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September 16, 2021

VIA ELECTRONIC FILING

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

Re: Docket No. 20210015-EI

Dear Mr. Teitzman:

I enclose for filing in the above referenced docket Florida Power & Light Company's ("FPL") responses to the Staff of the Florida Public Service Commission's ("Staff") Twelfth Data Request (Nos. 1-4). Please note that on September 13, 2021, FPL served upon all parties a specific objection related to Staff Data Request, No. 4.

Please contact me if you or your Staff has any questions regarding this filing.

Sincerely,

/s/ Maria Jose Moncada

Maria Jose Moncada
Senior Attorney
Fla. Bar No. 0773301

Enclosures

CERTIFICATE OF SERVICE

20210015-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail this 16th day of September 2021 to the following parties:

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By: /s/ Maria Jose Moncada
Maria Jose Moncada
Fla. Bar No. 0773301

QUESTION:

Please refer to witness Bores' pre-filed settlement testimony, Exhibit SRB-14.

- a. Please provide data similar to Schedule 7.1 and 7.2 of the Company's Ten-Year Site Plan for the No STE Resource Plan and SolarTogether Extension Resource Plan. As part of this response, please include an additional column with the net reserve margin capacity above or below the 20 percent planning reserve margin level.
- b. Please explain why there are no solar units utilized after 2025. As a part of this response, include a revised SRB-14 plan that utilizes solar units after 2025, if available.

RESPONSE:

- a. Please see Attachment 1 for the requested information.
- b. The objective of the analysis is to determine if adding the next new increment of solar, represented by the Solar Together Extension MW shown in red font in Exhibit SRB-14, that was in addition to the amount of solar previously planned for the years 2023 thru 2025, was cost-effective to add. Because the focus is solely on the economics of the next new increment of solar, no additional solar was considered in the years after 2025. This analysis approach is identical to the approach that was used in FPL's prior SoBRA filings and in the original Solar Together filing with the FPSC.

FPL did not perform an analysis that included the Solar Together Extension increment as well as solar additions in the years beyond 2025. Therefore, the requested resource plans are not available.

NO STE RESOURCE PLAN																
Schedule 7.2																
Forecast of Capacity, Demand, and Scheduled Maintenance At Time Of Winter Peak																
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)
January of Year	Firm Installed Capacity MW	Firm Capacity Import MW	Firm Capacity Export MW	Firm QF MW	Total Firm Capacity Available MW	Total Demand MW	DSM MW	Firm Winter Peak Demand MW	Total Reserve Margin Before Maintenance MW	Scheduled Maintenance MW	Total Reserve Margin After Maintenance MW	Generation Only Reserve Margin After Maintenance MW	Capacity Above/ (Below) 20% RM (MW)			
FPL																
2021	26,993	110	0	404	27,507	20,068	1,370	18,698	8,809	47.1	0	8,809	47.1	7,439	37.1	5,069
Gulf																
2021	2,388	994	0	0	3,382	2,174	1	2,173	1,209	55.6	0	1,209	55.6	1,208	55.6	774
Integrated FPL and Gulf																
2022	28,521	1,104	0	4	29,629	22,461	1,406	21,055	8,574	40.7	0	8,574	40.7	7,168	31.9	4,363
2023	29,749	1,104	0	4	30,857	22,869	1,443	21,426	9,431	44.0	0	9,431	44.0	7,988	34.9	5,146
2024	29,380	219	0	4	29,603	23,287	1,482	21,805	7,798	35.8	0	7,798	35.8	6,316	27.1	3,437
2025	29,395	219	0	4	29,618	23,624	1,527	22,097	7,521	34.0	0	7,521	34.0	5,994	25.4	3,101
2026	29,390	219	0	4	29,613	23,957	1,556	22,401	7,212	32.2	0	7,212	32.2	5,656	23.6	2,732
2027	30,224	219	0	0	30,443	24,199	1,585	22,614	7,830	34.6	0	7,830	34.6	6,244	25.8	3,307
2028	30,584	219	0	0	30,803	24,552	1,615	22,937	7,866	34.3	0	7,866	34.3	6,251	25.5	3,279
2029	30,584	219	0	0	30,803	24,916	1,644	23,272	7,531	32.4	0	7,531	32.4	5,887	23.6	2,877
2030	32,674	219	0	0	32,893	25,289	1,673	23,616	9,277	39.3	0	9,277	39.3	7,604	30.1	4,554

Col. (2) represents capacity additions and changes projected to be in-service by January 1st. These MW are generally considered to be available to meet Winter peak loads which are forecasted to occur during January of the year indicated.
Col. (6) = Col.(2) + Col.(3) - Col(4) + Col(5).
Col.(7) reflects the 2021 load forecast without incremental DSM or cumulative load management.
Col.(8) represents cumulative load management capability, plus incremental conservation and load management, from 9/2020-on intended for use with the 2021 load forecast.
Col.(10) = Col.(6) - Col.(9)
Col.(11) = Col.(10) / Col(9)
Col.(12) indicates the capacity of units projected to be out-of-service for planned maintenance during the Winter peak period.
Col.(13) = Col.(10) - Col.(12)
Col.(14) = Col.(13) / Col(9)
Col.(15) = Col.(6) - Col.(7) - Col.(12)
Col.(16) = Col.(15) / Col(7)
Col.(17) = Col.(6) - (Col.(9)*1.20)

SOLARTOGETHER EXTENSION RESOURCE PLAN																
Schedule 7.2																
Forecast of Capacity, Demand, and Scheduled Maintenance At Time Of Winter Peak																
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)
January of Year	Firm Installed Capacity MW	Firm Capacity Import MW	Firm Capacity Export MW	Firm QF MW	Total Firm Capacity Available MW	Total Demand MW	DSM MW	Firm Winter Peak Demand MW	Total Reserve Margin Before Maintenance MW	Scheduled Maintenance MW	Total Reserve Margin After Maintenance MW	Generation Only Reserve Margin After Maintenance MW	Capacity Above/ (Below) 20% RM (MW)			
FPL																
2021	26,993	110	0	404	27,507	20,068	1,370	18,698	8,809	47.1	0	8,809	47.1	7,439	37.1	5,069
Gulf																
2021	2,388	994	0	0	3,382	2,174	1	2,173	1,209	55.6	0	1,209	55.6	1,208	55.6	774
Integrated FPL and Gulf																
2022	28,521	1,104	0	4	29,629	22,461	1,406	21,055	8,574	40.7	0	8,574	40.7	7,168	31.9	4,363
2023	29,749	1,104	0	4	30,857	22,869	1,443	21,426	9,431	44.0	0	9,431	44.0	7,988	34.9	5,146
2024	29,380	219	0	4	29,603	23,287	1,482	21,805	7,798	35.8	0	7,798	35.8	6,316	27.1	3,437
2025	29,395	219	0	4	29,618	23,624	1,527	22,097	7,521	34.0	0	7,521	34.0	5,994	25.4	3,101
2026	29,390	219	0	4	29,613	23,957	1,556	22,401	7,212	32.2	0	7,212	32.2	5,656	23.6	2,732
2027	30,224	219	0	0	30,443	24,199	1,585	22,614	7,830	34.6	0	7,830	34.6	6,244	25.8	3,307
2028	30,584	219	0	0	30,803	24,552	1,615	22,937	7,866	34.3	0	7,866	34.3	6,251	25.5	3,279
2029	30,584	219	0	0	30,803	24,916	1,644	23,272	7,531	32.4	0	7,531	32.4	5,887	23.6	2,877
2030	30,681	219	0	0	30,900	25,289	1,673	23,616	9,277	39.3	0	9,277	39.3	7,604	30.1	4,554

Col. (2) represents capacity additions and changes projected to be in-service by January 1st. These MW are generally considered to be available to meet Winter peak loads which are forecasted to occur during January of the year indicated.
Col. (6) = Col.(2) + Col.(3) - Col(4) + Col(5).
Col.(7) reflects the 2021 load forecast without incremental DSM or cumulative load management.
Col.(8) represents cumulative load management capability, plus incremental conservation and load management, from 9/2020-on intended for use with the 2021 load forecast.
Col.(10) = Col.(6) - Col.(9)
Col.(11) = Col.(10) / Col(9)
Col.(12) indicates the capacity of units projected to be out-of-service for planned maintenance during the Winter peak period.
Col.(13) = Col.(10) - Col.(12)
Col.(14) = Col.(13) / Col(9)
Col.(15) = Col.(6) - Col.(7) - Col.(12)
Col.(16) = Col.(15) / Col(7)
Col.(17) = Col.(6) - (Col.(9)*1.20)

QUESTION:

Please refer to witness Bores' pre-filed settlement testimony, Exhibit SRB-15.

- a. Please verify that only SolarTogether Extension costs and benefits are present in table SRB-15. If not, please provide a revised SRB-15 with only SolarTogether Extension costs and benefits. If applicable, use this revised SRB-15 for the remaining subparts.
- b. Please explain why subscription credits are not reflected in the table. As a part of this response, please provide a revised version of SRB-15 that includes subscription credits.
- c. Please provide the annual values (in nominal and net present value) for SRB-15. Provide this in electronic (excel) format.
- d. Please refer to FPL's response to Staff's 8th Data Request No. 6, Attachment No. 1, tab "System Impacts (Extension)". Please explain the differences between this tab and Exhibit SRB-15, if any. This response should include any variation in years, values and factors included in the calculations.

RESPONSE:

- a. The information presented in table SRB-15 represents the difference in resource planning CPVRR costs for the two resource plans: the No STE Plan and the SolarTogether Extension Plan. From these values, the system costs and system benefits for the STE program are derived.
- b. Table SRB-15 presents the projected \$425 million difference in total CPVRR costs between the two resource plans. This projection is the first of a two-step analysis process in which the projected total net CPVRR benefits are identified.
The allocation of those total net benefits into net benefits allocated to STE participants (*i.e.*, the subscription credits) and net benefits for non-participants occurs in the second step of this process. Attachment 1 contains a revised version of Exhibit SRB-15 including the projected Credits associated with the SolarTogether Extension.
- c. Please see Attachment 2 for these annual values.
- d. In regard to Attachment 1, the tab "System Impacts (Extension)" in FPL's response to Staff's Eighth Data Request, provides the same information as Exhibit SRB-15 with two exceptions. First, the CPVRR cost associated with the capital and fixed O&M from the STE solar facilities were not included in that system impact summary. Second, the projected annual nominal dollars for each of the other cost categories are shown through 2069, with the CPVRR summary at the top of the attachment indicating a net benefit of \$2.974 billion through 2050. This was not correctly presented or labeled in the original system impact extension tab.

The tab “System Impacts (Extension)” is part of work that was intended to determine only the system benefits of 1,788 MW of additional STE solar facilities without yet accounting for the cost of those solar facilities. As such, FPL’s IRP model performed an analysis through the year 2069 to better account for longer-lived resources (such as CTs or CCs). Because the projected life of the additional STE solar facilities was assumed to be 35 years, and the last year of the additional STE solar facilities is projected to come in-service in 2025, the overall STE analysis as presented in Exhibit SRB-15 ends in the year 2060. This difference in analysis horizon explains the numerical discrepancy between the tab “System Impacts (Extension)” and Exhibit SRB-15 for several of the cost categories under “generation costs avoided” and “system costs avoided.” Please refer to Attachment No. 2 to this Data Request (prepared in response to subpart c) which demonstrates there is no difference in the two documents after the nominal values from 2061 through 2069 are excluded and the total CPVRR appropriately calculated and presented through 2060.

Program	SolarTogether Extension Revenue Requirements				Non-SolarTogether Extension Generation Costs Avoided				System Costs Avoided			Total CPVRR (Millions)	ST Extension Subscription Credits CPVRR (Millions)
	Generation Capital (Millions)	Transmission Interconnection (Millions)	Fixed O&M (Millions)	Land (Millions)	Generation Capital (Millions)	Fixed O&M and Capital Replacement (Millions)	Transmission Interconnection (Millions)	Incremental Gas Transport (Millions)	System Net Fuel (Millions)	Startup + VOM (Millions)	Emission (Millions)		
Admin. Costs (Millions)	\$1,677	\$361	\$132	\$187	(\$520)	(\$134)	(\$3)	(\$287)	(\$1,310)	(\$101)	(\$446)	(\$425)	\$1,840

* Negative () indicates savings to FPL customers

* This hypothetical revised exhibit was prepared at the request of Staff and excludes subscription charges which offset the base revenue requirements of the SolarTogether facilities when netted with the generation capital, O&M and VOM savings, thus resulting in a CPVRR benefit for the general body of customers.

SolarTogether Extension (1,788 MW)

	SolarTogether Extension Revenue Requirements					Non-SolarTogether Extension Generation Costs Avoided				System Costs Avoided			Total CPVRR (Millions)
	Program Admin. Costs (Millions)	Generation Capital (Millions)	Transmission Interconnection (Millions)	Fixed O&M (Millions)	Land (Millions)	Generation Capital (Millions)	Fixed O&M and Capital Replace. (Millions)	Transmission Interconnection (Millions)	Incremental Gas Transport (Millions)	System Net Fuel (Millions)	Startup + VOM (Millions)	Emission (Millions)	
Thru 2060	\$22	\$1,677	\$361	\$132	\$187	(\$520)	(\$134)	(\$3)	(\$287)	(\$1,310)	(\$101)	(\$446)	(\$425)

* Negative () Indicates Savings to FPL Customers

Year	SolarTogether Extension Revenue Requirements					Non-SolarTogether Extension Generation Costs Avoided				System Costs Avoided			Total RevReq's (Millions)
	Program Admin. Costs (Millions)	Generation Capital (Millions)	Transmission Interconnection (Millions)	Fixed O&M (Millions)	Land (Millions)	Generation Capital (Millions)	Fixed O&M and Capital Replace. (Millions)	Transmission Interconnection (Millions)	Incremental Gas Transport (Millions)	System Net Fuel (Millions)	Startup + VOM (Millions)	Emission (Millions)	
1.07 2021	\$0	\$0	\$0	\$0	\$1								\$1
1.00 2022	\$2	(\$0)	\$0	\$0	\$4	\$0	\$0	\$0	\$0	(\$0)	\$0	\$0	\$5
0.93 2023	\$4	\$50	\$10	\$2	\$9	\$0	\$0	\$0	\$0	(\$20)	(\$3)	(\$0)	\$52
0.87 2024	\$3	\$126	\$25	\$4	\$14	\$0	\$0	\$0	\$0	(\$49)	(\$7)	(\$0)	\$118
0.81 2025	\$3	\$186	\$40	\$7	\$15	\$0	\$0	\$0	\$0	(\$79)	(\$7)	(\$0)	\$164
0.75 2026	\$2	\$190	\$42	\$8	\$15	(\$50)	(\$3)	(\$2)	\$0	(\$82)	(\$8)	(\$2)	\$111
0.70 2027	\$2	\$179	\$40	\$9	\$15	(\$66)	(\$6)	(\$2)	\$0	(\$86)	(\$4)	(\$3)	\$77
0.65 2028	\$1	\$171	\$39	\$9	\$15	(\$52)	(\$6)	\$0	\$0	(\$87)	\$4	(\$5)	\$90
0.61 2029	\$1	\$163	\$38	\$10	\$15	(\$201)	(\$13)	(\$5)	(\$9)	(\$44)	\$18	(\$3)	(\$30)
0.57 2030	\$1	\$158	\$36	\$11	\$15	\$17	(\$5)	\$0	(\$35)	(\$98)	(\$11)	(\$9)	\$80
0.53 2031	\$1	\$153	\$35	\$11	\$15	\$17	(\$11)	\$0	(\$36)	(\$103)	(\$12)	(\$11)	\$60
0.49 2032	\$1	\$149	\$34	\$12	\$15	(\$48)	(\$9)	\$0	(\$36)	(\$108)	(\$10)	(\$12)	(\$12)
0.46 2033	\$1	\$145	\$33	\$12	\$15	(\$47)	(\$4)	\$0	(\$37)	(\$112)	(\$8)	(\$14)	(\$16)
0.43 2034	\$1	\$141	\$31	\$12	\$15	(\$46)	(\$16)	\$0	(\$37)	(\$118)	(\$8)	(\$17)	(\$42)
0.40 2035	\$1	\$136	\$30	\$12	\$15	(\$112)	(\$5)	\$0	(\$38)	(\$123)	(\$4)	(\$21)	(\$107)
0.37 2036	\$1	\$132	\$29	\$12	\$15	(\$109)	(\$18)	\$0	(\$39)	(\$124)	(\$4)	(\$27)	(\$130)
0.35 2037	\$1	\$128	\$28	\$12	\$15	(\$36)	(\$19)	\$0	(\$40)	(\$132)	(\$9)	(\$33)	(\$85)
0.32 2038	\$1	\$139	\$26	\$13	\$15	(\$34)	(\$10)	\$0	(\$40)	(\$133)	(\$10)	(\$40)	(\$73)
0.30 2039	\$1	\$134	\$25	\$13	\$15	(\$33)	(\$16)	\$0	(\$41)	(\$137)	(\$11)	(\$47)	(\$96)
0.28 2040	\$1	\$129	\$24	\$13	\$15	(\$31)	(\$39)	\$0	(\$42)	(\$139)	(\$8)	(\$55)	(\$131)
0.26 2041	\$1	\$124	\$23	\$13	\$15	(\$106)	\$17	\$0	(\$43)	(\$141)	(\$14)	(\$62)	(\$171)
0.24 2042	\$1	\$119	\$23	\$14	\$15	(\$26)	(\$30)	\$0	(\$43)	(\$144)	(\$15)	(\$71)	(\$157)
0.23 2043	\$1	\$114	\$22	\$14	\$15	(\$25)	(\$37)	\$0	(\$44)	(\$142)	(\$6)	(\$79)	(\$167)
0.21 2044	\$1	\$109	\$21	\$14	\$15	(\$104)	(\$10)	\$0	(\$45)	(\$152)	(\$13)	(\$91)	(\$253)
0.20 2045	\$1	\$105	\$20	\$14	\$15	(\$19)	(\$19)	\$0	(\$46)	(\$150)	(\$22)	(\$100)	(\$202)
0.18 2046	\$1	\$100	\$19	\$15	\$15	(\$18)	(\$61)	\$0	(\$47)	(\$151)	(\$11)	(\$114)	(\$253)
0.17 2047	\$1	\$95	\$19	\$16	\$15	(\$24)	(\$27)	\$0	(\$48)	(\$155)	(\$17)	(\$119)	(\$246)
0.16 2048	\$1	\$90	\$18	\$16	\$15	(\$41)	(\$14)	\$0	(\$49)	(\$165)	(\$19)	(\$126)	(\$275)
0.15 2049	\$1	\$85	\$17	\$16	\$15	(\$113)	(\$26)	\$0	(\$50)	(\$159)	(\$14)	(\$131)	(\$361)
0.14 2050	\$1	\$80	\$16	\$16	\$15	(\$5)	(\$24)	\$0	(\$51)	(\$160)	(\$19)	(\$140)	(\$270)
0.13 2051	\$1	\$75	\$15	\$16	\$15	(\$5)	(\$12)	\$0	(\$52)	(\$167)	(\$21)	(\$142)	(\$275)
0.12 2052	\$1	\$70	\$15	\$17	\$15	(\$5)	(\$49)	\$0	(\$53)	(\$172)	(\$22)	(\$147)	(\$330)
0.11 2053	\$1	\$66	\$14	\$18	\$15	(\$100)	\$1	\$0	(\$54)	(\$164)	(\$18)	(\$148)	(\$369)
0.10 2054	\$1	\$62	\$13	\$19	\$15	(\$0)	(\$18)	\$0	(\$48)	(\$171)	(\$25)	(\$150)	(\$302)
0.10 2055	\$1	\$58	\$12	\$19	\$15	\$0	(\$17)	\$0	\$0	(\$169)	(\$24)	(\$154)	(\$258)
0.09 2056	\$1	\$54	\$12	\$19	\$15	\$0	(\$10)	\$0	\$0	(\$175)	(\$27)	(\$158)	(\$269)
0.08 2057	\$1	\$50	\$11	\$19	\$15	\$1	(\$44)	\$0	\$0	(\$174)	(\$25)	(\$160)	(\$306)
0.08 2058	\$1	\$37	\$8	\$15	\$12	\$1	(\$20)	\$0	\$0	(\$170)	(\$32)	(\$165)	(\$312)
0.07 2059	\$1	\$20	\$5	\$8	\$11	\$2	\$3	\$0	\$0	(\$176)	(\$26)	(\$166)	(\$317)
0.07 2060	\$1	\$5	\$1	\$2	\$5	\$2	(\$31)	\$0	\$0	(\$181)	(\$26)	(\$169)	(\$390)
CPVRR	\$22	\$1,677	\$361	\$132	\$187	(\$520)	(\$134)	(\$3)	(\$287)	(\$1,310)	(\$101)	(\$446)	(\$425)

QUESTION:

Please refer to Attachment No. 1, "FPL SolarTogether Extended Program", in response to Staff's 8th Data Request No. 6, tab 13 of 21. Explain what factors were included in FPL's determination for the projected values of the following categories: Generation Capital, Fixed O&M, Incremental Gas Transport and Emissions. This explanation should include specific avoided units, deferred units, emissions savings and any other relevant information used in making determinations for the projected values.

RESPONSE:

The analyses of both the STE plan and the No STE plan used the same forecasts for load, fuel costs, and environmental compliance costs that were presented in the direct testimony of FPL witness Sim. In addition, the costs for all resource options, except for the additional STE solar facilities, are the same as what was used in the integrated resource planning analyses described in the direct testimony of FPL witness Sim. The cost of the STE solar facilities was developed by FPL's engineering team based on current cost estimates for labor and materials.

In regard to which units were avoided or deferred, please see FPL witness Bores' Exhibit SRB-14. This exhibit shows that for the years 2026 through 2030, the additional STE solar facilities: (i) deferred a 3x0 CT from 2026 to 2029; (ii) deferred a 3x1 CC from 2029 to 2030; (iii) deferred 2x 100 batteries from 2027 to 2029, plus a 1x100 battery from 2028 to 2029; and (iv) deferred 3 x 100 batteries from 2028 to 2030.

Other information regarding projected benefits of the STE plan that are not presented in Exhibit SRB-14 include:

- A projected CO₂ emission cumulative reduction of approximately 59 million tons through 2060; and,
- A projected reduction in firm gas transportation of 60 MMCF/day.

QUESTION:

Please refer to witness Bores' pre-filed settlement testimony, Exhibit SRB-16.

- a. Please provide a revised "SolarTogether Original Phase" table that utilizes the original Subscription Credits as approved by Order No. PSC-2020-0084-S-EI. Please provide this in both Adobe PDF and electronic (excel) format.
- b. Please provide a revised "SolarTogether Extended Program" table that utilizes the revised "SolarTogether Original Phase" and original "SolarTogether Extension" table. Please provide this in both Adobe PDF and electronic (excel) format.

RESPONSE:

- a. Please see Attachments Nos. 1 and 2 for a PDF and excel of the requested information.
- b. Notwithstanding FPL's Objection to this request, FPL offers the following explanation. The "SolarTogether Extension," which comprises the 1,788 megawatts of additional capacity contemplated in the Proposed Settlement Agreement, was never analyzed as a standalone program, but rather as an extension of the original phase. As such, FPL did not develop pricing or a subscription credit for the standalone extension. Analysis of such a standalone program would have yielded different pricing or credit rates. FPL analyzed the overall extended program, which allowed for a reasonable payback for all participants while projecting a \$292 million CPVRR benefit for the general body of customers.

8	SolarTogether Phase 1 (1,490 MW)																
9	(\$ millions)	CPVRR	Nominal Total	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031-2056	
10																	
11	Discount Factor			1.01	0.93	0.87	0.80	0.75	0.69	0.64	0.60	0.55	0.51	0.48	0.44		
12																	
13	Base Revenue Requirements																
14	FPL SolarTogether Capital, O&M	\$1,839.7	\$4,677.7	\$3.5	\$70.3	\$197.9	\$206.5	\$196.0	\$187.9	\$180.8	\$175.3	\$171.0	\$167.1	\$162.7	\$158.5	\$2,800.3	
15	Program Administrative Costs	11.5	20.3	2.3	2.1	1.8	1.7	1.1	0.7	0.4	0.3	0.3	0.3	0.3	0.3	8.5	
16	Total SolarTogether Costs	1,851.1	4,698.1	5.8	72.4	199.7	208.2	197.1	188.6	181.2	175.7	171.3	167.4	163.0	158.8	2,808.8	
17	System Impacts (Avoided Generation Capital, O&M)	(561.4)	(1,678.2)	-	(2.0)	(14.8)	(38.2)	(60.4)	(48.3)	(47.0)	(44.5)	(37.4)	(176.3)	(111.1)	(28.0)	(1,070.0)	
18	Total Base RevReq's (fav) unfav	\$1,289.8	\$3,019.9	\$5.8	\$70.3	\$184.9	\$170.0	\$136.7	\$140.3	\$134.2	\$131.1	\$133.9	(\$8.9)	\$51.9	\$130.8	\$1,738.8	
19																	
20	Clause Revenue Requirements																
21	System Net Fuel	(\$1,029.2)	(\$3,732.8)	\$0.0	(\$19.6)	(\$55.4)	(\$60.4)	(\$64.5)	(\$73.6)	(\$78.4)	(\$82.7)	(\$90.5)	(\$91.4)	(\$81.6)	(\$80.0)	(\$2,954.6)	
22	Incremental Gas Transport	(389.6)	(1,622.1)	-	-	-	-	-	-	-	-	(59.6)	(59.2)	(58.9)	(58.6)	(1,385.8)	
23	Emissions	(94.4)	(648.8)	-	(0.0)	(0.0)	(0.0)	(0.0)	(0.0)	(0.0)	(0.6)	(1.0)	(2.1)	(2.2)	(3.1)	(639.7)	
24	Total Clause RevReq's (fav) unfav	(\$1,513.1)	(\$6,003.7)	\$0.0	(\$19.6)	(\$55.5)	(\$60.4)	(\$64.6)	(\$73.6)	(\$78.5)	(\$83.3)	(\$151.1)	(\$152.8)	(\$142.7)	(\$141.6)	(\$4,980.1)	
25																	
26	Net Revenue Requirements (fav) unfav	(\$223.3)	(\$2,983.8)	\$5.8	\$50.7	\$129.4	\$109.6	\$72.1	\$66.7	\$55.8	\$47.8	(\$17.2)	(\$161.7)	(\$90.8)	(\$10.8)	(\$3,241.3)	
27																	
28																	
29	Regular Participant Subscription Charge and Credit	% of Total															
30	Subscription Charge (Revenue)		(\$1,336.0)	(\$4,123.9)	\$0.0	(\$32.4)	(\$106.0)	(\$117.8)	(\$117.8)	(\$117.8)	(\$117.8)	(\$117.8)	(\$117.8)	(\$117.8)	(\$117.8)	(\$2,925.1)	
31	Subscription Credits		1,383.1	4,706.1	\$0.0	\$29.0	\$95.0	\$106.9	\$108.4	\$110.2	\$111.4	\$113.0	\$114.5	\$116.4	\$117.8	3,564.3	
32	Regular Participant Net Distribution (Payment)	21.1%	\$47.1	\$582.2	\$0.0	(\$3.4)	(\$11.1)	(\$11.0)	(\$9.5)	(\$7.7)	(\$6.4)	(\$4.9)	(\$3.3)	(\$1.4)	(\$0.1)	\$1.6	
33																	
34	Low Income Participant Subscription Charge and Credit																
35	Subscription Charge (Revenue)		(\$28.4)	(\$87.7)	\$0.0	(\$0.7)	(\$2.3)	(\$2.5)	(\$2.5)	(\$2.5)	(\$2.5)	(\$2.5)	(\$2.5)	(\$2.5)	(\$2.5)	(\$62.2)	
36	Subscription Credits		32.0	98.7	\$0.0	\$0.8	\$2.5	\$2.8	\$2.8	\$2.8	\$2.8	\$2.8	\$2.8	\$2.8	\$2.8	70.0	
37	Low Income Participant Net Distribution (Payment)	1.6%	\$3.6	\$11.0	\$0.0	\$0.1	\$0.3	\$0.3	\$0.3	\$0.3	\$0.3	\$0.3	\$0.3	\$0.3	\$0.3	\$7.8	
38																	
39																	
40	Participant Subscription Charge and Credit	% of Total															
41	Subscription Charge (Revenue)		(\$1,364.5)	(\$4,211.7)	\$0.0	(\$33.1)	(\$108.3)	(\$120.3)	(\$120.3)	(\$120.3)	(\$120.3)	(\$120.3)	(\$120.3)	(\$120.3)	(\$120.3)	(\$2,987.3)	
42	Subscription Credits		1,415.1	4,804.9	-	29.7	97.5	109.7	111.2	113.0	114.2	115.8	117.4	119.3	120.6	3,634.3	
43	Participant Net Distribution (Payment)	22.7%	\$50.6	\$593.2	\$0.0	(\$3.3)	(\$10.8)	(\$10.6)	(\$9.2)	(\$7.3)	(\$6.1)	(\$4.6)	(\$3.0)	(\$1.1)	\$0.2	\$1.9	
44																	
45	Revenue Requirements																
46	Base	% of Total															
47	Total Base RevReq's		\$1,289.8	\$3,019.9	\$5.8	\$70.3	\$184.9	\$170.0	\$136.7	\$140.3	\$134.2	\$131.1	\$133.9	(\$8.9)	\$51.9	\$130.8	\$1,738.8
48	Participant Subscription (Revenue)	105.79%	(1,364.5)	(4,211.7)	-	(33.1)	(108.3)	(120.3)	(120.3)	(120.3)	(120.3)	(120.3)	(120.3)	(120.3)	(120.3)	(2,987.3)	
49	Net Base RevReq's (fav) unfav	-5.79%	(\$74.7)	(\$1,191.8)	\$5.8	\$37.2	\$76.6	\$49.7	\$16.4	\$20.0	\$13.9	\$10.8	\$13.5	(\$129.2)	(\$68.4)	\$10.5	
50																	
51	Clause	% of Total															
52	Total Clause RevReq's (fav) unfav		(\$1,513.1)	(\$6,003.7)	\$0.0	(\$19.6)	(\$55.5)	(\$60.4)	(\$64.6)	(\$73.6)	(\$78.5)	(\$83.3)	(\$151.1)	(\$152.8)	(\$142.7)	(\$141.6)	(\$4,980.1)
53	Participant Credits	93.52%	1,415.1	4,804.9	-	29.7	97.5	109.7	111.2	113.0	114.2	115.8	117.4	119.3	120.6	122.2	3,634.3
54	Net Clause RevReq's (fav) unfav	6.48%	(\$98.0)	(\$1,198.8)	\$0.0	\$10.2	\$42.1	\$49.3	\$46.6	\$39.4	\$35.8	\$32.5	(\$33.8)	(\$33.6)	(\$22.1)	(\$19.4)	
55																	
56	Total Net RevReq's (fav) unfav	77.3%	(\$172.7)	(\$2,390.6)	\$5.8	\$47.4	\$118.6	\$99.0	\$63.0	\$59.4	\$49.7	\$43.2	(\$20.2)	(\$162.8)	(\$90.6)	(\$8.9)	

DECLARATION

I, Scott R. Bores, sponsored the answer to Data Request No. 4, and co-sponsored the answers to Data Request Nos. 1-3 from Staff's Twelfth Set of Data Requests to Florida Power & Light Company in Docket No. 20210015-EI, and the responses are true and correct based on my personal knowledge.

Under penalty of perjury, I declare that I have read the foregoing declaration and the interrogatory answer identified above, and that the facts stated therein are true.



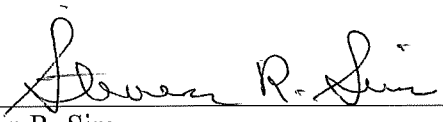
Scott R. Bores

Date: 9/14/2021

DECLARATION

I, Steven R. Sim, co-sponsored the answers to Data Request Nos. 1-3 from Staff's Twelfth Set of Data Requests to Florida Power & Light Company in Docket No. 20210015-EI, and the responses are true and correct based on my personal knowledge.

Under penalty of perjury, I declare that I have read the foregoing declaration and the interrogatory answer identified above, and that the facts stated therein are true.



Steven R. Sim

Date: 9/14/2021