

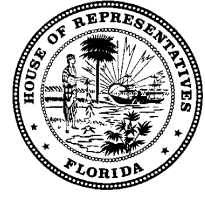


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JOSE R. OLIVA
*Speaker of the House of
Representatives*

January 9, 2020

-VIA ELECTRONIC FILING -

Adam Teitzman
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Re: Docket No. 20190061

Dear Mr. Teitzman:

Please find attached for filing Corrected Pages 7 and 8 of the Supplemental Testimony of James R. Dauphinais. Please contact me if you have any questions about this filing.

Thank you,

s/Stephanie A. Morse
Stephanie A. Morse

Attachments
cc: Parties of Record (w/ attachments)

TABLE JRD-1

SolarTogether Phase 1 Capacity in Excess of FPL’s Forecasted Need

<u>Year</u>	<u>FPL’s Forecasted Summer MW Needed to Meet 20% Reserve Margin</u>	<u>Summer MW that would be Provided by SolarTogether</u>	<u>SolarTogether Summer MW in Excess of FPL Forecasted Need</u>	<u>SolarTogether Nameplate MW_{AC} in Excess of FPL Forecasted Need</u>
2020	19	220	201	408
2021	252	735	483	979
2022	400	735	335	679
2023	764	735	0	0
2024	1,216	735	0	0

1 As can be seen from Table JRD-1, even under FPL’s own forecast, 408 MW_{AC}
 2 of the 447 MW_{AC} of SolarTogether generation projects that would enter service in 2020
 3 would not be needed to meet what FPL suggests is the minimum planning reserve
 4 margin requirement of 20% that FPL is currently using.³ Furthermore, only 64 MW_{AC}
 5 of the 1,043 MW_{AC} of SolarTogether generation projects that would enter service in
 6 2021 would be needed to meet the 20% planning reserve margin requirement in 2021.

³ The OPC takes the position that Order No. PSC-1999-2507-S-EU and its attached stipulation at paragraph 6 make it clear that the 20% minimum reserve margin planning criterion was not an unbounded minimum, but instead was essentially a target that would be maintained “for the indefinite future.” While deviations could occur to “adapt to relevant circumstances,” the Commission reserved the right to take action in response to any changes in the planning criteria. (*Id.* at 9.) In other words, there is a presumption that the 20% is a target reserve margin planning criterion, and neither FPL nor any other utility has unbridled discretion to make the reserve margin planning criterion any number above 20%. My reading of the stipulation attached to Order No. PSC-1999-2507-S-EU, combined with my planning experience, leads me to believe that this is the correct view of how the reserve margin should operate.

1 In addition, in 2022, FPL is forecasting that only 364 MW_{AC} of that 1,043 MW_{AC} of
2 SolarTogether generation would be needed to meet the 20% planning reserve margin
3 requirement.

4 Given all of the foregoing, the Phase 1 SolarTogether generation facilities
5 should only be considered eligible for approval by the Commission if FPL can
6 reasonably demonstrate that Non-Participating Customers will not be economically
7 harmed by this accelerated deployment of projected solar generation additions by FPL.
8 Otherwise, as I noted earlier, Non-Participating Customers will end up subsidizing
9 Participating Customers or, worse yet, subsidizing FPL's shareholders, by paying for
10 investment that is both uneconomic and not needed to provide reliable electric service
11 at the lowest reasonable cost to FPL's customers.

12
13 **III. FPL's REVISED ECONOMIC ANALYSIS**

14 **Q. PLEASE BRIEFLY REVIEW THE ECONOMIC ANALYSIS CONTAINED IN**
15 **FPL'S DIRECT TESTIMONY FOR THE SOLARTOGETHER GENERATION**
16 **FACILITIES FOR FPL'S CUSTOMERS AS A WHOLE.**

17 **A.** Under its mid-level fuel / mid-level CO₂ emission price assumptions, FPL in the
18 economic analysis contained in its direct testimony for its original case forecasted the
19 Phase 1 SolarTogether generation projects would provide a net CPVRR savings for
20 FPL's customers as a whole of \$139 million at the end of the 30-year book life of the
21 projects in 2051, with a forecasted CPVRR payback for FPL's customers as a whole
22 occurring in 2045 – approximately 24 years after the last of the Phase 1 SolarTogether