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FPL's Response to CLEO/Vote Solar's Second Request for Production of Documents Nos. 50, 59, 74.

(including attachment for No. 50)

QUESTION:
Refer to Witness Forrest's direct testimony at page 18, lines 20-23. Provide all documents and analysis showing the Company's updated calculations that produced the $0.48/MWh O&M rate for variable power plants.

RESPONSE:
Please see responsive document provided.

QUESTION:
Refer to Witness Sim's direct testimony, p. 23, lines 10-12. Provide all studies, reports data, analysis, assumptions and spreadsheets supporting the statement the cost of the CDR program for non-participant customers has increased greatly.

RESPONSE:
Please refer to Figure SRS-1 on page 23 of FPL witness Sim's direct testimony.

This figure shows the CDR incentive payment levels on a $/kW basis from the year 2000 through 2020. These incentives are recovered from all customers, both program participants and non-participants, through the ECCR clause. Beginning in 2013, the incentive levels went from approximately $4.68/kW to $7.30/kW. As a result of the increased incentive payments, the amount of money recovered from all customers, program participants and non-participants, also increased. As Figure SRS-1 shows, the incentive level – and amount of money needed to be recovered from all customers - continued to increase through 2020.

In addition, over this time period the number of CDR participating customers also increased. This further increased the amount of higher incentive money that needed to be recovered from all customers.

QUESTION:
Refer to Witness Bores' direct testimony at p.10-12.

a. Provide all input assumptions, model spreadsheets, and output data and analysis supporting the finding that the consolidation will unlock greater than $2.8 billion of CPVRR benefits for customers.

b. Provide all input assumptions, model spreadsheets, and output data and analysis supporting the findings that Gulf has forecasted savings in O&M expenses of $86 million that will translate into a projected $1.3 billion CPVRR net benefit for customers.

c. Provide all input assumptions, model spreadsheets, and output data and analysis supporting the findings on page 12, line 19 that the initiatives outlined will result in lower overall bills for customers.

RESPONSE:

a. The $2.8 billion of CPVRR benefit for customers associated with the FPL and Gulf consolidation consists of $1.5 billion projected CPVRR benefit from generation planning and joint dispatch and $1.3 billion of projected CPVRR benefit related to the reductions in Gulf's O&M expense after its acquisition by NextEra Energy (NEE) in 2019. The support for the $1.5 billion of projected generation and joint dispatch CPVRR benefits was provided in FPL's supplemental response to OPC's First Request for Production of Documents, Request No. 36. Please see Attachment 1 to this response for the Excel file supporting the calculation of the $1.3 billion projected CPVRR benefit related to O&M savings at Gulf.

b. Please see Company's supplemental response to OPC's First Request for Production of Documents, Request No. 36 for the calculation of the $86 million reduction in O&M expense, and Attachment 1 to this response for the Excel file supporting the calculation of the $1.3 billion CPVRR net benefit.

c. The Company did not prepare a customer bill impact associated with the $2.8 billion of projected CPVRR benefits. However, a CPVRR benefit translates into significant downward pressure on customer bills as compared to the baseline.