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# Public Service Commission

June 13, 2019

Kenneth M. Rubin  
Assistant General Counsel  
Florida Power & Light Company  
700 Universe Blvd.  
Juno Beach, Florida 33408

VIA E-MAIL  
[Ken.Rubin@fpl.com](mailto:Ken.Rubin@fpl.com)

RE: Docket No. 20180049-EI – Evaluation of storm restoration costs for Florida Power & Light Company related to Hurricane Irma.

Dear Mr. Rubin:

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

## Settlement Agreement questions

1. Please refer to page 4, paragraphs 2-4. In regards to the \$50 million in cumulative adjustments outlined in paragraphs 2-4, will FPL reverse the charges that it made to the Amortization Reserve? If so, will FPL need to file revised Earning Surveillance Reports as a result of the adjustments made in paragraph 2-4? If not, please explain the accounting treatment FPL will use to make the adjustments described in paragraphs 2-4.
2. Please refer to page 4, paragraph 2. What would be the amount of the Amortization Reserve before and after the \$5 million adjustment in paragraph 2?
3. Please refer to page 5, paragraph 5. Please explain why the Process Provisions excludes employees and personnel working on behalf of mutual aid utilities.
4. Please refer to page 5, paragraph 6. Please explain how the App would work if cellular service is not available.
5. Please refer to page 5, paragraph 6B. Is there a cell or notes page for contractors to enter a reason for an expense in the App?
6. Please refer to page 6, paragraph 8. Is the Crew Tracking App different from the App referenced in paragraph 6?
7. What are FPL's estimated costs for development of Phase I of the FPL App?

8. What are FPL's estimated costs for development of Phase II of the FPL App?
9. What are FPL's estimated costs for ongoing support of the FPL App?
10. Will FPL seek to recover the costs related to the development and ongoing support of its Apps through storm cost recovery?
11. Please refer to page 7, paragraph 9. Please define when a crew is determined to have begun to "travel" and whether or not this includes any mustering time or time spent returning to the crew's home base before heading to FPL's service territory.
12. Please refer to page 8, paragraph 16. Please clarify whether this documentation must be provided for every named storm, regardless of whether or not it affects FPL's service area, or if this documentation is only required when FPL's service area is affected by a named storm.
13. Please refer to pages 8-9, paragraph 16. Please explain what REDi is. Is REDi connected to the Crew Tracking App?
14. Please refer to page 9, paragraph 17. When will an independent audit be required?
15. Please refer to pages 9-10, paragraph 18b. Since the initial independent audit will not delay cost recovery, is this audit different from the audit referenced in paragraph 17?
16. Please refer to page 12, paragraph 25. Please detail the proposed Issue 1A referred to in paragraph 25, and explain how the settlement agreement affects this proposed issue.
17. Do the parties agree that safe and timely restoration of service after a storm event is the overarching goal of this settlement agreement?

Please file all responses electronically no later than June 18, 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) 413-6218 if you have any questions.

Very truly yours,

*/s/ Suzanne Brownless*  
Suzanne Brownless  
Special Counsel

SBr/lms

cc: Office of Commission Clerk  
Jon C. Moyle- Florida Industrial Power Users Group  
Robert Scheffel Wright – Gardner Law Firm  
Stephanie Morse Esq. – Office of Public Counsel