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April 2, 2025

VIA ELECTRONIC FILING

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

Re: Docket No. 20250014-EI
Florida Power & Light Company 2026-2035 Storm Protection Plan
Rebuttal Testimony of Michael Jarro

Dear Mr. Teitzman:

Enclosed for filing in the above referenced matter, please find the Rebuttal Testimony of Florida Power & Light Company witness Michael Jarro, together with Exhibits MJ-2 through MJ-10.

Copies of the foregoing are being served as indicated on the attached Certificate of Service. If you or your staff have any question regarding this filing, please contact me at (561) 691-7144.

Respectfully submitted,

/s/Christopher T. Wright
Christopher T. Wright
Fla. Auth. House Counsel No. 1007055

Enclosures

cc: Ken Hoffman (ken.hoffman@fpl.com)
Certificate of Service

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Electronic Mail to the following parties of record this 2nd day of April 2025:

<p>Jacob Imig Tim Sparks Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399 jimig@psc.state.fl.us TSparks@psc.state.fl.us discovery-gcl@psc.state.fl.us <i>For Commission Staff</i></p>	<p>Office of Public Counsel c/o The Florida Legislature 111 West Madison Street, Room 812 Tallahassee, FL 32399-1400 Trierweiler.walt@leg.state.fl.us christensen.patty@leg.state.fl.us ponce.octavio@leg.state.fl.us rehwinkel.charles@leg.state.fl.us watrous.austin@leg.state.fl.us wessling.mary@leg.state.fl.us <i>For Office of Public Counsel</i></p>
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s/ Christopher T. Wright

Christopher T. Wright

Fla. Auth. House Counsel No. 1007055

Attorney for Florida Power & Light Company

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 20250014-EI

**FLORIDA POWER & LIGHT COMPANY
2026-2035 STORM PROTECTION PLAN**

**REBUTTAL TESTIMONY OF
MICHAEL JARRO**

Filed: April 2, 2025

1 **Q. Please state your name and business address.**

2 A. My name is Michael Jarro. My business address is Florida Power & Light Company,
3 15430 Endeavor Drive, Jupiter, FL, 33478.

4 **Q. Have you previously submitted testimony in this docket?**

5 A. Yes. My direct testimony in support of Florida Power & Light Company's ("FPL")
6 2026-2035 Storm Protection Plan (hereinafter, the "2026 SPP") was filed in this docket
7 on January 15, 2025. The 2026 SPP was attached to my direct testimony as Exhibit
8 MJ-1.

9 **Q. What is the purpose of your rebuttal testimony?**

10 A. The purpose of my rebuttal testimony is to respond to the direct testimony and exhibits
11 submitted by Kevin J. Mara on behalf of the Office of Public Counsel ("OPC").
12 Specifically, my rebuttal testimony responds to OPC witness Mara's recommendations
13 that the Commission should order the following reductions to FPL's 2026 SPP: (1)
14 limit the Distribution Feeder Hardening Program projects to 75 feeders per year; (2)
15 limit the Distribution Lateral Hardening Program underground projects to 1,100 per
16 year; and (3) limit the Transmission Hardening Program projects to the replacement of
17 350 structures per year. I also address certain comments by OPC witness Mara
18 regarding FPL's storm hardening and its impact on storm restoration.

19 **Q. Are you sponsoring any exhibits in your rebuttal testimony?**

20 A. Yes. I am sponsoring the following exhibits attached to my rebuttal testimony:

- 21 • Exhibit MJ-2 – Appendices C from FPL's 2026 SPP and 2023 SPP
- 22 • Exhibit MJ-3 – FPL's Response to OPC's Second Set of Interrogatories No. 33
- 23 • Exhibit MJ-4 – FPL's Response to Staff's First Set of Interrogatories No. 12
- 24 • Exhibit MJ-5 – FPL's Response to Staff's First Set of Interrogatories No. 9

- 1 • Exhibit MJ-6 – FPL’s Response to Staff’s First Set of Interrogatories No. 7
- 2 • Exhibit MJ-7 – FPL’s Response to Staff’s First Set of Interrogatories No. 10
- 3 • Exhibit MJ-8 – Annual and Total SPP Costs for OPC Proposed Adjustments
- 4 • Exhibit MJ-9 – Rate Impacts of OPC’s Proposed Adjustments
- 5 • Exhibit MJ-10 – FPL’s Response to OPC’s Third Set of Interrogatories No. 42

6 **Q. On page 5 of his direct testimony, OPC witness Mara expresses an opinion that**
7 **there is a risk of “runaway budgets and expenditures over the life of these plans.”**
8 **Do you have a response?**

9 A. Yes. FPL’s 2026 SPP is a continuation of the same storm hardening programs that
10 were included in both the 2020 SPP and 2023 SPP approved by the Florida Public
11 Service Commission (“Commission”). As explained in my direct testimony, and as
12 acknowledged by OPC witness Mara on page 6, lines 8-9 of his direct testimony, FPL
13 has not proposed any material modifications to any of the existing eight programs
14 previously approved in the 2023 SPP. Rather, FPL has updated the projected costs for
15 certain programs to better reflect current data and pricing, reduced the estimated
16 average cost per project under the Distribution Lateral Hardening Program, reclassified
17 laterals as feeders to be addressed under the Distribution Feeder Hardening Program,
18 and identified additional substations that require storm surge and flood mitigation
19 through the Substation Storm Surge/Flood Mitigation Program.

20
21 Attached as Exhibit MJ-2 are the Appendices C from both the proposed 2026 SPP and
22 previously approved 2023 SPP, which show the estimated program costs and activities
23 for the applicable ten-year planning periods. Attached as Exhibit MJ-3 is FPL’s
24 response to OPC’s Second Set of Interrogatories No. 33, which provides a comparison

1 of the programs included in the 2023 SPP and the 2026 SPP. As shown in Exhibits
2 MJ-2 and MJ-3, the programs included in the 2026 SPP are generally consistent with
3 those included in the previously approved 2023 SPP. In fact, the difference in the
4 average annual spend for the first three years of the 2026 SPP (2026-2028) is a decrease
5 of approximately \$56 million compared to the 2023 SPP despite the fact that costs of
6 labor and materials have increased since the 2023 SPP, and the 2026 SPP includes five
7 additional substations under the Substation Storm Surge/Flood Mitigation Program.

8

9 Finally, I note that the projected, actual/estimated, and actual SPP costs are submitted
10 for review and approval by the Commission in the annual Storm Protection Plan Cost
11 Recovery Clause (“SPPCRC”) dockets. Thus, the Commission has the opportunity to
12 review and approve both the SPP budgets and expenditures on an annual basis, which
13 mitigates OPC witness Mara’s claimed risk of “runaway budgets and expenditures.”

14 **Q. Before addressing his specific recommendations, do you have any general**
15 **observations regarding OPC witness Mara’s proposed adjustments?**

16 A. Yes. I note that OPC witness Mara’s proposed adjustments to the Distribution Lateral
17 Hardening Program, Distribution Feeder Hardening Program, and Transmission
18 Hardening Program are, with the limited exception of the feeder hardening in calendar
19 year 2026, each within the estimated annual range of projects proposed in FPL’s 2026
20 SPP as shown in the table below.

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TABLE 1

Distribution Feeder	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	Total
2026 SPP # Feeders:	225-325	75-175	25-75	25-75	25-75	25-75	25-75	25-75	25-75	0	475-1025
OPC # Feeders:	75	75	75	75	75	75	75	75	75	75	750
Distribution Lateral	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	Total
2026 SPP # Laterals:	900-1,300	900-1,300	900-1,300	1,100-1,600	1,100-1,600	1,100-1,600	1,100-1,600	1,100-1,600	1,100-1,600	1,100-1,600	10,400-15,100
OPC # Laterals:	1,100	1,100	1,100	1,100	1,100	1,100	1,100	1,100	1,100	1,100	11,000
Transmission	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	Total
2026 SPP # Poles:	300-350	400-500	450-550	450-550	450-550	300-350	150-200	0	0	0	2,500-3,050
OPC # Poles:	350	350	350	350	350	350	350	325	0	0	2,775

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However, if the number of projects to be completed under the Distribution Lateral Hardening Program, Distribution Feeder Hardening Program, and Transmission Hardening Program were decreased and subject to a hard cap as proposed by OPC witness Mara, all things being equal, FPL projects there will be a delay in when customers would realize the important benefits of reductions in outages, outage times, and restoration costs associated with extreme weather events, as well as a delay of ancillary non-hardening benefits, such as improved day-to-day reliability. Notably, the impacts associated with delaying these SPP projects (*i.e.*, delay when customers and communities would realize these important benefits) could be significant for years with multiple extreme weather events, such as the 2022 and 2024 hurricane seasons. Such delays would likely also bring negative individual customer and local community impacts as a result of halting uncompleted work associated with these multi-year hardening projects.

16

Q. Do you have any observations regarding OPC witness Mara’s proposal to use a hard cap on the number of projects to be completed each year under the Distribution Lateral Hardening Program, Distribution Feeder Hardening Program, and Transmission Hardening Program?

17

18

19

1 A. Yes. It appears OPC witness Mara is proposing a hard cap on the annual number of
2 projects to be completed under each of these programs rather than a range of estimated
3 annual projects. As to be expected with any major construction project, project
4 schedules and cost estimates may change due to events and circumstances that are
5 largely beyond the utility's control, which may result in variances in the construction
6 schedules, number of projects, and the associated costs of the SPP projects to be
7 undertaken during a calendar year. Importantly, FPL manages the SPP projects at the
8 program level to ensure that resources are being utilized appropriately and efficiently.
9 For example, if a crew completes a project, FPL moves that crew onto the next project
10 based on the Commission-approved prioritization and selection criteria for the
11 applicable SPP program.

12
13 If, however, there was a hard cap on the number of SPP projects that could be
14 completed in a given year, FPL would lose efficiency by being forced to shut down
15 SPP program work once the cap was reached, release the crews from FPL's system,
16 and then incur additional costs to bring crews back onto the system to restart SPP
17 program work in the next calendar year. Rather than lose this efficiency, FPL submits
18 that it is appropriate to continue to use an estimated annual range of projects for each
19 SPP program, which is consistent with the approach approved in both FPL's 2020 SPP
20 and 2023 SPP.

21 **Q. On page 5, OPC witness Mara recommends that FPL's Distribution Lateral**
22 **Hardening Program should be limited to 1,100 laterals per year. Do you have a**
23 **response?**

1 A. Yes. OPC witness Mara overlooks that the number of estimated projects for the
2 Distribution Lateral Hardening Program reflects that the program was initially started
3 as a very limited pilot program in 2018, was continued as a limited pilot program in
4 FPL's Commission-approved 2020 SPP, and was implemented as a permanent program
5 in FPL's 2023 SPP with a ramp-up in the number of projects to be completed each year
6 over the ten-year period, which ramp-up included the new Management Region
7 selection criteria beginning in 2025. As can be seen in Exhibit MJ-2, the Distribution
8 Lateral Hardening Program included in FPL's 2026 SPP is consistent with the ramp-
9 up and number of estimated projects under the previously approved 2023 SPP. In fact,
10 the ramp-up in number of estimated lateral projects over the period 2026 through 2028
11 is slightly less in the 2026 SPP (3-year average estimated range of 900 to 1,300) than
12 in the 2023 SPP (3-year average estimated range of 967 to 1,333).

13
14 The Distribution Lateral Hardening Program is a significant contributing factor to
15 FPL's success in reducing outages, outage times, and restoration costs when FPL's
16 system and customers are impacted by extreme weather events. FPL's laterals make
17 up the majority of FPL's distribution system, with 1.9 times as many miles of overhead
18 laterals as there are overhead feeders, and many overhead laterals are rear-located
19 facilities that are more difficult and take longer to access and more likely to be near
20 vegetation. As shown in FPL's response to Staff's First Set of Interrogatories No. 9,
21 which is provided as Exhibit MJ-5, FPL's underground facilities have performed
22 significantly better during recent extreme weather events than overhead facilities that
23 are exposed to damages and outages caused by vegetation and debris. OPC witness

1 Mara's proposed adjustment to the Distribution Lateral Hardening Program would
2 result in a delay in when the customers and communities served by FPL would realize
3 these important hardening benefits. This delay should be considered by the
4 Commission when evaluating OPC witness Mara's proposal.

5 **Q. On page 5 of his direct testimony, OPC witness Mara recommends that FPL's**
6 **Distribution Feeder Hardening Program should be limited to 75 feeders per year.**
7 **Do you have a response?**

8 A. As shown on Exhibit MJ-2, FPL's Distribution Feeder Hardening Program is winding
9 down over 2026 (225-325 projects) and 2027 (75-175 projects) to an annual range of
10 25 to 75 feeders estimated to be completed each year from 2028 through 2034. As
11 acknowledged by OPC witness Mara on pages 6-7 of his direct testimony, the increase
12 in miles of feeders to be hardened is primarily the result of the need to reclassify
13 approximately 850 miles of feeders in the panhandle region of FPL's service area
14 (former Gulf Power Company service area) that were previously categorized as laterals.

15
16 Although OPC witness Mara's proposal of 75 feeders per year is consistent with the
17 25-75 project range proposed in the 2026 SPP for calendar years 2028 through 2034, it
18 would require an adjustment to the number of estimated projects to be completed in
19 2026 and 2027, as well as when the program is estimated to be completed. Importantly,
20 these feeder hardening projects are multi-year projects that span several years from
21 initial engineering and permitting stages through final construction and in-service. The
22 projects require coordination with the affected municipalities to mitigate traffic and
23 other impacts to the customer and communities in the areas of the projects. If FPL

1 were to limit the feeder hardening projects to 75 each for 2026 and 2027, FPL would
2 be required to shut down existing multi-year projects that have already started. The
3 impact would be greatest for communities where the work has already begun and may
4 necessitate the immediate stop of these hardening efforts and leaving equipment in a
5 temporary, compromised condition. As these are active work sites, FPL would need to
6 demobilize the corresponding materials and workforce, which would result in
7 additional costs for the impacted projects. As part of the permit process for SPP
8 projects, FPL makes commitments (with the caveat that the SPP projects are subject to
9 Commission approval) to finish the projects in a timely manner to mitigate the
10 disruption from road closures/limitations. Furthermore, restarting the projects that
11 would need to be paused to meet OPC's proposed annual cap of 75 feeders may require
12 additional coordination and acquisition of new permits, which would result in
13 additional costs for the impacted projects.

14

15 Finally, I note that FPL's hardened feeders have performed significantly better than
16 non-hardened feeders during recent extreme weather events. As shown in FPL's
17 response to Staff's First Set of Interrogatories No. 7, which is provided as Exhibit MJ-
18 6, FPL's Distribution Feeder Hardening Program has led to a significant reduction in
19 the number of distribution poles that failed and needed replacement due to impacts of
20 recent extreme weather events. OPC witness Mara's proposed adjustment to the
21 Distribution Feeder Hardening Program would result in a delay in when the customers
22 and communities served by FPL would realize these important hardening benefits. This

1 delay should be considered by the Commission when evaluating OPC witness Mara's
2 proposal.

3 **Q. On page 5 of his direct testimony, OPC witness Mara recommends that FPL's**
4 **Transmission Hardening Program should be limited to the replacement of 350**
5 **structures per year. Do you have a response?**

6 A. Yes, the recommendation by OPC witness Mara fails to account for the impacts
7 associated with stopping a project partway if the hard limit for the year is reached.
8 Similar to the Distribution Feeder Hardening Program, FPL's Transmission Hardening
9 Program is winding down with all existing transmission structures estimated to be
10 hardened by the end of 2032. As can be seen from Exhibit MJ-2, the estimated range
11 of transmission structures to be replaced during calendar years 2026 through 2032 are
12 almost identical in the proposed 2026 SPP and the previously approved 2023 SPP. In
13 fact, the only difference is the range of projects estimated for calendar year 2026 is
14 slightly less in the 2026 SPP (300-350 structures) than in the 2023 SPP (400-500
15 structures).

16
17 While an outage associated with distribution facilities can impact up to several
18 thousands of customers, a transmission-related outage can result in an outage affecting
19 tens of thousands of customers. Additionally, an outage on a transmission facility could
20 cause cascading loss of service for hundreds of thousands of customers. Thus, the
21 prevention of transmission-related outages is essential. As shown on page 32 of Exhibit
22 MJ-1 and in FPL's Response to Staff's First Set of Interrogatories No. 10, which is
23 provided as Exhibit MJ-7, the performance of FPL's system during recent storm events

1 indicates that FPL's Transmission Hardening Program has contributed to the overall
2 storm resiliency of the transmission system and provided savings in storm restoration
3 costs.

4
5 As of year-end 2022, all the existing transmission structures in the legacy FPL service
6 area have been hardened and the transmission structures remaining to be hardened
7 serve the customers located in the panhandle region of FPL's service area (*i.e.*, the
8 former Gulf Power service area). FPL submits that it is important to continue and
9 complete the Transmission Hardening Program to ensure that all FPL customers,
10 including those in the panhandle region of FPL's service area, receive these important
11 hardening benefits.

12 **Q. Does OPC witness Mara provide a justification for his recommended adjustments**
13 **to the Distribution Lateral Hardening Program, Distribution Feeder Hardening**
14 **Program, or Transmission Hardening Program?**

15 A. On page 7 of his direct testimony, OPC witness Mara cites to a Staff interrogatory
16 inquiring about reducing the number of annual feeder, lateral, and transmission
17 hardening projects. The only other support provided by OPC witness Mara appears to
18 be his statement on page 8, line 13, that the proposed reductions will make electric
19 service for all FPL customers more affordable.

20 **Q. Has FPL evaluated OPC witness Mara's claim?**

21 A. Yes. After receiving his direct testimony, the FPL Power Delivery team estimated the
22 annual and total SPP costs based on OPC witness Mara's proposed adjustments, which
23 estimates are provided in Exhibit MJ-8 in the same format as Appendix C to FPL's

1 2026 SPP. FPL’s Rates team then used this information to calculate the ten-year
2 revenue requirements and three-year rate impacts of OPC witness Mara’s proposed
3 adjustments, using the same methodology and assumptions used to calculate the
4 revenue requirements and rate impacts provided in FPL’s 2026 SPP.¹ A comparison
5 of the estimated ten-year revenue requirements and three-year rate impacts under OPC
6 witness Mara’s proposal and FPL’s proposed 2026 SPP is provided in Exhibit MJ-9.
7 As shown therein, OPC witness Mara’s proposed adjustments would have little impact
8 on customer rates. Importantly, however, OPC witness Mara’s proposed adjustments
9 would delay when customers receive the important storm hardening benefits from these
10 programs and result in additional costs to stop and restart projects.

11 **Q. On page 9, lines 6-11 of his direct testimony, OPC witness Mara appears to imply**
12 **that storm restoration costs could actually increase even if storm hardening is**
13 **substantially increased. Do you agree with his position?**

14 A. No. Storm restoration costs are a product of the construction man hours (“CMH”)
15 required to repair the transmission and distribution facilities damaged during an
16 extreme weather event. The greater the damage on the system the more CMH required
17 to restore that damage, and the more CMH required to restore service the greater the
18 storm restoration costs. Although the number of overhead line crews responding to a
19 storm on FPL’s system is an important factor in the time to restore power following an
20 extreme weather event (*i.e.*, all things being equal, more crews would restore faster
21 than less crews completing the same number of CMH), the number of crews does not

¹ The revenue requirements and rate impacts for the 2026 SPP are provided on pages 48-50 of Exhibit MJ-1 attached to the direct testimony of FPL witness Jarro.

1 directly impact the total CMH required to repair the transmission and distribution
2 facilities damaged during an extreme weather event. Rather, FPL's storm hardening
3 initiatives are the single biggest factor to reducing damage to the system from an
4 extreme weather event, which, in turn, reduces the total CMH required to restore power
5 to the customers and communities served.

6
7 FPL's response to OPC's Third Set of Interrogatories No. 42, which is attached as
8 Exhibit MJ-10, demonstrates that the performance of FPL's system during recent storm
9 seasons has significantly improved as compared to the performance of the system
10 during Hurricane Wilma, which occurred in 2005 before FPL began implementing its
11 current SPP programs. While no electrical system can be made completely resistant to
12 the impacts of hurricanes and other extreme weather conditions, the performance of
13 FPL's system during recent storm events demonstrates that continuing the existing
14 storm hardening plans included in the 2026 SPP will continue to reduce damage to
15 FPL's system, reduce outages, reduce outage times, and reduce restoration costs
16 associated with extreme weather events.

17 **Q. Does this conclude your rebuttal testimony?**

18 A. Yes.

**2026-2035 FPL SPP
Appendix C - Program Costs/Activities**

FPL SPP Programs	2026	2027	2028	2029	30	2031	2032	2033	2034	2035	Total SPP Costs	Annual Average Cost
Distribution Inspection Program												
Operating Expenses	\$ 4.1	\$ 4.1	\$ 4.1	\$ 4.1	\$ 4.9	\$ 5.0	\$ 5.2	\$ 5.0	\$ 5.1	\$ 5.3	\$ 46.9	\$ 4.7
Capital Expenditures	\$ 88.0	\$ 90.0	\$ 92.0	\$ 94.0	\$ 92.4	\$ 95.2	\$ 98.1	\$ 77.8	\$ 70.3	\$ 72.4	\$ 870.2	\$ 87.0
Total	\$ 92.1	\$ 94.1	\$ 96.1	\$ 98.1	\$ 97.3	\$ 100.2	\$ 103.3	\$ 82.8	\$ 75.4	\$ 77.7	\$ 917.1	\$ 91.7
# of Pole Inspections	180,000	180,000	180,000	160,000	160,000	160,000	160,000	145,000	145,000	145,000		
Transmission Inspection Program												
Operating Expenses	\$ 1.4	\$ 1.5	\$ 1.5	\$ 1.6	\$ 1.6	\$ 1.6	\$ 1.7	\$ 1.7	\$ 1.8	\$ 1.9	\$ 16.3	\$ 1.6
Capital Expenditures	\$ 60.3	\$ 62.1	\$ 64.0	\$ 65.9	\$ 67.9	\$ 69.9	\$ 72.0	\$ 92.8	\$ 95.5	\$ 98.4	\$ 749.0	\$ 74.9
Total	\$ 61.7	\$ 63.6	\$ 65.5	\$ 67.5	\$ 69.5	\$ 71.6	\$ 73.7	\$ 94.5	\$ 97.3	\$ 100.3	\$ 765.2	\$ 76.5
# of Structure Inspections	84,200	84,500	84,800	85,100	85,400	85,700	86,000	86,300	86,600	86,900		
Distribution Feeder Hardening Program												
Operating Expenses	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Capital Expenditures	\$ 311.8	\$ 207.8	\$ 180.8	\$ 172.8	\$ 200.0	\$ 200.0	\$ 200.0	\$ 238.0	\$ 238.0	\$ -	\$ 1,949.3	\$ 216.6
Total	\$ 311.8	\$ 207.8	\$ 180.8	\$ 172.8	\$ 200.0	\$ 200.0	\$ 200.0	\$ 238.0	\$ 238.0	\$ -	\$ 1,949.3	\$ 216.6
# of Feeders	225-325	75-175	25-75	25-75	25-75	25-75	25-75	25-75	25-75	25-75		
Distribution Lateral Hardening Program												
Operating Expenses	\$ 0.2	\$ 0.2	\$ 0.2	\$ 0.2	\$ 0.3	\$ 0.3	\$ 0.3	\$ 0.3	\$ 0.3	\$ 0.3	\$ 2.4	\$ 0.2
Capital Expenditures	\$ 743.8	\$ 777.3	\$ 732.9	\$ 967.6	\$ 996.6	\$ 1,026.5	\$ 1,057.3	\$ 1,089.0	\$ 1,121.7	\$ 1,155.3	\$ 9,668.0	\$ 966.8
Total	\$ 744.0	\$ 777.5	\$ 733.1	\$ 967.8	\$ 996.9	\$ 1,026.8	\$ 1,057.6	\$ 1,089.3	\$ 1,122.0	\$ 1,155.6	\$ 9,670.4	\$ 967.0
# of Laterals	900-1,300	900-1,300	900-1,300	1,100-1,600	1,100-1,600	1,100-1,600	1,100-1,600	1,100-1,600	1,100-1,600	1,100-1,600		
Transmission Hardening Program												
Operating Expenses	\$ 0.6	\$ 0.6	\$ 0.6	\$ 0.7	\$ 0.7	\$ 0.4	\$ 0.2	\$ -	\$ -	\$ -	\$ 3.8	\$ 0.5
Capital Expenditures	\$ 28.7	\$ 46.7	\$ 47.5	\$ 58.9	\$ 60.7	\$ 33.0	\$ 16.5	\$ -	\$ -	\$ -	\$ 292.0	\$ 41.7
Total	\$ 29.3	\$ 47.3	\$ 48.1	\$ 59.6	\$ 61.4	\$ 33.4	\$ 16.7	\$ -	\$ -	\$ -	\$ 295.8	\$ 42.3
# of Structures to be Replaced	300-350	400-500	450-550	450-550	450-550	300-350	150-200					
Distribution Vegetation Management Program												
Operating Expenses	\$ 116.3	\$ 119.1	\$ 120.4	\$ 123.6	\$ 123.6	\$ 125.2	\$ 124.2	\$ 121.5	\$ 117.0	\$ 111.2	\$ 1,202.1	\$ 120.2
Capital Expenditures	\$ 2.0	\$ 2.0	\$ 2.1	\$ 2.3	\$ 4.0	\$ 4.0	\$ 4.0	\$ 4.0	\$ 4.0	\$ 4.0	\$ 32.4	\$ 3.2
Total	\$ 118.3	\$ 121.1	\$ 122.5	\$ 125.9	\$ 127.6	\$ 129.2	\$ 128.2	\$ 125.5	\$ 121.0	\$ 115.2	\$ 1,234.5	\$ 123.5
# of Miles Maintained	18,055	17,955	17,864	17,755	17,639	17,514	17,389	17,264	17,139	17,014		
Transmission Vegetation Management Program												
Operating Expenses	\$ 16.8	\$ 17.4	\$ 17.7	\$ 18.0	\$ 18.0	\$ 18.0	\$ 18.8	\$ 19.5	\$ 20.3	\$ 21.1	\$ 185.6	\$ 18.6
Capital Expenditures	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total	\$ 16.8	\$ 17.4	\$ 17.7	\$ 18.0	\$ 18.0	\$ 18.0	\$ 18.8	\$ 19.5	\$ 20.3	\$ 21.1	\$ 185.6	\$ 18.6
# of Miles Maintained	9,457	9,504	9,552	9,600	9,648	9,696	9,744	9,793	9,842	9,891		
Substation Storm Surge/Flood Mitigation Program												
Operating Expenses	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Capital Expenditures	\$ 8.5	\$ 8.5	\$ 8.5	\$ 8.5	\$ 8.5	\$ 8.5	\$ 8.5	\$ 8.5	\$ 8.5	\$ -	\$ 68.0	\$ 8.5
Total	\$ 8.5	\$ -	\$ 68.0	\$ 8.5								
# of Substations	1	0	1	1	1	1	1	1	1			
Total SPP Costs	\$ 1,382.5	\$ 1,337.5	\$ 1,272.4	\$ 1,518.1	\$ 1,579.1	\$ 1,587.6	\$ 1,606.8	\$ 1,658.1	\$ 1,674.0	\$ 1,469.9	\$ 15,086.0	\$ 1,544.6

2023-2032 FPL SPP
Appendix C - Program Costs/Activities
 \$ in Millions

FPL SPP Programs	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	Total SPP Costs	Annual Average Cost
Distribution Inspection Program												
Operating Expenses	\$ 3.8	\$ 3.9	\$ 4.0	\$ 4.1	\$ 4.1	\$ 4.1	\$ 4.1	\$ 4.1	\$ 4.0	\$ 4.0	\$ 40.1	\$ 4.0
Capital Expenditures	\$ 58.9	\$ 60.4	\$ 61.9	\$ 63.5	\$ 64.9	\$ 64.9	\$ 64.3	\$ 63.8	\$ 63.4	\$ 62.8	\$ 628.8	\$ 62.9
Total	\$ 62.7	\$ 64.3	\$ 65.9	\$ 67.5	\$ 69.0	\$ 69.0	\$ 68.4	\$ 67.9	\$ 67.4	\$ 66.8	\$ 668.9	\$ 66.9
# of Pole Inspections	180,000	180,000	180,000	180,000	180,000	180,000	180,000	160,000	160,000	160,000		
Transmission Inspection Program												
Operating Expenses	\$ 1.4	\$ 1.4	\$ 1.4	\$ 1.4	\$ 1.5	\$ 1.5	\$ 1.6	\$ 1.6	\$ 1.6	\$ 1.7	\$ 15.1	\$ 1.5
Capital Expenditures	\$ 74.5	\$ 61.5	\$ 59.0	\$ 60.3	\$ 62.1	\$ 64.0	\$ 65.9	\$ 67.9	\$ 69.9	\$ 72.0	\$ 657.2	\$ 65.7
Total	\$ 75.9	\$ 62.9	\$ 60.4	\$ 61.8	\$ 63.6	\$ 65.5	\$ 67.5	\$ 69.5	\$ 71.6	\$ 73.7	\$ 672.4	\$ 67.2
# of Structure Inspections	84,000	84,500	85,000	85,500	86,000	86,500	87,000	87,500	88,000	88,500		
Distribution Feeder Hardening Program												
Operating Expenses	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Capital Expenditures	\$ 689.0	\$ 687.0	\$ 544.3	\$ 100.0	\$ 100.0	\$ 100.0	\$ 100.0	\$ 100.0	\$ 16.8	\$ -	\$ 2,437.1	\$ 270.8
Total	\$ 689.0	\$ 687.0	\$ 544.3	\$ 100.0	\$ 100.0	\$ 100.0	\$ 100.0	\$ 100.0	\$ 16.8	\$ -	\$ 2,437.1	\$ 270.8
# of Feeders	300-350	250-350	100-200	25-75	25-75	25-75	25-75	25-75				
Distribution Lateral Hardening Program												
Operating Expenses	\$ 0.2	\$ 0.2	\$ 0.2	\$ 0.2	\$ 0.2	\$ 0.2	\$ 0.2	\$ 0.2	\$ 0.2	\$ 0.2	\$ 1.9	\$ 0.2
Capital Expenditures	\$ 522.9	\$ 628.4	\$ 758.2	\$ 889.0	\$ 1,018.8	\$ 1,049.4	\$ 1,080.9	\$ 1,113.3	\$ 1,146.7	\$ 1,181.1	\$ 9,388.5	\$ 938.9
Total	\$ 523.1	\$ 628.6	\$ 758.4	\$ 889.1	\$ 1,019.0	\$ 1,049.6	\$ 1,081.1	\$ 1,113.5	\$ 1,146.9	\$ 1,181.3	\$ 9,390.5	\$ 939.0
# of Laterals	600-800	700-900	800-1,000	900-1,100	1,000-1,500	1,000-1,500	1,000-1,500	1,000-1,500	1,000-1,500	1,000-1,500		
Transmission Hardening Program												
Operating Expenses	\$ 0.6	\$ 0.6	\$ 0.6	\$ 0.6	\$ 0.6	\$ 0.6	\$ 0.7	\$ 0.7	\$ 0.4	\$ 0.2	\$ 5.6	\$ 0.6
Capital Expenditures	\$ 35.0	\$ 30.1	\$ 28.8	\$ 28.7	\$ 46.7	\$ 47.5	\$ 58.9	\$ 60.7	\$ 33.0	\$ 16.5	\$ 385.9	\$ 38.6
Total	\$ 35.6	\$ 30.7	\$ 29.4	\$ 29.3	\$ 47.4	\$ 48.1	\$ 59.6	\$ 61.4	\$ 33.4	\$ 16.7	\$ 391.5	\$ 39.2
# of Structures to be Replaced	500-600	400-500	400-500	400-500	400-500	450-550	450-550	450-550	350-400	150-200		
Distribution Vegetation Management Program												
Operating Expenses	\$ 68.2	\$ 68.1	\$ 69.3	\$ 68.9	\$ 73.8	\$ 78.9	\$ 78.4	\$ 77.9	\$ 77.4	\$ 76.9	\$ 738.0	\$ 73.8
Capital Expenditures	\$ 4.8	\$ 4.7	\$ 2.6	\$ 2.0	\$ 2.0	\$ 2.1	\$ 2.3	\$ 2.5	\$ 2.6	\$ 2.8	\$ 28.4	\$ 2.8
Total	\$ 73.0	\$ 72.8	\$ 71.9	\$ 70.9	\$ 75.8	\$ 81.1	\$ 80.7	\$ 80.4	\$ 80.1	\$ 79.7	\$ 766.5	\$ 76.6
# of Miles Maintained	16,690	16,600	16,450	16,350	16,350	16,350	16,350	16,350	16,350	16,350		
Transmission Vegetation Management Program												
Operating Expenses	\$ 11.8	\$ 12.5	\$ 12.6	\$ 12.8	\$ 13.7	\$ 14.7	\$ 14.7	\$ 15.8	\$ 17.0	\$ 18.2	\$ 143.7	\$ 14.4
Capital Expenditures	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total	\$ 11.8	\$ 12.5	\$ 12.6	\$ 12.8	\$ 13.7	\$ 14.7	\$ 14.7	\$ 15.8	\$ 17.0	\$ 18.2	\$ 143.7	\$ 14.4
# of Miles Maintained	9,350	9,350	9,350	9,350	9,350	9,350	9,350	9,350	9,350	9,350		
Substation Storm Surge/Flood Mitigation Program												
Operating Expenses	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Capital Expenditures	\$ 8.0	\$ 8.0	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 16.0	\$ 8.0
Total	\$ 8.0	\$ 8.0	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 16.0	\$ 8.0
# of Substations	2	2										
Total SPP Costs	\$ 1,479.1	\$ 1,566.8	\$ 1,542.9	\$ 1,231.5	\$ 1,388.4	\$ 1,428.0	\$ 1,471.9	\$ 1,508.4	\$ 1,433.1	\$ 1,436.5	\$ 14,486.6	\$ 1,482.1

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QUESTION:

Are you accelerating (relative to the current approved SPP) the pace or spending on any of the existing plans?

- a. If yes, is the acceleration being done in dollars, more poles or more miles (or all three)?
- b. If you are intentionally accelerating deployment in any of these values, why?

RESPONSE:

For purposes of FPL's 2026-2035 SPP, FPL is not proposing any material modifications to the programs previously approved in the 2023 SPP other than projecting three additional years for the 2026-2035 plan period. Rather, FPL has updated the projected costs for certain programs to better reflect current data and pricing, reduced the estimated average cost per project under the Distribution Lateral Hardening Program, and identified additional substations that require storm surge and flood mitigation through the Substation Storm Surge/Flood Mitigation Program.

a.-b.

Comparing FPL's 2026-2035 SPP Appendix C versus FPL's 2023-2032 SPP Appendix C, the programs are generally consistent with the exceptions of Distribution Lateral Hardening Program, Distribution Feeder Hardening Program, and Substation Storm Surge Flood Mitigation Program.

• **Distribution Inspection Program:**

- FPL is forecasting an increase in the projected capital costs for the Distribution Inspection Programs to better reflect current material and labor costs associated with the program, as well as the need to address the volume of pole replacements, remediations, or removals, including poles to be removed as a result of hardening projects as further explained in FPL's response to Staff's First Set of Interrogatories, No. 1.
- This increase will be partially offset by a reduction in the estimated average cost per project under the Distribution Lateral Hardening Program over the 2026-2035 plan period.
- An increase of approximately \$24.8 million per year compared to the estimated annual average program costs included in the 2023 SPP.

• **Transmission Inspection Program:**

- FPL is not proposing any material modifications to the program

• **Distribution Feeder Hardening Program:**

- FPL is reclassifying approximately 850 miles of feeders in the panhandle region of FPL's service area that were previously categorized as laterals as further detailed in FPL's response to Staff's First Set of Interrogatories, No. 2.
- FPL is projecting an increase in the projected capital costs under this program to reflect the current material and labor costs associated with the program and addition approximately 850 miles of feeders. This increase will be partially offset by a reduction in the estimated average cost per project under the Distribution Lateral Hardening Program over the 2026-2035 plan period.
- FPL is targeting to complete approximately 225-325 feeder projects in 2026, approximately 75-175 feeder projects in 2027 and approximately 25-75 feeder projects annually during the 2028 through 2034 period, at which point FPL projects all existing feeders will be hardened.

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- **Distribution Lateral Hardening Program:**
 - FPL is forecasting a decrease in the estimated average cost per project under the Distribution Lateral Hardening Program to reflect the efficiencies to be realized from the implementation of the program improvements addressed in Section IV(D)(1)(a) of Exhibit MJ-1.
 - This decrease in costs will partially offset the increase in capital costs projected for the Distribution Inspection Program, Distribution Feeder Hardening Program, and Substation Storm Surge/Flood Mitigation Program.
 - There is an estimated increase in number of projects to be completed under the 2026 SPP due to the fact that the underground program started as a very limited pilot in 2018, was continued as a limited pilot in the 2020 SPP, and began as a permanent program in the 2023 SPP with a ramp-up in estimated projects to be completed each year. The 2026 SPP reflects the continued ramp up and full deployment of estimated projects to be completed each year.
- **Transmission Hardening Program:**
 - FPL is not proposing any material modifications to the program.
- **Distribution Vegetation Management Program:**
 - FPL is forecasting an increase in the projected costs for the Distribution Vegetation Management Program to better reflect: current labor and equipment market pricing; and to ensure that FPL is able to maintain the current vegetation maintenance cycles.
 - FPL estimates a modest increase of approximately 11,400 miles in the number of miles to be maintained under the ten-year 2026 SPP to reflect system growth.
 - FPL plans to inspect and maintain, on average, approximately 17,559 miles annually.
 - A modest increase of approximately \$46.9 million per year compared to the estimated annual average program costs included in the 2023 SPP.
- **Transmission Vegetation Management Program:**
 - FPL is forecasting an increase in the projected costs for the Transmission Vegetation Management Program to better reflect: current labor and equipment market pricing; and an increase in both NERC and non-NERC transmission miles on FPL's system.
 - FPL estimates a slight increase of approximately 3,200 miles in the number of miles to be maintained under the ten-year 2026 SPP to reflect system growth.
 - FPL plans to inspect and maintain, on average, approximately 9,673 miles annually, which includes approximately 5,591 miles for NERC transmission line corridors and 4,082 miles for non-NERC transmission line corridors.
 - A modest increase of approximately \$4.2 million per year compared to the estimated annual average program costs included in the 2023 SPP.
- **Substation Storm Surge/Flood Mitigation Program:**
 - For purposes of the 2026 SPP, FPL will continue the work at the two remaining substations previously included in the 2023 SPP.
 - FPL has also identified five additional substations (Port Orange, Iona, Estero, Capri, and Naples) to be addressed through the Substation Storm Surge/Flood Mitigation Program based on recent extreme weather events. All five of these impacted substations experienced 1-2 feet of flooding, with the highest waterline of five feet seen at the Iona substation.

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- The additional substations added to the program result in an increase in the estimated costs for the 2026 SPP.

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QUESTION:

For the following question, please refer to the direct testimony of FPL's witness Jarro, Exhibit MJ-1, filed January 15, 2025.

Please refer to page 45. Did FPL identify any substations that were impacted by flooding or storm surge during Hurricanes Helene and Milton?

RESPONSE:

Yes. Please refer to the table below for the five substations that FPL proposes to add to the Substation Storm Surge/Flood Mitigation Program as part of the 2026 SPP, as well as an identification of the recent events that resulted in storm surge or flooding at these substations.

Substations Added to FPL's 2026-2035 SPP	Recent event(s) where substation was impacted by flooding/storm surge
Port Orange	Milton (2024) / Ian (2022)
Iona	Ian (2022)
Estero	Ian (2022)
Capri	Milton (2024) / Ian (2022)
Naples	Ian (2022)

Additionally, the Dumfoundling substation, which was included in FPL's Commission-approved 2023 SPP and proposed 2026 SPP, experienced significant flooding during the June 11-14, 2024 extreme weather event. A tropical system designated Invest 90L by the National Hurricane Center impacted Florida, with a period of heavy rain and extreme flooding from June 11 through June 14, with multiple cities recording over 15 inches of rain. The impacts from this event were much more widespread and of longer duration than a typical June event in Florida and resulted in flooding at the Dumfoundling substation.

In further response, see FPL's Hurricane Ian Forensic Reports (Pg. 26-55) and FPL's presentation to NATF (Pg. 17-22) provided in FPL's response to OPC's First Request for Production of Documents, Nos. 4 and 9, which provide additional details and pictures on substation flooding and impact to corresponding equipment at Port Orange, Iona, Estero, Capri, and Naples substations.

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Interrogatory No. 9
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QUESTION:

For the following question, please refer to the direct testimony of FPL's witness Jarro, Exhibit MJ-1, filed January 15, 2025.

Please refer to page 28. Please update the table for Hurricanes Helene and Milton, if applicable.

RESPONSE:

See table below. Please note that FPL's forensic analyses of Hurricanes Helene and Milton are on-going and will not be completed until later in calendar year 2025. As such, the information provided below regarding the performance of FPL's system during each of these storms is preliminary and based on the best information available at this time.

	Storm and Facility	Laterals Out	Total Laterals	% Out
	Ian Overhead	11,059	112,771	9.8%
	Ian Underground	2,025	116,595	1.7%
	Idalia Overhead	1,080	113,408	1.0%
	Idalia Underground	92	119,218	0.08%
NEW	Helene Overhead	2,205	114,200	1.93%
NEW	Helene Underground	163	122,520	0.13%
NEW	Milton Overhead	7,019	114,397	6.1%
NEW	Milton Underground	1,389	122,722	1.1%

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Interrogatory No. 7
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QUESTION:

For the following question, please refer to the direct testimony of FPL's witness Jarro, Exhibit MJ-1, filed January 15, 2025.

Please refer to page 22. Please update the table for Hurricanes Helene and Milton, if applicable.

RESPONSE:

See table below. Please note that FPL's forensic analyses of Hurricanes Helene and Milton are on-going and will not be completed until later in calendar year 2025. As such, the information provided below regarding the performance of FPL's system during each of these storms is preliminary and based on the best information available at this time.

	Hurricane Wilma	Hurricane Irma	Hurricane Ian	Hurricane Idalia	NEW Hurricane Helene	NEW Hurricane Milton
Year	2005	2017	2022	2023	2024	2024
Hurricane Strength (Category)	3	4	4	3	4	3
Distribution Poles Replaced	12,400	4,700	3,200	171	334	1,848

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QUESTION:

For the following question, please refer to the direct testimony of FPL's witness Jarro, Exhibit MJ-1, filed January 15, 2025.

Please refer to page 32. Please update the table for Hurricanes Helene and Milton, if applicable.

RESPONSE:

See table below. Please note that FPL's forensic analyses of Hurricanes Helene and Milton are on-going and will not be completed until later in calendar year 2025. As such, the information provided below regarding the performance of FPL's system during each of these storms is preliminary and based on the best information available at this time.

		Percentage of Line Sections Out	Structures Failed
	Hurricane Wilma	345	100
	Hurricane Irma	215	5*
	Irma v. Wilma Improvement	38%	95%
	Hurricane Ian	70	0
	Ian v. Wilma Improvement	80%	100%
	Hurricane Idalia	13	0
	Idalia v. Wilma Improvement	96%	100%
NEW	Hurricane Helene	20	0
NEW	Helene v. Wilma Improvement	94%	100%
NEW	Hurricane Milton	84	3*
NEW	Milton v. Wilma Improvement	76%	97%

* The transmission structures that failed were not hardened under FPL's SPP Transmission Inspection Program or Transmission Hardening Program.

2026-2035 Program Costs/Activities with OPC Adjustments												
FPL SPP Programs	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	Total SPP Costs	Annual Average Cost
Distribution Inspection Program												
Operating Expenses	\$ 4.1	\$ 4.1	\$ 4.1	\$ 4.1	\$ 4.9	\$ 5.0	\$ 5.2	\$ 5.0	\$ 5.1	\$ 5.3	\$ 46.9	\$ 4.7
Capital Expenditures	\$ 88.0	\$ 90.0	\$ 92.0	\$ 94.0	\$ 92.4	\$ 95.2	\$ 98.1	\$ 77.8	\$ 70.3	\$ 72.4	\$ 870.2	\$ 87.0
Total	\$ 92.1	\$ 94.1	\$ 96.1	\$ 98.1	\$ 97.3	\$ 100.2	\$ 103.3	\$ 82.8	\$ 75.4	\$ 77.7	\$ 917.1	\$ 91.7
# of Pole Inspections	180,000	180,000	180,000	160,000	160,000	160,000	160,000	145,000	145,000	145,000		
Transmission Inspection Program												
Operating Expenses	\$ 1.4	\$ 1.5	\$ 1.5	\$ 1.6	\$ 1.6	\$ 1.6	\$ 1.7	\$ 1.7	\$ 1.8	\$ 1.9	\$ 16.3	\$ 1.6
Capital Expenditures	\$ 60.3	\$ 62.1	\$ 64.0	\$ 65.9	\$ 67.9	\$ 69.9	\$ 72.0	\$ 92.8	\$ 95.5	\$ 98.4	\$ 749.0	\$ 74.9
Total	\$ 61.7	\$ 63.6	\$ 65.5	\$ 67.5	\$ 69.5	\$ 71.6	\$ 73.7	\$ 94.5	\$ 97.3	\$ 100.3	\$ 765.2	\$ 76.5
# of Structure Inspections	84,200	84,500	84,800	85,100	85,400	85,700	86,000	86,300	86,600	86,900		
Distribution Feeder Hardening Program												
Operating Expenses	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Capital Expenditures	\$ 85.0	\$ 124.7	\$ 271.2	\$ 259.2	\$ 300.0	\$ 300.0	\$ 300.0	\$ 357.0	\$ 357.0	\$ 367.7	\$ 2,721.9	\$ 261.6
Total	\$ 85.0	\$ 124.7	\$ 271.2	\$ 259.2	\$ 300.0	\$ 300.0	\$ 300.0	\$ 357.0	\$ 357.0	\$ 367.7	\$ 2,721.9	\$ 261.6
# of Feeders	75	75	75	75	75	75	75	75	75	75		
Distribution Lateral Hardening Program												
Operating Expenses	\$ 0.2	\$ 0.2	\$ 0.2	\$ 0.2	\$ 0.3	\$ 0.3	\$ 0.3	\$ 0.3	\$ 0.3	\$ 0.3	\$ 2.4	\$ 0.2
Capital Expenditures	\$ 743.8	\$ 777.3	\$ 732.9	\$ 788.4	\$ 812.0	\$ 836.4	\$ 861.5	\$ 887.3	\$ 914.0	\$ 941.4	\$ 8,295.1	\$ 829.5
Total	\$ 744.0	\$ 777.5	\$ 733.1	\$ 788.6	\$ 812.3	\$ 836.7	\$ 861.8	\$ 887.6	\$ 914.3	\$ 941.6	\$ 8,297.5	\$ 829.7
# of Laterals	1,100	1,100	1,100	1,100	1,100	1,100	1,100	1,100	1,100	1,100		
Transmission Hardening Program												
Operating Expenses	\$ 0.6	\$ 0.6	\$ 0.6	\$ 0.7	\$ 0.7	\$ 0.4	\$ 0.2	\$ -	\$ -	\$ -	\$ 3.8	\$ 0.5
Capital Expenditures	\$ 30.9	\$ 36.3	\$ 33.2	\$ 41.2	\$ 42.5	\$ 43.8	\$ 45.1	\$ 33.0	\$ -	\$ -	\$ 306.0	\$ 39.0
Total	\$ 31.5	\$ 37.0	\$ 33.9	\$ 41.9	\$ 43.2	\$ 44.2	\$ 45.3	\$ 33.0	\$ -	\$ -	\$ 309.8	\$ 39.5
# of Structures to be Replaced	350	350	350	350	350	350	350	325				
Distribution Vegetation Management Program												
Operating Expenses	\$ 116.3	\$ 119.1	\$ 120.4	\$ 123.6	\$ 123.6	\$ 125.2	\$ 124.2	\$ 121.5	\$ 117.0	\$ 111.2	\$ 1,202.1	\$ 120.2
Capital Expenditures	\$ 2.0	\$ 2.0	\$ 2.1	\$ 2.3	\$ 4.0	\$ 4.0	\$ 4.0	\$ 4.0	\$ 4.0	\$ 4.0	\$ 32.4	\$ 3.2
Total	\$ 118.3	\$ 121.1	\$ 122.5	\$ 125.9	\$ 127.6	\$ 129.2	\$ 128.2	\$ 125.5	\$ 121.0	\$ 115.2	\$ 1,234.5	\$ 123.5
# of Miles Maintained	18,055	17,955	17,864	17,755	17,639	17,514	17,389	17,264	17,139	17,014		
Transmission Vegetation Management Program												
Operating Expenses	\$ 16.8	\$ 17.4	\$ 17.7	\$ 18.0	\$ 18.0	\$ 18.0	\$ 18.8	\$ 19.5	\$ 20.3	\$ 21.1	\$ 185.6	\$ 18.6
Capital Expenditures	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total	\$ 16.8	\$ 17.4	\$ 17.7	\$ 18.0	\$ 18.0	\$ 18.0	\$ 18.8	\$ 19.5	\$ 20.3	\$ 21.1	\$ 185.6	\$ 18.6
# of Miles Maintained	9,457	9,504	9,552	9,600	9,648	9,696	9,744	9,793	9,842	9,891		
Substation Storm Surge/Flood Mitigation Program												
Operating Expenses	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Capital Expenditures	\$ 8.5	\$ 8.5	\$ 8.5	\$ 8.5	\$ 8.5	\$ 8.5	\$ 8.5	\$ 8.5	\$ 8.5	\$ -	\$ 68.0	\$ 8.5
Total	\$ 8.5	\$ -	\$ 68.0	\$ 8.5								
# of Substations	1	0	1	1	1	1	1	1	1			
Total SPP Costs	\$ 1,157.9	\$ 1,244.0	\$ 1,348.6	\$ 1,407.7	\$ 1,476.4	\$ 1,508.3	\$ 1,539.6	\$ 1,608.4	\$ 1,585.3	\$ 1,623.7	\$ 14,499.7	\$ 1,449.6

SPP Rate Impacts of OPC Proposed Adjustments

2026 SPP Revenue Requirements With OPC Adjustments			
Year	OPC Revenue Requirements	2026 SPP (As Filed)	Difference
2026	\$ 961.55	\$976.0	(\$14.5)
2027	\$ 1,081.74	\$1,116.3	(\$34.6)
2028	\$ 1,209.03	\$1,243.8	(\$34.8)
2029	\$ 1,345.32	\$1,381.2	(\$35.9)
2030	\$ 1,483.55	\$1,532.1	(\$48.5)
2031	\$ 1,625.14	\$1,684.2	(\$59.1)
2032	\$ 1,765.33	\$1,832.9	(\$67.6)
2033	\$ 1,906.10	\$1,980.2	(\$74.1)
2034	\$ 2,045.40	\$2,127.0	(\$81.6)
2035	\$ 2,181.36	\$2,256.9	(\$75.5)
Total	\$ 15,604.53	\$16,130.6	(\$526.1)

SPP Estimated Rate Impacts (2026-2028) With OPC Adjustments			
	2026	2027	2028
RS-1 (\$/kWh)	\$0.00978	\$0.01086	\$0.01194
GSD-1 (\$/kW)	\$1.74000	\$1.96000	\$2.19000
GSLDT-3 (\$/kW)	\$0.20000	\$0.23000	\$0.26000

SPP Estimated Rate Impacts (2026-2028) As Filed in 2026 SPP			
	2026	2027	2028
RS-1 (\$/kWh)	\$0.00992	\$0.01121	\$0.01229
GSD-1 (\$/kW)	\$1.77000	\$2.02000	\$2.25000
GSLDT-3 (\$/kW)	\$0.20000	\$0.23000	\$0.26000

Difference in SPP Estimated Rate Impacts (2026-2028) OPC Adjustments vs. As Filed in 2026 SPP			
	2026	2027	2028
RS-1 (\$/kWh)	-\$0.00014	-\$0.00035	-\$0.00035
GSD-1 (\$/kW)	-\$0.03000	-\$0.06000	-\$0.06000
GSLDT-3 (\$/kW)	\$0.00000	\$0.00000	\$0.00000

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QUESTION:

Please provide a chart containing the same information shown in the one provided in FPL's response to Staff's First Set of Interrogatories, Interrogatory No. 4, but with the inclusion two additional rows. The first additional row should show, for each storm, the total number of persons under contract with FPL for storm restoration purposes. The second additional row should show, for each storm, the total number of individual distribution line contractor persons under contract with FPL for storm restoration purposes.

RESPONSE:

The requested information is included in the table below, which also reflects FPL's ongoing hardening investments and provides additional statistics showing the significant expansion of the transmission and distribution system during the same time period used in FPL's response to Staff's First Set of Interrogatories, Interrogatory No. 4.

For example, from Hurricane Wilma (2005), which occurred prior to the implementation of the existing storm hardening efforts included in FPL's Storm Protection Plans, to Hurricane Milton (2024), which was the most recent storm and reflects FPL's storm hardening efforts as of September 2024:

- The number of customers served by FPL has increased by more than 1.5 million accounts.
- FPL's system has expanded by 350,000 overhead distribution poles, 13,500 transmission structures, and 135,000 overhead transformers.
- Despite this significant growth, distribution poles replaced due to Hurricane Milton was approximately 1,850 compared to 12,400 replaced due to Hurricane Wilma.
- Similar significant performance benefits from hardening investments can be seen in relation to transmission.
- FPL's Distribution Lateral Hardening Program is showing significant benefits as underground laterals performed 5 to 15.5x better than overhead laterals.

[See table on next page]

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	Hurricane Wilma	Hurricane Irma	Hurricane Ian	Hurricane Nicole	Hurricane Idalia	Hurricane Debby	Hurricane Helene	Hurricane Milton
Storm Season	2005	2017	2022	2022	2023	2024	2024	2024
Saffir-Simpson Scale	Category 3	Category 4	Category 4	Category 1	Category 3	Category 1	Category 4	Category 3
Landfall Max Sustained Winds	120 mph	130 mph	150 mph	75 mph	125 mph	80 mph	140 mph	120 mph
Customers Affected	3.2 million	4.4 million	2.2 million	0.5 million	0.2 million	0.25 million	0.7 million	2 million
FPL Counties Impacted	21	35	32	30	37	34	37	30
AFS Interruptions Avoided	N/A	546,000	404,000	152,000	69,000	85,000	184,000	554,000
Substations Flooded	0	2	6	0	0	0	0	2
Substations De-energized	241	92	27	2	7	1	14	50
Trans Structures Failed	100	5 ^(a)	0	0	0	0	0	3 ^(b)
Trans Line Sections Impacted	345	215	70	15	13	5	20	84
Distribution Poles Replaced	12,400	4,700	3,200	30	171	40	334	1,848
Lateral Performance (UG vs OH)	N/A	6.6x	5.6x	15.5x	13.6x	8.3x	14.5x	5.3x
50% of customers restored	5 days	1 day	1 day	1 day	1 day	1 day	1 day	1 day
100% of customers restored	18 days	10 days	8 days	1 day	2 days	2 days	4 days	6 days
Average customer outage	5.4 days	2.1 days	1.5 days	0.2 days	0.13 days	0.11 days	0.31 days	0.88 days
# of Customers Served	4,385,221	4,912,867	5,764,583	5,764,583	5,867,355	5,976,022	5,976,022	5,976,022
# of Dist. poles	1,092,685	1,188,186	1,417,128	1,417,128	1,424,330	1,443,499	1,443,499	1,443,499
# of Trans. Structures	69,974	66,685	83,401	83,401	83,295	83,573	83,573	83,573
# of OH Tx	541,866	548,991	677,874	677,874	676,909	676,990	676,990	676,990
OH Dist. Line FPL Personnel	1,040	811	902	902	896	916	916	916
OH Dist. Line Contractors (Embedded)	558	1,472	3,216	3,056	1,344	1,175	1,248	1,217
OH Dist. Line Contractors (External) ^(c)	6,305	10,840	6,945	1,836	1,379	1,006	2,196	6,282
Total OH Dist. Line	7,903	13,123	11,063	5,794	3,619	3,097	4,360	8,415

- (a) All five of the transmission structures that failed were wooden poles.
- (b) All three of the transmission structures that failed were installed in the 1980s and were on one line section adjacent to each other.
- (c) Inclusive of mutual assistance utility crews and contractor line

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Although the number of overhead line crews responding to a storm on FPL's system is an important factor in the time to restore power following an extreme weather event, the performance of FPL's system as shown in the table above illustrates that FPL's existing and ongoing storm hardening programs have been and will continue to be a significant contributing factor to increasing transmission and distribution infrastructure resiliency, reducing outages, reducing outage times, and reducing restoration costs associated with extreme weather events. Indeed, comparing the data from Hurricane Wilma and Hurricane Milton indicates that without FPL's storm hardening efforts there would have been significantly more damage to FPL's system and a greater number of customer outages due to Hurricane Milton, which would have required additional time and costs to restore power. Given that FPL's storm hardened assets are expected to have service lives ranging from 40 to 70 years, the existing programs included in FPL's 2026 Storm Protection Plan will continue to provide significant benefits to the customers and the communities served by FPL both now and for many years to come, including years with multiple extreme weather events, such as the 2022 and 2024 hurricane seasons.