

19

FPL's response to Staff's Third
Set of Interrogatories Nos. 27-
31

**Contains Confidential DN
03490-2022 in response to
Interrogatory No. 30**

**Florida Power & Light Company
Docket No. 20220007-EI
Staff's 3rd Set of Interrogatories
Interrogatory No. 27
Page 1 of 1**

QUESTION:

For the following questions, please refer to FPL's witness MacGregor's direct testimony filed April 1, 2022, page 5, lines 4 through 8, and FPL's responses to Staff's Second Set of Interrogatories, No. 25.

How many stacks are there for each of the 32 units that fall within the criteria to require testing?

RESPONSE:

Each of FPL's combustion turbines subject to the rule has one stack per combustion turbine generating unit that must demonstrate compliance with the EPA formaldehyde limits. There are a total of 32 stacks that need to be tested.

**Florida Power & Light Company
Docket No. 20220007-EI
Staff's 3rd Set of Interrogatories
Interrogatory No. 28
Page 1 of 1**

QUESTION:

For the following questions, please refer to FPL's witness MacGregor's direct testimony filed April 1, 2022, page 5, lines 4 through 8, and FPL's responses to Staff's Second Set of Interrogatories, No. 25.

Would different contractors be used for the testing or the same contractor?

RESPONSE:

FPL would use the same contractor for the testing. FPL reviewed bids from three contractors that have the capability to conduct the requisite testing and selected the lowest cost contractor that met FPL's requirements.

**Florida Power & Light Company
Docket No. 20220007-EI
Staff's 3rd Set of Interrogatories
Interrogatory No. 29
Page 1 of 1**

QUESTION:

For the following questions, please refer to FPL's witness MacGregor's direct testimony filed April 1, 2022, page 5, lines 4 through 8, and FPL's responses to Staff's Second Set of Interrogatories, No. 25.

If the same contractor would be used for testing, where is that contractor located?

RESPONSE:

FPL's selected contractor has facilities in 7 states. While FPL does not determine which of the facilities will supply the crew that will conduct the testing for FPL, it is FPL's understanding that the test crew will come from the contractor's Louisiana offices.

**Florida Power & Light Company
Docket No. 20220007-EI
Staff's 3rd Set of Interrogatories
Interrogatory No. 30
Page 1 of 1**

QUESTION:

For the following questions, please refer to FPL's witness MacGregor's direct testimony filed April 1, 2022, page 5, lines 4 through 8, and FPL's responses to Staff's Second Set of Interrogatories, No. 25.

Does FPL have an estimated mobilization and demobilization rate for the contractor(s) that would be performing the testing?

- a. If so, what is/are the rate(s)?**

RESPONSE:

Yes.

- a. FPL has received a quote of [REDACTED] per site mobilization/demobilization and a quote of [REDACTED] per rush mobilization/demobilization (*i.e.*, less than 5 days' notice) where system dispatch requirements impact scheduled testing. The mobilization/demobilization charge is in addition to the other stack testing costs including per stack testing fee, project support (test protocol, reports, etc.) and crew per diem.

**Florida Power & Light Company
Docket No. 20220007-EI
Staff's 3rd Set of Interrogatories
Interrogatory No. 31
Page 1 of 1**

QUESTION:

For the following questions, please refer to FPL's witness MacGregor's direct testimony filed April 1, 2022, page 5, lines 4 through 8, and FPL's responses to Staff's Second Set of Interrogatories, No. 25.

Does the initial compliance cost of \$380,000 include an estimated mobilization and demobilization cost or just the \$5,500 testing cost per stack?

RESPONSE:

Yes. The initial compliance cost includes mobilization and demobilization costs, which is standard across the stack testing industry. Stack testing company charges across the industry, and in bids that FPL received for this project, include mobilization/demobilization, per stack testing fee, project support (test protocol, reports, etc.) and crew per diem.