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OPC's Response to Staff's First Set of
Interrogatories Nos.1-2

(No. 2 has an attachment)

QUESTION:

Please refer to the direct testimony of FPL's witness Jarro for the following question.

Winterization Projects. Please refer to page 9, line 19 and page 10, line 3. Why was the 1989 winter-type event analyzed as opposed to the 1977 or 2010 winter-type events?

RESPONSE:

FPL experienced very high Winter loads in 1989 and again in 2010. In the 1989 event, the electrical heating loads were so high that FPL could not serve all of the customer demand. This resulted in large numbers of customers experiencing periods in which power to their homes could not be delivered, i.e., customers experienced "rolling blackouts". Although the 1977 winter event had a significant impact to Floridians and FPL's system, FPL does not have the necessary historical system information regarding that event to either perform a meaningful analysis or to use that event as the basis for an extreme winter forecast. In regard to the 2010 winter event, it was a significant event, but it was not as extreme as the 1989 event and no FPL firm customers had their load curtailed. Consequently, FPL chose the temperatures from the 1989 event, and the hourly load profile from the 2010 event, as the basis for its Extreme Winter forecast.

RESPONSE:

Please see completed table provided as Attachment 1 to this response.