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March 5, 2026

-VIA ELECTRONIC FILING-

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

**RE: Docket 20250143-EI
Florida Power & Light Company's 2025 Nuclear Decommission Study**

Dear Mr. Teitzman:

Enclosed for filing in the above-referenced docket is Florida Power & Light Company's ("FPL") response to the Florida Public Service Commission Staff's Second Data Request (Nos. 1-39) pertaining to FPL's 2025 Nuclear Decommission Study.

If there are any questions regarding this transmittal, please contact me at (561) 304-5662.

Sincerely,

/s/ William P. Cox
William P. Cox
Fla. Bar No. 0093531

Enclosure
cc: discovery-gcl@psc.state.fl.us
zbloom@psc.state.fl.us

Florida Power & Light Company
Docket No. 20250143-EI
Staff's Second Data Request
Request No. 1
Page 1 of 1

QUESTION:

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.

RESPONSE:

Currently, FPL does not have a set time for the filing of its next base rate case. FPL's current End of Life Materials and Supplies inventory expense accrual resulting from the 2020 Decommissioning Study for both St Lucie and Turkey Point Plants will remain unchanged until such time FPL proposes a change in a future base rate proceeding.

**Florida Power & Light Company
Docket No. 20250143-EI
Staff's Second Data Request
Request No. 2
Page 1 of 1**

QUESTION:

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.

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 above.

RESPONSE:

- a. and b. Refer to Attachment No. 1 to this response for the requested calculations of End-of-Life Materials and Supplies ("EOL M&S") Inventory accruals effective January 1, 2026, and January 1, 2030.
- c. For subpart (b), FPL utilized the current accrual amounts approved by the Florida Public Service Commission in the 2020 Decommissioning Study (Order No. PSC-2021-0232-PAA-EI, Docket. No. 20200257-EI) to calculate an estimated reserve balance as of December 31, 2029, and the current estimated retirement date of April 6, 2063.

Florida Power and Light Company
2025 Decommissioning Study
End-of-Life Materials and Supplies Inventory
Estimated Accrual as of 1/1/2026

| <u>Line Number</u> | | <u>St. Lucie Unit 2</u> | |
|--------------------|--|-----------------------------|-------------------------|
| 1 | Adjusted Ending Inventory Value @ End of License | \$ 55,988,014 | <i>a</i> |
| 2 | Estimated Salvage | <u>(1,913,304)</u> | <i>b</i> |
| 3 | Inventory Subject to Write-off | <u>\$ 54,074,710</u> | <i>c = (a+b)</i> |
| 4 | | | |
| 5 | FPL's Ownership Share Net of Participants⁽¹⁾ | \$ 50,047,358 | <i>d = (c * 92.55%)</i> |
| 6 | | | |
| 7 | Actual Reserve Balance Accrued as of 12/31/25 | <u>13,716,628</u> | <i>e</i> |
| 8 | | | |
| 9 | Remaining Amount to be Recovered as of 12/31/25 | <u>\$ 36,330,730</u> | <i>f = (d-e)</i> |
| 10 | | | |
| 11 | | | |
| 12 | Total Number of Months From: | | |
| 13 | 12/31/25 to End of License ⁽²⁾ | 447.5 | <i>g</i> |
| 14 | | | |
| 15 | Estimated Accrual Effective 01/01/2026 | | |
| 16 | Monthly | 81,186 | <i>h = (f/g)</i> |
| 17 | Annual | 974,232 | <i>i = (h * 12)</i> |
| 18 | | | |
| 19 | Note: | | |
| 20 | ⁽¹⁾ For PSL: The Participants' obligation is assumed to be treated the same as "Common Facility Cost" | | |
| 21 | which is calculated at one-half their ownership percentage. (0.5 * 14.89551% = 7.447755%) | | |
| 22 | Therefore, FPL's ownership share is 92.552245%. | | |
| 23 | ⁽²⁾ End of License for PSL unit 2 is 4/6/2063 | | |
| 24 | | | |

Florida Power and Light Company
2025 Decommissioning Study
End-of-Life Materials and Supplies Inventory
Estimated Accrual as of 1/1/2030

| <u>Line Number</u> | | <u>St. Lucie Unit 2</u> | |
|--------------------|--|-----------------------------|-------------------------|
| 1 | Adjusted Ending Inventory Value @ End of License | \$ 55,988,014 | <i>a</i> |
| 2 | Estimated Salvage | (1,913,304) | <i>b</i> |
| 3 | Inventory Subject to Write-off | <u>\$ 54,074,710</u> | <i>c = (a+b)</i> |
| 4 | | | |
| 5 | FPL's Ownership Share Net of Participants ⁽¹⁾ | \$ 50,047,358 | <i>d = (c * 92.55%)</i> |
| 6 | | | |
| 7 | Actual Reserve Balance Accrued as of 12/31/2025 | 13,716,628 | <i>e</i> |
| 8 | | | |
| 9 | Current Annual Accrual ⁽²⁾ | \$ 984,842 | <i>f</i> |
| 10 | Incremental Accumulated Accruals for 2026-2029 | 3,939,368 | <i>g = (f*4)</i> |
| 11 | Estimated Reserve Balance Accrued as of 12/31/2029 | \$ 17,655,996 | <i>h = (e+g)</i> |
| 12 | | | |
| 13 | Remaining Amount to be Recovered as of 01/01/2030 | <u>\$ 32,391,362</u> | <i>i = (d-h)</i> |
| 14 | | | |
| 15 | | | |
| 16 | Total Number of Months From: | | |
| 17 | 12/31/29 to End of License ⁽³⁾ | 399.5 | <i>j</i> |
| 18 | | | |
| 19 | Estimated Accrual Effective 01/01/30 | | |
| 20 | Monthly | 81,080 | <i>k = (i/j)</i> |
| 21 | Annual | 972,957 | <i>l = (k * 12)</i> |
| 22 | | | |
| 23 | Note: | | |
| 24 | ⁽¹⁾ For PSL: The Participants' obligation is assumed to be treated the same as "Common Facility Cost" | | |
| 25 | which is calculated at one-half their ownership percentage. (0.5 * 14.89551% = 7.447755%) | | |
| 26 | Therefore, FPL's ownership share is 92.552245%. | | |
| 27 | ⁽²⁾ | | |
| 28 | ⁽³⁾ End of License for PSL unit 2 is 4/6/2063 | | |
| 29 | | | |
| 30 | | | |
| 31 | | | |
| 32 | | | |

**Florida Power & Light Company
Docket No. 20250143-EI
Staff's Second Data Request
Request No. 3
Page 1 of 1**

QUESTION:

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.

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.

RESPONSE:

Please refer to FPL's response to Staff's Second Data Request No. 2, Attachment 1.

**Florida Power & Light Company
Docket No. 20250143-EI
Staff's Second Data Request
Request No. 4
Page 1 of 1**

QUESTION:

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.

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)).

RESPONSE:

The approximate \$22 million increase of the estimated Adjusted Ending Inventory Value at the end of the license between FPL's 2025 Decommissioning Study and 2020 Decommissioning Study is primarily due to the license extension for St Lucie Units 1 and 2, which occurred subsequent to FPL's 2020 Decommissioning Study. This extension for an additional 20 years requires FPL to maintain a higher inventory balance over an extended period, with the ramp-down phase beginning later than originally anticipated.

**Florida Power & Light Company
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Staff's Second Data Request
Request No. 5
Page 1 of 1**

QUESTION:

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.

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.

RESPONSE:

Please refer to FPL's response to Staff's Second Set of Data Request, No. 4. The approximate \$22 million increase in the M&S inventory balance is related to the license extension.

**Florida Power & Light Company
Docket No. 20250143-EI
Staff's Second Data Request
Request No. 6
Page 1 of 1**

QUESTION:

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.

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.

RESPONSE:

The value of EOL M&S Salvage in the 2025 Study is approximately 324% greater when compared to the 2020 Study. This is primarily due to a higher estimated salvage value percentage assumed in FPL's 2025 Decommissioning Study of 3.4% versus 2.1% assumed in FPL's 2020 Decommissioning Study. Nuclear inventory is unique and will have little value other than scrap value when the units are decommissioned. FPL calculated the estimated salvage value percentage of its EOL M&S based on historical obsolete inventory sales, and believes it is a reasonable estimate of what the Company could expect to receive in the future. Refer to Attachment No. 1 to this response to see how FPL developed the \$1.9 million estimated salvage value in the 2025 Decommissioning Study.

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Attachment 1 of 1
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| <u>PLANT</u> | <u>DATE</u> | <u>PART</u> | <u>EACH</u> | <u>SELLING PRICE</u> | <u>BOOK PRICE</u> | Salvage Value % | Book Value % | weighted Salvage Value % |
|--------------|-------------|---------------|-------------|----------------------|-------------------|------------------------|---------------------|---------------------------------|
| PSL | 11/17/2022 | Relay | 3 | \$1,300 | \$2,663 | 48.82% | 2% | 0.73% |
| PSL | 4/26/2023 | Relay | 1 | \$114 | \$758 | 15.04% | 0% | 0.06% |
| PSL | 4/26/2023 | Regulator | 1 | \$5 | \$2,711 | 0.18% | 2% | 0.00% |
| PSL | 4/26/2023 | Breaker | 1 | \$1,500 | \$17,178 | 8.73% | 10% | 0.85% |
| PTN | 4/26/2023 | Valve, Relief | 1 | \$48 | \$2,381 | 1.99% | 1% | 0.03% |
| PTN | 4/26/2023 | Circuit Board | 2 | \$38 | \$9,750 | 0.39% | 5% | 0.02% |
| PTN | 4/26/2023 | Power Supply | 1 | \$1,093 | \$34,119 | 3.20% | 19% | 0.62% |
| PTN | 4/26/2023 | Valve | 1 | \$10 | \$14,994 | 0.06% | 8% | 0.01% |
| PTN | 4/26/2023 | Spring | 1 | \$5 | \$6,595 | 0.07% | 4% | 0.00% |
| PTN | 4/26/2023 | Thermostat | 1 | \$48 | \$429 | 11.08% | 0% | 0.03% |
| PTN | 4/26/2023 | Relay | 1 | \$29 | \$2,874 | 0.99% | 2% | 0.02% |
| PTN | 4/26/2023 | Recitifier | 1 | \$10 | \$3,943 | 0.24% | 2% | 0.01% |
| PTN | 4/26/2023 | Switch | 1 | \$1,520 | \$8,382 | 18.13% | 5% | 0.86% |
| PTN | 4/26/2023 | Valve | 1 | \$219 | \$3,020 | 7.23% | 2% | 0.12% |
| PTN | 4/26/2023 | Switch | 1 | \$24 | \$731 | 3.25% | 0% | 0.01% |
| PTN | 4/26/2023 | Switch | 1 | \$71 | \$3,888 | 1.83% | 2% | 0.04% |
| PTN | 4/26/2023 | CPU | 1 | \$29 | \$50,352 | 0.06% | 28% | 0.02% |
| PTN | 4/26/2023 | Controller | 1 | \$5 | \$12,658 | 0.04% | 7% | 0.00% |
| Total | | | | \$6,063 | \$177,426 | | 100% | 3.42% |

Adjusted Ending Inventory Value @ End of License 55,988,014
Estimated Salvage (1,913,304)

**Florida Power & Light Company
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Staff's Second Data Request
Request No. 7
Page 1 of 1**

QUESTION:

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.

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.

RESPONSE:

The three highest value items in EOL M&S inventory in 2025 dollars at St. Lucie Nuclear Station are stated below:

- | | |
|-------------------------------------|----------------|
| 1. Valves | \$31.4 million |
| 2. Electric switches, relays, fuses | \$15.6 million |
| 3. Fasteners | \$12.3 million |

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Request No. 8
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QUESTION:

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.

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.

RESPONSE:

FPL estimated the amount of EOL M&S inventory at the end of license by using the inventory balance as of October 31, 2025, and updating the figure annually based on forecasted issuances and purchases, in order to estimate the inventory balance upon license expiration. The portion of the total EOL M&S inventory amount for the St. Lucie Nuclear Station related to scrap is \$1.9 million. For additional information on how FPL determined the portion related to salvage, please refer to FPL's response to Staff's Second Data Request, No. 6.

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Staff's Second Data Request
Request No. 9
Page 1 of 1**

QUESTION:

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.

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.

RESPONSE:

- a. and b. Please refer to Attachment 1 to this response.
- c. For subpart (b), FPL utilized the current accrual amounts approved by the FPSC in the 2020 Decommissioning Study (Order No. PSC-2021-0232-PAA-EI, Docket. No. 20200257-EI) to calculate an estimated reserve balance as of December 31, 2029, and the current estimated retirement date of April 10, 2053.

Florida Power and Light Company
2025 Decommissioning Study
End-of-Life Materials and Supplies Inventory
Estimated Balances as of 1/1/2026

| Line Number | | Turkey Point Unit 4 | |
|-------------|--|----------------------|--------------|
| 1 | Adjusted Ending Inventory Value @ End of License | \$ 56,354,176 | a |
| 2 | Estimated Salvage | (1,925,817) | b |
| 3 | Inventory Subject to Write-off | <u>\$ 54,428,359</u> | c = (a+b) |
| 4 | | | |
| 5 | FPL's Ownership Share Net of Participants | \$ 54,428,359 | d = c |
| 6 | | | |
| 7 | Actual Reserve Balance Accrued as of 12/31/2025 | <u>24,824,210</u> | e |
| 8 | | | |
| 9 | Remaining Amount to be Recovered as of 12/31/25 | <u>\$ 29,604,149</u> | f = (d-e) |
| 10 | | | |
| 11 | | | |
| 12 | Total Number of Months From: | | |
| 13 | 12/31/25 to End of License ⁽¹⁾ | 327.5 | g |
| 14 | | | |
| 15 | Estimated Accrual Effective 01/01/26 | | |
| 16 | Monthly | 90,394 | h = (f/g) |
| 17 | Annual | 1,084,732 | i = (h * 12) |
| 18 | | | |
| 19 | Note: | | |
| 20 | ⁽¹⁾ End of License PTN unit 4 is 4/10/2053 | | |
| 21 | | | |
| 22 | | | |

Florida Power and Light Company
2025 Decommissioning Study
End-of-Life Materials and Supplies Inventory
Estimated Balances as of 1/1/2030

| Line Number | | Turkey Point Unit 4 | |
|-------------|---|----------------------|--------------|
| 1 | Adjusted Ending Inventory Value @ End of License | \$ 56,354,176 | a |
| 2 | Estimated Salvage | (1,925,817) | b |
| 3 | Inventory Subject to Write-off | <u>\$ 54,428,359</u> | c = (a+b) |
| 4 | | | |
| 5 | FPL's Ownership Share Net of Participants | \$ 54,428,359 | d = c |
| 6 | | | |
| 7 | Actual Reserve Balance Accrued as of 12/31/2025 | 24,824,210 | e |
| 8 | | | |
| 9 | Current Annual Accrual ⁽¹⁾ | \$ 661,614 | f |
| 10 | Incremental Accumulated Accruals for 2026-2029 | 2,646,456 | g = (f*4) |
| 11 | Estimated Reserve Balance Accrued as of 12/31/2029 | <u>\$ 27,470,666</u> | h = (e+g) |
| 12 | | | |
| 13 | Remaining Amount to be Recovered as of 01/01/2030 | <u>\$ 26,957,693</u> | i = (d-h) |
| 14 | | | |
| 15 | | | |
| 16 | Total Number of Months From: | | |
| 17 | 12/31/29 to End of License ⁽²⁾ | 279.5 | j |
| 18 | | | |
| 19 | Estimated Accrual Effective 01/01/30 | | |
| 20 | Monthly | 96,450 | k = (i/j) |
| 21 | Annual | 1,157,396 | l = (k * 12) |
| 22 | | | |
| 23 | Note: | | |
| 24 | ⁽¹⁾ Approved by Order No. PSC-2021-0232-PAA-EI | | |
| 25 | ⁽²⁾ End of License PTN unit 4 is 4/10/2053 | | |
| 26 | | | |
| 27 | | | |
| 28 | | | |

**Florida Power & Light Company
Docket No. 20250143-EI
Staff's Second Data Request
Request No. 10
Page 1 of 1**

QUESTION:

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.

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.

RESPONSE:

Please refer to FPL's response to Staff's Second Data Request No. 9, Attachment 1.

**Florida Power & Light Company
Docket No. 20250143-EI
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Request No. 11
Page 1 of 1**

QUESTION:

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.

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).

RESPONSE:

The \$12.6 million increase in the amount of the estimated Adjusted Ending Inventory Value at the end of license is primarily related to updated inflation factors used for those calculation periods, as well as a lower inventory turnover of 18.24% in 2025 compared to 26.34% in 2020.

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Request No. 12
Page 1 of 1**

QUESTION:

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.

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.

RESPONSE:

As explained in FPL's response to Staff's Second Data Request, No. 11, license extension for Turkey Points Units 1 & 2 is not a contributing factor for the increase in the amount of FPL's estimated Adjusted Ending Inventory at End of License in the 2025 Decommissioning Study.

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Docket No. 20250143-EI
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Request No. 13
Page 1 of 1**

QUESTION:

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.

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.

RESPONSE:

The value of EOL M&S Salvage in the 2025 Study is approximately \$1.0 million greater when compared to the 2020 Study. This is primarily due to a higher estimated salvage value percentage assumed in FPL's 2025 Decommissioning Study of 3.4% versus 2.1% assumed in FPL's 2020 Decommissioning Study. This 1.3% increase is a result of the increased salvage value for its historical obsolete inventory sales, accompanied by the increase in the ending inventory value at the end of the license.

Nuclear inventory is unique and will have little value other than scrap value when the units are decommissioned. FPL calculated the estimated salvage value percentage of its EOL M&S based on historical obsolete inventory sales, and believes it is a reasonable estimate of what the Company could expect to receive in the future. Refer to Attachment No. 1 to this response for how FPL developed the \$1.9 million estimated salvage value in the 2025 Decommissioning Study.

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Attachment 1 of 1
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| <u>PLANT</u> | <u>DATE</u> | <u>PART</u> | <u>EACH</u> | <u>SELLING PRICE</u> | <u>BOOK PRICE</u> |
|--------------|-------------|---------------|-------------|----------------------|---------------------|
| PSL | ##### | Relay | 3 | \$1,300.00 | \$2,662.72 |
| PSL | 4/26/2023 | Relay | 1 | \$114.00 | \$758.19 |
| PSL | 4/26/2023 | Regulator | 1 | \$4.75 | \$2,711.11 |
| PSL | 4/26/2023 | Breaker | 1 | \$1,500.00 | \$17,178.00 |
| PTN | 4/26/2023 | Valve, Relief | 1 | \$47.50 | \$2,380.98 |
| PTN | 4/26/2023 | Circuit Board | 2 | \$38.00 | \$9,750.00 |
| PTN | 4/26/2023 | Power Supply | 1 | \$1,092.50 | \$34,119.00 |
| PTN | 4/26/2023 | Valve | 1 | \$9.50 | \$14,994.00 |
| PTN | 4/26/2023 | Spring | 1 | \$4.75 | \$6,595.00 |
| PTN | 4/26/2023 | Thermostat | 1 | \$47.50 | \$428.68 |
| PTN | 4/26/2023 | Relay | 1 | \$28.50 | \$2,874.00 |
| PTN | 4/26/2023 | Recitifier | 1 | \$9.50 | \$3,942.90 |
| PTN | 4/26/2023 | Switch | 1 | \$1,520.00 | \$8,382.00 |
| PTN | 4/26/2023 | Valve | 1 | \$218.50 | \$3,020.31 |
| PTN | 4/26/2023 | Switch | 1 | \$23.75 | \$730.83 |
| PTN | 4/26/2023 | Switch | 1 | \$71.25 | \$3,888.00 |
| PTN | 4/26/2023 | CPU | 1 | \$28.50 | \$50,352.00 |
| PTN | 4/26/2023 | Controller | 1 | \$4.75 | \$12,658.00 |
| Total | | | | \$6,063.25 | \$177,425.72 |

| Salvage Value % | Book Value % | weigntea Salvage Value % |
|------------------------|---------------------|---------------------------------|
| 48.82% | 2% | 0.73% |
| 15.04% | 0% | 0.06% |
| 0.18% | 2% | 0.00% |
| 8.73% | 10% | 0.85% |
| 1.99% | 1% | 0.03% |
| 0.39% | 5% | 0.02% |
| 3.20% | 19% | 0.62% |
| 0.06% | 8% | 0.01% |
| 0.07% | 4% | 0.00% |
| 11.08% | 0% | 0.03% |
| 0.99% | 2% | 0.02% |
| 0.24% | 2% | 0.01% |
| 18.13% | 5% | 0.86% |
| 7.23% | 2% | 0.12% |
| 3.25% | 0% | 0.01% |
| 1.83% | 2% | 0.04% |
| 0.06% | 28% | 0.02% |
| 0.04% | 7% | 0.00% |
| | 100% | 3.42% |

56,354,176.00 **Adjusted Ending Inventory Value @ End of License**
(1,925,816.94) **Estimated Salvage**

**Florida Power & Light Company
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QUESTION:

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.

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.

RESPONSE:

The three highest value items in EOL M&S inventory in 2025 dollars at Turkey Point Nuclear Station are stated below:

- | | |
|-------------------------------------|----------------|
| 1. Electric Switches, Relays, Fuses | \$24.4 million |
| 2. Valves | \$16 million |
| 3. Electric Components | \$9.9 million |

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QUESTION:

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:

RESPONSE:

The scheduled final operating cycles for the units referenced in the request are provided below:

- a. St. Lucie Unit 1: 48
- b. St. Lucie Unit 2: 47
- c. Turkey Point Unit 3: 48
- d. Turkey Point Unit 4: 48

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QUESTION:

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:

RESPONSE:

The most recent refueling dates and the estimated residual unburned fuel values for each unit are provided below:

- a. St. Lucie Unit 1: 10/31/2025 \$ 97,987,783.48
- b. St. Lucie Unit 2: 10/14/2024 \$ 95,664,407.33
- c. Turkey Point Unit 3: 11/15/2024 \$ 70,412,280.38
- d. Turkey Point Unit 4: 04/04/2025 \$109,949,433.89

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QUESTION:

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.

RESPONSE:

The \$197,800,000 million End of Life (EOL) Nuclear Fuel Last Core Value for St Lucie Unit No. 2 represents only FPL's portion of 86.63% related to this cost and therefore does not include the co-owners share. At the time of decommissioning of the unit, FPL will bill the Participants for their share of costs associated with the EOL nuclear fuel last core according to the Participation Agreement terms.

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QUESTION:

Using Table 1 found below, please answer the following questions concerning the percent change from the previous 5 years found on Line 2.

- a. 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.
- b. 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.
- c. 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)

RESPONSE:

- a. As shown in Table 1, the percent change in the future estimated cost of unburned fuel at end of license for St. Lucie Unit 1 increased by 307% from the 2020 study to the 2025 study. The increase is primarily attributable to nuclear fuel purchases made at higher market-based prices than those assumed in the 2020 study. The 2025 analysis reflects updated market conditions and incorporates higher nuclear fuel purchase costs, which in turn increases the estimated value of unburned fuel remaining at the end of license.
- b. Similarly, the 255% increase in the future estimated cost of unburned fuel for St. Lucie Unit 2 from the 2020 study to the 2025 study is primarily due to nuclear fuel purchases at higher market-based prices. The 2025 estimate reflects updated market-based nuclear fuel cost inputs, which increase the estimated cost of unburned fuel at end of license.

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- c. The percent changes from 2020 to 2025 are larger than those observed from 2015 to 2020 because the later study reflects nuclear fuel purchases at higher market-based prices than those reflected in the earlier period. When these higher fuel cost inputs are compared against the lower cost of previously purchased fuel reflected in the 2020 study, the resulting percentage change is magnified.

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QUESTION:

Using Table 2 found below, please answer the following questions concerning the percent change from the previous 5 years found on Line 2.

- a. 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.
- b. 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.
- c. 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)

RESPONSE:

- a. As shown in Table 2, the percent change in the future estimated cost of unburned fuel at end of license for Turkey Point Unit 3 increased by 51% from the 2020 study to the 2025 study. The increase is primarily attributable to nuclear fuel purchases made at higher market-based prices than those assumed in the 2020 study. The 2025 analysis reflects updated market conditions and incorporates higher nuclear fuel purchase costs, which in turn increases the estimated value of unburned fuel remaining at the end of license.
- b. Similarly, the 116% increase in the future estimated cost of unburned fuel for Turkey Point Unit 4 from the 2020 study to the 2025 study is primarily due to nuclear fuel purchases at higher market-based prices. The 2025 estimate reflects updated market-based nuclear fuel cost inputs, which increase the estimated cost of unburned fuel at end of license.

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- c. The percent changes from 2020 to 2025 are larger than those observed from 2015 to 2020 because the later study reflects nuclear fuel purchases at higher market-based prices than those reflected in the earlier period. When these higher fuel cost inputs are compared against the lower cost of previously purchased fuel reflected in the 2020 study, the resulting percentage change is magnified.

QUESTION:

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.

RESPONSE:

No. EnergySolutions, LLC did not perform the analysis to develop the 2025 estimated cost of unburned fuel remaining in the reactor at end of life shown in Line 1 of Tables 1 and 2. The estimated cost of unburned fuel was calculated internally by FPL using the same methodology applied in prior studies.

The estimated cost of unburned fuel remaining at the Turkey Point and St. Lucie Nuclear Stations at the end of license reflects the aggregation of estimated unamortized acquisition costs of each fuel batch, prorated based on the percentage of unburned fuel remaining at the conclusion of the final operating cycle.¹ This approach reflects the portion of nuclear fuel costs that have not been recovered through generation at the time of plant shutdown.

¹**Calculation Formula:** Unburned Fuel Cost = (Batch 1 Acquisition Cost × Remaining Burnup %) + (Batch 2 Acquisition Cost × Remaining Burnup %) + (Batch 3 Acquisition Cost × Remaining Burnup %)

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QUESTION:

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.

RESPONSE:

Please refer to Attachment 1 to this response.

Florida Power and Light Company
2025 Decommissioning Study
End-of-Life Unamortized Nuclear Fuel
Estimated Balances as of 1/1/2030

| <u>Line Number</u> | | | <u>St. Lucie Unit 1</u> | <u>St. Lucie Unit 2</u> |
|--------------------|--|---------------------|------------------------------|------------------------------|
| 1 | Estimated Cost of Unburned Fuel @ End of License | | | |
| 2 | FPL's Ownership Share Net of Participants | <i>a</i> | \$ 231,500,000 | \$ 197,800,000 |
| 3 | | | | |
| 4 | Actual Reserve Balance at 12/31/2025 | <i>b</i> | 47,437,854 | 39,144,037 |
| 5 | | | | |
| 6 | Current Annual Accrual ⁽¹⁾ | <i>c</i> | 919,256 | 952,847 |
| 7 | Incremental Accumulated Accruals for 2026-2029 | <i>d = (c*4)</i> | <u>3,677,024</u> | <u>3,811,388</u> |
| 8 | Estimated Reserve Balance Accrued as of 12/31/2029 | <i>e = (b+d)</i> | 51,114,878 | 42,955,425 |
| 9 | | | | |
| 10 | | | | |
| 11 | Remaining Amount to be Recovered as of 01/01/2030 | <i>f = (a-b)</i> | <u>\$ 180,385,122</u> | <u>\$ 154,844,575</u> |
| 12 | | | | |
| 13 | | | | |
| 14 | Total Number of Months From: | | | |
| 15 | 12/31/2029 to End of License⁽²⁾: | <i>g</i> | 314.5 | 399.5 |
| 16 | | | | |
| 17 | Estiated Accrual From 1/1/2030 to End of License | | | |
| 18 | Monthly | <i>h = (c/d)</i> | 573,562 | 387,596 |
| 19 | Annual | <i>i = (e x 12)</i> | 6,882,739 | 4,651,151 |
| 20 | | | | |
| 21 | Note: | | | |
| 22 | ⁽¹⁾ Approved by Order No. PSC-2021-0232-PAA-EI | | | |
| 23 | ⁽²⁾ The end of life for PSL U1 and U2 is 03/2056 and 04/2063, respectively. | | | |

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QUESTION:

Please provide a spreadsheet (with formulas intact and cells unlocked) showing the development of the data appearing in response to Question 21.

RESPONSE:

Please refer to FPL's response to Staff's Second Data Request, No. 21, Attachment 1.

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QUESTION:

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.

RESPONSE:

FPL assumes this request is referring to FPL's calculation of St. Lucie Units 1 and 2 EOL Unamortized Nuclear Fuel accruals with an effective date of January 1, 2030 provided in its response to Staff's Second Data Request, No. 21. Based on this assumption, FPL utilized the current accrual amounts approved by the FPSC in the 2020 Decommissioning Study (Order No. PSC-2021-0232-PAA-EI, Docket. No. 20200257-EI) to calculate an estimated reserve balance as of December 31, 2029, and the current estimated retirement dates of March 1, 2053, and April 6, 2063, for St. Lucie Units 1 and 2, respectively.

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QUESTION:

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?

RESPONSE:

Please refer to FPL's response to Staff's Second Data Request, No. 21, Attachment 1.

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QUESTION:

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.

RESPONSE:

Please refer to Attachment 1 to this response.

Florida Power and Light Company
2025 Decommissioning Study
End-of-Life Unamortized Nuclear Fuel
Estimated Balances as of 1/1/2030

| <u>Line</u> <u>Number</u> | | | Turkey Point <u>Unit 3</u> | Turkey Point <u>Unit 4</u> |
|------------------------------|--|---------------------|-------------------------------|-------------------------------|
| 1 | Estimated Cost of Unburned Fuel @ End of License | | | |
| 2 | FPL's Ownership Share Net of Participants | <i>a</i> | \$ 98,300,000 | \$ 138,100,000 |
| 3 | | | | |
| 4 | Actual Reserve Balance at 12/31/2025 | <i>b</i> | 43,916,617 | 39,473,890 |
| 5 | | | | |
| 6 | Current Annual Accrual ⁽¹⁾ | <i>c</i> | 803,138 | 888,681 |
| 7 | Incremental Accumulated Accruals for 2026-2029 | <i>d = (c*4)</i> | 3,212,554 | 3,554,726 |
| 8 | Estimated Reserve Balance Accrued as of 12/31/2029 | <i>e = (b+d)</i> | 47,129,170 | 43,028,616 |
| 9 | | | | |
| 10 | | | | |
| 11 | Remaining Amount to be Recovered as of 01/01/2030 | <i>f = (a-b)</i> | \$ 51,170,830 | \$ 95,071,384 |
| 12 | | | | |
| 13 | | | | |
| 14 | Total Number of Months From: | | | |
| 15 | 12/31/2029 to End of License⁽²⁾: | <i>g</i> | 270.5 | 279.5 |
| 16 | | | | |
| 17 | Estimated Accrual From 1/1/2030 to End of License | | | |
| 18 | Monthly | <i>h = (c/d)</i> | 189,171 | 340,148 |
| 19 | Annual | <i>i = (e x 12)</i> | 2,270,055 | 4,081,777 |
| 20 | | | | |
| 21 | | | | |
| 22 | Note: | | | |
| 23 | ⁽¹⁾ Approved by Order No. PSC-2021-0232-PAA-EI | | | |
| 24 | ⁽²⁾ The end of life for PTN U3 and U4 is 07/2052 and 04/2053, respectively. | | | |

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QUESTION:

Please provide a spreadsheet (with formulas intact and cells unlocked) showing the development of the data appearing in response to Question 25.

RESPONSE:

Please refer to FPL's response to Staff's Second Data Request, No. 25, Attachment 1.

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QUESTION:

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.

RESPONSE:

FPL assumes this request is referring to FPL's calculation of Turkey Point Units 3 and 4 End of Life Unamortized Nuclear Fuel accruals with an effective date of January 1, 2030 provided in its response to Staff's Second Data Request, No. 25. Based on this assumption, FPL utilized the current accrual amounts approved by the FPSC in the 2020 Decommissioning Study (Order No. PSC-2021-0232-PAA-EI, Docket. No. 20200257-EI) to calculate an estimated reserve balance as of December 31, 2029, and the current estimated retirement date of July 19, 2052 and April 10, 2053 for Units 3 and 4, respectively.

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QUESTION:

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?

RESPONSE:

Please refer to FPL's response to Staff's Second Data Request No. 25, Attachment 1.

QUESTION:

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.

RESPONSE:

- a. The most recent DOE "Strategy for the Management and Disposal of Used Nuclear Fuel and High-Level Radioactive Waste" is dated January 2013. DOE has issued subsequent related materials (e.g., consent-based siting process documents), but FPL has not identified any updated standalone "Strategy" document.

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- b. The DOE's January 2013 Strategy established an objective to develop the capability necessary to begin executing the federal commitment to accept spent nuclear fuel within a ten-year period. The objective was not achieved within the anticipated timeframe, primarily due to continued uncertainties related to the government spent nuclear fuel ("SNF") program. Notwithstanding these uncertainties, the resulting delays do not have any direct impact on FPL's current decommissioning cost estimates.
- c. The DOE's January 2013 Strategy identified a pilot interim storage facility as an initial phase with limited-capacity, intended to accept used nuclear fuel from shut-down reactor sites solely to demonstrate federal storage capabilities. While the DOE has engaged in limited planning and stakeholder outreach related to this concept, it does not currently operate a federal pilot interim storage facility for commercial used fuel, as the pilot facility is not intended for commercial operation. Notwithstanding the potential impacts of continued uncertainties of the government SNF program, there is no direct impact on FPL's current decommissioning cost estimates.
- d. The DOE's January 2013 Strategy also described a larger, consolidated interim storage facility intended to provide full-scale interim capability and operational flexibility, potentially co-located with the pilot facility and/or a future geologic repository. While the DOE has more recently advanced a consent-based siting process and initiated early federal project development steps, no federal consolidated interim storage facility is currently in operation as of the referenced timeframe. Notwithstanding the continued uncertainties with the government SNF program, there is no direct impact on FPL's current decommissioning cost estimates. However, Independent Spent Fuel Storage Installation ("ISFSI") costs may be reduced if a federal repository were to become available, as this could lessen ISFSI storage and operational costs reflected in future decommissioning costs.
- e. The DOE's 2004 Acceptance Priority Ranking and Annual Capacity Report established priority rankings for commercial SNF acceptance based on the age of each plant's fuel at the time the report was issued, rather than through a numerical ranking (e.g., 1, 2, 3). In other words, the priority rankings for pick-up schedules were based on the age of the fuel around the country in the order of oldest fuel first down to newest fuel last. As a result, multiple utility companies with nuclear facilities may share the same priority ranking year. The priority rankings applicable to St. Lucie Units 1 and 2 and Turkey Point Units 3 and 4 were assigned based on these criteria in the 2004 report. DOE has not issued a revised Acceptance Priority Ranking and Annual Capacity Report since 2004; therefore, the relative priority rankings for St. Lucie Units 1 and 2 and Turkey Point Units 3 and 4 remain unchanged, because the order of the fuel (based on its age) remains unchanged.

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QUESTION:

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.

RESPONSE:

The 2025 Decommissioning Cost Estimates for St. Lucie Units 1 and 2 and Turkey Point Units 3 and 4 address cost and other risks despite limited and older federal guidance by using established industry methodologies, applying conservative contingencies, and incorporating assumptions that account for key federal-policy uncertainties.

The 2025 estimates were prepared by EnergySolutions using the industry-accepted AIF/NESP-036 methodology and reflect current decommissioning practices and applicable U.S. Nuclear Regulatory Commission (NRC) requirements. Consistent with budget-level estimating practice, the estimates include contingency to address execution uncertainties and unplanned conditions (e.g., radiological conditions, labor/productivity, schedule impacts, and regulatory-driven changes).

The estimates clearly account for the uncertainty in U.S. Department of Energy (DOE) spent fuel acceptance by including costs for extended on-site spent fuel storage and related activities, rather than assuming timely federal acceptance. These costs are escalated over the study's projected time horizon.

Finally, although broader federal guidance may be limited or dated, decommissioning is governed by the NRC's enforceable regulations. The estimates are developed to reflect applicable NRC requirements for license termination, spent fuel management, and final status survey. In addition, the estimates are periodically updated and reviewed as part of the NRC financial assurance process, which helps ensure the projected estimated costs remain reasonable and adequate over time.

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QUESTION:

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.

RESPONSE:

- a. The amounts reflected in the Tax Savings column on pages 7-8 of 8 on Schedule G of the 2025 St. Lucie Study are calculated as follows:

$(\text{Jurisdictional Amount} - \text{Qualified Amount}) * \text{Corporate Tax Rate} = \text{Tax Savings}$

- b. Yes. Because there is no new available information regarding future tax legislation or changes that could affect the corporate tax rate, FPL is using the current federal and state income tax rates as established by existing legislation and regulatory authorities.
- c. There is no difference between the effective tax saving rates for St. Lucie Units 1 and 2 and Turkey Point Units 3 and 4.

QUESTION:

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.

RESPONSE:

- a. The methodology used to identify and develop the cost elements in the estimates follows the basic approach originally presented in the AIF/NESP-036 study report, “Guidelines for Producing Commercial Nuclear Power Plant Decommissioning Cost Estimates.”

Characterization/Surveys - costs associated with the initial radiological surveys of the plant and surrounding environment, ongoing monitoring of the decommissioning process (against an established criteria for release of material and the property), and the final radiological survey of the plant and surrounding environment required to demonstrate that the facility meets the requirements of the U.S. Nuclear Regulatory Commission (NRC) for termination of the license and release of the property for unrestricted use. (Baseline radiological surveys, final site surveys, and verification surveys).

Corporate Support (Fixed Overhead) - costs associated with site operations support.

Decontamination & Removal - labor and equipment costs required to flush, clean, and disassemble plant components and commodities from their installed location for transportation to a central area for processing/disposal, controlled removal of contaminated and activated concrete, remediation of any hazardous waste, excavation of soil, demolition of site buildings, etc.

Energy - costs associated with power purchased to support decommissioning activities (e.g., operating waste processing systems, cranes, tooling, ventilation, and lighting) and for maintaining critical site services.

Florida LLRW Inspection Fee - costs associated with Rule 64E-5.1508 Inspection of Low-Level Radioactive Waste (LLRW) Shipments:

“(6) Each generator of radioactive waste whose shipment is inspected by the department’s representative will be billed quarterly by the department a fee of \$1.95 per cubic foot (0.02832 cubic meter) of waste shipped or \$150.00 per shipment inspected, whichever is greater.”

Insurance & Regulatory Fees - costs for maintaining nuclear liability and property insurance throughout the decommissioning (coverage is adjusted as decommissioning proceeds), including long term storage, costs associated with emergency planning (as long as spent fuel is in the spent fuel pool) including payments to local municipalities, costs associated with regulatory license(s), NRC costs for monitoring and approving changes in the plant’s technical specifications, decommissioning related submittals (*e.g.*, exemptions, license termination plans, Final Status Surveys, etc.).

Misc. Equipment/Site Services - cost associated with tooling and equipment needed to support decontamination and dismantling activities (*e.g.*, contamination control equipment, rigging, portable waste processing equipment, etc.).

Program Management - costs associated with the organization identified to oversee the decommissioning project and manage the day-to-day site activities, similar in structure to the operating organization, although much reduced in size and function. Includes the costs for the plant personnel, supplemental engineering, and contractors.

Property Taxes - costs associated with assessed value of the property.

Security - costs associated with maintaining an on-site, plant security force including surveillance personnel, access/egress control and processing personnel, a rapid response contingent, training, and supervisory personnel.

Spent Fuel Management - costs associated with the relocation of the spent fuel from the spent fuel storage pools to the U.S. Department of Energy (DOE) and/or Independent Spent Fuel Storage Installation (ISFSI), including hardware (dry storage canisters and horizontal storage modules), the labor and equipment to load the canisters with spent fuel, seal-weld the canisters, transfer the canisters, etc., as well as contractor campaign costs (*e.g.*, for mobilization, subcontractors, ancillary services, demobilization). Also, includes ISFSI operating costs and spent fuel maintenance cost.

Spent Fuel Pool Isolation - costs associated with isolating the spent fuel pools (power, controls, water cooling, water makeup, etc.) from the adjacent power block buildings so that decontamination and dismantlement can proceed in adjacent power block buildings without impacting spent fuel storage and fuel transfer activities.

Waste Packaging, Transportation & Disposal (Class A, B, C) - includes costs to package, transport, and dispose of low-level radioactive waste. The study assumes that most of the material requiring controlled disposal will be shipped to the EnergySolutions' facility in Utah for disposal, and that higher activity waste, not suitable for disposal at the Utah facility, will be shipped to a facility in west Texas. The costs included additional fees and surcharges for specific waste types (*e.g.*, large components such as steam generators or irradiated metal from the reactor).

Waste Packaging, Transportation & Disposal (GTCC) - includes costs to package, transport, and dispose of Greater-Than-Class C (GTCC) radioactive waste. Presently, a facility does not exist for the disposal of wastes exceeding 10 CFR 61 Class C limitations; therefore, the study assumes that the DOE will accept the GTCC waste along with the spent fuel.

- b. The cost elements identified in FPL's response to Staff's Second Data Request No. 32 subpart (a) above are assigned to the aggregate categories of NRC License Termination, Spent Fuel Management, and Site Restoration based on the scope of activities and cost definitions consistent with NRC financial assurance regulations, including 10 CFR §§50.75 and 72.30. The assignments are summarized below.

NRC License Termination

The NRC License Termination aggregate category includes costs consistent with "decommissioning" as defined in 10 CFR §50.75, generally sufficient to terminate the plant's operating license. These costs may be incurred prior to or concurrent with spent fuel management activities but do not include long-term spent fuel storage or site restoration activities.

Spent Fuel Management

The Spent Fuel Management aggregate category includes costs associated with the management, packaging, and transfer of spent fuel from wet storage to the ISFSI and ultimately to the DOE, as well as the operation and decommissioning of the ISFSI in accordance with 10 CFR §72.30. This category excludes spent fuel management costs incurred prior to permanent cessation of operations and excludes final disposal costs.

Site Restoration

The Site Restoration aggregate category includes costs associated with the dismantlement and demolition of buildings and facilities demonstrated to be free of contamination, including structures that were never radiologically impacted and those decontaminated to acceptable levels. Structures are removed to a nominal depth of three feet below grade and the site is backfilled.

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| Cost Element Assignment Matrix | | | |
|--|--|--|---------------------------------------|
| Cost Element⁽¹⁾ | NRC License Termination⁽²⁾ | Spent Fuel Management⁽³⁾ | Site Restoration⁽⁴⁾ |
| Characterization / Survey | X | X | — |
| Corporate Support | X | X | X |
| Decontamination & Removal | X | — | — |
| Energy | X | X | X |
| Florida LLRW Inspection Fee | X | — | — |
| Insurance & Regulatory Fees | X | X | X |
| Miscellaneous Equipment / Site Services | X | — | — |
| Program Management | X | X | X |
| Property Taxes | X | X | X |
| Security | X | X | X |
| Waste Packaging, Transportation & Disposal (Class A, B, C) | X | — | — |
| Waste Packaging, Transportation & Disposal (GTCC) | X | — | — |
| Spent Fuel Management | — | X | — |
| Spent Fuel Pool Isolation | — | X | — |

⁽¹⁾ Certain cost elements are assigned to more than one aggregate category where activities span multiple phases of decommissioning.

⁽²⁾ NRC License Termination includes radiological decommissioning costs required to terminate the plant operating license.

⁽³⁾ Spent Fuel Management includes post-shutdown spent fuel handling, ISFSI operations, and ISFSI decommissioning activities.

⁽⁴⁾ Site Restoration includes demolition and removal of non-radiologically contaminated structures and associated site grading.

- c. The corporate support was comprised of escalated 2020 site-specific values and applied to 2025 period durations. The cost was shared between the two units at each site.
- d. The corporate support used in the studies was not percentage-based. See FPL's response to Staff's Second Data Request, No. 32 subpart (c) above.

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QUESTION:

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.

RESPONSE:

- a. Yes. FPL received DOE reimbursements for the following claim years through a comprehensive settlement in September 2024:

| | |
|-----------------------------------|--------------|
| Costs incurred through 12/31/2018 | \$29,998,420 |
| Costs incurred through 12/31/2019 | \$22,363,805 |
| Costs incurred through 12/31/2020 | \$18,193,706 |

- b. Reimbursements received from the U.S. Department of Energy (DOE) are reflected in the year in which the reimbursement is received and processed. Specifically, DOE reimbursements are applied to offset actual spent-fuel management expenses that were previously recorded for the applicable claim year.

When a reimbursement is received, FPL reduces the previously recorded amount of base rate recoverable Operations & Maintenance (O&M) and/or Capital accounts, as applicable, based on the activity the reimbursement relates to. For example, the reimbursements received in September 2024 for expenditures incurred during years 2018–2020 were reflected in FPL's books and records during the year 2024 following processing and reconciliation of those reimbursements. Therefore, customers received the benefit of lower base rate expenses during the 2024 calendar year.

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- c. Yes. FPL has outstanding DOE reimbursement claims related to spent nuclear fuel management costs incurred during 2021–2023 and is currently engaged in settlement discussions with the DOE regarding those claims. The 2024 reimbursement claim has been submitted; however, the DOE has deferred issuing its findings until the 2021–2023 claims are resolved. Claim amounts requested for the period of 2021-2024, and estimated for the period 2026-2030 are provided in FPL's response to Staff's Second Data Request, No. 37.
- d. Consistent with FPL's 2020 Nuclear Decommissioning study, FPL specifically segregates the expected DOE reimbursement amounts related to spent nuclear fuel (SNF) management costs per unit (Section 2) due to its impact on the funding requirement calculation. Several points of clarification stated in the request are reflected below:
- Each of the individual report's "Table 6-1" shows the total decommissioning costs by plant, on a decommissioning method (scenario) basis. Said another way, the costs shown in Table 6-1 are total costs to decommission units 3 and 4 combined for Turkey Point and total costs to decommission units 1 and 2 combined for St. Lucie depending on methodology.
 - The second item is that the costs shown under "Spent Fuel" in Table 6-1 for each of the scenarios represents total gross costs associated with SNF, not "DOE nonrecoverable costs of SNF management" as stated in the question.
 - The DOE reimbursement (Section 2) is the expected reimbursement (by unit) derived from the gross SNF costs estimated in Scenario 1 (Table 6-1) respectively. As mentioned above, FPL takes the gross SNF costs from Table 6-1 scenario 1 less the expected DOE reimbursement (Section 2) to calculate net SNF costs for its funding requirement calculations in Support Schedule G.
 - Finally, the expected DOE reimbursement amounts shown in Section 2 (Pages 11 and 9) are presented in the same manner as the "total decommissioning costs" by unit shown in Section 2 (Page 3) and correspond to Appendix F-5.

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QUESTION:

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.

RESPONSE:

No. FPL remains unaware of any state jurisdiction that has disallowed utilities from including DOE SNF settlement proceeds or expected reimbursements in their nuclear decommissioning funding analyses.

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QUESTION:

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.

RESPONSE:

In the 2025 Study, FPL revised the assumed start date for DOE acceptance of commercial SNF from 2030 to 2034. This revision reflects that the previously assumed 2030 start date is now approaching and that DOE has not provided updated information or clarification indicating that it remains on track to begin transfers or pickups of commercial SNF in 2030. Based on the revised DOE start date, the 2025 Study assumes that DOE will begin accepting SNF from Turkey Point in 2035 and from St. Lucie in 2037. These dates preserve the same relative timing between the assumed DOE start date and site-specific SNF acceptance used in prior studies.

QUESTION:

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?

RESPONSE:

- a. FPL's 2025 decommissioning cost estimates for Turkey Point and St Lucie assume any required ISFSI buildout will be complete prior to permanent plant shutdown, and therefore such costs are not included as decommissioning costs.
- b. The statements cited are not contradictory. The 2025 Nuclear Decommissioning Studies assume that sufficient ISFSI capacity will be constructed and available to support the timely decommissioning of the St. Lucie and Turkey Point units. However, consistent with Assumption No. 37 for St. Lucie and Assumption No. 35 for Turkey Point, any ISFSI construction or expansion required to provide such capacity is assumed to occur prior to permanent plant shutdown and is therefore excluded from the decommissioning cost estimates.

Accordingly, no ISFSI construction or expansion costs are included in FPL's 2025 Nuclear Decommissioning Studies for either St. Lucie or Turkey Point. The amount of ISFSI construction cost included in the 2025 studies is \$0 for both sites.

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The narrative statements in Section 2 of each study reflect the assumption that adequate ISFSI capacity exists or will exist to support decommissioning activities and do not indicate that ISFSI construction or expansion costs are included in the decommissioning cost estimates.

- c. The existing ISFSIs at St. Lucie and Turkey Point have available capacity to support current and planned spent fuel storage needs. As reflected in the 2025 Nuclear Decommissioning Study, FPL transitioned from horizontal to vertical dry storage systems, which increased available ISFSI capacity relative to the assumptions used in the 2020 study.

Based on current projections, FPL has not identified a specific date by which the existing ISFSIs at either site are expected to reach capacity. ISFSI capacity needs are evaluated on an ongoing basis as part of FPL's spent fuel management planning. However, as stated in subpart a of this response (above), FPL currently projects sufficient ISFSI capacity to support the timely decommissioning of its St. Lucie and Turkey Point units.

- d. FPL's dry storage inventory at the St. Lucie and Turkey Point nuclear units consists of NRC-licensed dry spent fuel storage systems, including HI-STORM FW overpacks, MPC-37 canisters, and associated dry storage containment materials procured in connection with site-specific spent fuel loading campaigns.

For the 2025 loading campaign, St. Lucie purchased 12 HI-STORM FW overpacks and MPC-37 canisters, along with associated dry storage containment materials, which were placed into service upon completion of the campaign on March 31, 2025. Turkey Point purchased 10 HI-STORM FW overpacks and MPC-37 canisters and associated dry storage containment materials for its 2025 loading campaign; these assets are expected to be placed into service upon completion of the campaign, currently estimated by May 29, 2026.

QUESTION:

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.

RESPONSE:

Pre-shutdown spent fuel management activities at the St. Lucie and Turkey Point Nuclear Units include both spent fuel pool and ISFSI activities, as discussed separately below.

- **Pre-Shutdown Spent Fuel Pool Costs**

Pre-shutdown spent fuel pool activities constitute routine plant operations and include operator rounds, chemistry sampling, equipment monitoring, and routine maintenance. The associated costs are not separately identified or tracked as discrete spent fuel management expenses and are embedded in station base operation and maintenance costs recovered through FPL's base rates. Because these activities are fully integrated into normal station operations, the related costs cannot reasonably be segregated or allocated into separate annual historical or projected spent fuel pool cost amounts without reliance on unsupported assumptions. These activities are not eligible for reimbursement under the DOE Settlement Agreement; therefore, no spent fuel pool costs are submitted to, or reimbursed by, the DOE.

- **Pre-Shutdown ISFSI Costs**

Pre-shutdown ISFSI activities consist of dry fuel loading campaigns; dry-storage equipment and associated contractor services; radiological monitoring; engineering oversight; and required inspection and surveillance of ISFSI systems. The associated costs are separately identified and recorded as ISFSI-related spent fuel management expenses. Annual historical and projected ISFSI cost amounts are identified in Table 1 and are recovered either through reimbursement under the DOE Settlement Agreement or, for any non-reimbursable amounts, through FPL's base rates. Eligible ISFSI costs are submitted annually to the DOE for reimbursement in accordance with the Settlement Agreement, and resulting reimbursements are applied as a direct offset to the corresponding ISFSI costs.

For further details concerning DOE reimbursement processes, ratepayer crediting and related cost-recovery treatment, refer to FPL's response to Staff's Second Data Request, No. 33.

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Table 1 – ISFSI Historical, Current, and Forecasted Reimbursement Amounts

| St. Lucie and Turkey Point ISFSI | | | |
|---|---------------|--------------------------|--------------------|
| Historical, Current, and Forecasted Reimbursement Expenses | | | |
| Claim Year | Status | DOE Reimbursement | FPL Request |
| 1997-2007 | Received | 77,152,032 | 99,676,062 |
| 2008 | Received | 17,951,796 | 21,674,523 |
| 2009 | Received | 20,247,584 | 30,511,609 |
| 2010 | Received | 57,079,526 | 54,291,987 |
| 2011 | Received | 31,152,911 | 31,148,888 |
| 2012 | Received | 10,804,886 | 10,819,659 |
| 2013 | Received | 13,269,632 | 13,419,190 |
| 2014 | Received | 5,670,812 | 5,673,067 |
| 2015 | Received | 9,230,419 | 9,403,912 |
| 2016 | Received | 19,822,524 | 19,915,627 |
| 2017 | Received | 19,873,563 | 20,208,015 |
| 2018 | Received | 29,998,420 | 31,216,975 |
| 2019 | Received | 22,363,805 | 23,517,055 |
| 2020 | Received | 18,193,706 | 19,448,402 |
| 2021 | Requested | Pending | 29,924,128 |
| 2022 | Requested | Pending | 16,012,589 |
| 2023 | Requested | Pending | 4,219,599 |
| 2024 | Requested | Pending | 26,853,438 |
| 2025 | Preparing | Estimate | 35,402,477 |
| 2026 | Forecast | Estimate | 11,325,735 |
| 2027 | Forecast | Estimate | 11,318,216 |
| 2028 | Forecast | Estimate | 33,000,880 |
| 2029 | Forecast | Estimate | 25,062,662 |
| 2030 | Forecast | Estimate | 15,674,239 |

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QUESTION:

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).

RESPONSE:

- a. St. Lucie's 2025 property tax projection is 43.9% lower than the 2020 study, primarily due to a six-year reduction in the assumed ISFSI operating duration for Period 5 (Dry Fuel/GTCC Storage & Transfer), as well as lower projected annual property tax millage rates. Turkey Point's 2025 property tax projection is 1.8% higher than the 2020 study, primarily reflecting land value appreciation since 2020.
- b. The increase in the Corporate Support cost element for both St. Lucie and Turkey Point is primarily attributable to an accelerated schedule for transferring SNF from the pool to the ISFSI pad reflected in the 2025 St. Lucie Study and 2025 Turkey Point Study, as well as the application of updated escalation assumptions.

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QUESTION:

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.

RESPONSE:

For the 2025 St. Lucie and Turkey Point Studies, published transportation tariffs were not used to develop transportation cost estimates. Instead, EnergySolutions relied on internal transportation expertise and vendor-specific pricing due to the specialized nature of radioactive waste packaging and transport.