

FPL's Response to OPC's Second Set of
Interrogatories Nos. 36-39, 40 redacted, 41
redacted, 42 redacted, 43-44
(Docket No. 20210178-EI)

QUESTION:

Isaias and Eta - Preparedness Plan.

Please refer to the Company's response to OPC's First Request for Production of Documents (POD) No. 11 and the link to Annual Status Report for 2020 filed by FPL, and specifically to Appendix D of the FPL Report entitled Emergency Preparedness Plan.

- a. Describe which organization entities, such as the FPL Command Center, specifically the Planning Section, and the Area Command Resource Unit, determine the resource requirements from the initiation of the storm response throughout the pre-storm landfall, and then in response to actual damage assessments, including whether more or fewer resources are required as the storm progresses, makes landfall, and then moves out or diminishes.
- b. Provide a description of all decision criteria and how they are applied to the resource decisions as the storm progresses, including the need for more or fewer resources.
- c. Describe in detail how the Company balances the need for resources with the cost of those resources, including all decision criteria and how they are applied to the resource decisions.

RESPONSE:

- a. The Resource Allocation team which reports to the Planning Section Chief provides the initial resource estimates based on the initial damage forecasts from the Storm Damage Model. The Planning Section Chief then submits this recommendation to the Area Commander for review and approval. Post impact analysis is performed based on the patrols and review of damage caused by the storm. Based on this analysis, resource estimates are updated to reflect actual workload. The Resource Allocation team then provides a revised resource estimate to the Area Commander for review and approval.
- b. FPL does not have a defined "decision criteria" that can be applied consistently during each restoration event. Each storm is different, and each storm produces a variety of challenges and obstacles that must be accounted for during restoration. Please see FPL Witness Miranda's direct testimony, pages 10-12, which describes FPL's responses when a hurricane threatens its service area. In summary, the resource decisions are based on the Construction Man Hours (CMH) damage forecast from the Storm Damage Model, information from historical events, experience, on-system resources, and the availability and location of external resources.

- c. As described at page 6 of FPL Witness Miranda's direct testimony "The primary objective of FPL's emergency preparedness plan and restoration process is to safely restore critical infrastructure and to restore power to the greatest number of customers in the least amount of time so that FPL can return normalcy to the communities it serves." Please also see page 15 of FPL Witness Miranda's direct testimony regarding how FPL takes costs into account when acquiring resources for storm restoration. In summary, FPL's process for balancing the need for resources and the costs of the resources starts well before the storm season begins. FPL negotiates storm contracts with as many vendors as possible to not only create a competitive cost environment but also to limit the need to negotiate pricing during an event. Resource decisions are based on the number of resources needed, resource availability and location, and expected travel duration. Resources available are then ranked based on contractual rate and the time it will take to reach the impacted area to provide sufficient assistance.

**Florida Power & Light Company
Docket No. 20210178-EI
OPC's Second Set of Interrogatories
Interrogatory No. 37
Page 1 of 1**

QUESTION:

Isaias and Eta - Preparedness Plan.

Please indicate whether the Company had an optimized target service restoration time that was used to determine resource requirements for Hurricane Isaias and Tropical Storm Eta. If so, explain.

RESPONSE:

Please see FPL's response to OPC's Second Set of Interrogatories No. 38. Target service restoration time or estimated restoration time is not used to determine resource requirements. Resource availability is one of the primary drivers in determining an achievable service restoration time.

QUESTION:

Isaias and Eta - Preparedness Plan.

When the final resource requirements were determined for Hurricane Isaias and Tropical Storm Eta just prior to landfall, please indicate the level of customer outages that was estimated by the Company's models and the estimated time of service restoration that might be required if the projected resource requirements were utilized.

RESPONSE:

FPL estimates the amount of damage and resources required based on construction man-hours (CMH), not customer outages. Based on the estimated CMH and the resources acquired, the estimated time for the system restoration was 3 days for Hurricane Isaias and 5 days for Tropical Storm Eta. As explained at page 10 of Witness Miranda's direct testimony, resource requirement decisions begin 72-96 hours in advance of landfall to ensure that necessary resources are available. Adjustments (increase or decrease) of the required resources are continually evaluated as more information is available related to forecast track, storm intensity, and resource availability.

**Florida Power & Light Company
Docket No. 20210178-EI
OPC's Second Set of Interrogatories
Interrogatory No. 39
Page 1 of 1**

QUESTION:

Isaias and Eta - Preparedness Plan.

Please indicate whether the Company utilizes a resource determination model for service restoration that is separate from the FPL storm damage model. If so, explain how that model works and indicate whether is it tied to or synchronized with the FPL storm damage model.

RESPONSE:

FPL does not utilize a "resource determination model." Please refer to FPL's response to OPC's First Production of Documents No. 12 and FPL's response to OPC's Second Set of Interrogatories No. 38 for additional details regarding the Storm Damage Model.

Isaias and Eta - Contractor Costs.

Each of the contractors and amounts listed in OPC's Interrogatory No. 9 (a) is included below. The fourth column explains the "Contractor Type".

Contract#	Contractor	Cost Amount	Contractor Type
[REDACTED]	[REDACTED] [REDACTED]	[REDACTED] [REDACTED]	[REDACTED] [REDACTED]
[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED] [REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]
[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED] [REDACTED]
[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED] [REDACTED]
[REDACTED]	[REDACTED] [REDACTED]	[REDACTED] [REDACTED]	[REDACTED] [REDACTED]
[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED] [REDACTED]
[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED] [REDACTED]
[REDACTED]	[REDACTED] [REDACTED]	[REDACTED] [REDACTED]	[REDACTED] [REDACTED]
[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED] [REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

FPL 029469
20210178-EI

**Florida Power & Light Company
Docket No. 20210178-EI
OPC's Second Set of Interrogatories
Interrogatory No. 40
Page 2 of 2**

vegetation management crews. Additionally, with respect to other vendors and contractors whose costs are the subject of this proceeding, FPL has also provided additional cost support workpapers, contracts, and invoice support in response to previous discovery responses.

Isaias and Eta -Contractor Costs.

Each of the contractors and amounts listed in the OPC's Interrogatory No. 10 (a) is included below. The fourth column explains the "Contractor type".

[illegible]

The information in the table shows that the contractors in question provided services involving emergency first responders and underground restoration, transmission storm restoration, damage assessors and production leads. These services are separate from the work provided by overhead line crews and vegetation management crews that perform the great majority of restoration work following a storm event. In this proceeding, FPL provided the data exported from the iStormed App for overhead line and vegetation management contractors (i.e., the flat files) on November 12, 2021. As described in paragraph 19 of the FPL Hurricane Irma Settlement Agreement, the early provision of these flat files was “intended to reduce the amount of discovery in future storm proceedings”; in short, OPC did not need to ask for or wait to receive the support for costs related to overhead line crews and vegetation management crews. Additionally, with respect to other vendors and contractors whose costs are the subject of this proceeding, FPL has also provided additional cost support workpapers, contracts, and invoice support in response to previous discovery responses.

QUESTION:

Isaias and Eta - Contractor Costs.

Please refer to the Confidential Excel flat file for [REDACTED], provided as part of the Company's November 12, 2021 filing for Tropical Storm Eta. Refer further to the "Expenses" worksheet tab at cell row 12, which contains an expense amount of [REDACTED] described in cell column AJ as "equipment necessary for work." Describe the equipment costs charged to the Company and explain why it was charged as part of the recovery costs.

RESPONSE:

The amount charged is for equipment that is necessary and used by the specific vegetation crews. The use of equipment and the right to be reimbursed for the use of that equipment are allowed as a part of their contract, provided it has been specifically pre-authorized by FPL. In this case, the equipment was pre-authorized to be used as a part of the storm restoration effort. The Cost Finalization team verifies that this equipment was used during storm restoration and appropriate rates were charged per their contract.

Please refer to FPL's response to OPC's Request for Production of Document No. 42 for details of the allowable equipment per their contract.

QUESTION:

Isaias and Eta -Contractor Costs.

Please refer to the Confidential invoice detail provided for the invoice from Pike Electric LLC provided in response to OPC's Request for POD No. 7 which was invoice no. 679667 (Bates page FPL 029417). The invoice for these underground crews indicates the following Product IDs and descriptions for regular hours:

Product ID 8476 SW Qualified
Product ID 8480 Non-SW Qualified

- a. Define the acronym SW and explain the distinctions between SW Qualified and Non-SW Qualified.
- b. Explain why underground crews such as these were mobilized for potential Tropical Storm Eta restoration and describe generally the work performed.

RESPONSE:

- a. "SW Qualified" refers to Switch Qualified, which means the crews have the qualifications and ability to "switch" (open and close) electrical devices on the grid. Switch Qualified crews have the potential to make areas safe by opening a device, and also to energize or restore service to customers by closing a device, both critical during the restoration process. "Non-SW Qualified" or Non-Switch Qualified crews do not have the ability to switch on the electric grid but based on their experience and skill set they are qualified to perform other restoration functions including repairs to equipment and the system, and damage assessment.
- b. Underground crews, which are also used to perform Switch Qualified work, are always mobilized during a restoration event. These crews have the experience, qualifications, and the ability to assist with the types of restoration activities described in FPL's response to OPC's Interrogatory No. 43(a) above. As described in part (a) of this question, these underground crews assist with overhead restoration activities including switching, thereby allowing overhead crews to remain productive with major overhead restoration activities. Underground crews are also required during restoration to inspect, repair, replace, and restore service to underground areas that have the potential to be impacted by uprooted trees and possible flooding due to heavy rains and/or storm surge.

QUESTION:

Isaias and Eta -Contractor Costs.

Refer to the Confidential invoice detail provided for the invoice from Lewis Tree Service Inc. provided in response to OPC's Request for POD No. 6 which was invoice no. 247933 (Bates page FPL 029307). The majority of the invoice relates to work performed by Arborists by the same company that performs tree clearing services.

- a. Indicate whether the costs related to Arborists were considered as part of the ICCA adjustment related to line clearing services.
- b. Describe the activities performed by the arborists and explain why they should or should not be considered as part of the ICCA adjustment related to line clearing services.

RESPONSE:

- a. Costs related to arborists for Lewis Tree Service reflected on invoice No. 247933 are recoverable storm costs and were included with Line Clearing Costs reflected on Line 5 of Exhibit DH-1. As explained in FPL's response to OPCs 1st Set of Interrogatories No. 14, the ICCA adjustment calculation utilized non-storm costs.

To calculate the ICCA adjustment for line clearing for Hurricane Isaias, FPL, in compliance with the storm rule, compared the "non-storm" tree trimming expenses for the prior three-year August average to actual "non-storm" tree trimming expenses in August 2020. As stated on page 19 of FPL witness Hughes' direct testimony, "[t]he tree trimming expenses for the prior three-year August average exceeded the tree trimming expenses during August 2020, the month in which Hurricane Isaias restoration work was performed, by \$1.1 million.", which is the amount of the ICCA adjustment reflected on line 24 of Exhibit DH-1.

- b. Arborists are responsible for performing field tree work assessments, working closely with tree crews, and understanding trimming guidelines and policies. Refer to subpart (a) above describing how the line clearing ICCA adjustment was calculated for Hurricane Isaias.