



Maria Jose Moncada
Assistant General Counsel
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408-0420
(561) 304-5795
(561) 691-7135 (Facsimile)
E-mail: maria.moncada@fpl.com

September 5, 2024

-VIA ELECTRONIC FILING -

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

Re: Docket No. 20240001-EI

Dear Mr. Teitzman:

Attached for electronic filing in the above docket is the prepared testimony and exhibit of Florida Power & Light Company's ("FPL") witness Michael Cashman. This testimony is submitted in support of FPL's Petition for Approval of its Levelized Fuel Cost Recovery Factors and Capacity Cost Recovery Factors for January 2025 through December 2025.

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

Sincerely,

s/ Maria Jose Moncada

Maria Jose Moncada

Attachments

cc: Counsel for Parties of Record (w/ attachments)

CERTIFICATE OF SERVICE

Docket No. 20230001-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic service on this 5th day of September 2024 to the following:

Suzanne Brownless
Ryan Sandy
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850
sbrownle@psc.state.fl.us
rsandy@psc.state.fl.us

J. Jeffry Wahlen
Malcolm N. Means
Virginia Ponder
Ausley McMullen
Post Office Box 391
Tallahassee, Florida 32302
jwahlen@ausley.com
mmeans@ausley.com
vponder@ausley.com
Attorneys for Tampa Electric Company

Paula K. Brown
Manager, Regulatory Coordination
Tampa Electric Company
Post Office Box 111
Tampa, Florida 33601-0111
regdept@tecoenergy.com

Mike Cassel
Vice President/Governmental
and Regulatory Affairs
Florida Public Utilities Company
208 Wildlight Avenue
Yulee, Florida 32097
mcassel@fpuc.com

Walt Trierweiler
Charles J. Rehwinkel
Mary A. Wessling
Patricia A. Christensen
Octavio Ponce
Austin Watrous
Office of Public Counsel
The Florida Legislature
111 W. Madison Street, Room 812
Tallahassee, Florida 32399
trierweiler.walt@leg.state.fl.us
rehwinkel.charles@leg.state.fl.us
wessling.mary@leg.state.fl.us
christensen.patty@leg.state.fl.us
ponce.octavio@leg.state.fl.us
watrous.austin@leg.state.fl.us
Attorneys for the Citizens of the State of Florida

Matthew R. Bernier
Robert L. Pickels
Stephanie A. Cuello
106 East College Avenue, Suite 800
Tallahassee, Florida 32301
matt.bernier@duke-energy.com
robert.pickels@duke-energy.com
stephanie.cuello@duke-energy.com
FLRegulatoryLegal@duke-energy.com
Attorneys for Duke Energy Florida

Dianne M. Triplett
299 First Avenue North
St. Petersburg, Florida 33701
dianne.triplett@duke-energy.com
Attorney for Duke Energy Florida

Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe Street, Suite 601
Tallahassee, Florida 32301-1804
bkeating@gunster.com
**Attorneys for Florida Public Utilities
Company**

Michelle D. Napier
Director, Regulatory Affairs
Florida Public Utilities Company
1635 Meathe Drive
West Palm Beach, Florida 33411
mnapier@fpuc.com

Robert Scheffel Wright
John Thomas LaVia, III
Gardner, Bist, Bowden, Dee, LaVia, Wright,
Perry & Harper, P.A.
1300 Thomaswood Drive
Tallahassee, Florida 32308
schef@gbwlegal.com
jlavia@gbwlegal.com
**Attorneys for the Florida Retail
Federation**

Jon C. Moyle, Jr.
Moyle Law Firm, P.A.
118 North Gadsden Street
Tallahassee, Florida 32301
jmoyle@moylelaw.com
mqualls@moylelaw.com
**Attorneys for Florida Industrial Power
Users Group**

James W. Brew
Laura Wynn Baker
Sarah B. Newman
Stone Mattheis Xenopoulos & Brew, P.C.
1025 Thomas Jefferson Street, NW
Eighth Floor, West Tower
Washington, DC 20007
jbrew@smxblaw.com
lwb@smxblaw.com
sbn@smxblaw.com
**Attorneys for White Springs
Agricultural Chemicals, Inc. d/b/a PCS
Phosphate -White Springs**

Peter J. Mattheis
Michael K. Lavanga
Joseph R. Briscar
Stone Mattheis Xenopoulos & Brew, PC
1025 Thomas Jefferson Street, NW
Eighth Floor, West Tower
Washington, DC 20007
pjm@smxblaw.com
mkl@smxblaw.com
jrb@smxblaw.com
Attorneys for Nucor Steel Florida, Inc.

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

1 **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

2 **FLORIDA POWER & LIGHT COMPANY**

3 **TESTIMONY OF MICHAEL V. CASHMAN**

4 **DOCKET NO. 20240001-EI**

5 **SEPTEMBER 5, 2024**

6
7 **Q. Please state your name, business address, employer and position.**

8 A. My name is Michael V. Cashman. My business address is 700 Universe
9 Boulevard, Juno Beach, Florida, 33408. I am employed by Florida Power & Light
10 Company (“FPL”) as Executive Director of Wholesale Operations in the Energy
11 Marketing and Trading Division.

12 **Q. Please summarize your educational background and professional**
13 **experience.**

14 A. I earned a bachelor’s degree in Mechanical Engineering and a master’s degree in
15 Business Administration from the University of Michigan. I joined the NextEra
16 Energy family of companies in 1998, progressing professionally within the
17 Market Analysis organization from Market Intelligence Analyst to Senior
18 Director before being tapped to lead NextEra Energy Marketing’s Asset Trading
19 and Optimization organization. In 2022, responsibilities for Independent System
20 Operator (“ISO”) asset operations were consolidated with asset trading and
21 optimization under me acting as the Executive Director of Asset Operations and
22 Trading. In this role my team was responsible for managing the operations and
23 optimization of 36 GW of generation located in eight U.S. and Canadian

1 Regional Transmission Organizations (“RTOs”) as well as the management of
2 annual commodity price exposure for approximately 250 Bcf of natural gas
3 and 10 million barrels of oil and natural gas liquids production. I joined FPL’s
4 Energy Marketing and Trading organization in July of 2024 as the Executive
5 Director of Wholesale Operations and Trading where I oversee power trading,
6 coal and fuel oil operations as well as FPL’s natural gas scheduling team.

7 **Q. Have you prepared or caused to be prepared under your supervision,**
8 **direction and control any exhibits or schedules in this proceeding?**

9 A. Yes, I am sponsoring the following exhibits:

- 10 • Exhibit MVC-1 - 2025 Projected Dispatch Costs and Availability
- 11 • Exhibit MVC-2 - 2025 Risk Management Plan

12 I am co-sponsoring the following schedules included in the Exhibits of FPL
13 witness Mohomed:

- 14 • Schedules E2 through E9 and H1 included in Exhibit AM-5;
- 15 • Schedule E2 included in Exhibits AM-6 and AM-7; and
- 16 • Schedule E12 included in Exhibit AM-8.

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

18 A. The purpose of my testimony is to present and explain FPL’s projections for
19 (1) the dispatch costs of natural gas, light fuel oil, and coal; (2) the availability
20 of natural gas to FPL; (3) generating unit heat rates and availabilities; and (4)
21 the quantities and costs of wholesale (off-system) power sales and purchased
22 power transactions. Additionally, my testimony addresses the Incremental
23 Optimization Costs included in FPL’s 2025 Projection Filing.

1

2

FUEL PRICE FORECAST

3 **Q. What forecast methodologies has FPL used for the 2025 recovery period?**

4 A. For natural gas commodity prices, the forecast methodology relies upon the
5 NYMEX Natural Gas Futures contract prices (forward curve). For light fuel oil
6 prices, FPL utilizes Over-The-Counter (“OTC”) forward market prices. For coal,
7 FPL utilizes actual coal purchases, current market quotes, and information from
8 S&P Global to develop its short- and long-term coal price forecasts. Forecasts
9 for the availability of natural gas are developed internally at FPL and are based
10 on contractual commitments and market experience. The forward curves for both
11 natural gas and light fuel oil represent expected future prices at a given point in
12 time. The basic assumption made with respect to using the forward curves is that
13 all available data that could impact the price of natural gas and light fuel oil in the
14 short-term is incorporated into the curves at all times. FPL utilized forward curve
15 prices from the close of business on August 1, 2024 for calculating its projected
16 fuel costs included in the 2025 Fuel Cost Recovery (“FCR”) factors. This
17 forecast methodology and the resulting fuel forecast were utilized to develop cost
18 projections for FPL during the January 2025 through December 2025 time period.

19 **Q. Has FPL previously used these same forecasting methodologies?**

20 A. Yes. For natural gas and light fuel oil, FPL began using the NYMEX Natural
21 Gas Futures contract prices (forward curve) and OTC forward market prices,
22 respectively, in 2004 for its 2005 projections and has used this methodology
23 consistently since that time. For coal price forecasting, FPL implemented the

1 methodology described above beginning in March 2022.

2 **Q. What are the factors that typically can affect FPL’s natural gas prices**
3 **during the January through December 2025 period?**

4 A. In general, the key factors are (1) North American natural gas demand and
5 domestic production; (2) the level of working gas in underground storage
6 throughout the period; (3) weather (particularly in the winter period); (4) the
7 potential for imports and/or exports of natural gas; and (5) the terms of FPL’s
8 natural gas supply and transportation contracts.

9
10 Henry Hub natural gas spot prices averaged \$2.24 per MMBtu for the first half
11 of 2024, compared with an annual average of \$2.53 per MMBtu in 2023. In its
12 August 2024 Short-Term Energy Outlook, the Energy Information
13 Administration (“EIA”) forecasts that Henry Hub natural gas spot prices will
14 average \$2.30 per MMBtu for 2024 and \$3.30 per MMBtu in 2025.

15
16 The EIA forecasts that demand for natural gas will decline by 1% in 2025,
17 dropping from roughly 90 billion cubic feet per day (“BCF/day”) in 2024 to 89.1
18 BCF/day in 2025 due to normalizing weather and the increase in electricity
19 generated from solar.

20
21 The EIA forecasts dry natural gas production to average 103 BCF/day during
22 2024 and increase to 105 BCF/day in 2025. Domestic natural gas inventories
23 ended July 2024 at 16% above the five-year average and 8% above the same

1 period last year. The EIA forecasts natural gas inventories to end the 2024
2 injection season (end of October) between 3.9 and 4.0 trillion cubic feet, or 6%
3 above the five-year average.

4 **Q. Please describe FPL’s natural gas transportation portfolio for the January
5 through December 2025 period.**

6 A. FPL utilizes the Florida Gas Transmission Company, LLC (“FGT”), Gulfstream
7 Natural Gas System, LLC (“Gulfstream”), Sabal Trail Transmission, LLC
8 (“Sabal Trail”), Florida Southeast Connection, LLC (“FSC”), and Gulf South
9 Pipeline Company, LLC (“Gulf South”) pipelines to deliver natural gas to its
10 generation facilities. FPL’s total firm transportation capacity on FGT ranges
11 from 1,387,000 to 1,511,000 MMBtu/day. It also has 695,000 MMBtu/day of
12 firm transport on Gulfstream, 600,000 MMBtu/day of firm transport on Sabal
13 Trail/FSC, and 30,000 MMBtu/day of firm transport on Gulf South.

14
15 FPL also has firm transportation capacity on several upstream pipelines that
16 provide FPL access to onshore gas supply. FPL has 325,000 MMBtu/day of firm
17 transport on the Southeast Supply Header, LLC (“SESH”) pipeline, 121,500
18 MMBtu/day of firm transport on the Transcontinental Gas Pipe Line Company,
19 LLC (“Transco”) Zone 4A lateral, 200,000 MMBtu/day (January through March
20 and November through December) and 345,000 MMBtu/day (April through
21 October) of firm transport on the Gulf South pipeline, 80,000 MMBtu/day of firm
22 transport on the Gulf South and Destin Pipeline Company, LLC (“Destin”)
23 pipelines combined, 75,000 MMBtu/day of firm transport on the Midcontinent

1 Express Pipeline LLC (“MEP”) and Destin pipelines combined, 50,000
2 MMBtu/day (January through March) and 100,000 MMBtu/day (April through
3 December) on the FGT and Trunkline Gas Company, LLC (“Trunkline”)
4 pipelines combined, and 100,000 MMBtu/day (January through March) and
5 125,000 MMBtu/day (April through December) on the Trunkline pipeline.
6 FPL’s firm transportation rights on these pipelines provide access for up to
7 1,171,500 MMBtu/day of onshore natural gas supply during the summer season,
8 which helps diversify FPL’s natural gas portfolio and enhance the reliability of
9 fuel supply.

10 **Q. Please describe FPL’s natural gas storage position.**

11 A. FPL currently holds 4.0 BCF of firm natural gas storage capacity in Bay Gas
12 Storage (“Bay Gas”), located in southwest Alabama, 2.0 BCF (January through
13 March) and 1.0 BCF (April through December) of firm natural gas storage
14 capacity in Southern Pines Energy Center (“Southern Pines”), located in
15 southeast Mississippi. Beginning April 1, 2025, FPL will hold an additional 2.0
16 BCF of firm natural gas storage capacity in Petal Gas Storage, located in southern
17 Mississippi.

18
19 While the acquisition of upstream transportation capacity has helped mitigate a
20 substantial portion of risk associated with offshore natural gas supply, natural gas
21 storage capacity also remains an important part of FPL’s gas portfolio from an
22 operational perspective, by helping FPL balance consumption “swings” due to
23 weather, solar generation variability, and overall unit availability. Storage

1 capacity improves reliability by providing a relatively inexpensive insurance
2 policy against supply and infrastructure problems while also increasing FPL's
3 ability to manage supply and demand on a daily basis.

4

5 FPL continually evaluates its natural gas storage portfolio and will make
6 adjustments as required to maintain reliability, provide the necessary flexibility
7 to respond to demand changes, and to diversify its overall portfolio.

8 **Q. What are FPL's projections for the dispatch cost and availability of
9 natural gas for the January through December 2025 period?**

10 A. FPL's projections of the system average dispatch cost and availability of
11 natural gas, by transport type, by pipeline and by month, are provided on page 1
12 of Exhibit MVC-1.

13 **Q. Please describe FPL's utilization of light fuel oil.**

14 A. FPL primarily utilizes light fuel oil (or ultra-low sulfur diesel) as a back-up fuel
15 in its natural gas-fired generation units. FPL's light fuel oil system is comprised
16 of approximately 1.6 million barrels of storage that provides an average of 83
17 hours of full load operation across the fleet of dual-fired units. FPL's light fuel
18 oil system offers substantial flexibility through varying tank sizes, resupply
19 options, and through varying locations and proximity to supply sources.

20 **Q. Please provide FPL's projection for the dispatch cost of light fuel oil for the
21 January through December 2025 period.**

22 A. FPL's projection for the system average dispatch cost of light fuel oil, by month,
23 is provided on page 1 of Exhibit MVC-1.

1 **Q. What is the basis for FPL’s projections of the dispatch cost of coal for Plant**
2 **Scherer?**

3 A. FPL’s projected dispatch cost is based on FPL’s price projection for coal
4 delivered to the plant.

5 **Q. Please provide FPL’s projection for the dispatch cost of coal at Plant Scherer**
6 **for the January through December 2025 period.**

7 A. FPL’s projection for the system average dispatch cost of coal for this period, by
8 month, is shown on page 1 of Exhibit MVC-1.

9 **Q. Do the fuel costs reflected on Schedule E3 for light oil and coal differ from**
10 **the dispatch costs shown on page 1 of Exhibit MVC-1?**

11 A. Yes. FPL maintains inventories of those fuels and runs its plants out of that
12 inventory. The dispatch costs reflect what FPL would pay to replace fuel that is
13 removed from inventory to run the plants. On the other hand, the “charge out”
14 costs for light oil and coal that are reflected on Schedule E3 are based on FPL’s
15 weighted average inventory cost, by month, for each fuel type.

16

17 **PLANT HEAT RATES, OUTAGE FACTORS, PLANNED**

18 **OUTAGES, AND CHANGES IN GENERATING CAPACITY**

19 **Q. Please describe how FPL developed the projected Average Net Heat Rates**
20 **shown on Schedule E4 of Exhibit AM-5.**

21 A. The projected Average Net Heat Rates were calculated by the GenTrader model.
22 The current heat rate equations and efficiency factors for FPL’s generating units,
23 which present heat rate as a function of unit power level, were used as inputs to

1 GenTrader for this calculation. The heat rate equations and efficiency factors are
2 updated as appropriate based on historical unit performance and projected
3 changes or upgrades to plant equipment.

4 **Q. Are you providing the outage factors projected for the period January
5 through December 2025?**

6 A. Yes. This data is shown on page 2 of Exhibit MVC-1.

7 **Q. How were the outage factors for this period developed?**

8 A. The unplanned outage factors were developed using the actual historical full and
9 partial outage event data for each of the units. The historical unplanned outage
10 factor of each generating unit was adjusted, as necessary, to eliminate non-
11 recurring events and recognize the effect of planned outages to arrive at the
12 projected factor for the period January through December 2025.

13 **Q. Please describe the significant planned outages for the January through
14 December 2025 period.**

15 A. Planned outages at FPL's nuclear units are the most significant in relation to fuel
16 cost recovery. St. Lucie Unit 1 is scheduled to be out of service from September
17 20, 2025 until October 30, 2025, or 40 days during the period. Turkey Point Unit
18 4 is scheduled to be out of service from March 1, 2025 until April 4, 2025, or 34
19 days during the period.

20 **Q. Please identify any changes to FPL's generation capacity projected to take
21 place during the January through December 2025 period.**

22 A. As shown in FPL's 2024 Ten Year Power Plant Site Plan (Schedule 8, page 167),
23 FPL projects a net increase in its 2025 summer firm capacity of 485 MW. This

1 increase is attributable to the addition of 563 MW of solar generation and 18 MW
2 of combined cycle upgrades. The additions are off-set by solar degradation
3 (9 MW) and the retirement of gas-fired generation (87 MW).

4
5 **WHOLESALE (OFF-SYSTEM) POWER AND**
6 **PURCHASED POWER TRANSACTIONS**

7 **Q. Are you providing the projected wholesale (off-system) power sales and**
8 **purchased power transactions forecasted for January through December**
9 **2025?**

10 A. Yes. This data is shown on Schedules E6, E7, E8, and E9 of Exhibit AM-5 of
11 this filing.

12 **Q. In what types of wholesale (off-system) power transactions does FPL**
13 **engage?**

14 A. FPL purchases FERC-mandated wholesale energy from Qualifying Facilities.
15 Additionally, FPL engages in structured Power Purchase Agreements (“PPA”)
16 and shorter term, opportunistic economy power sales and purchases. FPL’s
17 customers benefit from both purchases and sales as savings on purchases and
18 gains on sales are credited to customers through the FCR Clause. Power
19 purchases and sales are executed under specific tariffs that allow FPL to transact
20 with a given entity. Although FPL primarily transacts on a short-term basis
21 (hourly and daily transactions), FPL continuously searches for all opportunities
22 to lower fuel costs through purchasing and selling wholesale power, regardless
23 of the duration of the transaction.

1 **Q. Please describe the method used to forecast wholesale (off-system) economy**
2 **power purchases and sales.**

3 A. Wholesale (off-system) economy power purchases and sales are projected based
4 upon estimated generation costs, generation availability, fuel availability,
5 expected market conditions and historical data.

6 **Q. What are the forecasted amounts and costs of wholesale (off-system)**
7 **economy power sales?**

8 A. FPL has projected 2,985,500 MWh of wholesale (off-system) economy power
9 sales for the period of January through December 2025. The projected fuel cost
10 related to these sales is \$69,424,269. The projected transaction revenue from
11 these sales is \$103,238,745. After taking into account the transmission costs and
12 capacity revenues, the projected gain is \$29,001,741.

13 **Q. In what document are the fuel costs for wholesale (off-system) economy**
14 **power sales transactions reported?**

15 A. Schedule E6 of Exhibit AM-5 provides the total MWh of energy, total dollars for
16 fuel adjustment, total cost and total gain for wholesale (off-system) economy
17 power sales.

18 **Q. What are the forecasted amounts and costs of wholesale (off-system)**
19 **economy power purchases for the January to December 2025 period?**

20 A. The costs of these economy purchases are shown on Schedule E9 of Exhibit
21 AM-5. For the period, FPL projects it will purchase a total of 148,080 MWh
22 at a cost of \$6,524,090. If FPL generated this energy, FPL estimates that it

1 would cost \$10,585,771. Therefore, these economy purchases are projected to
2 result in savings of \$4,061,681.

3 **Q. Does FPL have additional agreements for the purchase of electric power
4 and energy that are included in your projections?**

5 A. Yes. FPL purchases energy under two contracts with the Solid Waste
6 Authority of Palm Beach County (“SWA”) and under two wind energy
7 purchase agreements (“Kingfisher I” and “Kingfisher II”) with Morgan Stanley
8 Capital Group. FPL has also entered into two PPAs, one with Mercuria Energy
9 America (“Mercuria PPA”) for 225 MW of capacity and energy from the
10 Lindsay Hill Combined Cycle Plant and the second with Southern Company
11 for output from Santa Rosa Energy Center Combined Cycle Plant (“Santa Rosa
12 PPA”) for 230 MW of capacity and energy, in order to supplement FPL’s
13 winter reserves, while providing fuel savings. The Mercuria PPA runs from
14 January 1, 2025 through February 28, 2025 and the Santa Rosa PPA runs from
15 January 1, 2025 through April 30, 2025. In addition, FPL contracts to purchase
16 and sell nuclear energy under the St. Lucie Plant Nuclear Reliability Exchange
17 Agreements with Orlando Utilities Commission and Florida Municipal Power
18 Agency. Lastly, FPL purchases energy and capacity from Qualifying Facilities
19 and “as-available” energy from a number of cogeneration and small power
20 production facilities under existing tariffs and contracts, including solar energy
21 purchases under agreements with three solar facilities located in Northwest
22 Florida.

1 **Q. Please provide the projected energy costs to be recovered through the**
2 **FCR Clause for the power purchases referred to above during the**
3 **January through December 2025 period.**

4 A. Energy purchases under the SWA agreements are projected to be 808,740
5 MWh for the period at an energy cost of \$32,060,321. FPL projects to
6 purchase 1,031,280 MWh at an energy cost of \$54,321,448 from Kingfisher I
7 and Kingfisher II combined. Additionally, FPL projects to purchase 15,050
8 MWh at an energy cost of \$1,343,898 and 367,899 MWh at an energy cost of
9 \$12,625,805 under the Mercuria PPA and Santa Rosa PPA, respectively.
10 FPL's cost for energy purchases under the St. Lucie Plant Reliability Exchange
11 Agreements is a function of the operation of St. Lucie Unit 2 and the fuel costs
12 to the owners. For the period, FPL projects purchases of 633,896 MWh at an
13 energy cost of \$2,870,619. These projections are shown on Schedule E7 of
14 Exhibit AM-5.

15
16 In addition, as shown on Schedule E8 of Exhibit AM-5, FPL projects that
17 purchases from Qualifying Facilities for the period will provide 569,112 MWh
18 at a cost of \$25,972,806.

19 **Q. How does FPL develop the projected energy costs related to purchases**
20 **from Qualifying Facilities?**

21 A. For those contracts that entitle FPL to purchase "as-available" energy at FPL's
22 avoided energy cost, FPL used its fuel price forecasts as inputs to the
23 GenTrader model to project the avoided energy cost that is used to set the price

1 of these energy purchases each month. For those contracts that are not based
2 on FPL's avoided energy cost (firm capacity and energy and "as-available"
3 energy), the applicable Unit Energy Cost mechanisms prescribed in the
4 contracts are used to project monthly energy costs.

5 **Q. What are the forecasted amounts and cost of energy being sold under the**
6 **St. Lucie Plant Reliability Exchange Agreement?**

7 A. FPL projects to sell 561,423 MWh of energy at a cost of \$2,890,328. These
8 projections are shown on Schedule E6 of Exhibit AM-5.

9

10 **HEDGING/ RISK MANAGEMENT PLAN**

11 **Q. Has FPL filed a Hedging Activity Final True-Up Report for 2023,**
12 **consistent with the Hedging Order Clarification Guidelines, as required**
13 **by Order No. PSC-08-0667-PAA-EI issued on October 8, 2008?**

14 A. No. Pursuant to Paragraph 27 of the 2021 Rate Settlement, FPL's fuel hedging
15 program was under a moratorium. Therefore, FPL had no hedging activity to
16 report for 2023.

17 **Q. Has FPL filed a comprehensive risk management plan for 2025, consistent**
18 **with the Hedging Order Clarification Guidelines as required by Order No.**
19 **PSC-08-0667-PAA-EI issued on October 8, 2008?**

20 A. Yes. On July 26, 2024, FPL filed its comprehensive risk management plan for
21 2025. I adopt the filed plan as my Exhibit MVC-2.

22

1 **THE ASSET OPTIMIZATION PROGRAM**

2 **Q. Has FPL included in its 2025 FCR factors projections of the savings that**
3 **it will achieve under the Asset Optimization Program?**

4 A. Yes. FPL has included projections for savings on wholesale power purchases
5 (Schedule E9), projections for gains on wholesale power sales (Schedule E6),
6 and projections for other types of asset optimization measures (Schedule E2)
7 for 2025.

8 **Q. Has FPL included in its 2025 FCR factors projections of the Incremental**
9 **Optimization Costs that it will incur under the Asset Optimization**
10 **Program?**

11 A. Yes. FPL has included in its 2025 FCR factors, Incremental Optimization Costs
12 from two categories: (i) incremental personnel, software and hardware costs
13 associated with managing the various asset optimization activities, and
14 (ii) variable power plant O&M (“VOM”) costs associated with wholesale
15 economy sales and purchases.

16 **Q. Have you made any changes in incremental personnel dedicated to the Asset**
17 **Optimization Program?**

18 A. FPL intends to dedicate an additional two personnel to the Program to optimize
19 renewable energy credits.

20 **Q. Please describe the costs that are included in FPL’s projections for**
21 **incremental personnel, software, and hardware expenses.**

22 A. FPL projects to incur incremental expenses of \$861,401 in 2025 for the salaries
23 and expenses related to the four and a half (4.5) employees that will support the

1 Asset Optimization Program.

2 **Q. Please describe the costs that are included in FPL’s projections for VOM**
3 **expenses.**

4 A. FPL has included for recovery in its 2025 FCR factors VOM expenses that
5 reflect the netting of economy sales and purchases. As shown on Schedules
6 E6 and E9 of Exhibit AM-5, FPL projects to sell 2,985,500 MWh and purchase
7 148,080 MWh of economy power. The 2021 Rate Settlement prescribes a
8 VOM rate of \$0.48/MWh. Applying that rate, FPL projects to incur VOM
9 expenses of \$1,433,040 associated with its economy sales and to avoid \$71,078
10 with its economy purchases. FPL has included for recovery the net of these two
11 figures, \$1,361,962 (Schedule E2, sum of line nos. 14 and 15), in its 2025 FCR
12 factors.

13

14 **CALCULATION OF FUEL SAVINGS ASSOCIATED WITH THE**
15 **COMMERCIAL OPERATION OF NEW SOLAR GENERATION**

16 **Q. Please describe the solar generation that FPL will put into commercial**
17 **operation during 2025 pursuant to the 2021 Rate Settlement.**

18 A. The solar generation to be constructed pursuant to the 2021 Rate Settlement
19 will consist of twelve solar energy centers located at twelve sites. The twelve
20 solar energy centers are sized to generate a total of 894 MW (nameplate
21 capacity) and are scheduled to go into service by January 31, 2025. These
22 twelve sites consist of Holopaw, Speckled Perch, Big Water, Fawn Solar, Hog
23 Bay, Green Pasture, Thomas Creek, Fox Trail, Long Creek, Swallowtail,

1 Tenmile, and Redlands.

2 **Q. Will the operation of the new solar generation during 2025 result in fuel**
3 **savings for FPL's customers?**

4 A. Yes. For the February through December 2025 period, the operation of the
5 twelve solar energy centers is projected to result in fuel savings for FPL's
6 customers of \$47,915,404.

7 **Q. How did FPL calculate the projected fuel savings associated with the**
8 **operation of the new solar energy centers?**

9 A. FPL utilized its GenTrader model to quantify the fuel savings associated with
10 the operation of the twelve new solar energy centers. This model is used to
11 calculate the fuel costs that are included in FPL's projection filing. The same
12 forecasted fuel prices and other assumptions that are reflected in the projection
13 filing were used for analyzing the new solar generation fuel savings. In order
14 to calculate the fuel savings, FPL ran two separate production cost simulations,
15 one without the twelve new solar energy centers and one with the twelve new
16 solar energy centers. A comparison of the total system fuel costs from
17 GenTrader for the two simulations showed that the fuel costs were lower in the
18 case that included the twelve new solar energy centers.

19 **Q. Does this conclude your testimony?**

20 A. Yes, it does.

EXHIBIT MVC-1
FUEL COST RECOVERY

EXHIBIT MVC-1
DOCKET NO. 20240001-EI
PAGES 1-2
SEPTEMBER 5, 2024

Florida Power & Light Company
Projected Dispatch Costs and Projected Availability of Natural Gas
January 2025 Through December 2025

<u>Light Oil</u>	<u>January</u>	<u>February</u>	<u>March</u>	<u>April</u>	<u>May</u>	<u>June</u>	<u>July</u>	<u>August</u>	<u>September</u>	<u>October</u>	<u>November</u>	<u>December</u>
Ultra-Low Sulfur Distillate (\$/Bbl)	109.77	109.58	109.02	108.22	107.69	107.32	107.40	107.55	107.72	107.88	107.82	107.55
Ultra-Low Sulfur Distillate (\$/MMBtu)	18.83	18.80	18.70	18.56	18.47	18.41	18.42	18.45	18.48	18.50	18.49	18.45
<u>Coal</u>	<u>January</u>	<u>February</u>	<u>March</u>	<u>April</u>	<u>May</u>	<u>June</u>	<u>July</u>	<u>August</u>	<u>September</u>	<u>October</u>	<u>November</u>	<u>December</u>
Scherer (\$/MMBtu)	3.17	3.17	3.17	3.17	3.17	3.17	3.19	3.19	3.19	3.21	3.21	3.21
<u>Natural Gas Dispatch Price</u>	<u>January</u>	<u>February</u>	<u>March</u>	<u>April</u>	<u>May</u>	<u>June</u>	<u>July</u>	<u>August</u>	<u>September</u>	<u>October</u>	<u>November</u>	<u>December</u>
Firm FGT (\$/MMBtu)	3.76	3.58	3.10	2.80	2.93	3.25	3.58	3.66	3.47	3.27	3.58	4.10
Firm Gulfstream (\$/MMBtu)	3.69	3.52	3.03	2.64	2.70	2.90	3.09	3.25	3.05	2.98	3.62	4.17
Firm Sabal Trail/FSC (\$/MMBtu)	3.96	3.78	3.25	3.15	3.22	3.48	3.85	3.89	3.62	3.44	4.01	4.52
Firm Gulf South (\$/MMBtu)	3.45	3.29	2.82	2.54	2.61	2.81	2.99	3.13	2.93	2.86	3.27	3.86
<u>Natural Gas Transportation</u>	<u>January</u>	<u>February</u>	<u>March</u>	<u>April</u>	<u>May</u>	<u>June</u>	<u>July</u>	<u>August</u>	<u>September</u>	<u>October</u>	<u>November</u>	<u>December</u>
Delivery Transportation												
Firm FGT (MMBtu/Day)	1,237,000	1,237,000	1,237,000	1,326,000	1,361,000	1,361,000	1,361,000	1,361,000	1,361,000	1,326,000	1,237,000	1,237,000
Firm FGT Western Division (MMBtu/Day)	150,000	150,000	150,000	150,000	150,000	150,000	150,000	150,000	150,000	150,000	150,000	150,000
Firm Gulfstream (MMBtu/Day)	695,000	695,000	695,000	695,000	695,000	695,000	695,000	695,000	695,000	695,000	695,000	695,000
Firm Sabal Trail/FSC (MMBtu/Day)	600,000	600,000	600,000	600,000	600,000	600,000	600,000	600,000	600,000	600,000	600,000	600,000
Firm Gulf South (MMBtu/Day)	30,000	30,000	30,000	30,000	30,000	30,000	30,000	30,000	30,000	30,000	30,000	30,000
Total Firm Delivery Availability (MMBtu/Day)	2,712,000	2,712,000	2,712,000	2,801,000	2,836,000	2,836,000	2,836,000	2,836,000	2,836,000	2,801,000	2,712,000	2,712,000
Upstream Transportation												
Firm SESH (MMBtu/Day)	325,000	325,000	325,000	325,000	325,000	325,000	325,000	325,000	325,000	325,000	325,000	325,000
Firm Transco (MMBtu/Day)	121,500	121,500	121,500	121,500	121,500	121,500	121,500	121,500	121,500	121,500	121,500	121,500
Firm Gulf South (MMBtu/Day)	200,000	200,000	200,000	345,000	345,000	345,000	345,000	345,000	345,000	345,000	200,000	200,000
Firm Gulf South/Destin (MMBtu/Day)	80,000	80,000	80,000	80,000	80,000	80,000	80,000	80,000	80,000	80,000	80,000	80,000
Firm MEP/Destin (MMBtu/Day)	75,000	75,000	75,000	75,000	75,000	75,000	75,000	75,000	75,000	75,000	75,000	75,000
Trunkline/FGT (MMBtu/Day)	50,000	50,000	50,000	100,000	100,000	100,000	100,000	100,000	100,000	100,000	100,000	100,000
Turnkline (MMBtu/Day)	100,000	100,000	100,000	125,000	125,000	125,000	125,000	125,000	125,000	125,000	125,000	125,000
Total Upstream Availability (MMBtu/Day)	951,500	951,500	951,500	1,171,500	1,171,500	1,171,500	1,171,500	1,171,500	1,171,500	1,171,500	1,026,500	1,026,500

FLORIDA POWER & LIGHT COMPANY
PROJECTED UNIT AVAILABILITIES & OUTAGE SCHEDULES
PERIOD OF: JANUARY 2025 THROUGH DECEMBER 2025

Plant/Unit	Forced Outage Factor (%)	Maintenance Outage Factor (%)	Planned Outage Factor (%)	Overhaul Date	Overhaul Date	Overhaul Date	Overhaul Date	Overhaul Date
Cape Canaveral 3	1.1	5.3	0.0	NONE				
Dania Beach 7	0.9	10.5	15.3	02/15/25 - 02/25/25	04/11/25 - 05/14/25	11/04/25 - 11/14/25	05/27/25 - 06/06/25	10/15/25 - 11/17/25
Fort Myers 2	0.7	5.1	2.0	05/02/25 - 05/23/25	04/10/25 - 05/01/25			
Fort Myers 3A	0.8	2.6	2.7	03/31/25 - 04/09/25				
Fort Myers 3B	0.8	2.6	2.7	03/31/25 - 04/09/25				
Fort Myers 3C	0.8	2.6	2.7	03/31/25 - 04/09/25				
Fort Myers 3D	0.7	2.3	14.8	03/31/25 - 04/09/25	02/15/25 - 03/30/25			
Ft. Myers GTs	2.5	2.6	4.5	04/12/25 - 05/14/25				
GCEC 5	4.3	4.9	0.0	NONE				
GCEC 6	6.0	10.5	0.0	NONE				
GCEC 7	6.2	9.9	14.2	03/25/25 - 05/15/25				
GCEC 8A	0.4	1.4	0.0	NONE				
GCEC 8B	0.4	1.4	0.0	NONE				
GCEC 8C	0.4	1.4	0.0	NONE				
GCEC 8D	0.4	1.4	0.0	NONE				
Lauderdale 6A	0.9	2.4	0.0	NONE				
Lauderdale 6B	0.9	2.4	0.0	NONE				
Lauderdale 6C	0.9	2.4	6.3	02/26/25 - 03/20/25				
Lauderdale 6D	0.9	2.4	6.3	03/10/25 - 04/01/25				
Lauderdale 6E	0.9	2.4	0.0	NONE				
Lauderdale GTs	2.3	0.2	0.0	NONE				
Manatee 3	0.4	5.2	2.9	02/15/25 - 03/07/25	02/15/25 - 03/07/25			
Martin 3	1.0	4.6	0.0	NONE				
Martin 4	1.2	5.6	0.0	NONE				
Martin 8	0.6	5.4	0.0	NONE				
Okeechobee 1	1.6	12.5	0.5	02/03/25 - 02/07/25				
Port Everglades 5	0.7	4.5	17.2	04/11/25 - 06/12/25	04/11/25 - 06/14/25	04/11/25 - 06/12/25	04/11/25 - 06/14/25	
Riviera 5	1.0	5.0	0.0	NONE				
Sanford 4	0.3	4.3	0.0	NONE				
Sanford 5	0.3	3.3	10.7	03/31/25 - 04/28/25	11/01/25 - 12/02/25	11/01/25 - 12/02/25	11/01/25 - 12/02/25	11/01/25 - 12/02/25
Scherer 3	0.4	2.1	17.8	03/25/25 - 05/29/25				
Smith 3	0.7	5.1	3.8	03/15/25 - 03/23/25	10/16/25 - 10/21/25	10/21/25 - 10/26/25		
St. Lucie 1	1.3	1.3	11.0	09/20/25 - 10/30/25				
St. Lucie 2	1.3	1.3	0.0	NONE				
Turkey Point 3	1.3	1.3	0.0	NONE				
Turkey Point 4	1.1	1.1	9.3	03/01/25 - 04/04/25				
Turkey Point 5	0.6	5.1	11.0	02/24/25 - 03/28/25	11/15/25 - 12/16/25	11/15/25 - 12/12/25		
West County 1	0.6	6.8	0.0	NONE				
West County 2	0.5	4.2	0.0	NONE				
West County 3	0.6	6.2	4.7	05/01/25 - 06/21/25				