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JOSE R. OLIVA
Speaker of the House of Representatives

August 31, 2020

Margo DuVal
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Re: Docket No. 20200182-EI; Joint petition for declaratory statement regarding application of MFR requirements in Rule 25-6.043(1), F.A.C., or, in the alternative, petition for variance, by Florida Power & Light Company and Gulf Power Company.

Dear Ms. DuVal:

I am enclosing a statement for inclusion in the record of this proceeding and for consideration in this Docket at the September 1, 2020 Commission Agenda Conference. The Office of Public Counsel and Florida Power & Light (FPL) and Gulf Power Company (Gulf) have agreed that the inclusion of this statement in the record — and preferably in any order that is issued to resolve this matter — will resolve any potential disputes in this Docket between the OPC and the Companies. We would ask that you consider including it in the body of the order or as an attachment. Patty Christensen will appear on behalf of the OPC to address this matter. I am authorized to represent to you that FPL and Gulf have agreed to this approach.

Please do not hesitate to contact me or Patty with any questions

Sincerely,

/s/ Charles J. Rehwinkel

Charles J. Rehwinkel
Deputy Public Counsel
850.717-0328 (Direct)

Attachment
cc: Parties of Record

CERTIFICATE OF SERVICE
DOCKET No. 20200182-EI

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic mail on this 31st day of August, 2020, to the following:

Florida Power & Light Company
Kenneth A. Hoffman
134 W. Jefferson Street
Tallahassee FL 32301
ken.hoffman@fpl.com

Florida Power & Light Company (20m Juno)
R. Wade Litchfield
700 Universe Boulevard
Juno Beach FL 33408
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Statement in support of the staff recommendation in Docket No. 20200182-EI

FPL, Gulf and the OPC jointly agree as follows in support of the Commission granting the relief as recommended by Staff.

The OPC does not object to the relief sought as long as the substantive effect of the relief is limited to ensuring that, if the 63 schedules at issue in the Petition, along with the 2 schedules identified in Staff's First Data Request No. 1, are populated as proposed in the Petition, that FPL's and Gulf's MFRs will not be deemed to be deficient for purposes of compliance with that Rule. The OPC's support for the relief is premised on the further understanding that neither FPL nor Gulf will assert that the Commission's order granting relief in this docket provides any basis for FPL or Gulf to object to, or the Commission to deny, discovery served by OPC in any FPL/Gulf base rate case. The OPC acknowledges that such forbearance by FPL and Gulf will not preclude the Companies from objecting to discovery sought by OPC or others related to the MFR Schedules on the grounds that such information is in fact not available or otherwise subject to other appropriate objections to discovery. With these understandings, that FPL and Gulf acknowledge and concur in, the OPC does not object to the relief sought by FPL and Gulf.