

State of Florida



Public Service Commission

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

-M-E-M-O-R-A-N-D-U-M-

DATE: February 3, 2023
TO: Adam J. Teitzman, Commission Clerk, Office of Commission Clerk
FROM: Amber M. Norris, Public Utilities Supervisor, Division of Accounting & Finance
AMN
RE: Docket Number 20230017-EI

Please file the attached document in the docket mentioned above.

AMN/sh

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2023 FEB -3 AM 9:49
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STATE OF FLORIDA



DIVISION OF
ACCOUNTING AND FINANCE
ANDREW L. MAUREY
DIRECTOR
(850) 413-6900

Public Service Commission

February 2, 2023

Christopher T. Wright, Esq.
Joel T. Baker, Esq.
Florida Power & Light Company
700 Universe Blvd.
Juno Beach, Florida 33408
Christopher.wright@fpl.com
Joel.baker@fpl.com

STAFF'S FIRST DATA REQUEST
via e-mail

Re: 20230017-EI - Petition for limited proceeding for recovery of incremental storm restoration costs related to Hurricanes Ian and Nicole, by Florida Power & Light Company.

Dear Sirs:

By this letter, the Commission staff requests that Florida Power & Light Company (FPL) provide responses to the following data requests:

1. Has FPL identified any legal prohibitions or impediments to implementing the alternate storm charge calculation described in paragraph 24 of the Petition for Limited Proceeding in this docket?
 - a. If so, please identify the specific authority (order, case, rule, statute, or other) that FPL relied upon to reach that conclusion.
 - b. As to each authority you have identified, please explain in detail the reason(s) why you believe that authority prevents or inhibits FPL from implementing the alternate storm charge calculation.
2. Does FPL believe that implementation of the alternate storm charge calculation would result in rates that are fair, just, and reasonable?
 - a. If so, please explain why FPL believes the relief requested in the Petition for Limited Proceeding is more appropriate.
 - b. If not, please explain why FPL believes implementation of the alternate storm charge calculation would result in rates that are not fair, just, and reasonable.

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

3. The alternate storm charge calculation shows that costs for Hurricanes Ian, Nicole, Sally, and Zeta will be recovered by March 2024. Under the currently-approved storm recovery schedule, recovery of Hurricanes Sally and Zeta costs are projected to be complete in December 2024.
 - a. Please discuss whether a shorter recovery period provides benefits to the general body of ratepayers and FPL.
 - b. If you contend it does not, please explain why.
4. The alternate storm charge calculation shows costs for Hurricanes Ian, Nicole, Michael, Sally, and Zeta being recovered through a uniform surcharge (\$15.30/kWh) applicable to all current FPL ratepayers. FPL in its Petition has requested recovery of costs from Hurricanes Ian and Nicole through a uniform surcharge (\$13.84/kWh) applicable to all current ratepayers, with the ratepayers of the former Gulf Power Company continuing to pay an additional, separate surcharge for Hurricanes Michael, Sally, and Zeta (\$11.00/kWh).
 - a. Please discuss whether the consolidation of storm costs proposed in the alternate storm charge calculation provides benefits to the general body of ratepayers and FPL.
 - b. If you contend it does not, please explain why.
5. Please state when and how the Company will notify customers of the requested storm surcharge.

Please file all responses electronically no later than Thursday, February 9, 2023, from the Commission's website at www.floridapsc.com, by selecting the Clerk's Office tab and Electronic Filing Web Form. Please feel free to contact me by phone at (850) 413-6510 or by email at dandrews@psc.state.fl.us if you have any questions.

Sincerely,

Dylan Andrews
Public Utilities Analyst III

DA

Cc: Office of Commission Clerk