

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Florida Power & Light Company.	DOCKET NO. 160021-EI
In re: Petition for approval of 2016-2018 storm hardening plan, by Florida Power & Light Company.	DOCKET NO. 160061-EI
In re: 2016 depreciation and dismantlement study by Florida Power & Light Company.	DOCKET NO. 160062-EI
In re: Petition for limited proceeding to modify and continue incentive mechanism, by Florida Power & Light Company.	DOCKET NO. 160088-EI
	DATED: November 10, 2016

LARSON POST-HEARING STATEMENT AND BRIEF

Pursuant to Order No. PSC-16-0483-PHO-EI, issued on October 24, 2016 (“Second Prehearing Order”), and pursuant to Rule 28-106.215, Florida Administrative Code (“F.A.C.”), Mr. Daniel R. Larson and Mrs. Alexandria Larson (“Larson”), Mr. Daniel R. Larson and Mrs. Alexandria Larson (“Larson”), by and through undersigned counsel, hereby submit their Post-Hearing Statement and Brief.

STATEMENT OF BASIC POSITION

1. On October 27, 2016, Mr. Daniel R. Larson and Mrs. Alexandria Larson (“Larson”), by and through undersigned counsel, timely filed their Written Statement in Lieu of Appearance at the settlement hearing. The Larsons join with AARP in opposing the proposed Settlement Agreement and further assert that the proposed Settlement Agreement is not in the public interest for the following reasons:

- a. The proposed Settlement Agreement represents a financial windfall to FPL to the detriment of residential customers. If the proposed settlement is approved by the Commission, residential customers will be forced to subsidize the costs of credits given to other rate classes resulting in higher bills and residential electric rates that are not fair, just, and reasonable.
- b. The Commission should place additional conditions and safeguards on the other concessions within the proposed Settlement Agreement to protect all FPL ratepayers (e.g.; guaranteed savings for the pipeline transfer and solar cost recovery).
- c. With respect to the Notice of Need of Commission Decision for Issues 7-23 pertaining to FPL's Storm Hardening Plan and Wooden Pole Inspection Program, the Larsons respectfully suggest that the Commission should stay a decision on Issues 7-23 pending a Commission workshop to assess the effectiveness and weaknesses of FPL's Storm Hardening Plan and Wooden Pole Inspection Program in the wake of Hurricane Matthew. Numerous inland and coastal FPL customers experienced extended, storm related outages which warrant review and implementation of lessons learned prior to Commission approval of Issues 7-23.

ISSUES AND POSITIONS

LEGAL ISSUES

ISSUE 1: Whether the Settlement Agreement dated October 6, 2016 is in the public interest and should be approved?

*No. The Larsons join with AARP in opposing the proposed Settlement Agreement. The proposed Settlement Agreement represents a financial windfall

to FPL to the detriment of residential customers. If the proposed settlement is approved by the Commission, residential customers will be forced to subsidize the costs of credits given to other rate classes resulting in higher bills and residential electric rates that are not fair, just, and reasonable.*

ISSUE 2: Should the consolidated docket be closed?

No.

CONCLUSION

For the reasons stated herein, the Commission should deny the Settlement Agreement in the above captioned docket and stay a decision on Issues 7-23 pending a Commission workshop to assess the effectiveness and weaknesses of FPL's Storm Hardening Plan and Wooden Pole Inspection Program in the wake of Hurricane Matthew.

Respectfully submitted this 10th day of November, 2016.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been filed with the Commission Clerk and furnished to the parties of record and interested parties indicated below via electronic mail on November 10, 2016:

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