

STATE OF FLORIDA



COMMISSIONERS:
GARY F. CLARK, CHAIRMAN
ART GRAHAM
JULIE I. BROWN
DONALD J. POLMANN
ANDREW GILES FAY

DIVISION OF ECONOMICS
JUDY HARLOW
DIRECTOR
(850) 413-6410

Public Service Commission

September 18, 2020

William P. Cox
Senior Attorney
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408-0420

STAFF'S THIRD DATA REQUEST
Via E-mail

Kenneth A. Hoffman
Vice President, Regulatory Affairs
Florida Power & Light Company
134 West Jefferson Street
Tallahassee, FL 32301

Re: Docket 20200170-EI -- Petition for Approval of Optional Electric Vehicle Public Charging Pilot Tariffs, by Florida Power & Light Company.

Mr. Cox and Mr. Hoffman:

By this letter, Commission staff respectfully request the following information from Florida Power & Light Company.

1. Please refer to FPL's Petition at page 8. Please confirm that all revenues, operating expenses, capital additions, and depreciation associated with the existing 166 Level 2 DCFC stations are reflected as above-the-line items in FPL's Earnings Surveillance Reports.
2. Please confirm that all revenues, operating expenses, capital additions, and depreciation associated with the planned Level 2 DCFC stations will be reflected as above-the-line items in FPL's Earnings Surveillance Reports.
3. Please refer to FPL's Petition at page 9. Please confirm that all revenues, operating expenses, capital additions, and depreciation associated with the FPL-owned fast charging stations are or will be reflected as above-the-line items in FPL's Earnings Surveillance Reports.
4. Please explain whether FPL contracted with a third party to install the charging stations installed to date, or whether FPL employees are performing the work.

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD • TALLAHASSEE, FL 32399-0850

An Affirmative Action / Equal Opportunity Employer

PSC Website: <http://www.floridapsc.com>

Internet E-mail: contact@psc.state.fl.us

5. The response to Staff's First Data Request No. 1 estimates the lost revenues from the proposed GSD-EV1 and GLSD-EV-1 tariffs (\$157,000). Please discuss why it is appropriate for the general body of ratepayers to subsidize third party fast charge providers or third party public charging hosts.
6. Please refer to the response to Staff's Second Data Request No. 2 and provide a full answer to the following hypothetical: If the Commission approved the pilot tariffs and subsequently denied base rate recovery of the EVolution facilities' infrastructure costs in FPL's next base rate proceeding, would FPL continue to offer the pilot tariffs?
7. Please discuss any potential impacts on the electric grid that may result from the installation of charging stations in FPL's service territory.
8. Referring to the response to Staff's First Data Request No. 13, please discuss why it is appropriate for the Commission to approve tariffs that would "incentivize external parties to expand development of the EV fast charge infrastructure..." In your response, please cite any relevant statutes and rules.
9. Please discuss any financial risks to the general body of ratepayers that could result from FPL-owned EV fast charge infrastructure and the associated proposed tariffs.
10. Please discuss in detail why it is appropriate for the general body of ratepayers to provide any cost support for FPL-owned EV fast charge infrastructure and the associated proposed tariffs. In your response, please cite any relevant statutes and rules.
11. Please discuss why it is appropriate for the Commission to allow FPL, as a regulated utility, to install charging stations in an existing competitive market. In your response, please cite the relevant statutes and rules that allow FPL to provide such service.
12. Did FPL consider alternative rates, such as time of use rates, to encourage customers to charge off peak and to collect data about customer reaction to such rates? Please explain.
13. According to page 9 of the Petition, FPL developed the proposed 30 cents per kWh amount for the FPL-owned EV chargers based primarily on a comparison to current rates of other EV charging providers and various automotive fuel alternatives that are available to customers. Please explain why the utility believes it is appropriate for the customers of a rate regulated utility to pay a market-based rate rather than a cost-based rate.
14. Section 366.02(2), F.S., defines an "electric utility" to mean any municipal electric utility, investor-owned electric utility, or rural electric cooperative which owns, maintains, or operates an electric generation, transmission, or distribution system within the state. Please explain whether and how FPL considers service provided pursuant to its proposed Utility-Owned Public Charging for Electric Vehicles rate schedule in Docket No. 20200170-EI to be generation, transmission, or distribution of electricity within the state. If the service provided pursuant to the proposed tariff is not generation, transmission, or distribution of electricity within the state, please provide the specific

statute or rule language that authorizes the Commission to approve a program “for the purpose of studying and supporting the development of electric vehicle (“EV”) public fast charging infrastructure in FPL’s service territory.” (Petition at p. 1)

15. Please cite to any known examples where the Florida Public Service Commission has approved an electric tariff or electric pilot program that does not involve the generation, transmission, or distribution of electricity within the state.

Please file all responses electronically no later than October 2, 2020, via the Commission’s website at www.floridapsc.com by selecting the Clerk’s Office tab and Electronic Filing Web Form. Please contact me at tcoston@psc.state.fl.us or at 850.413.6814 if you have any questions.

Thank you.

/s/Tripp Coston

Tripp Coston
Economic Supervisor

cc: Office of the Commission Clerk