

FPL's amended response to Staff's fifteenth
Interrogatories No. 197.

QUESTION:

On page 15, lines 6-8, of his Direct Testimony, FPL Witness Ferguson stated that the “St. Lucie Nuclear Plant subsequent license renewal is expected to be filed with the Nuclear Regulatory Commission (“NRC”) in August 2021.”

- a. Please identify how many months it took for FPL to receive the NRC’s approval for the Turkey Point Units 3 and 4 Subsequent Nuclear Plant License Renewal (SLR) application since the Company’s filing of the application.
- b. Please explain when FPL expects to receive the NRC’s approval for the St. Lucie Units 1 and 2 SLR application which will be filed in August 2021.
- c. Please explain why FPL did not use an 80-year life span to formulate St. Lucie nuclear plant’s depreciation rates for the “without RSAM and four-year rate plan” scenario in the current rate case, given A: “the level of confidence that the license renewal will be obtained” which witness Ferguson testified to on page 15, lines 10-11, of his Direct Testimony, and B: the reasonableness of a plant’s life span estimate is not governed/affected by the RSAM or the four-year rate plan proposal.

RESPONSE:

- a. FPL received the NRC approval for the Turkey Point Units 3 and 4 SLR approximately 20 months after the amended application was complete.
- b. FPL filed its Application for Subsequent Renewed Facility Operation Licenses with the Nuclear Regulatory Commission on August 3, 2021 and expects to receive the NRC’s approval for the St. Lucie Units 1 and 2 SLR application in approximately 18 months after the application is docketed by the NRC which is 45 days from the submittal.
- c. The assumption that a license extension for the St. Lucie nuclear plant will be granted is reasonable to support the RSAM for the policy reasons set forth in the direct testimony of FPL witness Barrett; however, at this time, the Company is only legally able to operate the plant until the end of its current license. Because there remains uncertainty until the license extension is granted, in the absence of the four year rate plan enabled by, among other things, approval of the RSAM, FPL believes it would be premature to assume outcomes for future licensing decisions in the depreciation study sponsored by FPL witness Allis.