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July 9, 2020

VIA ELECTRONIC FILING

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

**Re: Docket No. 2020 _____-EI
Joint Petition of Florida Power & Light Company and Gulf Power Company for
Declaratory Statement or, in the Alternative, Petition for Variance**

Dear Mr. Teitzman:

Enclosed for our initial filing please find the Joint Petition of Florida Power & Light Company and Gulf Power Company for Declaratory Statement or, in the Alternative, Petition for Variance, together with attached Exhibits 1 and 2.

Please contact me at (561) 691-2512 if you or your Staff have any questions regarding this filing.

Sincerely,

/s/ Kenneth M. Rubin
Kenneth M. Rubin

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Joint Petition of Florida Power)
& Light Company and Gulf Power) Docket No.
Company for declaratory statement)
regarding application of MFR requirements)
in Rule 25-6.043(1), Florida)
Administrative Code or, in the alternative,) Filed: July 9, 2020
petition for variance from portions of)
the MFR requirements)

**Joint Petition of Florida Power & Light Company and Gulf Power Company
for Declaratory Statement or, in the Alternative, Petition for Variance**

Florida Power & Light Company (“FPL”) and Gulf Power Company (“Gulf”), pursuant to Section 120.565, Florida Statutes (2019) and Rule 28-105.002, Florida Administrative Code (“F.A.C.”) hereby request a declaratory statement by the Commission that the proposed approach described herein for preparing Minimum Filing Requirements (“MFRs”) would meet the MFR requirements set forth in Rule 25-6.043(1), F.A.C., or if the Commission determines that the proposed approach would not meet those requirements, then pursuant to Section 120.542, Florida Statutes (2019) and Rule 28-104.002, F.A.C., FPL and Gulf hereby request a variance from Rule 25-6.043(1), F.A.C., that would allow use of the proposed approach. In support of this petition, FPL and Gulf state as follows:

1. The names and addresses of Petitioners are:

Florida Power & Light Company
700 Universe Boulevard
Juno Beach, Florida 33408

Gulf Power Company
One Energy Place
Pensacola, FL 32520

2. The name and address of the people authorized to receive notices and communications with respect to this Petition are:

R. Wade Litchfield Vice President and General Counsel Florida Power & Light Company 700 Universe Boulevard Juno Beach, Florida 33408 Wade.Litchfield@fpl.com (561) 691-7101	Kenneth A. Hoffman Vice President, Regulatory Affairs Florida Power & Light Company 134 West Jefferson St. Tallahassee, Florida 32301 Ken.Hoffman@fpl.com 850-521-3919
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Introduction and Background

3. Rule 25-6.043, entitled Investor-Owned Electric Utility Minimum Filing Requirements, provides the general filing instructions for utilities when submitting a petition for rate relief. Among the information required by the rule are MFR schedules, which include substantial accounting, engineering, rate, cost of capital and other data that the Commission staff and parties use in reviewing the rate request. The instructions and templates for the MFRs are provided in Commission Form PSC/AFD/011-E (2/04), entitled “Minimum Filing Requirements for Investor-Owned Electric Utilities,” which is incorporated by reference in Rule 25-6.043(1)(a)1.

4. In 2016, FPL entered into a stipulation and settlement (the “2016 FPL Rate Case Settlement”) to resolve its then-pending rate case in Docket No. 20160021-EI. The 2016 FPL Rate Case Settlement, which was approved by the Commission in Order No. PSC-2016-0560-S-EI and affirmed by the Supreme Court of Florida, provided a base rate freeze for a minimum of four years (until the end of 2020), with the opportunity for FPL to continue operating under the settlement terms for an additional year (until the end of 2021) by giving notice of its intent to do so by no later than March 31, 2020. On March 5, 2020, FPL sent a letter to its settlement co-signatories

(with a copy to the Commission) of its intent not to seek new base rates that would be effective any earlier than January 1, 2022.

5. In 2017, Gulf entered into a stipulation and settlement (the “2017 Gulf Rate Case Settlement”) to resolve its then-pending rate case in Docket No. 20160186-EI, which was approved by the Commission in Order No. PSC-2017-0178-S-EI and was not appealed. The 2017 Gulf Rate Case Settlement does not specify a minimum term.

6. In January 2019, FPL’s parent company, NextEra Energy (“NEE”), completed its acquisition of Gulf from Southern Company. Upon the acquisition of Gulf by NEE, FPL and Gulf began to consolidate various aspects of their utility operations; however, they presently operate as separate entities with their own set of books and rates for their respective customers.¹

7. FPL and Gulf have reviewed the MFR requirements for a rate filing in 2021 that would result in new consolidated rates effective January 1, 2022. These rates would reflect the integration of FPL and Gulf operations in a fully-consolidated FPL (“Consolidated FPL”). MFR data for 2022 and beyond naturally and appropriately would be based on the operations of Consolidated FPL. However, because FPL and Gulf will be operated separately with their own sets of books through the end of 2021, there will be only limited data available on a consolidated basis prior to 2022.² Thus, for the individual MFRs that seek data for the test period and prior years for which consolidated data are not available, FPL and Gulf seek a Commission declaration

¹ On May 1, 2020, NEE, FPL and Gulf filed an application with the Federal Energy Regulatory Commission (“FERC”) for approval of an internal corporate reorganization under Section 203 of the Federal Power Act. Under the proposed Reorganization, Gulf Power will merge with and into FPL. The separate legal existence of Gulf Power will cease, and FPL will continue as the surviving entity, effective January 1, 2021. FERC’s decision is expected no later than the end of October 2020.

² FPL intends to prepare a pro forma consolidation of legacy FPL and legacy Gulf rate base and capital structure components for the month of December 2021, in order to calculate 13-month averages for 2022 where required by the MFRs. This process will be relatively straightforward and representative because hypothetically consolidating the companies one month early would change little about the rate base and capital structure components.

that the approach set forth herein will meet the requirements of Rule 25-6.043 or, in the alternative, that the Commission grant the relevant variance from such requirements.

8. Specifically, FPL and Gulf propose to populate Consolidated FPL, Pre-Consolidation FPL (or “legacy FPL”), and Pre-Consolidation Gulf (or “legacy Gulf”) data into the specified format of the MFRs as follows:

- a. There are 55 MFRs that contemplate the reporting of accounting and other data for years prior to the test year. Those MFRs are identified on Exhibit 1 to this petition. For the Exhibit 1 MFRs, FPL proposes to provide Consolidated FPL data for the 2022 test year on an initial page or set of pages (“Page 1”). Then, for reporting on any years prior to the 2022 test year on the Exhibit 1 MFRs, FPL and Gulf would provide standalone data for legacy FPL operations on a second page or set of pages (“Page 2”) and standalone data for legacy Gulf operations on a third page or set of pages (“Page 3”). Together, Pages 1, 2 and 3 would provide a complete view of the requested data for all of the years required by the Exhibit 1 MFRs, while recognizing the reality that in the years prior to 2022, FPL and Gulf were operated as separate entities with their own standalone rate base, operating expenses, etc. Attached as part of Exhibit 1 is a mock-up of MFR B-22 showing on Pages 1, 2 and 3 illustrative data for Consolidated FPL, standalone legacy FPL and standalone legacy Gulf, respectively.
- b. In addition to the 55 MFRs identified in Exhibit 1, there are 8 other MFRs that likewise contemplate the reporting of accounting and other data for years prior to the test year but also require specific calculations and/or comparisons of data

between the 2022 test year and the earlier years. The calculations and comparisons would not be meaningful if made using Consolidated FPL data for the 2022 test year and standalone legacy FPL (or standalone legacy Gulf) data for the prior years. Those MFRs are identified on Exhibit 2 to this petition. In order to provide a basis for the calculations and comparisons required for the Exhibit 2 MFRs, FPL and Gulf propose to add the legacy FPL and legacy Gulf data together for years prior to 2022 and report the resulting totals in the necessary locations on Page 1 of the Exhibit 2 MFRs. FPL would include a footnote to those MFRs making it clear that the totals may not precisely reflect what the results of actual consolidation would have been if FPL and Gulf had been operated as one company but represent the available information for the purpose of the MFRs. Attached as part of Exhibit 2 is a mock-up of each Exhibit 2 MFR showing where the “Legacy FPL + Legacy Gulf” totals would be provided, along with the appropriate footnote.

Declaratory Statement

9. Rule 28-105.002, F.A.C., provides that “[a] petition for declaratory statement may be used to resolve questions or doubts as to how the statutes, rules, or orders may apply to the petitioner’s particular circumstances.” FPL and Gulf respectfully submit that, for a rate case filed in 2021 using a 2022 test year to establish rates for Consolidated FPL as described above, the approach for addressing the Exhibit 1 MFRs and Exhibit 2 MFRs that is set forth in Paragraphs 8(a) and 8(b) would adequately and appropriately satisfy the MFR requirements of Rule 25-6.043(1).

10. Accordingly, FPL and Gulf request that the Commission issue the following declaratory statement: “Preparing the Exhibit 1 and Exhibit 2 MFRs as described in Paragraphs 8(a) and 8(b) of FPL’s and Gulf’s July 9, 2020 joint petition for declaratory statement would adequately and appropriately satisfy the MFR requirements of Rule 25-6.043(1) for years prior to 2022 when FPL and Gulf operations were not yet consolidated.”

Request for Variance

11. FPL and Gulf respectfully submit that the proposed approach will provide the best information available for completing the Exhibit 1 and Exhibit 2 MFRs and that a declaratory statement of the Commission affirming this approach as compliant with Rule 25-6.043(1) is appropriate. However, in the event that the Commission does not grant FPL’s and Gulf’s requested declaratory statement in the affirmative, then FPL and Gulf respectfully request that the Commission grant FPL a variance from Rule 25-6.043(1) to allow FPL to complete and file the Exhibit 1 and Exhibit 2 MFRs as proposed in Paragraphs 8(a) and 8(b).

12. Section 120.542, Florida Statutes, provides that the Commission may grant a variance from its rules “when the person subject to the rule demonstrates that the purpose of the underlying statute will be or has been achieved by other means by the person and when application of a rule would create a substantial hardship or would violate principles of fairness.” As described below, FPL’s and Gulf’s contingent request for a variance meets this test:

- a. The information that FPL would provide in the Exhibit 1 and Exhibit 2 MFRs pursuant to the requested variance would achieve the purpose of the underlying statute. Rule 25-6.043 implements Section 366.06, Florida Statutes, the principal statute governing the Commission’s rate setting procedures. Rule 25-6.043 prescribes the filing requirements for rate cases brought by investor-owned electric utilities, so that the

Commission is provided up front with the information necessary for its preliminary evaluation of those cases. A significant part of that information is to be contained in the MFRs prescribed by Rule 25-6.043(1). The proposed approach to the Exhibit 1 and Exhibit 2 MFRs described above will provide the Commission with the types of information contemplated by those MFRs, to the maximum extent it is available, so that the Commission would be in a position to evaluate a rate case filing based on those MFRs. Thus, the requested variance would achieve the underlying purpose of Section 366.06.

- b. Not permitting the proposed approach for completing the Exhibit 1 and Exhibit 2 MFRs would create a substantial hardship and violate principles of fairness. FPL and Gulf do not believe that there is a more reasonable or meaningful way to populate the information required for the Exhibit 1 and Exhibit 2 MFRs than what it has proposed herein. Thus, if the requested declaratory statement were denied and no variance were granted for the Exhibit 1 and Exhibit 2 MFRs, FPL would risk being found deficient in its rate case filing, which would impose a substantial hardship and violate principles of fairness.

WHEREFORE, FPL and Gulf respectfully request that the Commission issue a declaratory statement affirming that: “Preparing the Exhibit 1 and Exhibit 2 MFRs as described in Paragraphs 8(a) and 8(b) of FPL’s and Gulf’s July 9, 2020 joint petition for declaratory statement would adequately and appropriately satisfy the MFR requirements of Rule 25-6.043(1) for years prior to 2022 when FPL and Gulf operations were not yet consolidated.” In the event or to the extent that the Commission does not grant the requested declaratory statement, then FPL and Gulf respectfully

request that the Commission grant a variance from Rule 25-6.043(1) to allow the completion and submission of the Exhibit 1 and Exhibit 2 MFRs as proposed in Paragraphs 8(a) and 8(b).

Respectfully submitted this 9th day of July 2020.

<p>John T. Burnett Vice President and Deputy General Counsel Florida Power & Light Company 700 Universe Boulevard Juno Beach, Florida 33408-0420 John.T.Burnett@fpl.com (561) 304-5795</p>	<p>Russell M. Badders Vice President and Associate General Counsel Gulf Power Company One Energy Place Pensacola, FL 32520-0100 Florida Bar No. 007455 Russell.Badders@nexteraenergy.com (850) 444-6550</p> <p>John T. Butler 700 Universe Boulevard Juno Beach, Florida 33408 John.Butler@fpl.com 561-691-7100 Counsel for Florida Power & Light Company And Gulf Power Company</p> <p>By: <i>s/ John T. Butler</i> John T. Butler Fla. Bar No. 283479</p>
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Joint Petition of FPL and Gulf for Declaratory Statement or Petition for Variance
 Exhibit 1 - MFRs Reporting Accounting and Other Data for Years Prior to the Test Year
 Page 1 of 5

MFR	MFR Description
B-01	ADJUSTED RATE BASE
B-02	RATE BASE ADJUSTMENTS
B-03	13 MONTH AVERAGE BALANCE SHEET - SYSTEM BASIS
B-04	TWO YEAR HISTORICAL BALANCE SHEET
B-06	JURISDICTIONAL SEPARATION FACTORS - RATE BASE
B-11	CAPITAL ADDITIONS AND RETIREMENTS
B-12	PRODUCTION PLANT ADDITIONS
B-15	PROPERTY HELD FOR FUTURE USE - 13 MONTH AVERAGE
B-16	NUCLEAR FUEL BALANCES
B-17	WORKING CAPITAL - 13 MONTH AVERAGE
B-18	FUEL INVENTORY BY PLANT
B-21	ACCUMULATED PROVISION ACCOUNTS - 228.1, 228.2 and 228.4
B-22	TOTAL ACCUMULATED DEFERRED INCOME TAXES
B-23	INVESTMENT TAX CREDITS - ANNUAL ANALYSIS
B-24	LEASING ARRANGEMENTS
B-25	ACCOUNTING POLICY CHANGES AFFECTING RATE BASE
C-01	ADJUSTED JURISDICTIONAL NET OPERATING INCOME
C-02	NET OPERATING INCOME ADJUSTMENTS
C-03	JURISDICTIONAL NET OPERATING INCOME ADJUSTMENTS
C-04	JURISDICTIONAL SEPARATION FACTORS-NET OPERATING INCOME
C-06	BUDGETED VERSUS ACTUAL OPERATING REVENUES AND EXPENSES
C-09	FIVE YEAR ANALYSIS - CHANGE IN COST
C-11	UNCOLLECTIBLE ACCOUNTS
C-13	MISCELLANEOUS GENERAL EXPENSES
C-14	ADVERTISING EXPENSES
C-15	INDUSTRY ASSOCIATION DUES
C-16	OUTSIDE PROFESSIONAL SERVICES
C-17	PENSION COST
C-18	LOBBYING EXPENSES, OTHER POLITICAL EXPENSES AND CIVIC/CHARITABLE CONTRIBUTIONS
C-20	TAXES OTHER THAN INCOME TAXES
C-21	REVENUE TAXES
C-22	STATE AND FEDERAL INCOME TAX CALCULATION
C-23	INTEREST IN TAX EXPENSE CALCULATION
C-24	PARENT(S) DEBT INFORMATION
C-25	DEFERRED TAX ADJUSTMENT
C-26	INCOME TAX RETURNS

Joint Petition of FPL and Gulf for Declaratory Statement or Petition for Variance
 Exhibit 1 - MFRs Reporting Accounting and Other Data for Years Prior to the Test Year
 Page 2 of 5

C-28	MISCELLANEOUS TAX INFORMATION
C-29	GAINS & LOSSES ON DISPOSITION OF PLANT AND PROPERTY
C-34	STATISTICAL INFORMATION
C-39	BENCHMARK YEAR RECOVERABLE O & M EXPENSES BY FUNCTION
C-40	O & M COMPOUND MULTIPLIER CALCULATION
C-43	SECURITY COSTS
D-01a	COST OF CAPITAL - 13-MONTH AVERAGE
D-01b	COST OF CAPITAL - ADJUSTMENTS
D-02	COST OF CAPITAL - 5 YEAR HISTORY
D-03	SHORT-TERM DEBT
D-04a	LONG-TERM DEBT OUTSTANDING
D-04b	REACQUIRED BONDS
D-05	PREFERRED STOCK OUTSTANDING
D-06	CUSTOMER DEPOSITS
D-07	COMMON STOCK DATA
D-09	FINANCIAL INDICATORS SUMMARY
E-16	CUSTOMERS BY VOLTAGE LEVEL
E-17	LOAD RESEARCH DATA
E-18	MONTHLY PEAKS

In the following illustrative mockup of MFR B-22, “[Consolidated FPL]” refers to data for FPL once FPL’s and Gulf’s operations have been fully integrated, “[Legacy FPL]” refers to data for FPL based on its separate, pre-consolidation operations, and “[Legacy Gulf]” refers to data for Gulf based on its separate, pre-consolidation operations. Please note that the terms “legacy FPL” and “pre-consolidation FPL,” as well as “legacy Gulf” and “pre-consolidation Gulf,” are used interchangeably in the illustrative MFR B-22.

Joint Petition of FPL and Gulf for Declaratory Statement or Petition for Variance
 Exhibit 1 - MFRs Reporting Accounting and Other Data for Years Prior to the Test Year
 Page 3 of 5

Schedule B-22

TOTAL ACCUMULATED DEFERRED INCOME TAXES

Page 1 of 3

FLORIDA PUBLIC SERVICE COMMISSION
 COMPANY: FLORIDA POWER & LIGHT COMPANY
 AND SUBSIDIARIES (CONSOLIDATED)

EXPLANATION: For each of the accumulated deferred income tax accounts (Nos. 190, 281, 282, 283), provide annual balances beginning with the historical base year in the last rate case and ending with the end of the test year.

Type of Data Shown:
 Projected Test Year Ended 12/31/22
 Prior Year Ended 12/31/21
 Historical Test Year Ended 12/31/20

DOCKET NO.:

Witness:

Line No.	Annual Period	Account 190 Accumulated Deferred Income Taxes Dr(Cr)	Account 281 Accumulated Deferred Income Taxes Cr(Dr)	Account 282 Accumulated Deferred Income Taxes Cr(Dr)	Account 283 Accumulated Deferred Income Taxes Cr(Dr)	Net Accumulated Deferred Income Taxes Cr(Dr)
1.	2015	See pages 2 and 3	See pages 2 and 3	See pages 2 and 3	See pages 2 and 3	See pages 2 and 3
2.	2016	See pages 2 and 3	See pages 2 and 3	See pages 2 and 3	See pages 2 and 3	See pages 2 and 3
3.	2017	See pages 2 and 3	See pages 2 and 3	See pages 2 and 3	See pages 2 and 3	See pages 2 and 3
4.	2018	See pages 2 and 3	See pages 2 and 3	See pages 2 and 3	See pages 2 and 3	See pages 2 and 3
5.	2019	See pages 2 and 3	See pages 2 and 3	See pages 2 and 3	See pages 2 and 3	See pages 2 and 3
6.	2020	See pages 2 and 3	See pages 2 and 3	See pages 2 and 3	See pages 2 and 3	See pages 2 and 3
7.	2021	See pages 2 and 3	See pages 2 and 3	See pages 2 and 3	See pages 2 and 3	See pages 2 and 3
8.	2022	[Consolidated FPL]	[Consolidated FPL]	[Consolidated FPL]	[Consolidated FPL]	[Consolidated FPL]
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Supporting Schedules:

Recap Schedules:

Joint Petition of FPL and Gulf for Declaratory Statement or Petition for Variance
 Exhibit 1 - MFRs Reporting Accounting and Other Data for Years Prior to the Test Year
 Page 4 of 5

Schedule B-22

TOTAL ACCUMULATED DEFERRED INCOME TAXES

Page 2 of 3

FLORIDA PUBLIC SERVICE COMMISSION EXPLANATION: For each of the accumulated deferred income tax accounts (Nos. 190, 281, 282, 283), provide annual balances beginning with the historical base year in the last rate case and ending with the end of the test year.

COMPANY: FLORIDA POWER & LIGHT COMPANY AND SUBSIDIARIES (PRE-CONSOLIDATION FPL)

DOCKET NO.:

Type of Data Shown:
 Projected Test Year Ended 12/31/22
 Prior Year Ended 12/31/21
 Historical Test Year Ended 12/31/20

Witness:

Line No.	Annual Period	Account 190 Accumulated Deferred Income Taxes Dr(Cr)	Account 281 Accumulated Deferred Income Taxes Cr(Dr)	Account 282 Accumulated Deferred Income Taxes Cr(Dr)	Account 283 Accumulated Deferred Income Taxes Cr(Dr)	Net Accumulated Deferred Income Taxes Cr(Dr)
1.	2015	[Legacy FPL]	[Legacy FPL]	[Legacy FPL]	[Legacy FPL]	[Legacy FPL]
2.	2016	[Legacy FPL]	[Legacy FPL]	[Legacy FPL]	[Legacy FPL]	[Legacy FPL]
3.	2017	[Legacy FPL]	[Legacy FPL]	[Legacy FPL]	[Legacy FPL]	[Legacy FPL]
4.	2018	[Legacy FPL]	[Legacy FPL]	[Legacy FPL]	[Legacy FPL]	[Legacy FPL]
5.	2019	[Legacy FPL]	[Legacy FPL]	[Legacy FPL]	[Legacy FPL]	[Legacy FPL]
6.	2020	[Legacy FPL]	[Legacy FPL]	[Legacy FPL]	[Legacy FPL]	[Legacy FPL]
7.	2021	[Legacy FPL]	[Legacy FPL]	[Legacy FPL]	[Legacy FPL]	[Legacy FPL]
8.	2022	See page 1	See page 1	See page 1	See page 1	See page 1
9.						
10.						
11.						
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Supporting Schedules:

Recap Schedules:

Joint Petition of FPL and Gulf for Declaratory Statement or Petition for Variance
 Exhibit 1 - MFRs Reporting Accounting and Other Data for Years Prior to the Test Year
 Page 5 of 5

Schedule B-22

TOTAL ACCUMULATED DEFERRED INCOME TAXES

Page 3 of 3

FLORIDA PUBLIC SERVICE COMMISSION

EXPLANATION:

For each of the accumulated deferred income tax accounts (Nos. 190, 281, 282, 283), provide annual balances beginning with the historical base year in the last rate case and ending with the end of the test year.

Type of Data Shown:

- Projected Test Year Ended 12/31/22
- Prior Year Ended 12/31/21
- Historical Test Year Ended 12/31/20

COMPANY: FLORIDA POWER & LIGHT COMPANY
 AND SUBSIDIARIES (PRE-CONSOLIDATION GULF)

DOCKET NO.:

Witness:

Line No.	Annual Period	Account 190 Accumulated Deferred Income Taxes Dr(Cr)	Account 281 Accumulated Deferred Income Taxes Cr(Dr)	Account 282 Accumulated Deferred Income Taxes Cr(Dr)	Account 283 Accumulated Deferred Income Taxes Cr(Dr)	Net Accumulated Deferred Income Taxes Cr(Dr)
1.	2015	[Legacy Gulf]	[Legacy Gulf]	[Legacy Gulf]	[Legacy Gulf]	[Legacy Gulf]
2.	2016	[Legacy Gulf]	[Legacy Gulf]	[Legacy Gulf]	[Legacy Gulf]	[Legacy Gulf]
3.	2017	[Legacy Gulf]	[Legacy Gulf]	[Legacy Gulf]	[Legacy Gulf]	[Legacy Gulf]
4.	2018	[Legacy Gulf]	[Legacy Gulf]	[Legacy Gulf]	[Legacy Gulf]	[Legacy Gulf]
5.	2019	[Legacy Gulf]	[Legacy Gulf]	[Legacy Gulf]	[Legacy Gulf]	[Legacy Gulf]
6.	2020	[Legacy Gulf]	[Legacy Gulf]	[Legacy Gulf]	[Legacy Gulf]	[Legacy Gulf]
7.	2021	[Legacy Gulf]	[Legacy Gulf]	[Legacy Gulf]	[Legacy Gulf]	[Legacy Gulf]
8.	2022	See page 1	See page 1	See page 1	See page 1	See page 1
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Supporting Schedules:

Recap Schedules:

Joint Petition of FPL and Gulf for Declaratory Statement or Petition for Variance
 Exhibit 2 - MFRs Requiring Calculations/Comparisons between the Test Year and Earlier Years
 Page 1 of 21

MFR	MFR Description
B-05	DETAIL OF CHANGES IN RATE BASE
C-08	DETAIL OF CHANGES IN EXPENSES
C-12	ADMINISTRATIVE EXPENSES
C-33	PERFORMANCE INDICES
C-35	PAYROLL AND FRINGE BENEFIT INCREASES COMPARED TO CPI
C-36	NON-FUEL OPERATION AND MAINTENANCE EXPENSE COMPARED TO CPI
C-37	O & M BENCHMARK COMPARISON BY FUNCTION
E-01	COST OF SERVICE STUDIES

In the following illustrative mockups of the MFRs listed above, “[Legacy FPL + Legacy Gulf]” refers to the sum of data for FPL’s and Gulf’s separate pre-consolidation operations; the mockup MFRs also have red text to show where values derived from calculations and comparisons using the “[Legacy FPL + Legacy Gulf]” values would appear. Please note that the terms “legacy FPL” and “pre-consolidation FPL,” as well as “legacy Gulf” and “pre-consolidation Gulf,” are used interchangeably in the illustrative MFRs.

Joint Petition of FPL and Gulf for Declaratory Statement or Petition for Variance
 Exhibit 2 - MFRs Requiring Calculations/Comparisons between the Test Year and Earlier Years
 Page 2 of 21

Schedule B-5

DETAIL OF CHANGES IN RATE BASE

Page 1 of 3

FLORIDA PUBLIC SERVICE COMMISSION
 COMPANY: FLORIDA POWER & LIGHT COMPANY
 AND SUBSIDIARIES (CONSOLIDATED)

EXPLANATION:

Provide the data listed below regarding all changes in rate base primary accounts that exceed 1/20th of one percent (.0005) of total rate base and ten percent from the prior year to the test year. Quantify each reason for the change.

Type of Data Shown:
 Projected Test Year Ended 12/31/22
 Prior Year Ended 12/31/21¹
 Historical Test Year Ended ___/___/___

DOCKET NO.:

Witness:

Line No.	(1) Account Number		(2) Account Name	(3) Test Year Ended 12/31/2022	(4) Prior Year ¹ Ended 12/31/2021	(5) Increase / (Decrease) ¹		(6) Reason(s) for Change
	Amount (3)-(4) (000)	Percent (5)/(4) (%)						
1	107	CONSTRUCTION WORK IN PROGRESS-ELECTRIC	X,XXX,XXX	[Legacy FPL + Legacy Gulf]	X,XXX,XXX	XX.XX%	Reason A	
2							Reason B	
3							Reason C	
4	131	CASH	X,XXX,XXX	[Legacy FPL + Legacy Gulf]	X,XXX,XXX	XX.XX%	Reason D	
5							Reason E	
6							Reason F	
7	183	PRELIM SURVEY & INVESTIGATION CHARGES	X,XXX,XXX	[Legacy FPL + Legacy Gulf]	X,XXX,XXX	XX.XX%	Reason G	
8								
9								
10	236	TAXES ACCRUED	X,XXX,XXX	[Legacy FPL + Legacy Gulf]	X,XXX,XXX	XX.XX%		
11								
12								
13	253	OTHER DEFERRED CREDITS	X,XXX,XXX	[Legacy FPL + Legacy Gulf]	X,XXX,XXX	XX.XX%		

Notes:

¹The requested data is not available for consolidated FPL in the prior year. For the purpose of this MFR, prior year amounts reflected for all accounts are instead assumed to be the sum of the amounts of pre-consolidation FPL and pre-consolidation Gulf in the prior year (minus elimination of intercompany transactions). All accounts that meet the threshold of 1/20th of one percent of total rate base for consolidated FPL in the projected test year and represent at least a ten percent change from the calculated prior year are included in this MFR. The amounts for each company pre-consolidation are listed on pages 2 and 3 of this MFR. Please note that totaling values for pre-consolidation FPL and Gulf in this manner may not precisely reflect the results of actual consolidation if FPL and Gulf were operated as one company, but it is the best information available to provide the required calculation.

Supporting Schedules:

Recap Schedules: B-6

Joint Petition of FPL and Gulf for Declaratory Statement or Petition for Variance
 Exhibit 2 - MFRs Requiring Calculations/Comparisons between the Test Year and Earlier Years
 Page 3 of 21

Schedule B-5

DETAIL OF CHANGES IN RATE BASE

Page 2 of 3

FLORIDA PUBLIC SERVICE COMMISSION
 COMPANY: FLORIDA POWER & LIGHT COMPANY
 AND SUBSIDIARIES (PRE-CONSOLIDATION FPL)
 DOCKET NO.:

EXPLANATION:

Provide the data listed below regarding all changes in rate base primary accounts that exceed 1/20th of one percent (.0005) of total rate base and ten percent from the prior year to the test year. Quantify each reason for the change.

Type of Data Shown:
 Projected Test Year Ended 12/31/22
 Prior Year Ended 12/31/21
 Historical Test Year Ended / /
 Witness:

Line No.	(1) Account Number	(2) Account Name	(3) Test Year Ended 12/31/2022	(4) Prior Year Ended 12/31/2021	(5) Increase / (Decrease)		(6) Percent (5)/(4) (%)	(7) Reason(s) for Change
					Amount (3)-(4) (000)	Amount		
1	107	CONSTRUCTION WORK IN PROGRESS-ELECTRIC	See page 1	X,XXX,XXX	See page 1	See page 1	See page 1	
2								
3								
4	131	CASH	See page 1	X,XXX,XXX	See page 1	See page 1	See page 1	
5								
6								
7	183	PRELIM SURVEY & INVESTIGATION CHARGES	See page 1	X,XXX,XXX	See page 1	See page 1	See page 1	
8								
9								
10	236	TAXES ACCRUED	See page 1	X,XXX,XXX	See page 1	See page 1	See page 1	
11								
12								
13	253	OTHER DEFERRED CREDITS	See page 1	X,XXX,XXX	See page 1	See page 1	See page 1	

Notes:

Supporting Schedules:

Recap Schedules: B-6

Joint Petition of FPL and Gulf for Declaratory Statement or Petition for Variance
 Exhibit 2 - MFRs Requiring Calculations/Comparisons between the Test Year and Earlier Years
 Page 4 of 21

Schedule B-5

DETAIL OF CHANGES IN RATE BASE

Page 3 of 3

FLORIDA PUBLIC SERVICE COMMISSION
 COMPANY: FLORIDA POWER & LIGHT COMPANY
 AND SUBSIDIARIES (PRE-CONSOLIDATION GULF)

EXPLANATION:

Provide the data listed below regarding all changes in rate base primary accounts that exceed 1/20th of one percent (.0005) of total rate base and ten percent from the prior year to the test year. Quantify each reason for the change.

Type of Data Shown:
 Projected Test Year Ended 12/31/22
 Prior Year Ended 12/31/21
 Historical Test Year Ended ___/___/___

DOCKET NO.:

Witness:

Line No.	(1) Account Number	(2) Account Name	(3) Test Year Ended 12/31/2022	(4) Prior Year Ended 12/31/2021	(5) Increase / (Decrease)		(7) Reason(s) for Change
					(6) Amount (3)-(4) (000)	(6) Percent (5)/(4) (%)	
1	107	CONSTRUCTION WORK IN PROGRESS-ELECTRIC	See page 1	X,XXX,XXX	See page 1	See page 1	See page 1
2							
3							
4	131	CASH	See page 1	X,XXX,XXX	See page 1	See page 1	See page 1
5							
6							
7	183	PRELIM SURVEY & INVESTIGATION CHARGES	See page 1	X,XXX,XXX	See page 1	See page 1	See page 1
8							
9							
10	236	TAXES ACCRUED	See page 1	X,XXX,XXX	See page 1	See page 1	See page 1
11							
12							
13	253	OTHER DEFERRED CREDITS	See page 1	X,XXX,XXX	See page 1	See page 1	See page 1

Notes:

Supporting Schedules:

Recap Schedules: B-6

Schedule C-8

DETAIL OF CHANGES IN EXPENSES

Page 1 of 3

FLORIDA PUBLIC SERVICE COMMISSION
 COMPANY: FLORIDA POWER & LIGHT COMPANY
 AND SUBSIDIARIES (CONSOLIDATED)

EXPLANATION: Provide the changes in primary accounts that exceed 1/20th of one percent (.0005) of total operating expenses and ten percent from the prior year to the test year. Quantify each reason for the change.

Type of Data Shown:
 Projected Test Year Ended 12/31/22
 Prior Year Ended 12/31/21¹
 Historical Test Year Ended ___/___/___

DOCKET NO.:

Witness:

(1) Account Number	(2) Account	(3) Test Year Ended 12/21/2022	(4) Prior Year ¹ Ended 12/31/2021	(5) Increase / (Decrease) ¹		(6) Percent (5)/(4) (%)	(7) Reason(s) for Change
				Dollars (3)-(4) (000)			
404	Amortization of Limited-Term Electric Plant, and amortization and depletion of producing natural gas land and land rights	XXX,XXX	[Legacy FPL + Legacy Gulf]	XXX,XXX		XX.XX%	Reason A
407	Amortization of property losses, unrecovered plant and regulatory study costs.	XXX,XXX	[Legacy FPL + Legacy Gulf]	XXX,XXX		XX.XX%	Reason B
409+ 410 + 411	Operating income taxes.	XXX,XXX	[Legacy FPL + Legacy Gulf]	XXX,XXX		XX.XX%	Reason C
506	Miscellaneous steam power expenses (Major only).	XXX,XXX	[Legacy FPL + Legacy Gulf]	XXX,XXX		XX.XX%	Reason D
512	Maintenance of boiler plant (Major only).	XXX,XXX	[Legacy FPL + Legacy Gulf]	XXX,XXX		XX.XX%	Reason E
528	Maintenance supervision and engineering (Major only).	XXX,XXX	[Legacy FPL + Legacy Gulf]	XXX,XXX		XX.XX%	Reason F
530	Maintenance of reactor plant equipment (Major only).	XXX,XXX	[Legacy FPL + Legacy Gulf]	XXX,XXX		XX.XX%	Reason G

Notes:
¹ The requested data is not available for consolidated FPL in the prior year. For the purpose of this MFR, prior year operating expenses for all accounts is instead assumed to be the sum of the operating expenses of pre-consolidation FPL and pre-consolidation Gulf in the prior year. All accounts that meet the threshold of 1/20th of one percent of total operating expenses for consolidated FPL in the projected test year and represent at least a ten percent change from the calculated prior year are included in this MFR. The amounts for each company pre-consolidation are listed on pages 2 and 3 of this MFR. Please note that totaling values for pre-consolidation FPL and Gulf may not precisely reflect the results if the operations had been consolidated, but it is the best information available to provide the required calculation.

Joint Petition of FPL and Gulf for Declaratory Statement or Petition for Variance
 Exhibit 2 - MFRs Requiring Calculations/Comparisons between the Test Year and Earlier Years

Schedule C-8

DETAIL OF CHANGES IN EXPENSES

Page 2 of 3

FLORIDA PUBLIC SERVICE COMMISSION
 COMPANY: FLORIDA POWER & LIGHT COMPANY
 AND SUBSIDIARIES (PRE-CONSOLIDATION FPL)

EXPLANATION:

Provide the changes in primary accounts that exceed 1/20th of one percent (.0005) of total operating expenses and ten percent from the prior year to the test year. Quantify each reason for the change.

Type of Data Shown:

Projected Test Year Ended 12/31/22
 Prior Year Ended 12/31/21
 Historical Test Year Ended ___/___/___

DOCKET NO.:

Witness:

(1) Account Number	(2) Account	(3) Test Year Ended 12/21/2022	(4) Prior Year Ended 12/31/2021	(5) / (6) Increase / (Decrease) Dollars Percent (3)-(4) (5)/(4) (000) (%)		(7) Reason(s) for Change
404	Amortization of Limited-Term Electric Plant, and amortization and depletion of producing natural gas land and land rights	See Page 1	X,XXX,XXX	See Page 1	See Page 1	See Page 1
407	Amortization of property losses, unrecovered plant and regulatory study costs.	See Page 1	X,XXX,XXX	See Page 1	See Page 1	See Page 1
409+ 410 + 411	Operating income taxes.	See Page 1		See Page 1	See Page 1	See Page 1
506	Miscellaneous steam power expenses (Major only).	See Page 1	X,XXX,XXX	See Page 1	See Page 1	See Page 1
512	Maintenance of boiler plant (Major only).	See Page 1	X,XXX,XXX	See Page 1	See Page 1	See Page 1
528	Maintenance supervision and engineering (Major only).	See Page 1		See Page 1	See Page 1	See Page 1
530	Maintenance of reactor plant equipment (Major only).	See Page 1	X,XXX,XXX	See Page 1	See Page 1	See Page 1

Notes:

Supporting Schedules: C-7

Recap Schedules:

Joint Petition of FPL and Gulf for Declaratory Statement or Petition for Variance
 Exhibit 2 - MFRs Requiring Calculations/Comparisons between the Test Year and Earlier Years

Schedule C-8

DETAIL OF CHANGES IN EXPENSES

Page 3 of 3

FLORIDA PUBLIC SERVICE COMMISSION
 COMPANY: FLORIDA POWER & LIGHT COMPANY
 AND SUBSIDIARIES (PRE-CONSOLIDATION GULF)

EXPLANATION:

Provide the changes in primary accounts that exceed 1/20th of one percent (.0005) of total operating expenses and ten percent from the prior year to the test year. Quantify each reason for the change.

Type of Data Shown:

Projected Test Year Ended 12/31/22
 Prior Year Ended 12/31/21
 Historical Test Year Ended / /

DOCKET NO.:

Witness:

(1) Account Number	(2) Account	(3) Test Year Ended 12/21/2022	(4) Prior Year Ended 12/31/2021	(5) / (6) Increase / (Decrease) Dollars Percent (3)-(4) (5)/(4) (000) (%)		(7) Reason(s) for Change
404	Amortization of Limited-Term Electric Plant, and amortization and depletion of producing natural gas land and land rights	See Page 1	X,XXX,XXX	See Page 1	See Page 1	See Page 1
407	Amortization of property losses, unrecovered plant and regulatory study costs.	See Page 1	X,XXX,XXX	See Page 1	See Page 1	See Page 1
409+ 410 + 411	Operating income taxes.	See Page 1		See Page 1	See Page 1	See Page 1
506	Miscellaneous steam power expenses (Major only).	See Page 1	X,XXX,XXX	See Page 1	See Page 1	See Page 1
512	Maintenance of boiler plant (Major only).	See Page 1		See Page 1	See Page 1	See Page 1
528	Maintenance supervision and engineering (Major only).	See Page 1	X,XXX,XXX	See Page 1	See Page 1	See Page 1
530	Maintenance of reactor plant equipment (Major only).	See Page 1	X,XXX,XXX	See Page 1	See Page 1	See Page 1

Notes:

Supporting Schedules: C-7

Recap Schedules:

Joint Petition of FPL and Gulf for Declaratory Statement or Petition for Variance
 Exhibit 2 - MFRs Requiring Calculations/Comparisons between the Test Year and Earlier Years
 Page 8 of 21

Schedule C-12

ADMINISTRATIVE EXPENSES

Page 1 of 3

FLORIDA PUBLIC SERVICE COMMISSION
 COMPANY: FLORIDA POWER & LIGHT COMPANY
 AND SUBSIDIARIES (CONSOLIDATED)

EXPLANATION: Provide a schedule of jurisdictional administrative, general, customer service, R & D, and other miscellaneous expenses by category and on a per customer basis for the test year and the most recent historical year.

Type of Data Shown:
 Projected Test Year Ended 12/31/22
 Prior Year Ended / /
 Historical Test Year Ended 12/31/20¹

DOCKET NO.:

Witness:

Line No.	(1) Jurisdictional Administrative Expenses Excluding Recoverable Conservation	(2) Test Year Ended 12/31/22	(3) Historical Year ¹ Ended 12/31/20	(4) Difference ¹ (2)-(3)	(5) Percent Increase/(Decrease) ¹ (4)/(3)
	xxxxxxx	xxx,xxx.xx	[Legacy FPL + Legacy Gulf]	xxx,xxx.xx	xx.xx%
	xxxxxxx	xxx,xxx.xx	[Legacy FPL + Legacy Gulf]	xxx,xxx.xx	xx.xx%
	xxxxxxx	xxx,xxx.xx	[Legacy FPL + Legacy Gulf]	xxx,xxx.xx	xx.xx%
	xxxxxxx	xxx,xxx.xx	[Legacy FPL + Legacy Gulf]	xxx,xxx.xx	xx.xx%
	Total Administrative Expense (Acts 901-932)	xxx,xxx.xx	[Legacy FPL + Legacy Gulf]	xxx,xxx.xx	xx.xx%
	Average Number of Customers	x,xxx,xxx	[Legacy FPL + Legacy Gulf] ²	xxx,xxx	xx.xx%
	Administrative Expense Per Customer	xxx.xx	[Legacy FPL + Legacy Gulf] ²	xx,xxx.xx	xx.xx%

¹ The requested data is not available for consolidated FPL in the historical year. For the purpose of this MFR, historical year jurisdictional amounts for the expenses listed are instead assumed to be the sum of the jurisdictional amounts of pre-consolidation FPL and pre-consolidation Gulf in the historical year. The amounts for each company pre-consolidation are listed on pages 2 and 3 of this MFR. Please note that totaling values for pre-consolidation FPL and Gulf may not precisely reflect the results if the operations had been consolidated, but it is the best information available to provide the required calculation.

² For the purpose of this MFR, FPL assumes that the historical number of customers for consolidated FPL would equal the sum of the number of customers for pre-consolidation FPL and pre-consolidation Gulf.

Joint Petition of FPL and Gulf for Declaratory Statement or Petition for Variance
 Exhibit 2 - MFRs Requiring Calculations/Comparisons between the Test Year and Earlier Years
 Page 9 of 21

Schedule C-12

ADMINISTRATIVE EXPENSES

Page 2 of 3

FLORIDA PUBLIC SERVICE COMMISSION
 COMPANY: FLORIDA POWER & LIGHT COMPANY
 AND SUBSIDIARIES (PRE-CONSOLIDATION FPL)

EXPLANATION: Provide a schedule of jurisdictional administrative, general, customer service, R & D, and other miscellaneous expenses by category and on a per customer basis for the test year and the most recent historical year.

Type of Data Shown:
 Projected Test Year Ended 12/31/22
 Prior Year Ended / /
 Historical Test Year Ended 12/31/20

DOCKET NO.:

Witness:

Line No.	(1) Jurisdictional Administrative Expenses Excluding Recoverable Conservation	(2) Test Year Ended 12/31/22	(3) Historical Year Ended 12/31/20	(4) Difference (2)-(3)	(5) Percent Increase/(Decrease) (4)/(3)
	xxxxxxx	See Page 1	xxx,xxx.xx	See Page 1	See Page 1
	xxxxx	See Page 1	xxx,xxx.xx	See Page 1	See Page 1
	xxxxxxx	See Page 1	xxx,xxx.xx	See Page 1	See Page 1
	xxxxxxx	See Page 1	xxx,xxx.xx	See Page 1	See Page 1
	Total Administrative Expense (Acts 901-932)	See Page 1	xxx,xxx.xx	See Page 1	See Page 1
	Average Number of Customers	See Page 1	x,xxx,xxx	See Page 1	See Page 1
	Administrative Expense Per Customer	See Page 1	xxx.xx	See Page 1	See Page 1

Supporting Schedules: C-7, C-13, F-8

Recap Schedules: C-7

Joint Petition of FPL and Gulf for Declaratory Statement or Petition for Variance
 Exhibit 2 - MFRs Requiring Calculations/Comparisons between the Test Year and Earlier Years
 Page 10 of 21

Schedule C-12

ADMINISTRATIVE EXPENSES

Page 3 of 3

FLORIDA PUBLIC SERVICE COMMISSION
 COMPANY: FLORIDA POWER & LIGHT COMPANY
 AND SUBSIDIARIES (PRE-CONSOLIDATION GULF)

EXPLANATION: Provide a schedule of jurisdictional administrative, general, customer service, R & D, and other miscellaneous expenses by category and on a per customer basis for the test year and the most recent historical year.

Type of Data Shown:
 Projected Test Year Ended 12/31/22
 Prior Year Ended / /
 Historical Test Year Ended 12/31/20

DOCKET NO.:

Witness:

Line No.	(1) Jurisdictional Administrative Expenses Excluding Recoverable Conservation	(2) Test Year Ended 12/31/22	(3) Historical Year Ended 12/31/20	(4) Difference (2)-(3)	(5) Percent Increase/(Decrease) (4)/(3)
	xxxxxxx	See Page 1	xxx,xxx.xx	See Page 1	See Page 1
	xxxxxxx	See Page 1	xxx,xxx.xx	See Page 1	See Page 1
	xxxxxxx	See Page 1	xxx,xxx.xx	See Page 1	See Page 1
	xxxxxxx	See Page 1	xxx,xxx.xx	See Page 1	See Page 1
	Total Administrative Expense (Acts 901-932)	See Page 1	xxx,xxx.xx	See Page 1	See Page 1
	Average Number of Customers	See Page 1	x,xxx,xxx	See Page 1	See Page 1
	Administrative Expense Per Customer	See Page 1	xxx.xx	See Page 1	See Page 1

Supporting Schedules: C-7, C-13, F-8

Recap Schedules: C-7

Schedule C-33

PERFORMANCE INDICES

Page 1 of 3

FLORIDA PUBLIC SERVICE COMMISSION	EXPLANATION:	Provide a schedule for the last four prior years and the test year of other operation and maintenance expense summary by average customer, selected growth indices, selected growth rates and average number of customers.	Type of Data Shown: <u>X</u> Projected Test Year Ended <u>12/31/22</u> <u>X</u> Prior Year Ended <u>12/31/21</u> ¹ <u>X</u> Historical Test Year Ended <u>12/31/20</u> ¹
COMPANY: FLORIDA POWER & LIGHT COMPANY AND SUBSIDIARIES (CONSOLIDATED)			Witness:
DOCKET NO.:			

Line No.	(1)	(2) 2018 Year	(3) 2019 Year	(4) 2020 Year	(5) 2021 Year	(6) 2022 Year
SUMMARY OF OTHER O&M EXPENSES (DOLLARS PER CUSTOMER)						
	Power Production Expense	See pages 2 and 3	See pages 2 and 3	See pages 2 and 3	See pages 2 and 3	xxx.xx
	Transmission Expenses	See pages 2 and 3	See pages 2 and 3	See pages 2 and 3	See pages 2 and 3	xxx.xx
	Distribution Expenses	See pages 2 and 3	See pages 2 and 3	See pages 2 and 3	See pages 2 and 3	xxx.xx
	Customer Account Expenses	See pages 2 and 3	See pages 2 and 3	See pages 2 and 3	See pages 2 and 3	xxx.xx
	Customer Service Expenses	See pages 2 and 3	See pages 2 and 3	See pages 2 and 3	See pages 2 and 3	xxx.xx
	Sales Expenses	See pages 2 and 3	See pages 2 and 3	See pages 2 and 3	See pages 2 and 3	xxx.xx
	Administration & General Expenses	See pages 2 and 3	See pages 2 and 3	See pages 2 and 3	See pages 2 and 3	xxx.xx
	Total Other O & M Expenses	See pages 2 and 3	See pages 2 and 3	See pages 2 and 3	See pages 2 and 3	xxx.xx
GROWTH INDICES¹						
	Consumer Price Index	xxx.x	xxx.x	xxx.x	xxx.x	xxx.x
	Average Customer	[Legacy FPL + Legacy Gulf]	[Legacy FPL + Legacy Gulf]	[Legacy FPL + Legacy Gulf]	[Legacy FPL + Legacy Gulf]	x,xxx,xxx
	CPI Percent Increase	x.x	x.x	x.x	x.x	x.x
	Average Customer Percent Increase	[Legacy FPL + Legacy Gulf]	[Legacy FPL + Legacy Gulf]	[Legacy FPL + Legacy Gulf]	[Legacy FPL + Legacy Gulf]	x.x
	Index Percent CPI x Customer Growth	[Legacy FPL + Legacy Gulf]	[Legacy FPL + Legacy Gulf]	[Legacy FPL + Legacy Gulf]	[Legacy FPL + Legacy Gulf]	x.xxxxx
	Average Customer Increase	[Legacy FPL + Legacy Gulf]	[Legacy FPL + Legacy Gulf]	[Legacy FPL + Legacy Gulf]	[Legacy FPL + Legacy Gulf]	xx,xxx
DOLLAR AMOUNTS, IN CURRENT DOLLARS AND ANNUAL GROWTH RATES FOR:						
	O & M Expense Less Fuel per KWH Sold	See pages 2 and 3	See pages 2 and 3	See pages 2 and 3	See pages 2 and 3	x.xxxxx
	Capital Cost per Installed Kilowatt of Capacity	See pages 2 and 3	See pages 2 and 3	See pages 2 and 3	See pages 2 and 3	xxx.xx
	Revenue per KWH Sold	See pages 2 and 3	See pages 2 and 3	See pages 2 and 3	See pages 2 and 3	x.xxxxx
AVERAGE NUMBER OF CUSTOMERS¹						
	Residential	[Legacy FPL + Legacy Gulf]	[Legacy FPL + Legacy Gulf]	[Legacy FPL + Legacy Gulf]	[Legacy FPL + Legacy Gulf]	x,xxx,xxx
	Commercial	[Legacy FPL + Legacy Gulf]	[Legacy FPL + Legacy Gulf]	[Legacy FPL + Legacy Gulf]	[Legacy FPL + Legacy Gulf]	xxx,xxx
	Industrial	[Legacy FPL + Legacy Gulf]	[Legacy FPL + Legacy Gulf]	[Legacy FPL + Legacy Gulf]	[Legacy FPL + Legacy Gulf]	x,xxx
	Street Lighting	[Legacy FPL + Legacy Gulf]	[Legacy FPL + Legacy Gulf]	[Legacy FPL + Legacy Gulf]	[Legacy FPL + Legacy Gulf]	x,xxx
	Other Sales to Public Authorities	[Legacy FPL + Legacy Gulf]	[Legacy FPL + Legacy Gulf]	[Legacy FPL + Legacy Gulf]	[Legacy FPL + Legacy Gulf]	xxx
	Total	[Legacy FPL + Legacy Gulf]	[Legacy FPL + Legacy Gulf]	[Legacy FPL + Legacy Gulf]	[Legacy FPL + Legacy Gulf]	x,xxx,xxx

¹The requested data is not available for consolidated FPL in the historical year. For the purpose of this MFR, FPL assumes that the total number of customers pre-consolidation equals the sum of pre-consolidation FPL and Gulf customers for the years provided. Please note that totaling values for pre-consolidation FPL and Gulf may not precisely reflect the results if the operations had been consolidated, but it is the best information available to provide the required calculation.

Joint Petition of FPL and Gulf for Declaratory Statement or Petition for Variance
 Exhibit 2 - MFRs Requiring Calculations/Comparisons between the Test Year and Earlier Years
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Schedule C-33

PERFORMANCE INDICES

Page 2 of 3

FLORIDA PUBLIC SERVICE COMMISSION EXPLANATION: Provide a schedule for the last four prior years and the test year of other operation and maintenance expense summary by average customer, selected growth indices, selected growth rates and average number of customers.

COMPANY: FLORIDA POWER & LIGHT COMPANY
 AND SUBSIDIARIES (PRE-CONSOLIDATION FPL)

Type of Data Shown:
 Projected Test Year Ended 12/31/22
 Prior Year Ended 12/31/21
 Historical Test Year Ended 12/31/20

DOCKET NO.:

Witness:

Line No.	(1)	(2) 2018 Year	(3) 2019 Year	(4) 2020 Year	(5) 2021 Year	(6) 2022 Year
SUMMARY OF OTHER O&M EXPENSES (DOLLARS PER CUSTOMER)						
	Power Production Expense	xxx.xx	xxx.xx	xxx.xx	xxx.xx	See page 1
	Transmission Expenses	xxx.xx	xxx.xx	xxx.xx	xxx.xx	See page 1
	Distribution Expenses	xxx.xx	xxx.xx	xxx.xx	xxx.xx	See page 1
	Customer Account Expenses	xxx.xx	xxx.xx	xxx.xx	xxx.xx	See page 1
	Customer Service Expenses	xxx.xx	xxx.xx	xxx.xx	xxx.xx	See page 1
	Sales Expenses	xxx.xx	xxx.xx	xxx.xx	xxx.xx	See page 1
	Administration & General Expenses	xxx.xx	xxx.xx	xxx.xx	xxx.xx	See page 1
	Total Other O & M Expenses	xxx.xx	xxx.xx	xxx.xx	xxx.xx	See page 1
GROWTH INDICES						
	Consumer Price Index	xxx.x	xxx.x	xxx.x	xxx.x	See page 1
	Average Customer	x,xxx,xxx	x,xxx,xxx	x,xxx,xxx	x,xxx,xxx	See page 1
	CPI Percent Increase	x.x	x.x	x.x	x.x	See page 1
	Average Customer Percent Increase	x.x	x.x	x.x	x.x	See page 1
	Index Percent CPI x Customer Growth	x.xxxxx	x.xxxxx	x.xxxxx	x.xxxxx	See page 1
	Average Customer Increase	xx,xxx	xx,xxx	xx,xxx	xx,xxx	See page 1
DOLLAR AMOUNTS, IN CURRENT DOLLARS AND ANNUAL GROWTH RATES FOR:						
	O & M Expense Less Fuel per KWH Sold	x.xxxxx	x.xxxxx	x.xxxxx	x.xxxxx	See page 1
	Capital Cost per Installed Kilowatt of Capacity	xxx.xx	xxx.xx	xxx.xx	xxx.xx	See page 1
	Revenue per KWH Sold	x.xxxxx	x.xxxxx	x.xxxxx	x.xxxxx	See page 1
AVERAGE NUMBER OF CUSTOMERS						
	Residential	x,xxx,xxx	x,xxx,xxx	x,xxx,xxx	x,xxx,xxx	See page 1
	Commercial	xxx,xxx	xxx,xxx	xxx,xxx	xxx,xxx	See page 1
	Industrial	x,xxx	x,xxx	x,xxx	x,xxx	See page 1
	Street Lighting	x,xxx	x,xxx	x,xxx	x,xxx	See page 1
	Other Sales to Public Authorities	xxx	xxx	xxx	xxx	See page 1
	Total	x,xxx,xxx	x,xxx,xxx	x,xxx,xxx	x,xxx,xxx	See page 1

Joint Petition of FPL and Gulf for Declaratory Statement or Petition for Variance
 Exhibit 2 - MFRs Requiring Calculations/Comparisons between the Test Year and Earlier Years

Schedule C-35

PAYROLL AND FRINGE BENEFIT INCREASES COMPARED TO CPI

Page 1 of 3

FLORIDA PUBLIC SERVICE COMMISSION EXPLANATION: Provide the following Payroll and Fringe Benefits data for the historical test year and two prior years. If a projected test year is used, provide the same data for the projected test year and for prior years to include two historical years.

COMPANY: FLORIDA POWER & LIGHT COMPANY AND SUBSIDIARIES (CONSOLIDATED)

Type of Data Shown:
 Projected Test Year Ended 12/31/22
 Prior Year Ended 12/31/21¹
 Historical Test Year Ended 12/31/20

DOCKET NO.:

Witness:

Line No.	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)
		Test Year 2022				Prior Year 2021			Historical Year 2020		Historical Year 2019
	Amount	%Increase ¹	CPI	Amount ¹	%Increase	CPI	Amount	%Increase	CPI	Amount	
<u>Total Company Basis</u>											
Gross Payroll	x,xxx,xxx	x.xx	x.x	[Legacy FPL + Legacy Gulf]	See pages 2 and 3	x.x	See pages 2 and 3	See pages 2 and 3	x.x	See pages 2 and 3	
Gross Average Salary	xxx,xxx	x.xx		[Legacy FPL + Legacy Gulf]	See pages 2 and 3		See pages 2 and 3	See pages 2 and 3		See pages 2 and 3	
<u>Fringe Benefits</u>											
Life Insurance	x,xxx	x.xx		[Legacy FPL + Legacy Gulf]	See pages 2 and 3		See pages 2 and 3	See pages 2 and 3		See pages 2 and 3	
Medical Insurance	xx,xxx	x.xx		[Legacy FPL + Legacy Gulf]	See pages 2 and 3		See pages 2 and 3	See pages 2 and 3		See pages 2 and 3	
Retirement Plan	xx,xxx	x.xx		[Legacy FPL + Legacy Gulf]	See pages 2 and 3		See pages 2 and 3	See pages 2 and 3		See pages 2 and 3	
Employee Savings Plan	xx,xxx	x.xx		[Legacy FPL + Legacy Gulf]	See pages 2 and 3		See pages 2 and 3	See pages 2 and 3		See pages 2 and 3	
Federal Insurance Contributions Act	xx,xxx	x.xx		[Legacy FPL + Legacy Gulf]	See pages 2 and 3		See pages 2 and 3	See pages 2 and 3		See pages 2 and 3	
Federal & State Unemployment Taxes	x,xxx	x.xx		[Legacy FPL + Legacy Gulf]	See pages 2 and 3		See pages 2 and 3	See pages 2 and 3		See pages 2 and 3	
Worker's Compensation	x,xxx	x.xx		[Legacy FPL + Legacy Gulf]	See pages 2 and 3		See pages 2 and 3	See pages 2 and 3		See pages 2 and 3	
Other (Education, Service Awards, Physicals, etc.) -SPECIFY	x,xxx	x.xx		[Legacy FPL + Legacy Gulf]	See pages 2 and 3		See pages 2 and 3	See pages 2 and 3		See pages 2 and 3	
Sub Total-Fringes	xxx,xxx	x.xx		[Legacy FPL + Legacy Gulf]	See pages 2 and 3		See pages 2 and 3	See pages 2 and 3		See pages 2 and 3	
Total Payroll and Fringes	x,xxx,xxx	x.xx		[Legacy FPL + Legacy Gulf]	See pages 2 and 3		See pages 2 and 3	See pages 2 and 3		See pages 2 and 3	
Average Employees	xx,xxx	x.xx		[Legacy FPL + Legacy Gulf]	See pages 2 and 3		See pages 2 and 3	See pages 2 and 3		See pages 2 and 3	
Payroll and Fringes Per Employee	xxx,xxx	x.xx		[Legacy FPL + Legacy Gulf]	See pages 2 and 3		See pages 2 and 3	See pages 2 and 3		See pages 2 and 3	

¹ The requested data is not available for consolidated FPL in the prior year. For the purpose of this MFR, prior year payroll and fringe benefit for all accounts is instead assumed to be the sum of the payroll and fringe benefit of pre-consolidation FPL and pre-consolidation Gulf in the prior year. Please note that totaling values for pre-consolidation FPL and Gulf may not precisely reflect the results if the operations had been consolidated, but it is the best information available to provide the required calculation.

Joint Petition of FPL and Gulf for Declaratory Statement or Petition for Variance
 Exhibit 2 - MFRs Requiring Calculations/Comparisons between the Test Year and Earlier Years
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Schedule C-36

NON-FUEL OPERATION AND MAINTENANCE EXPENSE COMPARED TO CPI

Page 1 of 3

FLORIDA PUBLIC SERVICE COMMISSION
 COMPANY: FLORIDA POWER & LIGHT COMPANY
 AND SUBSIDIARIES (CONSOLIDATED)

EXPLANATION: Provide a comparison of the change in operation and maintenance expenses (excluding fuel) for the last three years and the test year to the CPI.

Type of Data Shown:
 Projected Test Year Ended 12/31/22
 Prior Year Ended 12/31/21¹
 Historical Test Year Ended 12/31/20

DOCKET NO.:

Witness:

Line No.	(1)	(2) 2019	(3) 2020	(4) 2021	(5) 2022
	Non-Fuel Operations & Maintenance Expenses (Excluding Conservation, Adjusted for Regulatory Adjustments).	See pages 2 and 3	See pages 2 and 3	[Legacy FPL + Legacy Gulf] ¹	x,xxx,xxx
	Percent Change in Non-Fuel Operations & Maintenance Expense Over Previous Year.	See pages 2 and 3	See pages 2 and 3	[Legacy FPL + Legacy Gulf] ¹	XX.XX% ¹
	Percent Change in CPI Over Previous Year.	x.xx%	x.xx%	x.xx%	x.xx%
	Difference Between Change in CPI and Non-Fuel Operations & Maintenance Expense.	See pages 2 and 3	See pages 2 and 3	[Legacy FPL + Legacy Gulf] ¹	X,XXX,XXX ¹

¹ The sum of the total non-fuel O&M expenses of pre-consolidation FPL and Gulf is assumed for the prior year. Please note that totaling values for pre-consolidation FPL and Gulf may not precisely reflect the results if the operations had been consolidated, but it is the best information available to provide the required calculation.

Joint Petition of FPL and Gulf for Declaratory Statement or Petition for Variance
 Exhibit 2 - MFRs Requiring Calculations/Comparisons between the Test Year and Earlier Years
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Schedule C-36

NON-FUEL OPERATION AND MAINTENANCE EXPENSE COMPARED TO CPI

Page 2 of 3

FLORIDA PUBLIC SERVICE COMMISSION

EXPLANATION: Provide a comparison of the change in operation and maintenance expenses (excluding fuel) for the last three years and the test year to the CPI.

Type of Data Shown:

Projected Test Year Ended 12/31/22

Prior Year Ended 12/31/21

Historical Test Year Ended 12/31/20

COMPANY: FLORIDA POWER & LIGHT COMPANY
 AND SUBSIDIARIES (PRE-CONSOLIDATION FPL)

DOCKET NO.:

Witness:

Line No.	(1)	(2) 2019	(3) 2020	(4) 2021	(5) 2022
Non-Fuel Operations & Maintenance Expenses (Excluding Conservation, Adjusted for Regulatory Adjustments).		x,xxx,xxx	x,xxx,xxx	x,xxx,xxx	See page 1
Percent Change in Non-Fuel Operations & Maintenance Expense Over Previous Year.		x.xx%	x.xx%	x.xx%	See page 1
Percent Change in CPI Over Previous Year.		x.xx%	x.xx%	x.xx%	x.xx%
Difference Between Change in CPI and Non-Fuel Operations & Maintenance Expense.		x,xxx,xxx	x,xxx,xxx	x,xxx,xxx	See page 1

Supporting Schedules C-40, C-6

Recap Schedules:

Joint Petition of FPL and Gulf for Declaratory Statement or Petition for Variance
 Exhibit 2 - MFRs Requiring Calculations/Comparisons between the Test Year and Earlier Years
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Schedule C-36

NON-FUEL OPERATION AND MAINTENANCE EXPENSE COMPARED TO CPI

Page 3 of 3

FLORIDA PUBLIC SERVICE COMMISSION

EXPLANATION: Provide a comparison of the change in operation and maintenance expenses (excluding fuel) for the last three years and the test year to the CPI.

Type of Data Shown:

Projected Test Year Ended 12/31/22

Prior Year Ended 12/31/21

Historical Test Year Ended 12/31/20

COMPANY: FLORIDA POWER & LIGHT COMPANY
 AND SUBSIDIARIES (PRE-CONSOLIDATION GULF)

DOCKET NO.:

Witness:

Line No.	(1)	(2) 2019	(3) 2020	(4) 2021	(5) 2022
Non-Fuel Operations & Maintenance Expenses (Excluding Conservation, Adjusted for Regulatory Adjustments).		x,xxx,xxx	x,xxx,xxx	x,xxx,xxx	See page 1
Percent Change in Non-Fuel Operations & Maintenance Expense Over Previous Year.		x.xx%	x.xx%	x.xx%	See page 1
Percent Change in CPI Over Previous Year.		x.xx%	x.xx%	x.xx%	x.xx%
Difference Between Change in CPI and Non-Fuel Operations & Maintenance Expense.		x,xxx,xxx	x,xxx,xxx	x,xxx,xxx	See page 1

Supporting Schedules C-40, C-6

Recap Schedules:

Schedule C-37

O&M BENCHMARK COMPARISON BY FUNCTION

Page 1 of 1

FLORIDA PUBLIC SERVICE COMMISSION
 COMPANY: FLORIDA POWER & LIGHT COMPANY
 AND SUBSIDIARIES (CONSOLIDATED)

EXPLANATION: For test year functionalized O & M expenses,
 provide the benchmark variances.

Type of Data Shown:
 Projected Test Year Ended 12/31/22
 Prior Year Ended ___/___/___
 Historical Test Year Ended ___/___/___

DOCKET NO.:

Witness:

Line No.	(1) FUNCTION	(2) CONSOLIDATED FPL (Projected Test Year Ended 12/31/2022)			(5) PRE-CONSOLIDATION FPL (Test Year Ended 12/31/18) ¹			(8) PRE-CONSOLIDATION GULF (Test Year Ended 12/31/17) ²			(11) SUM COMBINED [Legacy FPL + Legacy GULF] (7) + (10)	(12) UNADJUSTED BENCHMARK VARIANCE (4) - (11)	(13) UNADJUSTED BENCHMARK VARIANCE EXCLUDING	(14) ADJUSTED BENCHMARK VARIANCE
		(3) TEST YEAR TOTAL COMPANY PER BOOKS	(4) O & M ADJUSTMENTS (A)	(4) ADJUSTED TEST YEAR O & M (2) - (3)	(5) 2018 BASE YEAR ADJUSTED O & M	(6) COMPOUND MULTIPLIER	(7) TEST YEAR BENCHMARK (5) x (6)	(8) 2017 BASE YEAR ADJUSTED O & M	(9) COMPOUND MULTIPLIER	(10) TEST YEAR BENCHMARK (8) x (9)				
1														
2	PRODUCTION - STEAM	XXX,XXX	(XXX,XXX)	XX,XXX	XX,XXX	X.XXXXXX	XX,XXX	XXX,XXX	X.XXXXXX	XXX,XXX	XXX,XXX	(XXX,XXX)	-	(XXX,XXX)
3														
4	PRODUCTION - NUCLEAR	XXX,XXX	(XXX,XXX)	XXX,XXX	XXX,XXX	X.XXXXXX	XXX,XXX	-	X.XXXXXX	-	XXX,XXX	(XX,XXX)	-	(XX,XXX)
5														
6	PRODUCTION - OTHER	X,XXX,XXX	(X,XXX,XXX)	XXX,XXX	XXX,XXX	X.XXXXXX	XXX,XXX	XX,XXX	X.XXXXXX	XX,XXX	XXX,XXX	(XX,XXX)	-	(XX,XXX)
7														
8	POWER SUPPLY	XXX,XXX	(XXX,XXX)	X,XXX	X,XXX	X.XXXXXX	X,XXX	X,XXX	X.XXXXXX	X,XXX	XX,XXX	(X,XXX)	-	(X,XXX)
9														
10	TRANSMISSION	XX,XXX	XX,XXX	XX,XXX	XX,XXX	X.XXXXXX	XX,XXX	XX,XXX	X.XXXXXX	XX,XXX	XX,XXX	XX,XXX	-	XX,XXX
11														
12	DISTRIBUTION	XXX,XXX	(X,XXX)	XXX,XXX	XXX,XXX	X.XXXXXX	XXX,XXX	XX,XXX	X.XXXXXX	XX,XXX	XXX,XXX	XX,XXX	-	XX,XXX
13														
14	CUSTOMER ACCOUNTS	XXX,XXX	(XXX)	XXX,XXX	XXX,XXX	X.XXXXXX	XXX,XXX	XX,XXX	X.XXXXXX	XX,XXX	XXX,XXX	XX,XXX	-	XX,XXX
15														
16	CUSTOMER SERVICE & INFORMATION	XX,XXX	(XX,XXX)	XX,XXX	XX,XXX	X.XXXXXX	XX,XXX	XX,XXX	X.XXXXXX	XX,XXX	XX,XXX	XX,XXX	-	XX,XXX
17														
18	SALES EXPENSES	XX,XXX	-	XX,XXX	XX,XXX	X.XXXXXX	XX,XXX	X,XXX	X.XXXXXX	X,XXX	XX,XXX	(X,XXX)	-	(X,XXX)
19														
20	ADMINISTRATIVE & GENERAL	XXX,XXX	(XX,XXX)	XXX,XXX	XXX,XXX	X.XXXXXX	XXX,XXX	XX,XXX	X.XXXXXX	XXX,XXX	XXX,XXX	(XXX,XXX)	-	(XXX,XXX)
21														
22	TOTAL	X,XXX,XXX	(X,XXX,XXX)	X,XXX,XXX	X,XXX,XXX		X,XXX,XXX	XXX,XXX		XXX,XXX	X,XXX,XXX	(XXX,XXX)	-	(XXX,XXX)
23														
24														
25	Notes:													
26	¹ For pre-consolidation FPL, the benchmark year is assumed to be 2018, which is the most recent filed test year for FPL (i.e. the "Subsequent Year Adjustment" as filed in Docket 20160021-EI).													
27	² For pre-consolidation Gulf, the benchmark year is assumed to be 2017, which is the most recent filed test year for Gulf (i.e. the "Requested Test Year" as filed in Docket 20160186-EI).													

Joint Petition of FPL and Gulf for Declaratory Statement or Petition for Variance
Exhibit 2 - MFRs Requiring Calculations/Comparisons between the Test Year and Earlier Years
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Schedule E-1

COST OF SERVICE STUDIES

Page 1 of 1

FLORIDA PUBLIC SERVICE COMMISSION EXPLANATION:

COMPANY:

DOCKET NO.:

Provide under separate cover a cost of service study that allocates production and transmission plant using the average of the twelve monthly coincident peaks and 1/13 weighted average demand (12 CP and 1/13th) method. In addition, if the company is proposing a different cost allocation method, or if a different method was adopted in its last rate case, provide cost of service studies using these methods as well. All studies filed must be at both present and proposed rates. The cost of service analysis must be done separately for each rate class. If it is not possible to separate the costs of the lighting classes, the lighting classes can be combined.

Each cost study must include a schedule showing total revenues, total expenses, NOI, rate base, rate of return, rate of return index, revenue requirements at an equalized rate of return, revenue excess/deficiency, and revenue requirements index, for each rate class and for the total retail jurisdiction for the test year.

In all cost of service studies filed, the average of the 12 monthly peaks method must be used for the jurisdictional separation of the production and transmission plant and expenses unless the FERC has approved another method in the utility's latest wholesale rate case. The minimum distribution system concept must not be used. The jurisdictional rate base and net operating income in the studies must equal the fully adjusted rate base in Schedule B-1 and the fully adjusted net operating income in Schedule C-1.

Costs and revenues for recovery clauses, franchise fees, and other items not recovered through base rates must be excluded from the cost of service study. Costs for service charges must be allocated consistently with the allocation of the collection of the revenues from these charges. Any other miscellaneous revenues must be allocated consistent with the allocation of the expense associated with the facilities used or services purchased.

If an historic test year is used, the twelve monthly peaks must be the hour of each month having the highest FIRM load, (i.e., exclude the load of non-firm customers in determining the peak hours).

Type of Data Shown:

Projected Test Year Ended 12/31/22

Prior Year Ended / /

Historical Test Year Ended / /

Witness:

See Attached Schedules:

Attachment # 1 - Cost of Service Study at Present Rates [Please note that "present rates" do not exist for consolidated FPL. To provide a valid basis for conducting the cost of service studies "at both present and proposed rates" for the purpose of this MFR, FPL has subsumed Gulf rate classes into FPL rate classes for cost allocation and rate-making purposes. This methodology should yield the proper comparisons of Rate of Return by Rate Class, Increases by Rate Class, and Parity Comparisons by Rate Class at both present and proposed rates. Any additional Consolidated FPL MFRs that seek information "at present rates" (e.g. D-09, E-03a, E-03b, E-04a, E-04b, E-05, E-06a, E-06b, E-07, E-08, E-09, E-10, E-11, and E-12) likewise provide such information assuming that Gulf rate classes are subsumed into FPL rate classes.]

Attachment # 2 - Cost of Service Study at Proposed Rates

Supporting Schedules: E-5, E-4b, E-4a, E-3b, E-3a

Recap Schedules:

E-8, E-6b, E-6a