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STATE OF FLORIDA



ADRIA E. HARPER
GENERAL COUNSEL
(850) 413-6199

Public Service Commission

February 3, 2026

STAFF'S SECOND DATA REQUEST *via email*

John T. Burnett, Esq.
William P. Cox, Esq.
Florida Power & Light Company
700 University Boulevard
Juno Beach, FL. 33408-0420
John.t.burnett@fpl.com
Will.p.cox@fpl.com

RE: Docket No. 20250143 - Petition for approval of 2025 nuclear decommissioning study, by Florida Power & Light Company.

Dear Mr. Burnett and Mr. Cox:

By this letter, the Florida Public Service Commission (Commission) staff requests that Florida Power & Light Company (FPL) provide responses to the following data requests:

1. Does FPL expect to file a base rate case in a time frame such that base rates could change on January 1, 2030? Please explain your response, clarifying whether End-of-Life Materials and Supplies Inventory Expense (EOL M&S) accrual amounts are expected to remaining constant until such time that base rates change.

For the following questions, please refer to FPL's 2025 Decommissioning Study for St. Lucie Nuclear Unit Nos. 1 & 2 (2025 St. Lucie Study), Section 7.

2. Support Schedule E, Page 1 of 1, reflects values prepared as of December 31, 2025.
 - a. Based on the values in this schedule, please provide the current monthly and annual accrual amounts as of January 1, 2026.
 - b. Please provide an updated projected version of Support Schedule E, including monthly and annual accrual amounts, prepared as of the accrual date of January 1, 2030.

- c. State assumptions incorporated into the values provided in response to Question 2.b above.
3. Please provide a spreadsheet (with formulas intact and cells unlocked) showing the development of the data appearing in response to Question 2.a and 2.b above.
4. Please explain the major factors causing the increase in the Adjusted Ending Inventory Value @ End of License reflected on Support Schedule E, Line 1 (\$55,988,014 in FPL's 2025 Decommissioning Study (2025 Study) versus \$33,928,292 in FPL's 2020 Decommissioning Study (2020 Study)).
5. If the license extension received for the St. Lucie Station is included in FPL's response to Question 4 above, please quantify the impact to the Adjusted Ending Inventory @ End of License, FPL's Ownership Share Net of Participants (Line 5), and the EOL M&S accrual recovery.
6. Please identify the principle reasons why the value of EOL M&S Salvage in the 2025 Study (approximately \$1.9 million) is significantly higher than the amount in the 2020 Study (about \$448 thousand). Specify in your response what portion of the increase is attributable to current M&S Salvage amounts versus what portion of the increase is attributable to forecasted amounts in projected periods up to EOL. Additionally, provide primary source materials relied upon for developing FPL's EOL M&S Salvage.
7. In descending order, please identify the top 3 highest value items in the EOL M&S inventory at the St. Lucie Nuclear Station and the related value amounts.
8. See the 2025 St. Lucie Study, Section 2, Page 8 of 11, which states, "These inventories (EOL Materials and Supplies) are unique and will have little value other than scrap value when the units are decommissioned." In the 2025 St. Lucie Study, Section 7, Support Schedule E, Page 1 of 1, FPL has estimated the value of such St. Lucie Unit 2 inventories at \$1.9 million. Please further explain how FPL's estimated value of EOL M&S for St. Lucie was determined and if some portion of this amount is not related to scrap value. Please explain what that amount is and how it was measured.

For the following questions, please refer to FPL's 2025 Decommissioning Study for the Turkey Point Nuclear Unit Nos. 3 & 4 (2025 Turkey Point Study), Section 7.

9. Support Schedule E, Page 1 of 1, reflects values prepared as of December 31, 2025.
 - a. Based on the values in this schedule, please provide the current monthly and annual accrual amounts as of January 1, 2026.
 - b. Please provide an updated projected version of Support Schedule E, including monthly and annual accrual amounts, prepared as of the accrual date of January 1, 2030
 - c. State assumptions incorporated into the values provided in response to Question 9.b above.
10. Please provide a spreadsheet (with formulas intact and cells unlocked) showing the development of the data appearing in response to Question 9.a and 9.b above.
11. Please explain the major factors causing the increase in the Adjusted Ending Inventory Value @ End of License reflected on the 2025 Turkey Point Study, Section 7, Support Schedule E, Page 1 of 1, Line 1 (\$56,354,176 in the 2025 Study versus \$43,794,727 in the 2020 Study).
12. If the license extension received for the Turkey Point Station is included in FPL's response to Question 11. above, please quantify the impact to the Adjusted Ending Inventory @ End of License, FPL's Ownership Share Net of Participants (Line 5), and the EOL M&S accrual recovery.
13. Please identify the principle reasons why the value of EOL M&S Salvage in the 2025 Study (approximately \$1.9 million) is significantly higher than the amount in the 2020 Study (about \$914 thousand). Specify in your response what portion of the increase is attributable to current M&S Salvage amounts versus what portion of the increase is attributable to forecasted amounts in projected periods up to EOL. Additionally, provide primary source materials relied upon for developing FPL's EOL M&S Salvage.
14. In descending order, please identify the top 3 highest value items in the EOL M&S inventory at the Turkey Point Nuclear Station and the related value amounts.

15. Please state the scheduled final cycles of operation for each of the following units:
 - a. St. Lucie Unit 1:
 - b. St. Lucie Unit 2:
 - c. Turkey Point Unit 3:
 - d. Turkey Point Unit 4:
16. For each unit identified below, state the date of the most recently completed refueling. As of that date, state the estimated residual value of unburned nuclear fuel at each facility.
 - a. St. Lucie Unit 1:
 - b. St. Lucie Unit 2:
 - c. Turkey Point Unit 3:
 - d. Turkey Point Unit 4:
17. In the 2025 St. Lucie Study, Section 2, FPL's Ownership Allocation (%) for St. Lucie Unit No. 2 is listed as 86.63 percent, with the balance of ownership divided between Florida Municipal Power Agency and Orlando Utilities Commission. In the same section under *End of Life Last Core Nuclear Fuel Values*, the estimated cost of unburned fuel remaining in the reactor at the end of life (end of license) for St. Lucie Unit No. 2 (net of Participant's costs) is \$197,800,000. Please clarify if this amount (\$197,800,000) represents the combined cost for all owners, or whether FPL is only responsible for 86.63 percent of this amount. If applicable, explain in your response if FPL is responsible for collecting monies from co-owners at end of life.

18. Using Table 1 found below, please answer the following questions concerning the percent change from the previous 5 years found on Line 2.
- As shown for St. Lucie Unit 1, the percent change in the future estimated cost of unburned fuel (Line 1) in 2025 compared to 2020 is 307 percent. Please provide a detailed explanation or justification for the 307 percent increase.
 - As shown for St. Lucie Unit 2, the percent change in the future estimated cost of unburned fuel (Line 1) in 2025 compared to 2020 is 255 percent. Please provide a detailed explanation or justification for the 255 percent increase.
 - Please state why the percent change in the future estimated cost of unburned fuel (Line 1) from 2020 to 2025 had such large increases when compared to the percent changes from 2015 to 2020.

Table 1., Compiled Information for St. Lucie Units 1 and 2

	St. Lucie Unit 1			St. Lucie Unit 2		
	2015	2020	2025	2015	2020	2025
1 Estimated Cost of Unburned Fuel @ End of License (FPL's Ownership Share net of Participants)	\$89,300,000	\$56,900,000	\$231,500,000	\$98,700,000	\$55,700,000	\$197,800,000
2 Percent Change from Previous 5 years (Estimated Cost of Unburned Fuel @ End of License)	-	-36%	307%	-	-44%	255%
3 Actual Reserve Balance at 12/31/2025	\$24,907,651	\$40,639,303	\$47,437,854	\$17,878,608	\$32,439,890	\$39,144,037
4 Percent Change From Previous 5 Years (Actual Reserve Balance)	-	63%	17%	-	81%	21%
5 Remaining Amount to be Recovered as of 12/31/2025	\$64,392,349	\$16,260,697	\$184,062,146	\$80,821,392	\$23,260,110	\$158,655,963
6 Percent Change From Previous 5 Years (Remaining Amount to be Recovered)	-	-75%	1032%	-	-71%	582%
7 Total Number of Months From: 12/31/20XX to End of License:	242.5	182.5	362.5	327.5	267.5	447.5

2015 data from Support Schedule F in Docket No. 20150265-EI (Document No. 07868-2015); 2020 data from Support Schedule F in Docket No. 20200257-EI (Document No. 13466-2020); 2025 data from Support Schedule F in Docket No. 20250143-EI (Document No. 15414-2025)

19. Using Table 2 found below, please answer the following questions concerning the percent change from the previous 5 years found on Line 2.
- As shown for Turkey Point Unit 3, the percent change in the future estimated cost of unburned fuel (Line 1) in 2025 compared to 2020 is 51 percent. Please provide a detailed explanation or justification for the 51 percent increase.
 - As shown for Turkey Point Unit 4, the percent change in the future estimated cost of unburned fuel (Line 1) in 2025 compared to 2020 is 116 percent. Please provide a detailed explanation or justification for the 116 percent increase.
 - Please state why the percent change in the future estimated cost of unburned fuel (Line 1) from 2020 to 2025 had such large increases when compared to the percent changes from 2015 to 2020.

Table 2., Compiled Information for Turkey Point Units 3 and 4

		Turkey Point Unit 3			Turkey Point Unit 4		
		2015	2020	2025	2015	2020	2025
1	Estimated Cost of Unburned Fuel @ End of License (FPL's Ownership Share net of Participants)	\$67,500,000	\$65,300,000	\$98,300,000	\$62,700,000	\$63,800,000	\$138,100,000
2	Percent Change from Previous 5 years (Estimated Cost of Unburned Fuel @ End of License	-	-3%	51%	-	2%	116%
3	Actual Reserve Balance at 12/31/2025	\$25,061,121	\$38,235,239	\$43,916,617	\$21,048,106	\$33,626,367	\$39,473,890
4	Percent Change From Previous 5 Years (Actual Reserve Balance)	-	53%	15%	-	60%	17%
5	Remaining Amount to be Recovered as of 12/31/2025	\$42,438,879	\$27,064,761	\$54,383,383	\$41,651,894	\$30,173,633	\$98,626,110
6	Percent Change From Previous 5 Years (Remaining Amount to be Recovered)	-	-36%	101%	-	-28%	227%
7	Total Number of Months From: 12/31/20XX to End of License:	198.5	378.5	318.5	207.5	387.5	327.5

2015 data from Support Schedule F in Docket No. 20150265-EI (Document No. 07868-2015); 2020 data from Support Schedule F in Docket No. 20200257-EI (Document No. 13466-2020); 2025 data from Support Schedule F in Docket No. 20250143-EI (Document No. 15414-2025)

20. Did EnergySolutions, LLC perform the analysis to develop the 2025 estimated cost of unburned fuel remaining in the reactor at end of life found in Line 1 of Tables 1 and 2? If so, please state what information EnergySolutions, LLC relied on in order to estimate the costs. If not, please describe the analysis or modeling used for this estimation.
21. Please refer to the 2025 St. Lucie Study, Section 8, Support Schedule F, Page 1 of 1 with values prepared as of December 31, 2025. Please provide an updated version of Schedule F showing all values prepared as of the accrual date of January 1, 2030.
22. Please provide a spreadsheet (with formulas intact and cells unlocked) showing the development of the data appearing in response to Question 21.
23. Please identify what assumptions are incorporated into the estimated values shown in the updated 2025 St. Lucie Study Schedule F prepared as of the accrual date of January 1, 2030 for St. Lucie Units 1 and 2.
24. What is the resulting annual amortization of End of Life Nuclear Fuel from January 1, 2030 to the end of license for St. Lucie Units 1 and 2?
25. Please refer to the 2025 Turkey Point Study, Section 8, Support Schedule F Page 1 of 1 with values prepared as of December 31, 2025. Please provide an updated version of Schedule F showing all values prepared as of the accrual date of January 1, 2030.
26. Please provide a spreadsheet (with formulas intact and cells unlocked) showing the development of the data appearing in response to Question 25.
27. Please identify what assumptions are incorporated into the estimated values shown in the updated 2025 Turkey Point Study Schedule F prepared as of the accrual date of January 1, 2030 for Turkey Point Units 3 and 4.
28. What is the resulting annual amortization of End of Life Nuclear Fuel from January 1, 2030 to the end of license for Turkey Point 3 and 4?

29. The 2025 St. Lucie Study, Section 12, Page 11 of 45, and similar text in the 2025 Turkey Point Study, Section 11 , Page 10 of 43 states, in part,

In January 2013, DOE (Department of Energy) released its "Strategy for Management and Disposal of Used Nuclear Fuel and High-Level Radioactive Waste" (Ref. No. 5). The DOE Strategy contemplates building the capability to begin executing DOE's commitment to address waste disposal within the next ten years. Under this strategy, by 2021, operation would begin of a "pilot storage facility" with an "initial focus on accepting spent fuel from shutdown reactor sites." By 2025, a "larger interim storage facility" would be available and by 2048 a geologic repository would commence operations. For purposes of this estimate, FPL has assumed the DOE pickup of commercial fuel to begin in 2034. The DOE starts accepting spent fuel from the St. Lucie facility in 2037 [and 2035 for Turkey Point] and the acceptance rate is consistent with the 2004 "Acceptance Priority Ranking & Annual Capacity Report" (Ref. No. 6), which is the most current information regarding the acceptance of spent fuel.

- a. A DOE strategy document is referenced in this text. Please state the date of the last known update to this document. If known, provide an estimate of when the next update of the referenced document will be published.
- b. The DOE strategy document references a timeline of "within the next ten years." Has this been met? If not, why not, and please explain how this delay impacts decommissioning costs at St. Lucie Units 1 and 2 and Turkey Point Units 3 and 4.
- c. The DOE strategy document references a "pilot storage facility." Please state what information is known about this facility, and explain how it is relevant to estimated decommissioning costs at the St. Lucie Units 1 and 2 and Turkey Point Units 3 and 4.
- d. The DOE strategy document references a "larger interim storage facility." Please state what information is known about this facility, and explain how it is relevant to estimated decommissioning costs at the St. Lucie Units 1 and 2 and Turkey Point Units 3 and 4.
- e. The above-cited text references the 2004 Acceptance Priority Ranking and Annual Capacity Report. In 2004, what priority rankings were given to St. Lucie Units 1 and 2 and Turkey Point Units 3 and 4? Since that time, have those rank positions changed? If applicable, describe the changes and state why.

30. Please explain how the 2025 Decommissioning Cost Estimate of the St. Lucie Nuclear Plant, Units 1 and 2 and, the similar study for Turkey Point Units 3 and 4, adequately addresses the cost and other risks from very limited and decades-old guidance from the federal government.
31. Please refer to the 2025 St. Lucie Study, Support Schedule G, Pages 7-8 of 8, columns labeled "Tax Savings," for the following requests. Also refer to the 2025 Turkey Point Study, Sections 9, Support Schedule G, Pages 7-8 of 8, columns labeled "Tax Savings," for the following requests.
 - a. Please discuss the methodology used to calculate the "Tax Savings" for each year.
 - b. Should the "Tax Savings" associated with the expenditures from the qualified portion of the Nuclear Decommissioning Trust be calculated using FPL's corporate tax rate of 25.345 percent? Please explain any response.
 - c. Please explain in detail the specific factor(s) driving the variance in the effective tax saving rates between St. Lucie Units 1 and 2 as well as Turkey Point Units 3 and 4.
32. For the purposes of the following requests, please refer to the 2025 St. Lucie Study, Section 12, Page 5 of 9, Table 2. In addition, please refer to the 2025 Turkey Point Study, Section 11, Page 5 of 9, Table 2.
 - a. Please more fully explain each of the cost elements listed in these summary tables, including a sample listing of what each cost element contains.
 - b. Please identify which aggregate category – Nuclear Regulatory Commission License Termination, Spent Fuel Management, or Site Restoration – that each of the cost elements identified in 39a. is assigned to.
 - c. Please explain how the Corporate Support (fixed overhead) charges shown in this summary table were developed.
 - d. Please identify the Corporate Support (fixed overhead) percent used in the decommissioning cost studies.

33. For the following requests, please refer to the 2025 St. Lucie Study, Section 2, Page 11 of 11, as well as the 2025 Turkey Point Study, Section 2, Page 9 of 9.
- a. Since the 2020 Study, has the company received any additional Spent Nuclear Fuel (SNF) reimbursements from the Federal Government as a result of the 2009 Settlement Agreement? If yes, please identify the cost and the date each cost was incurred, as well as the associated reimbursement amount and the date each associated reimbursement was received (Please present the reimbursement amounts as incremental to the total of \$282,255,686 provided in Order No. PSC-2021-0232-PAA-EI, page 10).
 - b. Please specify when these reimbursements detailed in 33.a have been/will be credited to ratepayers and through what mechanism.
 - c. Are there any cost recovery amounts currently being litigated? If so, please provide an update on the litigation proceedings.
 - d. Please explain the basis for segregating DOE recoverable SNF management costs (as specified in the 2025 St. Lucie Study,, Section 2, Page 11 of 11 and in the 2025 Turkey Point Study, Section 2, Page 9 of 9 and DOE non-recoverable costs of SNF management. Refer to FPL's Total SNF costs in the 2025 St. Lucie Study, Section 11, Page 36 of 45, Table 6-1 and in the 2025 Turkey Point Study, Section 10, Page 35 of 43, Table 6-1.
34. FPL stated in its last Decommissioning Study that it was unaware of any state jurisdictions that have not allowed utilities to include SNF settlements in their decommissioning funding analyses (Dkt. 20200257-EI, Document No. 02585-2021, Request No. 72, Page 1 of 1). Does FPL have any update to this response? If so, please include the respective order numbers with the decisions.
35. In the 2020 Study, the company states that it still assumed DOE will begin any transfers/pick up of commercial SNF in 2030, with pickups/transfers from Turkey Point beginning in 2031 and from St. Lucie beginning in 2033 (Dkt. 20200257-EI, Document No. 02585-2021, Request No. 73, Page 1 of 1). However, in the 2025 Study, FPL adjusts these projections to a 2034 beginning pickup/transfer date for DOE, with pickups/transfers from Turkey Point beginning in 2035 and from St. Lucie beginning in 2037. Please explain the basis for FPL's change in the expected date for DOE to begin any transfers/pick up of commercial SNF as well as the change in expected date for Turkey Point and St. Lucie transfers/pickups of commercial SNF.

36. Please refer to the 2025 St. Lucie Study, Section 11, Page 32-35 of 45 and the 2025 Turkey Point Study, Section 10, Page 32-35 of 45 for the following requests.
- a. Why does EnergySolutions not include Independent Spent Fuel Storage Installation (ISFSI) expansion costs in their cost estimate (per assumption No. 37 for St. Lucie and assumption No. 35 for Turkey Point) despite its recognition that such an expansion may be required?
 - b. EnergySolutions states (in assumption No. 37 for St. Lucie and assumption No. 35 for Turkey Point) that both St. Lucie and Turkey Point both have existing ISFSI's on site and construction costs for any required expansion are not included in its estimate. However, the narratives in the 2025 St. Lucie Study, Section 2, Page 10 of 11 and the 2025 Turkey Point Study, Section 2, Page 8 of 9, read, "This updated 2025 decommissioning study includes the costs relating to the *construction*, operation, and dismantlement of an on-site independent spent fuel storage installation (ISFSI) that is required to accommodate the timely decommissioning of the St. Lucie (Turkey Point) units." Please explain if these statements are contradictory, and quantify what ISFSI construction costs, if any, were included in FPL's 2025 Nuclear Decommissioning Study.
 - c. What is the available capacity of the existing ISFSIs and when does FPL anticipate the ISFSFI's may reach capacity?
 - d. What is FPL's inventory of dry casks and other dry storage containment structures and materials at the St. Lucie and Turkey Point nuclear units, and when does FPL anticipate that these inventories will be placed into service?
37. Please identify the annual pre-shutdown spent fuel management costs (historical and projected) associated with the spent fuel pools and the ISFSIs for St. Lucie and Turkey Point Nuclear Units how and when such costs have been or will be recovered from FPL customers, and the amount and timing of related DOE reimbursements.
38. Please refer to the 2025 St. Lucie Study, Section 12, Pages 5-6 of 9 and the 2025 Turkey Point Study, Section 11, Page 5-6 of 9 for the following questions.
- a. Comparing FPL's 2025 nuclear decommissioning study to its last study (2020), please elaborate on why EnergySolutions' property tax projections have decreased 43.9 percent for St. Lucie but are increasing 1.8 percent for Turkey Point.
 - b. Please explain the reasons for the increase in the "Corporate Support" cost element for both the St Lucie (13.9 percent) and Turkey Point (13.1 percent).

39. Please refer to the 2025 St. Lucie Study, Section 11, Page 14 of 45 and the 2025 Turkey Point Study, Section 10, Page 14 of 43. The narrative states, "Transportation costs for the selected routes and modes are obtained from vendor quotes or published tariffs whenever possible." Please identify the published tariffs used to determine transportation costs.

Please file all responses electronically no later than Thursday, March 5, 2026, through the Commission's website at www.floridapsc.com, by selecting the Clerk's Office tab and Electronic Filing Web Form. *In addition, please email the filed response to discovery-gcl@psc.state.fl.us.*

Please feel free to call me at (850) 413-6524 if you have any questions.

Sincerely,

/s/ Zachary Bloom
Zachary Bloom
Attorney

ZB/ds

cc: Office of Commission Clerk