5%	8.8%
13	RS(T)-1	6.02%	112%	4,949,587	21,316	389,493	(41)	410,769	6.38%	100%	5.4%	8.3%
14	SL-1	6.12%	114%	123,948	-	9,660	(0)	9,660	7.42%	116%	6.9%	7.8%
15	SL-1M	6.13%	114%	941	-	84	(0)	84	9.87%	154%	4.5%	8.9%
16	SL-2	5.94%	111%	1,944	-	173	(0)	173	8.73%	136%	5.2%	8.9%
17	SL-2M	8.42%	157%	212	-	19	(0)	19	3.51%	55%	5.8%	8.9%
18	SST-DST	8.73%	163%	1,579	-	(1,043)	(0)	(1,043)	5.37%	84%	(62.8%)	(66.0%)
19	SST-TST	17.91%	335%	6,021	-	1,860	(0)	1,860	21.70%	339%	21.2%	30.9%
20	TOTAL RETAIL	5.35%	100%	7,938,744	28,542	663,534	(76)	692,000	6.40%	100%	5.4%	8.7%
21												
22										1.5 X	8.1%	
23										Max	21.2%	
24												

25 NOTES:

26 Columns 2 and 3: Columns 2 and 3 reflect FPL's as-filed 12CP 1/13th Cost of Service methodology.

27 Column 4: Column 4 reflects the as-filed Present Operating Revenue.

28 Columns 5 through 8: Information shown in Columns 5 through 8 reflects the negotiated revenue allocation pursuant to the Proposed Settlement Agreement. Increase from Service Charges in Column 5 includes Misc Service Revs - Other Billings (Minimum Bill).

29 Columns 9 through 10: The signatory parties did not agree to a specific cost of service methodology in the Proposed Settlement Agreement and, instead, agreed to a specific allocation of the revenue increase consistent with prior settlement agreements. Therefore, parity for each rate class under the Proposed Settlement Agreement cannot be determined by application of a "settlement cost of service". As a proxy, FPL and Staff agreed that the Minimum Distribution System (MDS) cost of service methodology would be used to estimate the information shown in Columns 9 and 10 for the Proposed Settlement Agreement.

30 Rate classes left below the system rate of return are due to application of FPSC practice of limiting rate class increases to 1.5 times the system average increase.

31 Column 11: The percent increase in column 11 includes 2022 proposed base revenues with adjustment clauses.

32 SST-DST and SST-TST were designed as one rate class, which resulted in a % Increase with Adjustment Clauses of 7.8% in total.

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38 TOTAL MAY NOT ADD DUE TO ROUNDING.

FLORIDA PUBLIC SERVICE COMMISSION

EXPLANATION: Provide a schedule which shows the company-proposed increase in revenue by rate schedule and the present and company-proposed class rates of return under the proposed cost of service study. Provide justification for every class not left at the system rate of return. If the increase from service charges by rate class does not equal that shown on Schedule E-13b or if the increase from sales of electricity does not equal that shown on Schedule E-13a, provide an explanation.

Type of Data Shown:

___ Projected Test Year Ended ___/___/___
___ Prior Year Ended ___/___/___
___ Historical Test Year Ended ___/___/___
X Proj. Subsequent Yr. Ended 12/31/23
Witness: Tiffany C. Cohen

COMPANY: FLORIDA POWER & LIGHT COMPANY
AND SUBSIDIARIES (CONSOLIDATED)

DOCKET NO.: 20210015-EI

(\$000 WHERE APPLICABLE)

Line No.	(1) Rate Class	(2) Present ROR	(3) Present Index	(4) Present Class Operating Revenue	(5) Increase from Service Charges	(6) Increase from Sales of Electricity	(7) Increase from Unbilled	(8) Total Increase	(9) Company Proposed ROR	(10) Company Proposed Index	(11) % Increase With Adjustment Clauses	(12) % Increase Without Adjustment Clauses
1	CILC-1D	4.14%	87%	108,872		15,795	9	15,804	7.06%	108%	7.9%	14.5%
2	CILC-1G	4.28%	90%	5,245		788	0	788	7.36%	113%	8.5%	15.0%
3	CILC-1T	3.57%	75%	43,445		6,072	6	6,077	4.95%	76%	6.2%	14.0%
4	GS(T)-1	4.94%	103%	604,401	11,120	114,413	31	125,564	6.82%	105%	13.5%	20.8%
5	GSCU-1	6.77%	142%	4,471		692	0	692	4.94%	76%	10.0%	15.5%
6	GSD(T)-1	3.91%	82%	1,464,509		240,809	104	240,913	7.00%	108%	9.6%	16.5%
7	GSLD(T)-1	2.64%	55%	467,944		71,920	38	71,958	5.40%	83%	8.4%	15.4%
8	GSLD(T)-2	2.16%	45%	140,200		21,817	14	21,831	4.68%	72%	7.8%	15.6%
9	GSLD(T)-3	1.83%	38%	25,165		4,766	4	4,769	3.52%	54%	7.9%	19.0%
10	MET	4.43%	93%	4,196		1,086	0	1,086	8.95%	138%	14.9%	25.9%
11	OL-1	6.75%	141%	15,167		1,406	0	1,406	3.98%	61%	7.8%	9.3%
12	OS-2	4.25%	89%	1,102		221	0	221	15.44%	237%	14.7%	20.1%
13	RS(T)-1	5.43%	114%	4,970,049	32,070	708,981	238	741,290	6.47%	99%	9.9%	14.9%
14	SL-1	6.09%	127%	130,036		17,431	1	17,432	8.42%	129%	12.2%	13.4%
15	SL-1M	5.75%	120%	1,155		170	0	170	11.02%	169%	7.7%	14.7%
16	SL-2	5.21%	109%	1,932		303	0	303	9.00%	138%	9.3%	15.7%
17	SL-2M	13.65%	286%	1,230		273	0	273	16.20%	249%	14.9%	22.2%
18	SST-DST	8.08%	169%	1,579		(1,009)	0	(1,009)	2.79%	43%	(60.1%)	(63.9%)
19	SST-TST	16.73%	350%	6,033		2,432	0	2,432	24.82%	382%	27.8%	40.3%
20	TOTAL RETAIL	4.78%	100%	7,996,730	43,190	1,208,364	447	1,252,000	6.50%	100%	9.9%	15.7%
21												
22											1.5 X	14.9%
23											Max	27.8%
24												

NOTES:

- 26 Columns 2 and 3: Columns 2 and 3 reflect FPL's as-filed 12CP 1/13th Cost of Service methodology.
- 27 Column 4: Column 4 reflects the as-filed Present Operating Revenue.
- 28 Columns 5 through 8: Information shown in Columns 5 through 8 reflects the negotiated revenue allocation pursuant to the Proposed Settlement Agreement.
- 29 Increase from Service Charges in Column 5 includes Misc Service Revs - Other Billings (Minimum Bill).
- 30 Columns 9 through 10: The signatory parties did not agree to a specific cost of service methodology in the Proposed Settlement Agreement and, instead, agreed to a specific allocation of the revenue increase consistent with prior settlement agreements. Therefore, parity for each rate class under the Proposed Settlement Agreement cannot be determined by application of a "settlement cost of service". As a proxy, FPL and Staff agreed that the Minimum Distribution System (MDS) cost of service methodology would be used to estimate the information shown in Columns 9 and 10 for the Proposed Settlement Agreement.
- 31 Rate classes left below the system rate of return are due to application of FPSC practice of limiting rate class increases to 1.5 times the system average increase.
- 32 Column 11: The percent increase in column 11 includes 2023 proposed base revenues with adjustment clauses.
- 33 SST-DST and SST-TST were designed as one rate class, which resulted in a % Increase with Adjustment Clauses of 13.6% in total.
- 34
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- 37
- 38 TOTAL MAY NOT ADD DUE TO ROUNDING.

QUESTION:

Referring to Paragraph 22(iii) of the Settlement, please respond to the following questions regarding the Residential Electric Vehicle Charging Services Pilot.

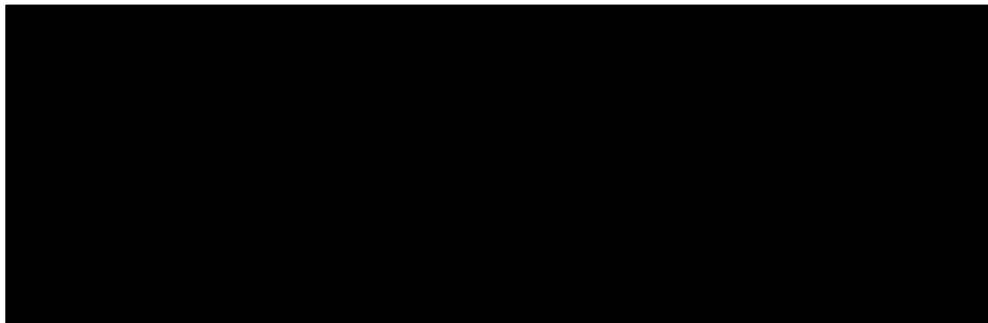
- a. Paragraph 22(iii) of the Settlement states “The total investment in the Residential EV Charging Pilot is forecast to be \$25 million over the four-year period 2022-2025.” Tariff Sheet No. 8.213 states “This Rider shall expire five years from the effective date of this program...” Please clarify if FPL intends for the pilot program period to last four or five years. If the above statement from tariff Sheet No. 8.213 is accurate, please provide the total forecasted investment into the pilot program over the five-year period 2022-2026.
- b. Referring to tariff Sheet No. 8.213, please demonstrate how FPL determined the Total Monthly Service Payments for Full Installations and Equipment Only Installations.
- c. Referring to tariff Sheet No. 8.213, please demonstrate how FPL determined the EV Energy Charge for On-Peak and Off-Peak periods.
- d. Please provide the projected number of program participants for each year of the pilot program.
- e. Please explain if FPL intends to provide the Commission with program data and any insights gained from the Residential Electric Vehicle Charging Services Pilot after the program ends.
- f. Please explain why FPL believes it is appropriate to provide installation service behind the customer’s meter, as a regulated utility, to install a 240V circuit, up to 15 feet of 50A branch circuit and the associated designing and permitting.
- g. Please explain if FPL or a third-party contractor will complete the installation service if participants opt for a Full Installation, as described on tariff Sheet No. 9.843.
- h. Please refer to tariff Sheet No. 9.843, under Scope of Services. Please explain the impact to participants, if any, in the event the participant’s internet service provider fails to provide internet service, though no fault of the participant.

RESPONSE:

- a. Tariff Sheet No. 8.213 contains a typographical error and Paragraph 22(iii) is correct; FPL intends for the pilot program period to last four years. FPL will provide a corrected copy of the tariff sheet.
- b. The Total Monthly Service Payment is the sum of the Monthly Program Charge and the Monthly Off-Peak Energy Charge.

The Monthly Program Charge is designed to recover the non-energy revenue requirements of the residential EV program over a ten-year period, thereby leaving non-participants harmless on a present value basis. The Monthly Program Charge was calculated by leveling FPL's anticipated upfront costs for charging equipment, installation, technology costs, and customer acquisition (taking into account FPL's weighted average cost of capital, property tax and insurance rates); and then adding projected annual Operations and Maintenance (O&M) and General and Administrative (G&A) costs; all divided by 12 months per year.

The difference between the Full Installation and Equipment Only Installation charges is a function of FPL's projected costs for the Company's scope of the installation. These calculations are shown in the table below, where the 10-year levelization factor represents the ratio of the annual payment to the upfront costs, such that the present value of the 10-year payment stream is equal to the cumulative present value revenue requirements of the associated depreciation, return on capital, property tax, insurance costs, and upfront operating expenses.



The Monthly Off-Peak Energy Charge was determined by multiplying the expected average monthly residential charging usage in kilowatt-hours (kWh) by the off-peak energy charges consistent with the Residential Time of Use Rider (RTR-1 – Sheet No. 8.203).

The expected average monthly residential charging (kWh) was estimated by dividing the average monthly mileage of Florida drivers¹ by the weighted average efficiency of electric

¹ According to the Federal Highway Administration, the annual vehicle miles per licensed driver in Florida is 11,836 miles. <https://www.fhwa.dot.gov/ohim/onh00/onh2p11.htm>

vehicles in FPL and Gulf service territory²; and then multiplying by the assumed percentage of time drivers charge at home³. Although the expected usage is based on high-level assumptions, conducting this pilot will provide data on actual usage that will inform possible future versions of this program.

The calculations of the Monthly Off-Peak Energy Charge are demonstrated in the table below.

<u>Off-Peak Energy Charge</u>	
Est. Annual Driving Distance (mi.)	11,836
Divided by 12 Months	÷ <u>12</u>
Est. Monthly Driving Distance (mi.)	986
Vehicle Efficiency (mi/kWh)	÷ <u>3.3</u>
Monthly Energy Usage (kWh)	299
Estimated % Charged at Home	× <u>85%</u>
Monthly Residential Charging (kWh)	254
Off-Peak Energy Rate (\$/kWh)	× <u>0.0501</u>
Monthly Off-Peak Energy Charge	\$ 12.73

² Based on weighted average efficiency of vehicles registered in FPL/Gulf service territory, using Florida Department of Motor Vehicles and US Department of Energy data.

³ FPL assumes EV drivers charge 85% at home, based on research of numerous sources with estimates that range from 70-90%, including, Consumer Reports, “Consumer Interest and Knowledge of EVs” (December 2020) <https://advocacy.consumerreports.org/wp-content/uploads/2020/12/CR-National-EV-Survey-December-2020-2.pdf>. Idaho National Laboratory, “Plugged In: How Americans Charge Their Electric Vehicles,” 2015, <https://avt.inl.gov/sites/default/files/pdf/arra/ARRAPEVnInfrastructureFinalReportLqlySept2015.pdf>. AlixPartners, “Electric Vehicle Penetration and Energy Disruption Discussion.” (April 1, 2021).

The Off-Peak Energy Rate per kWh was determined using the rates in the below table.

<u>Off-Peak Energy Rate per kWh</u>	<u>\$/kWh</u>	<u>source</u>
Base Energy, First 1,000 kWh	0.06683	Sheet No. 8.201
Base Energy, All additional kWh	<u>0.07683</u>	Sheet No. 8.201
Weighted Average Base Energy	0.07002	weighted 68.1%:31.9%
Off-Peak Base Energy Rider	<u>(0.05267)</u>	Sheet No. 8.203
Off-Peak Base Energy	0.01735	subtotal
Fuel, First 1,000 kWh	0.02174	As filed 2022 projections
Fuel, All additional kWh	<u>0.03174</u>	As filed 2022 projections
Weighted Average Fuel	0.02493	weighted 68.1%:31.9%
Off-Peak Fuel Rider	<u>(0.00164)</u>	As filed 2022 projections
Off-Peak Fuel	0.02329	subtotal
Other Clause Rates	<u>0.00946</u>	As filed 2022 projections
Off-Peak Clause Energy	0.03275	subtotal
Total Off-Peak Base and Clause Energy	<u>0.05010</u>	total

- c. The Off-Peak Energy Charge is detailed in section (b) to this response. The per kWh On-Peak energy charge is based on the on-peak energy charges consistent with the Residential Time of Use Rider (RTR-1 – Sheet No. 8.203).

<u>On-Peak Energy Rate per kWh</u>	<u>\$/kWh</u>	<u>source</u>
Base Energy, First 1,000 kWh	0.06683	Sheet No. 8.201
Base Energy, All additional kWh	<u>0.07683</u>	Sheet No. 8.201
Weighted Average Base Energy	0.07002	weighted 68.1%:31.9%
On-Peak Base Energy Rider	<u>0.12043</u>	Sheet No. 8.203
On-Peak Base Energy	0.19045	subtotal
Fuel, First 1,000 kWh	0.02174	As filed 2022 projections
Fuel, All additional kWh	<u>0.03174</u>	As filed 2022 projections
Weighted Average Fuel	0.02493	weighted 68.1%:31.9%
On-Peak Fuel Rider	<u>0.00384</u>	As filed 2022 projections
On-Peak Fuel	0.02877	subtotal
Other Clause Rates	<u>0.00946</u>	As filed 2022 projections
On-Peak Clause Energy	0.03823	subtotal
Total On-Peak Base and Clause Energy	<u>0.22868</u>	total

- d. For purposes of initial planning, FPL projected the following participation:

Year	Projected Participants per Year
2022	500
2023	2,000
2024	5,000
2025	7,500

Actual participation will vary; one of the Pilot objectives is to obtain information about how many customers may elect to participate in a program of this nature.

- e. Yes, FPL intends to share key learnings and insights at the end of the program.
- f. As a voluntary tariff, the Pilot is designed to meet the customer's needs, which include having Full Installation and Equipment Only Installation options. One of the Pilot objectives is to gain experience and obtain information about customer preference and the benefits, costs, and optimal economic implementation of various solutions.
- g. FPL intends to use third-party contractors, selected through a competitive bidding process, to complete the installation service.
- h. An interruption in internet service will have no impact on the Participant. FPL plans to deploy EV chargers with local data storage capabilities that can store 90 days to 6 months' worth of historical charging session data. When service is restored, any missing data will be retrieved from the EV charger.