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# Public Service Commission

March 8, 2019

Marie J. Moncada/ Joel T. Baker  
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STAFF'S SECOND DATA REQUEST  
via e-mail

RE: Docket No. 20190034-EI – Petition for approval of optional supplemental power services pilot program and rider, by Florida Power & Light Company.

Dear Ms. Moncada:

By this letter, the Commission staff requests that Florida Power & Light Company (FPL) provide responses to the following data requests:

1. The following questions refer to Florida Power & Light's (FPL or Company) proposed Optional Supplemental Power Services Pilot Program (OSPS).
  - a. Does a generator for which the capital cost has been fully recovered by the Company (i.e. actual life exceeding book life), but is still operable, remain at the customer's premises at a lowered rate for service? As in, will the capital portion of the service agreement terminate for that particular customer?
  - b. If the response to Request No. 1(a.) is negative, please detail the specific accounting treatment that would occur under the specified hypothetical scenario.
2. Please refer to FPL's Responses to Staff's First Set of Data Requests, No. 4 (d.). For the assets listed in this response, please specify which Federal Energy Regulatory Commission (FERC) account(s) the Company intends to record each asset.
3. Please specify which FERC account(s) the Company intends to record the heavy-duty generators and light-duty generators investments.

4. Please refer to page 5 of the Petition for Approval of Optional Supplemental Power Services Pilot Program and Rider (Petition) for the following request. Given that FERC Account 371 – Installations on Customers' Premises currently depreciates at 3.3 percent, how does the Company intend to reconcile (if at all) it's proposed (initial whole life) depreciation rates of 5 percent for heavy-duty generators and 10 percent for light-duty generators?
5. Indicated on page five of the Petition, the Company is proposing a zero percent net salvage rate for both light- and heavy-duty generators. Please briefly discuss the Company's expectations for both gross salvage and cost of removal for the two classes of generators.
6. Please refer to section 12(d) of the proposed Residential and Non-Residential OSPS agreements. In the instance where this provision of "Risk of Loss to Equipment (Company Responsibility)" is invoked, how and from whom would "Company Costs" be recovered? Would the general body of rate payers be held harmless in such an instance?
7. Please refer to the paragraph titled "Limitation of Service" on proposed tariff sheet No. 8.845.
  - a. Please explain why energy provided by OSPS assets on the Company's side of the billing meter will be billed under the customer's otherwise applicable general service rate schedule. Is FPL saying that the customer will be billed for the output of generator?
  - b. Please list the components (e.g., customer charge, non-fuel energy, fuel, other clauses, etc.) of the customer's otherwise applicable general service rate schedule which would be billed to the customer for energy provided by OSPS assets on the Company's side of the billing meter.
8. Please refer to No. 3 of staff's first data request in this docket.
  - a. Please provide the communication and/or agreements with a customer explaining the option of having the Company install additional equipment to assist with meeting system emergencies and other conditions for which the equipment may benefit grid operations.
  - b. Please explain if a customer would be compensated if their OSPS assets are used to benefit grid operations.
  - c. If a customer's OSPS assets are used to benefit grid operations, will the customer's access to power provided by the generating assets be affected?

9. How many customers does FPL anticipate will take service under the proposed pilot?

Please file all responses electronically no later than March 22, 2019 from the Commission's website at [www.floridapsc.com](http://www.floridapsc.com), by selecting the Clerk's Office tab and Electronic Filing Web Form. Please feel free to call me at (850) 413-6584 if you have any questions.

Sincerely,

***Walt Trierweiler***

Walt Trierweiler  
Senior Attorney

WLT/nah

cc: Office of Commission Clerk  
Ken Hoffman, FPL