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*VIA ELECTRONIC FILING*

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

**Re: Docket No. 20240000-OT**  
**Florida Power & Light Company 2024 Load Research Sampling Plan**  
**Responses to Staff's First Data Requests**

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Dear Mr. Teitzman:

Enclosed for filing in the above-referenced docket are the responses of Florida Power & Light Company to the Florida Public Service Commission Staff's First Data Requests regarding the 2024 Load Research Sampling Plan

If you or your staff have any question regarding this filing, please contact Tara Dubose at 561-691-2391 or [tara.dubose@fpl.com](mailto:tara.dubose@fpl.com).

Respectfully submitted,

/s/Christopher T. Wright  
Christopher T. Wright  
Fla. Auth. House Counsel No. 1007055

Enclosures

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Request No. 1  
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**QUESTION:**

Table 1 (Page 2) of Florida Power & Light Company's 2024 Load Research Sampling Plan, dated May 31, 2024 (FPL's 2024 Plan) indicates that for the RS(T)-1 Rate Class grouping, samples will come from the RS-1, RSFB, RS-1(EV), and RTR-1 rate classes. The table reflects that the identified classes collectively accounted for 70,161,113 megawatt-hours (54.85 percent) of 2023 Annual Retail Billed Sales.

- A. For each identified rate class (RS-1, RSFB, RS-1(EV), and RTR-1), please provide the specific contribution of 2023 Annual Retail Billed Sales in megawatt-hours.
- B. The RSFB and RS-1(EV) rate classes were not sampled in Florida Power & Light Company's 2022 Load Research Sampling Plan (FPL's 2022 Plan). Please provide a basic description of the RSFB and RS-1(EV) rate classes and explain why FPL's 2024 Plan proposes to include these rate classes for sampling in addition to the RS-1 and RTR-1 rate classes.

**RESPONSE:**

A.

Rate Class	MWH	
<b>RS(T)-1 Residential Service (RS-1, RSFB, RS-1(EV), and RTR-1)</b>	<b>70,161,113</b>	
<b>Schedule</b>		<b>Percent</b>
RS-1	70,029,239	99.81%
RSFB	88,032	0.13%
RS-1(EV)	33,043	0.05%
RTR-1	10,799	0.02%
<b>Total</b>	<b>70,161,113</b>	<b>100.00%</b>

- B. RS-1(EV) and RSFB are newer optional rate schedules, which became effective on January 1, 2022, that are part of the RS(T)-1 rate class for purposes of load research and cost of service allocations. Because there were customers in both rate schedules during the sampling period for the 2024 Load Research Sampling Plan, these rate schedules were included in the sampling plan.

The RS-1(EV) – Residential Electric Vehicle Charging Services Rider Pilot rate schedule is an optional schedule for residential customers with an FPL EV charger. The RSFB rate schedule is an optional Residential Fixed Rate (flat bill) that was originally a Gulf rate schedule. FPL retained RSFB following the 2021 rate case that merged FPL and Gulf rates.

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**QUESTION:**

Table 1 (Page 2) of FPL's 2024 Plan indicates that for the GSD(T)-1 Rate Class grouping, samples will come from the GSD-1, GSdT-1, GSD-1EV, HLFT-1, UEV, SDTR-1A and SDTR-1B rate classes. The table reflects that the identified classes collectively accounted for 29,137,716 megawatt-hours (22.78 percent) of 2023 Annual Retail Billed Sales.

- A. For each identified rate class (GSD-1, GSdT-1, GSD-1EV, HLFT-1, UEV, SDTR-1A and SDTR-1B), please provide the specific contribution of 2023 Annual Retail Billed Sales in megawatt-hours.
- B. The GSD-1EV and UEV rate classes were not sampled in Florida Power & Light Company's 2022 Load Research Sampling Plan (FPL's 2022 Plan). Please provide a basic description of the GSD-1EV and UEV rate classes and explain why FPL's 2024 Plan proposes to include these rate classes for sampling in the GSD(T)-1 Rate Class grouping.

**RESPONSE:**

A.

Rate Class	MWH	
<b>GSD(T)-1 General Service Demand (GSD-1, GSdT-1, GSD-1EV, HLFT-1, UEV, SDTR-1A, &amp; SDTR-1B)</b>	<b>29,137,716</b>	
<b>Schedule</b>		<b>Percent</b>
GSD-1	23,200,546	79.62%
GSdT-1	4,311,723	14.80%
GSD-1EV	14,056	0.05%
HLFT-1	750,979	2.58%
UEV	1,783	0.01%
SDTR-1A	784,459	2.69%
SDTR-1B	74,170	0.25%
<b>Total</b>	<b>29,137,716</b>	<b>100.00%</b>

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- B. GSD-1EV and UEV are newer pilot optional rate schedules within the GSD(T)-1 rate class, which became effective January 1, 2021. Because there were customers in both rate schedules during the sampling period for the 2024 Load Research Sampling Plan, these rate schedules were included in the population used for the sampling plan. Additionally, these rate schedules were part of the GSD(T)-1 rate class when the 2022 Load Research Sampling Plan was prepared and the customers that were included in those schedules at that time, were in the population used for sampling in 2022.

The GSD-1EV – Electric Vehicle Charging Infrastructure Rider Pilot is an optional rate schedule for commercial customers with EV charging stations.

The UEV – Utility – Owned – Public Charging for Electric Vehicles Pilot is a rate schedule for members of the public who use FPL owned EV chargers in public locations. While the rate schedule is included in the GSD(T)-1 rate class for cost allocation purposes, it is not possible to include these premises in load research samples because the premises are company owned.

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**QUESTION:**

Table 1 (Page 2) of FPL's 2024 Plan indicates that for the GSLD(T)-1 Rate Class grouping, samples will come from the GSLD-1, GSLDT-1, GSLD-1EV, HLFT-1, CS-1, CST-1, HLFT-2, SDTR-2A and SDTR-2B rate classes. The table reflects that the identified classes collectively accounted for 10,822,084 megawatt-hours (8.46 percent) of 2023 Annual Retail Billed Sales.

- A. For each identified rate class (GSLD-1, GSLDT-1, GSLD-1EV, HLFT-1, CS-1, CST-1, HLFT-2, SDTR-2A and SDTR-2B), please provide the specific contribution of 2023 Annual Retail Billed Sales in megawatt-hours.
- B. The GSLD-1EV rate class was not sampled in FPL's 2022 Plan. Please provide a basic description of this rate class and explain why FPL's 2024 Plan proposes to include this class in the GSLD(T)-1 Rate Class grouping.

**RESPONSE:**

A.

Rate Class	MWH	
<b>GSLD(T)-1 General Service Large Demand 1 (500-1999 KW) (GSLD-1, GSLDT-1, GSLD-1EV, CS-1, CST-1, HLFT-2, SDTR-2A, &amp; SDTR-2B)</b>	<b>10,822,084</b>	
<b>Schedule</b>		<b>Percent</b>
GSLD-1	3,562,254	32.92%
GSLDT-1	4,496,694	41.55%
GSLD-1EV	6,099	0.06%
CS-1	38,740	0.36%
CST-1	29,950	0.28%
HLFT-2	1,520,590	14.05%
SDTR-2A	1,019,102	9.42%
SDTR-2B	148,655	1.37%
<b>Total</b>	<b>10,822,084</b>	<b>100.00%</b>

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- B. GSLD-1EV is a pilot optional rate schedule within the GSLD(T)-1 rate class, which became effective January 1, 2021. Because there were customers in this rate schedule during the sampling period for 2024 Load Research Sampling Plan, it was included in the sampling plan. Additionally, these pilot rate schedules were part of the GSD(T)-1 rate class when the 2022 Load Research Sampling Plan was prepared and the customers that were included in those schedules at that time were in the population used for sampling in 2022.

The GSLD-1EV – Electric Vehicle Charging Infrastructure Rider to General Service Large Demand (Pilot Program) is an optional schedule for commercial customers with EV charging stations.

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**QUESTION:**

Please refer to Section II, Proposed Sampling Plan Design Methodology (Page 3) of FPL's 2024 Plan to answer the following questions:

- A. In FPL's 2024 Plan, a total of 899 Sample Points are proposed for the RS(T)-1 Rate Class. In FPL's 2022 Plan, a total of 770 Sample Points were proposed for this class. Please explain why FPL's 2024 Plan proposes 229 (about 17 percent) more sample points for the RS(T)-1 Rate Class, compared to FPL's 2022 Plan.
  
- B. In FPL's 2024 Plan, a total of 139 Sample Points are proposed for the GSLD(T)-1 Rate Class. In FPL's 2022 Plan, a total of 384 Sample Points were proposed for this class. Please explain why FPL's 2024 Plan proposes 245 (about 176 percent) fewer sample points for the GSLD(T)-1 Rate Class, compared to FPL's 2022 Plan.
  
- C. In FPL's 2024 Plan, the suggested sample size for Stratum Number 1 of the GSLD(T)-1 Rate Class (0-307,800 kWh) is 74. In FPL's 2022 Plan, the suggested sample size for Stratum Number 1 of the GSLD(T)-1 Rate Class (0-296,000 kWh) was 128. Please explain why FPL's 2024 Plan proposes a sample size that is smaller by 54 (about 73 percent), compared to FPL's 2022 Plan

**RESPONSE:**

A.B.C. In FPL's response to Staff's First Data Request, Nos. 4(A) and (B) in FPL's 2022 Load Research Sampling Plan, FPL explained that due to a lack of historical load research data for the consolidated FPL and Gulf systems, which were fully merged effective January 1, 2022, FPL used a different sampling methodology for its 2022 Sampling Plan than was used in prior load research studies for pre-merger, standalone FPL. Specifically, FPL explained:

“FPL used the Oracle Utilities Load Analysis (OULA) software to calculate an optimal sample design by finding the minimum number of sample points per stratum based on total population data obtained from FPL's billing systems for each rate class. This billing data included number of customers, customer region, total kWh usage, and usage per customer. Please note that the data obtained from the billing systems did not include all intervals. To ensure that sample sizes (including alternates) were large enough to meet FPL's vigorous data validation requirements throughout the study period, the minimum samples sizes were multiplied by a whole number to account for sample degradation.”

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However, for the 2024 Load Research Sampling Plan, FPL had two years of consolidated load research data and could once again use its historical method for adjusting sample sizes to ensure that a sufficient number of sample points are chosen. For this plan, FPL analyzed two years of consolidated data to choose the month that produced the largest number of sample points (the month with the highest standard deviation). The sample size suggested for that month was used to develop the sample sizes by strata. It is not possible to compare the two different methods as they are fundamentally different.



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**QUESTION:**

Please refer to Section III, Proposed Sampling Plan Summary (Page 5) of FPL's 2024 Plan, which reflects the planned deployment year is 2025. Please explain the reasoning behind this planned deployment plan as may relate to anticipated load studies or ratemaking needs of the utility.

**RESPONSE:**

As noted on the sampling plan filing, "As part of the review of its 2022 Plan, Staff requested, and FPL agreed to file a new plan in May 2024 for the consolidated Company to restart the three-year cycle. Thus, the proposed 2024 Plan provides for the RS(T)-1, GS(T)-1, GSD(T)-1, and GSLD(T)-1 rate class samples to be updated every 3 years consistent with the express requirements of the Rule." Assuming that the 2024 Sampling Plan is approved, it would go into effect in January 2025 and would be used for filing projected clause rates in 2027. This timeline assumes that the intervals are studied for all of 2025 with results by mid-2026.

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**QUESTION:**

In staff's review of FPL's 2022 Load Sampling Plan, FPL's response to Staff's 2<sup>nd</sup> Data Request, No. 1, dated January 12, 2023 indicates that the utility used a new data validation process for its load research studies called ALR.

- A. Please provide the summary results of the data validation process used in FPL's 2023 Load Research Study.
- B. Explain whether and how ALR data process will be updated or revised for purposes of the 2025 deployment of FPL's load sampling plan and what issues, if any, will be addressed.

**RESPONSE:**

- A. FPL's load research process includes a data validation system known as Automated Load Research (ALR). While this process does not produce a summarized results report, it does produce a monthly detailed error table. Based on the identified errors, ALR applies logic to interpolate missing intervals (within specified parameters) or to switch a premise with an alternate premise. Additionally, analysts will view the error table to determine if additional action is necessary to prevent future errors, which could include ensuring intervals are being uploaded from data gathering software and ensuring billing issues related to intervals are resolved. This analysis ensures the quality of the premise data for the prior calendar month before allowing the results from that month to be included in the active sample. Attachment 1 contains a list of each Error Code with a Description.
- B. ALR will be updated with the rate class sample sizes, active sample points, and stratum weights upon FPSC approval for FPL's proposed 2024 Proposed Sampling Plan.

The following errors are generated by the validations process:

Error Code	Description
PREMISE	Rate code changes, address changes, work center changes, meter multiplier changes
SPI	An error is written if more than one distinct SPI value is found in the intervals. This is also flagged by the <i>spi_flg</i> field in <i>fetch_results</i> .
SPILENGTH	An error is written if the SPI for an interval is longer than 60 minutes.
NODATA	An error is written if no meter data could be fetched, but a bill was fetched.
BADINTV	An error is written if the percent of intervals missing after interpolation is attempted ( <i>badintvper</i> in <i>premise_usage</i> ) exceeds the threshold given by <i>DRO</i> in the <i>variable</i> table. Automatic switching occurs, if applicable, when this feature exceeds <i>INTDATASECOND</i> from the <i>variable</i> table.
DIFFBILLCOMP	An error is written if the difference between the cut usage and the billed usage ( <i>kwh</i> and <i>billkwh</i> in <i>premise_usage</i> , respectively) is greater than the threshold given by <i>BILLCOMP</i> in the <i>variable</i> table.
NULLBILL	An error is written if billed usage ( <i>billkwh</i> in <i>premise_usage</i> ) is null or 0. Bill comparisons cannot be made if billed usage is 0, since the operand would be undefined.
INCOMPINTVS	An error is written if the maximum <i>meterstop_dt</i> for all channels fetched for a bill is less than the bill's <i>billstop</i> . This indicates that there should be at least one more channel to cover the rest of the bill, but such intervals could not be fetched.
AUMONTH	An error is written if the number of months available to calculate average monthly usage is less than the threshold set by <i>AUMONTH</i> in the <i>variable</i> table.
METERCHANGE	An error is written if a meter stopped or started within the duration of the bill, based on the values of <i>meterstart_dt</i> , <i>metersop_dt</i> , <i>billstart</i> , and <i>billstop</i> .
PURESTUDY	An error is written if a premise is matched to a "PURE" study in <i>fetch_results</i> but contains at least one net-meter channel (as marked by the <i>netmeter</i> flag).
INFORMATIONAL	An error is written for each master data change in any of the following fields for a premise: <i>customer</i> , <i>accountid</i> , <i>account_status</i> . Premises are compared to any prior data for the premise existing in the ALR database, as well as any new data.
DUPROWS	An error is written if the data in CAMS has 2 rows for the same netmeter status in the same bill. This happens because of a backdated change in CAMS which ALR cannot solve for without creating duplicate interval rows. This is a very rare error and should be monitored for frequency.

The following errors are generated by the automatic switching process:

Error Code	Description
RATECODE	An error is written if a premise's ratecode is not one of the ratecodes specified by the study to which it is matched.
STRATUM	An error is written if a premise's <i>avgmonthlykwh</i> is outside of the kwh limits of the stratum defined for the studypoint. Stratum kwh upper limits are defined by the <i>stratumkwh</i> field of <i>study</i> .
BILLDATA	An error is written if no bill was fetched for a studypoint for the given <i>rltv_mo</i> .

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**QUESTION:**

Since FPL's 2022 Plan was approved, have any advancements in smart meter technology:

- A. Influenced the methodologies for estimating average coincident peak and class load factors? If so, please describe how FPL's 2024 Plan reflects these advancements.
- B. Influenced the methodologies for estimating average coincident peak and class load factors? If so, please describe how FPL's 2024 Plan reflects these advancements.
- C. What specific technological enhancements in smart meters does FPL plan to utilize in the 2025 deployment year, and how do these compare to the strategies employed in the 2022 load research sampling?

**RESPONSE:**

- A. No
- B. No
- C. FPL's load research process is not impacted by changes in metering technologies as load research gathers the intervals from AWS databases and not the meter gathering systems themselves. Because there are various types of meters and meter technologies used in the field, it was determined that maintaining all metering data in a consistent format in a database was the best way to ensure the integrity and usefulness of the data.