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Adam Teitzman, Commission Clerk
Division of the Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 20210015-EI
Petition by FPL for Base Rate Increase and Rate Unification

Dear Mr. Teitzman:

Attached for filing on behalf of Florida Power & Light Company ("FPL") in the above-referenced docket is the Rebuttal Testimony of FPL witness Christopher Chapel.

Please let me know if you should have any questions regarding this submission.

(Document 5 of 15)

Sincerely,

A handwritten signature in black ink, appearing to read 'Wade Litchfield', written in a cursive style.

R. Wade Litchfield
Vice President & General Counsel
Florida Power & Light Company

RWL:ec
Attachment
cc: Counsel of Record

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
FLORIDA POWER & LIGHT COMPANY
REBUTTAL TESTIMONY OF CHRISTOPHER CHAPEL
DOCKET NO. 20210015-EI
JULY 14, 2021

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1 **I. INTRODUCTION**

2

3 **Q. Please state your name and business address.**

4 A. My name is Christopher Chapel, and my business address is Florida Power &
5 Light Company (“FPL” or the “Company”), 700 Universe Boulevard, Juno
6 Beach, Florida 33408.

7 **Q. Have you previously submitted direct testimony in this proceeding?**

8 A. Yes.

9 **Q. Are you co-sponsoring or sponsoring any rebuttal exhibits in this case?**

10 A. Yes. I am co-sponsoring the following rebuttal exhibit:

- 11 • LF-10 – FPL’s Notice of Identified Adjustments filed May 7, 2021 and
12 Witness Sponsorship, filed with the rebuttal testimony of FPL witness
13 Fuentes.

14

15 **II. OVERVIEW**

16

17 **Q. What is the purpose of your rebuttal testimony?**

18 A. The purpose of my rebuttal testimony is to address statements made by CLEO
19 Institute and Vote Solar’s witness Whited regarding disconnections and
20 reconnections in 2020-2021, as well as recommendations that she makes
21 regarding disconnection policies during emergencies and extreme temperature
22 events. In response to general suggestions made by CLEO Institute and Vote
23 Solar’s witness Volkmann, I also discuss the strong customer satisfaction with

1 Florida Power & Light Company's ("FPL") and Gulf Power Company's
2 ("Gulf") reliability.

3 **Q. Please summarize your rebuttal testimony.**

4 A. My rebuttal testimony uses actual data and information to show that witness
5 Whited's contention that FPL/Gulf have disproportionately disconnected
6 customers in an "aggressive" manner is simply not true. My rebuttal testimony
7 also shows that FPL/Gulf already have the very protections that witness Whited
8 suggests be in place to address customer disconnections during emergencies
9 and extreme temperature events, making witness Whited's recommendations
10 that FPL/Gulf adopt such policies unnecessary. Finally, my testimony shows
11 that the Company's reliability has been and remains important to our customers,
12 rebutting the general theme in a section of witness Volkmann's testimony where
13 he implies, without basis, that FPL/Gulf's reliability is not significantly
14 important to FPL/Gulf's customers.

15

16 **III. FPL/GULF'S RATE OF DISCONNECTIONS AND RECONNECTIONS**
17 **DURING 2020-2021**

18

19 **Q. How do you respond to witness Whited's testimony regarding customer**
20 **disconnections in 2020-2021?**

21 A. On pages 13 through 15 of her testimony, witness Whited suggests that
22 FPL/Gulf's disconnections and disconnections without reconnections between
23 September 2020 and April 2021 are disproportionate when compared to Duke

1 Energy Florida and Tampa Electric Company. However, year-over-year
 2 comparisons within FPL/Gulf show that the Company has not been
 3 “aggressive” with its residential disconnections, relative to similar pre-COVID-
 4 19 timeframes, nor has the Company experienced a significant change in the
 5 percent of residential accounts that are reconnected after disconnection relative
 6 to similar pre-COVID-19 timeframes as is seen in the table below.

Company	Timeframe	Disconnects	Reconnects	Reconnect Rate
FPL	October 2020 – April 2021	538,886	496,726	92%
	October 2018 – April 2019	507,657	475,837	94%
	October 2017 – April 2018 ⁽¹⁾	526,505	489,678	93%
Gulf	November 2020 – April 2021	19,805	15,449	78%
	November 2018 – April 2019 ⁽²⁾	19,108	12,810	67%
	January 2018 – April 2018 ⁽²⁾	12,508	8,559	68%

8 ⁽¹⁾ Partially impacted by September – October 2017 collections suspension due to Hurricane Irma.
 9 ⁽²⁾ Southern Company data for Gulf. Not available prior to January 2018.

10 With respect to reconnection rates, it is also important to recognize that not
 11 every customer is reconnected every time, as shown by the information above,
 12 and that that has nothing to do with the pandemic. Customers frequently move,
 13 change the account owner, or have other circumstances for not reconnecting,
 14 and this fact further demonstrates that without context, simple numerical
 15 comparisons aren’t particularly meaningful.

16
 17 Furthermore, it is important to note that FPL/Gulf continue to work with
 18 customers experiencing hardship due to the COVID-19 pandemic by offering
 19 flexible payment plans and cancelling late fees. Disconnection has been, is and
 20 always will be the very last resort for us.

1 **IV. FPL/GULF'S DISCONNECTION POLICES DURING EMERGENCIES**
2 **AND EXTREME TEMPERATURE EVENTS**

3
4 **Q. How do you respond to witness Whited's recommendations that FPL/Gulf**
5 **adopt policies for disconnections during emergencies and extreme**
6 **temperature events?**

7 A. On pages 27 and 28 of her testimony, witness Whited states that FPL/Gulf
8 should adopt policies that suspend customer disconnections during emergencies
9 and extreme temperature events. However, FPL/Gulf voluntarily have these
10 policies already in place. This was demonstrated when FPL/Gulf voluntarily
11 suspended disconnections from March through October 2020 during the height
12 of the COVID-19 emergency. The Company also already suspends
13 disconnections in geographic areas that are forecasted to be impacted and that
14 are impacted by severe weather events such as hurricanes. Lastly, the Company
15 has an existing voluntary policy in place to suspend disconnections during
16 extreme cold and heat events. Therefore, witness Whited's recommendation
17 that we enact these policies is both redundant and factually misguided.

1 **V. CUSTOMER SATISFACTION WITH FPL/GULF'S RELIABILITY**

2

3 **Q. What points do you wish to make regarding FPL/Gulf's reliability in**
4 **response to witness Volkmann?**

5 A. Although witness Volkmann acknowledges that FPL/Gulf's reliability is "very
6 good compared to other utilities," he nonetheless implies on page 11 of his
7 testimony that customers do not place a high premium on reliable electric
8 service. While FPL witness Spoor responds to witness Volkmann's specific
9 arguments about investments and reliability metrics, I, from a customer service
10 perspective, want to reiterate the fact that our customers care deeply about
11 having reliable electric service.

12

13 As we saw during the Quality of Service Hearings in this matter, our customers
14 specifically cited service reliability as an important and/or determining factor
15 in their support – 246 of the 379 customers who testified specifically cited
16 reliability. Importantly, even customers not supportive of FPL's request agreed
17 our reliability is excellent. Further, our actual complaint data bears this out as
18 well. Overall, service reliability complaints per 10,000 customers are trending
19 down year over year. As noted in FPL witness Spoor's direct testimony,
20 reliability-related logged complaints per 10,000 customers have decreased by
21 32% from 2016 to 2020. Based on year-to-date complaints, we continue our
22 track of historically low service reliability complaints in 2021. Thus, apart from
23 the pure commonsensical fact that customers do in fact care about having highly

1 reliable access to electric power, especially in times when they were working
2 and schooling from home during the last year, our customers themselves have
3 told us that reliability matters and that they are very happy with the reliable
4 service that they are receiving.

5 **Q. Does this conclude your rebuttal testimony?**

6 A. Yes.