

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Evaluation of storm restoration costs for
Florida Power & Light Company related to
Hurricane Irma.

DOCKET NO. 20180049-EI

DATED: SEPTEMBER 12, 2018

STAFF'S FIRST SET OF INTERROGATORIES TO FLORIDA POWER & LIGHT
COMPANY (NOS. 1-6)

The Staff of the Florida Public Service Commission, by and through its undersigned attorney, propounds the following interrogatories, pursuant to Rule 1.340, Florida Rules of Civil Procedure, to Florida Power & Light (FPL). These interrogatories shall be answered under oath by you or your agent, who is qualified and who will be identified, with the answers being served as provided by the Rules of Civil Procedure, **and within the time period set out in Order No. PSC-2018-0290-PCO-EI**. As provided by Rule 1.340(a), Florida Rules of Civil Procedure, each interrogatory shall be answered separately and fully in writing under oath unless it is objected to. Each answer shall be signed by the person making it.

Give the name, address, and relationship to FPL of those persons providing the answers to each of the following interrogatories.

If an interrogatory contained herein asks for information that has already been provided or is in the process of being provided to the Commission through a Commission audit, please so state, indicating the date provided and the audit document/record request number.

DEFINITIONS

“You”, “your”, “Company” or “FPL” refers to Florida Power & Light Co., its employees and authorized agents.

“Document” refers to written matter of any kind, regardless of its form, and to information recorded on any storage medium, whether in electrical, optical or electromagnetic form, and capable of reduction to writing by the use of computer hardware and software.

“Identify” means:

- (a) With respect to a person, to state the person’s name, address and business relationship (e.g., “employee”) to the Company;
- (b) With respect to a document, to state the nature of the document in sufficient detail for identification in a request for production, its date, its author, and to identify its custodian. If the information or document identified is recorded in electrical, optical or electromagnetic form, identification includes a description of the computer hardware or software required to reduce it to readable form.

INTERROGATORIES

1. Please refer to page 23, lines 15 through 22 of FPL witness Miranda's direct testimony.

a. On what day did FPL began to commit to resources for restoration work?

b. On what day did FPL begin to open staging sites?

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2. Please refer to page 26, line 10 of witness Miranda's direct testimony. What is meant by
"FPL embedded contractors?"

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3. Please refer to page 26, lines 10 through 13 of witness Miranda's direct testimony.

a. Please explain how FPL determines when to begin follow-up work.

b. What is the time frame when follow-up work generally starts? (for example, 24 hours after 99% of customers are restored)

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- c. Please explain how FPL determines when to release external contractors.

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4. Please refer to page 30, lines 5 through 9 of witness Miranda's direct testimony. Please describe the advantages and any disadvantages of acquiring external resources earlier.

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5. Please refer to page 31, lines 3 through 6 of witness Miranda's direct testimony. What is meant by "embedded reporters at the FPL command center?"

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6. Please refer to page 14, lines 11 through 15 of FPL witness DeVarona's direct testimony.
 - a. Please explain the difference between the contractors that the External Affairs and Economic Development (EA) business unit retained to clear debris and lines to help open roads and the contractors that witness Miranda discusses in his direct testimony on page 26 at line 10.

SUZANNE S. BROWNLESS
Special Counsel, Office of the General Counsel

FLORIDA PUBLIC SERVICE COMMISSION
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
(850) 413-6199
sbrownle@psc.state.fl.us

AFFIDAVIT

STATE OF FLORIDA)

COUNTY OF _____)

I hereby certify that on this _____ day of _____, 2018, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared _____, who is personally known to me, and he/she acknowledged before me that he/she provided the answers to interrogatory number(s) _____ from STAFF'S FIRST SET OF INTERROGATORIES TO FLORIDA POWER & LIGHT (Nos. 1-6) in Docket 20180049-EI, and that the responses are true and correct based on his/her personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this _____ day of _____, 2018.

Notary Public
State of Florida, at Large

My Commission Expires:

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that STAFF'S FIRST SET OF INTERROGATORIES TO FLORIDA POWER & LIGHT (Nos. 1-6) has been served by electronic mail to Kenneth M. Rubin and Kevin Donaldson, 700 Universe Boulevard, Juno Beach, Florida 33408, Ken.rubin@fpl.com / kevin.donaldson@fpl.com and that a true copy has been furnished to the following by electronic mail this 12th day of September, 2018:

Jon Moyle Jr.
Karen Putnal
Moyle Law Firm, PA
118 North Gadsden St.
Tallahassee, FL 32301
jmoyle@moylelaw.com
kputnal@moylelaw.com

Ken Hoffman
Florida Power & Light Company
215 South Monroe Street, Suite 810
Tallahassee, FL 32301
Ken.hoffman@fpl.com

J.R. Kelly
Stephanie Morse
Office of Public Counsel
111 W. Madison St. Room 812
Tallahassee, FL 32399
Kelly.jr@leg.state.fl.us
Morse.stephanie@leg.state.fl.us

Robert S. Wright
John T. Lavia
Gardner Law Firm/ Florida Retail Federation
1300 Thomaswood Dr.
Tallahassee, FL 32308
jlavia@gbwlegal.com
schef@gbwlegal.com

SUZANNE S. BROWNLESS
Special Counsel, Office of the General Counsel

FLORIDA PUBLIC SERVICE COMMISSION
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
(850) 413-6199
sbrownle@psc.state.fl.us