State of Florida

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# **Public Service Commission**

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD TALLAHASSEE, FLORIDA 32399-0850

## -M-E-M-O-R-A-N-D-U-M-

DATE:	March 15, 2024
то:	Adam J. Teitzman, Commission Clerk, Office of Commission Clerk
FROM:	Donna D. Brown, Chief of Auditing, Office of Auditing and Performance Analysis
RE:	Docket No.: 20230017-EI Company Name: Florida Power & Light Company Company Code: EI802 Audit Purpose: A1d: Comprehensive Earnings Review – Limited Scope Audit Control No.: 2023-341-1-1

Attached is the revised final audit report for the Utility stated above. I am sending the Utility a copy of this memo and the revised audit report. The audit report was revised to correct references to the docket and order noted in the jurisdictional factor section of the audit report. If the Utility desires to file a response to the audit report, it should a response to the Office of the Commission Clerk.

Attachment: Copy of Letter

Cc: Office of Auditing and Performance Analysis File.



# **Public Service Commission**

Office of Auditing and Performance Analysis Bureau of Auditing

## **Revised Auditor's Report**

Florida Power & Light Storm Recovery Cost Audit – Hurricanes Ian and Nicole

As of June 1, 2023

Docket No. 20230017-EI Audit Control No. 2023-341-1-1 March 12, 2024

Yen Ngo

Audit Manager

Donna Brown

Jonna Brown Reviewer

## Table of Contents

Purpos	5e	1
Object	ives and Procedures	2
	Findings ne	5
Exhibi		
1:	Hurricane Ian Company Exhibit KF-1	6
2:	Hurricane Nicole Company Exhibit KF-2	7
3:	Calculation of Total Storm Costs to be Recovered	8

### Purpose

To: Florida Public Service Commission

We have performed the procedures described later in this report to meet the objectives set forth by the Division of Accounting and Finance in its audit service request dated December 1, 2023. We have applied these procedures to the attached schedules prepared by Florida Power & Light Company in support of its filing for storm recovery costs in Docket No. 20230017-EI.

The report is intended only for internal Commission use.

## **Objectives and Procedures**

## General

#### Definition

Florida Power & Light Company hereinafter referred to as FPL or Utility.

Incremental Costs are costs that are incremental to costs normally charged to non-cost recovery clause operating expenses in the absence of a storm (ICCA).

Non-incremental Costs are costs that are not incremental to costs normally charged to non-cost recovery clause operating expenses in the absence of a storm.

#### Background

On January 23, 2023, FPL filed a petition for approval to implement an Interim Storm Charge to recover an initial estimate of \$1.5 billion for the combined incremental restoration costs related to Hurricanes Ian and Nicole with the remaining amounts to be collected for Hurricanes Michael, Sally, and Zeta, and to replenish the storm reserve, which was approved by Order No. PSC-2023-0110-PCO-EI, issued on March 23, 2023. On September 5, 2023, FPL filed a supplemental petition with the Commission requesting to reduce the Interim Storm Charge to reflect a decrease in the estimated incremental storm restoration from the original estimate of \$1.5 billion to \$1.3 billion, which was approved by Order No. PSC-2023-0354-PCO-EI, issued on November 27, 2023. On November 17, 2023, FPL filed a petition for approval of the final actual incremental storm restoration costs of \$1.3 billion to be recovered through the Interim Storm Charge, including the replenishment of the storm reserve, and for approval of the proposed process for determining and applying a one-time true-up of the actual revenues collected under the Interim Storm Charge.

### Expense

#### Payroll, Overtime, and Related Costs

**Objectives:** The objectives were to determine whether regular payroll, overtime, and related costs were properly stated, storm-related, and recoverable pursuant to Rule 25-6.0143, Florida Administrative Code (F.A.C.).

**Procedures:** We reviewed regular payroll, overtime, and related costs from Account 186 – Miscellaneous Deferred Debits by function and reconciled the balances to the storm restoration costs filing. We selected a statistical sample of costs for detail testing and traced the amounts to payroll records. No exceptions were noted.

### Contractor Costs

**Objectives:** The objectives were to determine whether contractor costs were properly stated, storm-related, and recoverable pursuant to Rule 25-6.0143, Florida Administrative Code (F.A.C.).

**Procedures:** We reviewed contractor costs from Account 186 – Miscellaneous Deferred Debits by function and reconciled the balances to the storm restoration costs filing. We selected a statistical sample of costs for detail testing and traced the amounts to purchase orders, invoices, or contracts. No exceptions were noted.

#### Line Clearing

**Objectives:** The objectives were to determine whether line clearing costs were properly stated, storm-related, and recoverable pursuant to Rule 25-6.0143, Florida Administrative Code (F.A.C.).

**Procedures:** We reviewed line clearing costs from Account 186 – Miscellaneous Deferred Debits by function and reconciled the balances to the storm restoration costs filing. We selected a statistical sample of costs for detail testing and traced the amounts to purchase orders, invoices, or contracts. No exceptions were noted.

#### Vehicle and Fuel

**Objectives:** The objectives were to determine whether vehicle and fuel costs were properly stated, storm-related, and recoverable pursuant to Rule 25-6.0143, Florida Administrative Code (F.A.C.).

**Procedures:** We reviewed vehicle and fuel costs from Account 186 – Miscellaneous Deferred Debits by function and reconciled the balances to the storm restoration costs filing. We selected a statistical sample of costs for detail testing and traced the amounts to source documents. No exceptions were noted.

#### Materials and Supplies

**Objectives:** The objectives were to determine whether materials and supplies were properly stated, storm-related, and recoverable pursuant to Rule 25-6.0143, Florida Administrative Code (F.A.C.).

**Procedures:** We reviewed materials and supplies from Account 186 – Miscellaneous Deferred Debits by function and reconciled the balances to the storm restoration costs filing. We selected a statistical sample of costs for detail testing and traced the amounts to purchase orders, invoices, or inventory records. We also verified that the materials and supplies listed were specifically utilized in the restoration process. No exceptions were noted.

#### Logistics

**Objectives:** The objectives were to determine whether logistics costs were properly stated, storm-related, and recoverable pursuant to Rule 25-6.0143, Florida Administrative Code (F.A.C.).

**Procedures:** We reviewed logistics costs from Account 186 – Miscellaneous Deferred Debits by function and reconciled the balances to the storm restoration costs filing. We selected a statistical sample of costs for detail testing and traced the amounts to source documents. No exceptions were noted.

#### Other Costs

**Objectives:** The objectives were to determine whether other costs were properly stated, storm-related, and recoverable pursuant to Rule 25-6.0143, Florida Administrative Code (F.A.C.).

**Procedures:** We reviewed other costs from Account 186 – Miscellaneous Deferred Debits by function and reconciled the balances to the storm restoration costs filing. We selected a statistical sample of costs for detail testing and traced the amounts to purchase orders, invoices, or contracts. No exceptions were noted.

#### Other

#### Capitalizable Costs

**Objectives:** The objectives were to determine whether the capitalizable costs have been accounted for correctly and removed in their entirety from the recoverable costs as per Rule 25-6.0143(1)(d), F.A.C.

**Procedures:** We reviewed capitalizable costs from Account 186 – Miscellaneous Deferred Debits by function and reconciled the balances to the storm restoration costs filing. We requested a detailed description of the capitalizable costs. We selected a statistical sample of costs for detail testing test to determine if the Utility included for recovery only those costs that are allowed by the applicable rule. No exceptions were noted.

#### Incremental Cost and Capitalization Approach Methodology (ICCA)

**Objectives:** The objective was to determine whether non-incremental costs have been accounted for correctly and removed in their entirety from the recoverable costs as per Rule 25-6.0143, Florida Administrative Code F.A.C.

**Procedures:** We reviewed ICCA costs from Account 186 – Miscellaneous Deferred Debits by function and reconciled the balances to the storm restoration costs filing. We selected a statistical sample of costs for detail testing and recalculated the allocation of the ICCA to charge types. We determined the Utility calculated the ICCA adjustments as allowed by Rule 25-6.0143, F.A.C. No exceptions were noted.

#### Jurisdictional Factors

**Objectives:** The objective was to determine whether the Utility used the appropriate jurisdictional factors for the filing.

**Procedures:** We obtained and reviewed Order No. PSC-2021-0446-S-EI in Docket No. 20210015-EI, issued December 2, 2021, regarding the jurisdictional factors for the storm costs. We reconciled the jurisdictional factors from the support documentation provided by the Utility to the utility filing and verified the calculation of these factors. No exceptions were noted.

## Audit Findings

None

## **Exhibits**

#### Exhibit 1: Hurricane Ian Company Exhibit KF-1

#### Fiorida Power & Light Company Hurricane Ian Incremental Cost and Capitalization Approach Adjustments through June 1, 2023 (\$000s)

Storm Costs By Function (A) General (B) Customer Service Total (7) Steam & Other Nuclear Transmission Distribution (1) (2) (3) (4) (5) (6) Storm Restoration Costs Regular Payroll and Related Costs (C) \$172 \$47 \$1,146 \$12,070 \$1,197 \$631 \$15,263 2 27 2,458 23,614 1,744 1,044 29,277 Overtime Payroll and Related Costs (C) 392 3 621,490 27,232 579,979 4,833 357 660 8.428 4 Contractors 165,704 165 382 5 Line Clearing 322 36,286 6 Vehicle & Fuel 8 348 35,333 583 13 7 695 1.346 45,413 210 127 47,790 Materials & Supplies 1,187 585 202,422 571 17 204,781 Logistics 8 789 4,261 6,963 447 13,640 1,177 9 Other (D) \$737 \$2,635 \$1,134,230 \$12,058 \$34,224 \$1,068,474 \$16,101 10 Total Storm Restoration Costs Sum of Lines 2 - 9 11 12 Less: Capitalizable Costs \$178 \$3,789 \$0 \$3,584 \$28 13 Payroll and Related Costs 55.511 14 Contractors 5,640 49 4 4 6 425 31,766 15 Materials & Supplies 395 31.138 109 124 16 Other 2,159 2,417 4,576 Total Capitalizable Costs Sum of Lines 13 - 16 \$6,035 \$86,328 \$3,128 \$152 \$95,642 17 18 Less: Insurance Receivables 19 20 \$2,483 \$1,038,588 \$6.024 \$737 \$34 224 \$982 147 \$12 973 21 Net Storm Restoration Costs Incurred Lines 10 - 17 - 19 22 23 Less: ICCA Adjustments Regular Payroll and Related Costs (E) \$178 \$0 \$204 \$3,514 \$1,043 \$534 \$5,472 24 Overtime Payroll and Related Costs (E) 27 381 36 116 562 25 3 1,195 26 Contractors 666 47 7 328 148 Line Clearing: 27 28 Vegetation Management (F) 29 Vehicle & Fuel: 3,452 30 Vehicle Utilization 347 3,105 . 31 Fuel 32 Other 33 Legal Claims 614 Employee Assistance and Childcare 614 34 \$7,328 \$650 Total ICCA Adjustments \$844 \$74 \$560 \$1,841 \$11,296 Sum of Lines 24 - 34 35 36 37 Incremental Storm Losses \$47 \$6.001 38 Regular Payroll and Related Costs Lines 2 - 13 - 24 -\$6 \$942 \$4 972 -\$24 \$69 39 Overtime Payroll and Related Costs Lines 3 - 25 392 0 2.455 23.233 1.708 928 28,715 Lines 4 - 14 - 26 2,123 614 27,225 530,205 4,261 357 564,784 40 Contractors 41 Lines 5 - 28 322 165,382 165,704 Line Clearing Vehicle & Fuel Lines 6 - 30 - 31 8 32,228 583 13 32,834 42 2 300 1,346 14,275 101 3 16,024 Lines 7 - 15 43 Materials & Supplies 202,422 17 204,781 1.187 585 571 44 Locistics Line 8 Line 9 - 16 - 33 - 34 789 3.932 447 8.449 45 Other 1 177 2.102 46 Total Incremental Storm Losses (G) Sum of Lines 38 - 45 \$5,180 \$663 \$33,665 \$974.819 \$11,132 \$1,834 \$1,027,293 47 48 Jurisdictional Factor (H) 0.9556 0.9431 0.9065 0.9999 0.9690 1.0000 49 \$974,679 \$10,787 \$1,834 \$1,023,393 Line 46 \* 48 \$4,950 \$626 \$30.517 50 **Retail Recoverable Costs** 

51 (A) Storm costs are as of June 1, 2023. Totals may not add due to rounding.

52 (B) General plant function reflects restoration costs associated with FPL's Human Resources, External Affairs, Information Technology, Corporate Real Estate, Regulatory Affairs, Development, Corporate Security and Marketing and Communications departments.

53 (C) Represents total payroll charged to the business unit (function) being supported. For example, an employee that works in FPL Development but is supporting Distribution during storm restoration would charge their time to Distribution.

54 (D) Includes other miscellaneous costs, including payroll and related overheads from affiliate personnel directly supporting storm restoration

55 (E) Represents regular payroll normally recovered through base rate Q&M and not charged to the Storm Reserve. The amounts are charged to the employee's normal business unit, which may not be the business unit that the employee supported during the storm. Therefore, in the esample in Note C above, if the FPL Development employee had payroll cannot be charged to the Storm Reserve, that amount would be charged to FPL Development (General) whereas the recoverable portion of their time would remain in Distribution.

56 (F) Since FPL recovers all actual vegetation costs incurred through the storm charge or the Storm Protection Plan Cost Recovery Clause, there is no ICCA applicable.

## Exhibit 2: Hurricane Nicole Company Exhibit KF-2

## Florida Power & Light Company Hurricane Nicole Incremental Cost and Capitalization Approach Adjustments

through June 1, 2023

#### (\$000s)

					Storm Costs By F	Function (A)		Cunterra	
LINE NO.			Steam & Other (1)	Nuclear (2)	Transmission (3)	Distribution (4)	General (B) (5)	Customer Service (6)	Total (7)
1	Storm Restoration Costs								
2	Regular Payroll and Related Costs (C)		\$54	\$126	\$180	\$2,322	\$279	\$113	\$3,07
3	Overtime Payroll and Related Costs (C)		173	236	335	5,151	241	86	6,222
4	Contractors		594	3,566	1,631	59,004	318	25	65,13
5	Line Clearing		-	-	-	23,451	242	54 c	23,45
6	Vehicle & Fuel		0		84	3,794	24	0.55	3,90
7	Materials & Supplies		5	33	1	1,966		5	2,01
8	Logistics		0	207	12	16,603	18	1	16,84
9	Other (D)		21	33	61	1,710	383	27	2,23
10	Total Storm Restoration Costs	Sum of Lines 2 - 9	\$848	\$4,200	\$2,302	\$114,001	\$1,263	\$257	\$122,87
11									
12	Less: Capitalizable Costs								
13	Payroll and Related Costs		-		-	\$110		\$2	\$112
14	Contractors		-		-	661	-	100	66
15	Materials & Supplies		-	380	-	1,046	353	5	1,05
16	Other		•	598		121	243	2943	12
17	Total Capitalizable Costs	Sum of Lines 13 - 16	-	1	· ·	\$1,938		\$7	\$1,94
18									
19	Less: Insurance Receivables		-	165		34	(A)		-
20									
21	Net Storm Restoration Costs Incurred	Lines 10 - 17 - 19	\$848	\$4,200	\$2,302	\$112,063	\$1,263	\$250	\$120,92
22									
23	Less: ICCA Adjustments								
24	Regular Payroll and Related Costs (E)		\$0 56	\$35 4	\$2 0		\$123 5	\$0 0 25	\$62
25	Overtime Payroll and Related Costs (E)		-	368	_	-	-	24	39:
26	Contractors		-	100	84	- 781	-	33	39
27	Line Clearing:		-	8 <b>.</b> 55		-	-	250	
28 29	Vegetation Management (F) Vehicle & Fuel:		-	8	-	-	-		-
30	Vehicle Utilization						28		\$86
30	Fuel								φ00.
32	Other								
33	Legal Claims				i				
34	Employee Assistance and Childcare								\$2
35	Total ICCA Adjustments	Sum of Lines 24 - 34	\$56	\$407	\$86	\$1,264	\$156	\$25	\$1,99
36	Total to or regulation a	Guiller Ellige Et - Ot				• • • • •			
37	Incremental Storm Losses								
38	Regular Payroll and Related Costs	Lines 2 - 13 - 24	\$54	\$91	\$179	\$1,750	\$156	\$111	\$2,34
39	Overtime Payroll and Related Costs	Lines 3 - 25	117	232	334	5,130	236	86	6,13
40	Contractors	Lines 4 - 14 - 26	594	3,198	1,631	58,343	318	0	64,08
41	Line Clearing	Lines 5 - 28	-	142		23,451	-		23,45
42	Vehicle & Fuel	Lines 6 - 30 - 31	0		0	3,013	24	(e)	3,03
43	Materials & Supplies	Lines 7 - 15	5	33	t.	920		0	95
44	Logistics	Line 8	Ó	207	12	16,603	18	1	16,84
45	Other	Line 9 - 16 - 33 - 34	21	33	61	1,589	355	27	2,08
46	Total Incremental Storm Losses	Sum of Lines 38 - 45	\$791	\$3,793	\$2,216	\$110,799	\$1,107	\$225	\$118,93
47	Jurisdictional Eactor (0)		0.9556	0.9431	0.9065	0.9999	0,9690	1.0000	
48 49	Jurisdictional Factor (G)		0.8006	0.9431	0.5065	0.8989	0.9090	1.0000	
49 50	Retail Recoverable Costs	Line 46 * 48	\$756	\$3,577	\$2,009	\$110,783	\$1,072	\$225	\$118,42
	• • • • • • • • • • • • • • • • • • • •								

52 53 Notes:

(A) Storm costs are as of June 1, 2023. Totals may not add due to rounding. 54 55

(B) General plant function reflects reatoration costs associated with FPL's Human Resources, External Affairs, Information Technology, Corporate Real Estate, Regulatory Affairs, Development, Corporate Security, and Marketing and Communications departments.

(C) Represents total payroll charged to the business unit (function) being supported. For example, an employee that works in FPL Development but is supporting Distribution during storm restoration 56 would charge their time to Distribution.

57 (D) includes other miscellaneous costs, including payroll and related overheads from affiliate personnel directly supporting storm restoration.

## Exhibit 3: Calculation of Total Storm Costs to be Recovered

	(\$000s)								
	Modified Interim Storm Charge (A)								
	Total Recoverable Storm Amount								
		(1) (2)							
Line No.		Modified Interim Storm Charged (A)	Total Recoverable Storm Amunt	Nores					
2	Humicane Michael		_	(8					
3	Hurricane Sally	\$132,247	\$132,247	(C)					
4	Humicane Zeta	4,552	4,552	(D)					
5	Hunicane lan	1,024,211	1,023,393	(E)					
6	Humicane Nicole	120,840	118,423	(F)					
7	Total Retail Recoverable Costs	\$1,281,849	\$1,278,614						
8									
9	Less:								
10	Funded Storm Reserve Balance as of 9/30/22	(114,872)	(114,872)	(G)					
11	Unfunded Storm Reserve Balance as of 9/30/22	(105,034)	(105,034)	(H)					
12	Storm Reserve Activity for the period October 2022 through October 2023	1,010	781	(1)					
13									
14	Balance of Retail Recoverable Costs after Storm Reserve Funding ("Eligible Restoration Costs") (Line 7 + 10 + 11 + 12)	\$1,062,953	\$1,059,490						
15									
16	Plus:								
17	Interest on Unrecovered Storm Costs for the period April 2023 through November 2023	\$19,043	\$18,631						
18	Amount to Replenish Storm Reserve Pursuant to FPL's 2021 Settlement Agreement ("Storm Reserve Replenishment")	2 19,906	219,906	(K)					
19									
20	Total Amount to be Recovered from Customers ("Recoverable Storm Amount") (Line 14 + 17 + 18)	\$1,301,903	\$1,298,027						
21									
22	Notes:								
	(A) Amounts reflected in column (1) represents amounts presented on Appendix C of FPL's Supplemental Petition to Modify Nicole filed on September 5, 2023 and approved for recovery by the Commission at the November 9, 2023 Agenda Conference of the section of the	ence.							
	(B) Incremental storm costs associated with the Hurricane Michael surcharge approved by the Commission in Order No. PS recovered as of March 31, 2023.								
	Amount represents the actual amount of the Hurrican Sally surcharge (approved by the Commission in Order No. PSC-202 recovered as of March 31, 2023.								
26	(D) Represents the actual amount of Hurricane Zeta incremental costs approved by the Commission for recovery in Order N additional Storm Accruais reflected on Gulf Power's books and records as of December 31, 2021.	lo. PSC- 2022- 0406- FOF- El, I	0ocket No. 20210179-El le	<del>3</del> 55					
27	reflected on Exhibit KF-1.								
28	(F) Amount reflected in column (2) represents incremental storm costs for Hurricane Nicole incurred as of June 1, 2023 as n	enected on Exhibit KF-2.							

30 (H) Represents unfunded storm reserve balance as of September 30, 2022 prior to Hurricanes lan and Nicole.

(i) Represents the following: (1) \$2.3 million of losses upon liquidation of the storm fund in the fourth quarter of 2022, offset by (2) \$1.3 million of storm reserve accrual recorded during October through December 2022, which were authorized under paragraph 16 of FPL's 2021 Settlement Agreement approved by the Commission in Order No. PSC-2021-0446-S-El, Docket
(i) Amount reflected in column (2) includes actual interest recorded on FPL's books and records for the period April 2023 through October 2023, and forecasted interest for the month of November 2023. Incremental storm costs are forecasted to be recovered during the month of November 2023 and then FPL will begin to apply surcharge revenues to the replenishment of November 2023.

33 (K) Represent storm serve replenishment allowed under paragraph 10 of FPL's 2021 Settle Agreement approved by the Commission in Order No. PSC-2021-0440S- El, Docket No. 20210015-El.