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Public Service Commission

March 1, 2021

STAFF'S FIRST DATA REQUEST
VIA E-MAIL
Maria.moncada@fpl.com

Maria Moncada, Esq.
Florida Power & Light Company
700 Universe Blvd.
Juno Beach, Florida 33408

Re: Docket No. 20210001-EI – In re: Fuel and purchased power cost recovery clause with generating performance incentive factor.

Dear Ms. Moncada:

Please file responses to the following data and document requests in the above-referenced docket with the Commission Clerk by March 8, 2021:

1. Please refer to Florida Power & Light Company's (FPL or Company) "Mid-Course Correction Petition" (MCC Petition), dated February 26, 2021, filed in Docket No. 20210001-EI,¹ Please specify the numerator, denominator, and quotient of the figure alluded to on page five, paragraph 11, of the MCC Petition (i.e. figure that "exceeds the 10% materiality threshold for mid-course FCR corrections"). Please also discuss the derivation of both projected true up and revenue figures used in the calculation.

2. Please refer to page four the MCC Petition, and page three of the Direct Testimony of FPL witness Gerard J. Yupp, filed September 3, 2019, in Docket No. 20190001-EI with FPL's "Petition for Approval of Fuel Cost Recovery and Capacity Cost Recovery Factors for January through December 2021" (Original Projection).² The Company states on page four of the MCC Petition that: "FPL based its original 2021 projected fuel cost on a forward curve as of the close of business July 1, 2020. However, according to FPL witness Yupp in 2019, the Company "FPL utilized forward curve prices from the close of business on July 26, 2019 for its 2020 projection filing, which is the most current information that could be incorporated into

¹Document No. 02487-2021.

²Document No. 08562-2019.

FPL's schedule for calculating the 2020 Fuel Cost Recovery ("FCR") Clause factors." Both the 2019 and 2020 projection petitions were filed on September 3rd of the respective year.

- a. For the purposes of developing estimated future year fuel costs, did moving the date on which natural gas forward pricing data is obtained (from The New York Mercantile Exchange, or "NYMEX") from July 26th in 2019, to July 1st in 2020, meaningfully effect the accuracy of the 2021 projected fuel cost as approved by Order No. PSC-2020-0439-FOF-EI?³ Please discuss any response.
 - b. For the purposes of developing its projected 2021 fuel cost recovery request (ultimately approved by Order No. PSC-2020-0439-FOF-EI), with respect to natural gas, did FPL use the most current information that could be incorporated into its schedule for calculating the 2021 fuel clause factors?⁴
 - c. If known, at what approximate date does the Company expect to collect NYMEX forward curve data for the purposes of developing its fuel cost projections for 2022?
3. Please discuss whether the Company plans on instituting any different processes, procedures, and/or measures related to fuel cost and fuel revenue forecasting as a result of requiring a mid-course correction of its fuel-related charges. If so, please explain.
4. Please refer to page six of the MCC petition. Please briefly discuss how this petition effects, on average, the Company's non-residential classes of service. Please also quantify bill impacts to typical (i.e. typical based on a conventional or average level of usage) industrial and commercial class (large and small) customers if the Company's MCC Petition is approved.
5. Due to the COVID-19 pandemic and associated economic effects, please discuss general terms if the Company is currently experiencing increased service disconnections, late payments, non-payments, possible payment deferrals etc., over what it would consider typical for a similar timeframe in the recent past? If so, please discuss in general how possible customer-payment issues are affecting the Company's ability to recover its current fuel-related revenue requirement.⁵
6. Please describe any other Company efforts in notifying its customers of the proposed action it has requested through its MCC Petition. Please also provide copies of any notifications that were previously, or will be, sent to customers regarding the actions requested in the MCC Petition.

³Order No. PSC-2020-0439-FOF-EI, Issued November 16, 2020, in Docket No. 20200001-EI, *In re: Fuel and purchased power cost recovery clause with generating performance incentive factor*.

⁴*Id.*

⁵*Id.*

Maria Moncada, Esq.

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7. Please specify the exact range/beginning and ending dates of FPL's April 2021 billing cycle.

8. Please discuss how, if at all, the Company's updated fuel costs detailed in its MCC Petition have affected its planned power market purchases for the remainder of 2021.

Should you have any questions or need more information regarding this data request, please contact me at (850) 413-6218 or sbrownle@psc.state.fl.us.

Very truly yours,

/s/ Suzanne Brownless

Suzanne Brownless
Special Counsel

cc: Commission Clerk