

John T. Burnett Vice President & General Counsel Florida Power & Light Company 700 Universe Boulevard Juno Beach, FL 33408 (561) 304-5253

February 28, 2025

VIA ELECTRONIC FILING

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

Re: Docket No. 20250011-EI Petition by Florida Power & Light Company for Base Rate Increase

Dear Mr. Teitzman:

Attached for filing on behalf of Florida Power & Light Company ("FPL") in the above docket are the direct testimony and exhibits of FPL witness Liz Fuentes.

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

Sincerely,

s/ John T. Burnett John T. Burnett Vice President & General Counsel Florida Power & Light Company

(Document 14 of 30)

CERTIFICATE OF SERVICE Docket 20250011-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished

by electronic service this <u>28th</u> day of February 2025 to the following:

Shaw Stiller Timothy Sparks **Florida Public Service Commission** Office of the General Counsel 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850 sstiller@psc.state.fl.us tsparks@psc.state.fl.us Walt Trierweiler Mary A. Wessling Office of Public Counsel c/o The Florida Legislature 111 W. Madison St., Rm 812 Tallahassee, Florida 32399-1400 trierweiler.walt@leg.state.fl.us wessling.mary@leg.state.fl.us Attorneys for the Citizens of the State of Florida

By: <u>s/ John T. Burnett</u>

John T. Burnett

1	BEFORE THE
2	FLORIDA PUBLIC SERVICE COMMISSION
3	DOCKET NO. 20250011-EI
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8	FLORIDA POWER & LIGHT COMPANY
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10	DIRECT TESTIMONY OF LIZ FUENTES
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23	Filed: February 28, 2025

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1		I. INTRODUCTION
2	Q.	Please state your name and business address.
3	A.	My name is Liz Fuentes. My business address is Florida Power & Light Company,
4		4200 West Flagler Street, Miami, Florida 33134.
5	Q.	By whom are you employed and what is your position?
6	A.	I am employed by Florida Power & Light Company ("FPL" or the "Company") as
7		Executive Director of Regulatory Accounting.
8	Q.	Please describe your duties and responsibilities in that position.
9	A.	I am responsible for planning, guidance, and management of most regulatory
10		accounting activities for FPL. In this role, I ensure that financial books and records
11		comply with multi-jurisdictional regulatory accounting requirements and regulations.
12	Q.	Please describe your educational background and professional experience.
13	A.	I graduated from the University of Florida in 1999 with a Bachelor of Science Degree
14		in Accounting. I began my employment with FPL that same year. During my tenure
15		at the Company, I have held various accounting and regulatory positions of increasing
16		responsibility with most of my career focused in regulatory accounting and the
17		calculation of revenue requirements. Specifically, I have filed testimony or provided
18		accounting support in multiple FPL retail base rate filings, clause filings, and other
19		regulatory dockets filed at the Florida Public Service Commission ("Commission") as
20		well as the Federal Energy Regulatory Commission ("FERC"). My responsibilities
21		have included the management of the accounting for FPL's cost recovery clauses and
22		the preparation, review, and filing of FPL's monthly Earnings Surveillance Reports

1		("ESR") at the Commission. I am a Certified Public Accountant ("CPA") licensed in
2		the Commonwealth of Virginia and member of the American Institute of CPAs.
3	Q.	Are you sponsoring or co-sponsoring any exhibits in this case?
4	A.	Yes. I am sponsoring the following exhibits:
5		• Exhibit LF-1 – List of MFRs Sponsored or Co-Sponsored by Liz Fuentes
6		• Exhibit LF-2 – MFR A-1 for the 2026 and 2027 Projected Test Year
7		• Exhibit LF-3 – List of Proposed Company Adjustments for the 2026 and 2027
8		Projected Test Year
9		• Exhibit LF-4 – 2026 and 2027 ROE Calculation Without Rate Adjustment
10		• Exhibit LF-5 – ADIT Proration Adjustment to Capital Structure for 2026 and
11		2027 Projected Test Year
12		• Exhibit LF-6 – 2026 and 2027 Plant Daniel Costs and Expenses
13		I am co-sponsoring the following exhibit:
14		• Exhibit SRB-7 – Solar and Battery Base Rate Adjustment Mechanism, filed
15		with the direct testimony of FPL witness Bores.
16	Q.	Are you sponsoring or co-sponsoring any Minimum Filing Requirements in this
17		case?
18	A.	Yes. Exhibit LF-1 lists the minimum filing requirements ("MFR") that I am sponsoring
19		and co-sponsoring.
20	Q.	What time periods are presented in the MFRs?
21	A.	The MFRs and associated schedules reflect information for the 2024 Historical Test
22		Year, 2025 Prior Year, 2026 Projected Test Year, and 2027 Projected Test Year.
23		

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to support the calculation of the proposed revenue
requirements and appropriateness of certain ratemaking adjustments. My testimony
supports accounting and ratemaking practices that affect the determination of rate base,
working capital, rate of return, capital structure, and net operating income.
Specifically, this includes:

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- The calculation of the revenue requirement requested for the 2026 Projected Test Year;
- 9 The calculation of the revenue requirement requested for the 2027 Projected
 10 Test Year; and
- FPL's proposed adjustments to rate base, net operating income, and capital
 structure for the 2026 Projected Test Year and 2027 Projected Test Year.
- In addition, I support the calculation of the revenue requirements for FPL's proposed
 Solar and Battery Base Rate Adjustment ("SoBRA") mechanism as summarized in
 Exhibit SRB-7 attached to the direct testimony of FPL witness Bores.
- 16 **O**.

Q. Please summarize your testimony.

A. I sponsor and co-sponsor many MFRs and provide the calculation of net operating
income, working capital, rate base, capital structure, and revenue requirements for the
2026 Projected Test Year and 2027 Projected Test Year. Based on these supporting
calculations, FPL's requested base rate increase for the 2026 Projected Test Year and
2027 Projected Test Year is \$1,545 million and \$927 million, respectively. Finally, I
support the methodology for the revenue requirement and true-up calculations for the

1		proposed SoBRA mechanism reflected in Exhibit SRB-7 attached to the direct
2		testimony of FPL witness Bores.
3		
4		II. 2026 PROJECTED TEST YEAR REVENUE REQUIREMENT
5	Q.	What is the amount of FPL's requested base rate increase for the 2026 Projected
6		Test Year?
7	A.	FPL's requested base revenue increase for the 2026 Projected Test Year is \$1,545
8		million.
9	Q.	Which MFRs directly support the 2026 Projected Test Year revenue increase
10		calculation?
11	A.	Page 1 of Exhibit LF-2 reflects the MFRs that directly support FPL's proposed
12		jurisdictional revenue requirement increase for the 2026 Projected Test Year. Those
13		MFRs include schedules that support jurisdictional adjusted rate base of \$75,130
14		million, jurisdictional adjusted net operating income of \$4,580 million, and the
15		calculation of the jurisdictional revenue expansion factor of 1.34115 used to derive the
16		requested revenue increase. Additionally, page 1 of Exhibit LF-2 references MFR D-
17		1 a that supports the jurisdictional adjusted capital structure and the overall rate of return
18		("ROR") of 7.63% and reflects FPL's requested return on equity ("ROE") of 11.9%.
19	Q.	Did FPL apply any proposed Company adjustments in its calculation of the
20		jurisdictional revenue requirements for the 2026 Projected Test Year?
21	A.	Yes. Each of the proposed rate base and net operating income Company adjustments
22		for the 2026 Projected Test Year and their amounts are reflected on Exhibit LF-3 and
23		explained in more detail below.

Q. Has FPL

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Has FPL reflected the flow-through of battery storage Investment Tax Credits ("ITC") in its 2026 Projected Test Year revenue requirements?

3 Yes. As described in FPL witness Laney's testimony, FPL proposes to reflect the flow-A. 4 through of battery storage ITC in the year in which the assets are placed into service. 5 This flow-through approach will provide an immediate benefit to customers by Under this 6 reducing revenue requirements for the first year of operations. 7 methodology, the ITC associated with battery storage assets will conclude at the end of 8 the first calendar year of operations. Consistent with this approach, FPL's revenue 9 requirement for the 2026 Projected Test Year reflects the full amount of ITCs 10 associated with the battery storage assets to be installed in 2026.

11 Q. Are there any other items you would like to address regarding the calculation of 12 the revenue requirements for the 2026 Projected Test Year?

13 Yes. On June 29, 2023, the FERC issued Order 898, Accounting and Reporting A. 14 Treatment of Certain Renewable Energy Assets in Docket No. RM21-11-000, which, 15 among other things, amended the Uniform System of Accounts for public utilities by 16 creating new plant and Operating and Maintenance ("O&M") accounts for wind, solar, 17 energy storage, and other renewable generating assets. The new accounts under FERC 18 Order 898 became effective January 1, 2025. As a result, FPL's forecast for the 2026 19 Projected Test Year and 2027 Projected Test Year was prepared using the new 20 accounts, which is further discussed by FPL witness Laney.

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1	Q.	What would FPL's ROE for the 2026 Projected Test Year be without the
2		requested base rate adjustment?
3	A.	As shown on page 1 of Exhibit LF-4, FPL's jurisdictional adjusted ROE for the 2026
4		Projected Test Year is projected to be 8.84% absent the rate relief requested for the
5		2026 Projected Test Year. This is well below the bottom end of the current authorized
6		ROE range, as well as the ROE range supported by FPL witness Coyne.
7		
8		III. 2027 PROJECTED TEST YEAR REVENUE REQUIREMENT
9	Q.	What is the amount of FPL's requested base rate increase for the 2027 Projected
10		Test Year?
11	A.	The 2027 Projected Test Year requested by FPL yields a base revenue increase of \$927
12		million.
13	Q.	Which MFRs directly support the 2027 Projected Test Year calculation?
14	A.	Page 2 of Exhibit LF-2 reflects the MFRs that directly support the 2027 Projected Test
15		Year. Those MFRs include schedules that support FPL's jurisdictional adjusted rate
16		base of \$80,752 million, jurisdictional adjusted net operating income of \$4,326 million,
17		and the calculation of the jurisdictional revenue expansion factor of 1.34113 to arrive
18		at the requested revenue increase. Additionally, page 2 of Exhibit LF-2 also references
19		MFR D-1a that supports the jurisdictional adjusted capital structure and an overall ROR
20		of 7.64% and reflects FPL's requested ROE of 11.9%.
21	Q.	What Company adjustments did FPL apply to the 2027 Projected Test Year?
22	A.	FPL applied the same Company adjustments proposed for the 2026 Projected Test Year
23		to the 2027 Projected Test Year and reflected the amount of those adjustments in the

calculation of jurisdictional revenue requirements for the 2027 Projected Test Year.
 Each of the proposed rate base and net operating income Company adjustments for the
 2027 Projected Test Year and their amounts are reflected on Exhibit LF-3 and
 explained in more detail below.

- Q. Has FPL reflected the flow-through of battery storage ITC in its 2027 Projected
 Test Year revenue requirements?
- A. Yes. Consistent with the one-year ITC flow back methodology described above and
 further explained by FPL witness Laney, FPL's revenue requirement for the 2027
 Projected Test Year reflects the conclusion of the 2026 ITCs and the addition of the
 full amount of ITCs associated with the battery storage assets to be installed in 2027.
- Q. What would FPL's ROE be for the 2027 Projected Test Year without the
 requested base rate adjustment?
- 13 Page 1 of Exhibit LF-4 shows that FPL's jurisdictional adjusted ROE for the 2027 A. 14 Projected Test Year is projected to be 7.34% absent the requested rate relief for both 15 the 2026 Projected Test Year and 2027 Projected Test Year. This is well below the 16 bottom end of the current authorized ROE range, as well as the ROE range supported 17 by FPL witness Coyne. Exhibit LF-4 also shows that, even with FPL's requested base 18 adjustment for the 2026 Projected Test Year, FPL's jurisdictional adjusted ROE for the 19 2027 Projected Test Year is projected to be 10.19% without the requested rate 20 adjustment for the 2027 Projected Test Year. This is below the bottom end of the ROE 21 range supported by FPL witness Coyne.

1		IV. ADJUSTMENTS TO 2026 PROJECTED TEST YEAR
2		AND 2027 PROJECTED TEST YEAR
3	Q.	Has FPL included the Commission's adjustments to rate base and net operating
4		income for the 2026 Projected Test Year and 2027 Projected Test Year?
5	A.	Yes. Consistent with prior Commission orders, FPL has reflected Commission rate
6		base and net operating income adjustments in the calculation of the 2026 Projected Test
7		Year and 2027 Projected Test Year revenue requirement calculations. These
8		adjustments are detailed in MFRs B-2 and C-3 for their respective periods and are the
9		same Commission adjustments reflected in FPL's monthly ESR.
10	Q.	Has FPL proposed any Company adjustments in its calculation of rate base and
11		net operating income for the 2026 Projected Test Year and 2027 Projected Test
11 12		net operating income for the 2026 Projected Test Year and 2027 Projected Test Year?
	A.	
12	A.	Year?
12 13	A.	Year? Yes. FPL is proposing various Company adjustments to its rate base and net operating
12 13 14	A.	Year? Yes. FPL is proposing various Company adjustments to its rate base and net operating income calculations for both the 2026 Projected Test Year and 2027 Projected Test Year.
12 13 14 15	A.	Year? Yes. FPL is proposing various Company adjustments to its rate base and net operating income calculations for both the 2026 Projected Test Year and 2027 Projected Test Year. Each of FPL's proposed Company adjustments, their impact on rate base and/or net
12 13 14 15 16	А. Q.	Year? Yes. FPL is proposing various Company adjustments to its rate base and net operating income calculations for both the 2026 Projected Test Year and 2027 Projected Test Year. Each of FPL's proposed Company adjustments, their impact on rate base and/or net operating income, and the FPL witness supporting each one are provided in Exhibit
12 13 14 15 16 17		Year? Yes. FPL is proposing various Company adjustments to its rate base and net operating income calculations for both the 2026 Projected Test Year and 2027 Projected Test Year. Each of FPL's proposed Company adjustments, their impact on rate base and/or net operating income, and the FPL witness supporting each one are provided in Exhibit LF-3.

1	• <u>Rate Case Expense Amortization</u> – C	onsistent with FPL's 2021 Rate
2	2 Settlement, ¹ 2016 Rate Settlement, ² and	d 2012 Rate Settlement, ³ FPL is
3	3 requesting a four-year amortization period	for the estimated, incremental rate
4	4 case expenses totaling \$5.0 million. The ar	nortization of the rate case expenses
5	5 over a four-year period result in an incre	ease to operating expenses of \$1.3
6	6 million in 2026 and 2027, and a reduction	n to rate base of (\$0.6) million and
7	7 (\$1.9) million in 2026 and 2027, respectiv	vely. In addition, FPL is requesting
8	8 that the unamortized balance remain in rate	base in the 2026 Projected Test Year
9	and 2027 Projected Test Year as current	ly forecasted in order to avoid an
10) implicit disallowance of reasonable and	necessary costs required by the
11	Company to present its evidence, respond	to discovery, and litigate this case.
12	2 FPL's proposed multi-year rate plan reduc	es the amount of rate case expenses
13	3 FPL would otherwise incur for multiple	ple, back-to-back base rate case
14	proceedings. Full recovery of necessary r	ate case expenses is appropriate but
15	5 will not occur unless FPL is afforded the	opportunity to earn a return on the
16	6 unamortized balance of those expenses.	
17	Capital Recovery Schedule Income Tax Act	ljustments – Under the Tax Cuts and

Capital Recovery Schedule Income Tax Adjustments – Onder the Tax Cuts and
 Jobs Act of 2017 (the "TCJA"), FPL is required to follow the Internal Revenue
 Service ("IRS") normalization requirements for excess accumulated deferred
 income taxes ("EADIT") attributable to the book and tax differences related to

¹ Stipulation and Settlement Agreement approved in FPL's 2021 Rate Case in Docket No. 20210015-EI, Commission Order Nos. PSC-2021-0446-S-EI and PSC 2021-0446A-S-EI.

² Stipulation and Settlement Agreement approved in FPL's 2016 Rate Case in Docket No. 160021-EI, Commission Order No. PSC-16-0560-AS-EI.

³ Revised Stipulation and Settlement Agreement approved in FPL's 2012 Rate Case in Docket No. 120015-EI, Commission Order No. PSC-13-0023-S-EI.

1 depreciation of public utility property as protected and to employ the Average 2 Rate Assumption Method ("ARAM"). The ARAM ensures that the amortization occurs no sooner than would occur as the book and tax differences 3 4 turnaround. Per Commission Order No. PSC-2019-0225-FOF-EI in Docket 5 No. 20180046-EI, FPL is employing the ARAM for the turnaround of all 6 protected EADIT and reflecting the amortization via base revenue requirements 7 regardless of whether they relate to base or clause assets. However, when a major depreciable asset is retired early, it is proper to align any remaining 8 9 EADIT amortization associated with the retired asset with the recovery of any unrecovered investment remaining at the time of retirement.⁴ Therefore, FPL 10 11 proposes to accelerate the amortization of the remaining EADIT associated with 12 the total unrecovered investment reflected in the capital recovery schedules 13 proposed and discussed in detail by FPL witness Ferguson over the same 10-14 year recovery period. In addition, FPL also proposes an adjustment to deferred 15 income tax expense to account for permanent timing differences resulting from 16 the capital recovery schedule amortization. The net reduction to operating 17 expenses in 2026 and 2027 for these items is (\$1.1) million and (\$1.0) million, 18 respectively.

Depreciation Income Tax Adjustments – As discussed in the testimony of FPL
 witness Ferguson, FPL is proposing the use of new depreciation rates and asset
 lives beginning on January 1, 2026. Because this proposal changes the
 calculation of book depreciation and impacts the calculation of ARAM, FPL

⁴ Rev. Proc. 2020-39, 2020-36 IRB 546, 08/14/2020, IRC Sec(s). 168

1 proposes to adjust EADIT amortization similar to the capital recovery schedule 2 EADIT adjustment above in order to properly align depreciation expense and the turnaround of EADIT. In addition, FPL also proposes to increase the 3 4 amount of ITC amortization due to a decrease in lives of certain solar equipment 5 reflected in FPL's 2025 Depreciation Study and increase deferred income tax 6 expense to consider permanent timing differences resulting from changes in 7 forecasted book depreciation expense. The net reduction to operating expenses 8 in both 2026 and 2027 for these items is (\$5.3) million.

9 Storm Protection Plan ("SPP") Costs – FPL is proposing to move certain costs 10 and expenses from base rates to the Storm Protection Plan Cost Recovery 11 Clause ("SPPCRC") starting in 2026 to better align the recovery of these costs 12 with how they are incurred consistent with the ratemaking principle of cost 13 causation, while ensuring there is no double-recovery. The realignment of these 14 SPP costs from base to the SPPCRC will result in a net decrease in operating 15 expenses and rate base in 2026 of (\$86.0) million and (\$66.6) million, 16 respectively, and in 2027 of (\$104.5) million and (\$85.5) million, respectively. 17 If these proposed reclassifications are approved, each of these costs will be 18 subject to review and true-up as part of FPL's annual SPPCRC filings. Below 19 is a summary of each proposed reclassification from base to the SPPCRC:

20 o <u>SPP Projects</u> – As discussed by FPL witness De Varona, FPL is
 21 requesting authority to move the recovery of SPP related costs
 22 associated with FPL's transmission visual patrols and wire and cable

1	materials associated specifically with FPL's SPP projects from base to
2	the SPPCRC.
3	o <u>Retirements and Cost of Removal</u> - As described by FPL witness
4	Ferguson, FPL is requesting to discontinue the recovery of cost of
5	removal and retirements associated with SPP projects in base rates.
6	• <u>Inventory</u> – FPL is requesting to move all the inventory associated with
7	the SPP from base to the SPPCRC.
8	• Property Taxes - FPL is proposing to recover the property taxes
9	associated with SPP investments through the SPPCRC, reducing the
10	base recoverable property tax expenses. The calculation was computed
11	by multiplying the beginning balance in the 2026 Projected Test Year
12	and 2027 Projected Test Year times the average millage rates for each
13	respective year reflected on MFR F-8.
14	• Environmental Cost Recovery Clause ("ECRC") Costs – FPL is proposing to
15	move certain expenses related to existing environmental projects from base
16	rates to the ECRC beginning in 2026 to better align with the ratemaking
17	principles of cost causation, while ensuring there is no double-recovery. The
18	costs associated with these projects have already been approved by the
19	Commission for recovery from customers; however, a portion of these costs
20	have continued to be recovered in FPL's base rates rather than through the
21	ECRC. Therefore, the Company is proposing to reclassify costs for certain
22	environmental projects from base to the ECRC. The realignment of these costs
23	from base to the ECRC will result in a net decrease in operating expenses and

1	rate base in 2026 of (\$4.4) million and (\$0.5) million, respectively, and in 2027
2	of (\$4.5) million and (\$0.5) million, respectively. If these proposed
3	reclassifications are approved, each of these costs will be subject to review and
4	true-up as part of FPL's annual ECRC filings. Below is a summary of each
5	proposed reclassification from base to the ECRC:
6	• <u>Project 1 - ECRC Air Emission Fees</u> : Currently, certain air emission fees
7	for some generation sites are being recovered by FPL in base rates while
8	other fees are recovered in the ECRC. This adjustment will align the
9	recovery of all applicable air emission fees to the ECRC.
10	o Project 19 - Oil filled Equipment and Hazardous Substance
11	Remediation: Currently, FPL recovers only the spill response expense
12	related to substations in its ECRC. This adjustment aligns the recovery
13	of all O&M expenses for spill response activities related to distribution
14	assets to FPL's ECRC.
15	o Project 21 - St. Lucie Turtle Nets: Currently, FPL recovers capital and
16	O&M costs in base rates for certain but not all turtle nets at the St. Lucie
17	nuclear site. This adjustment aligns the recovery of all turtle net capital
18	and O&M expenses in FPL's ECRC.
19	• <u>Net Energy Metering Payments</u> – Per Rule 25-6.065, Florida Administrative
20	Code, the Company is required to pay net metering customers for any unused
21	energy credits at the end of each calendar year. Since these payments are the
22	functional equivalent to payments made to other qualifying facilities for the
23	purchase of power and recovered through FPL's Fuel and Purchased Power Cost

1		Recovery Clause ("FCR"), FPL proposes to recover the annual payments to net
2		metering customers for 2026 and 2027 of \$0.7 million each period through the
3		FCR instead of base rates. If approved, these payments will be subject to review
4		and true-up as part of FPL's annual FCR filings.
5	Q.	Have all of FPL's proposed Company adjustments reflected on Exhibit LF-3 been
6		incorporated into the calculation of the jurisdictional rate base and net operating
7		income for the 2026 Projected Test Year and 2027 Projected Test Year?
8	A.	Yes. As reflected on MFRs B-2 and C-3 for their respective periods, FPL has included
9		all proposed Company adjustments reflected on Exhibit LF-3 in its calculation of the
10		jurisdictional rate base and net operating income for the 2026 Projected Test Year and
11		2027 Projected Test Year.
12	Q.	Has FPL incorporated any adjustments other than Commission or Company
12 13	Q.	Has FPL incorporated any adjustments other than Commission or Company adjustments in its calculation of the revenue requirements for the 2026 Projected
	Q.	
13	Q. A.	adjustments in its calculation of the revenue requirements for the 2026 Projected
13 14		adjustments in its calculation of the revenue requirements for the 2026 Projected Test Year or 2027 Projected Test Year?
13 14 15		adjustments in its calculation of the revenue requirements for the 2026 Projected Test Year or 2027 Projected Test Year? Yes. As reflected on MFR D-1a for their respective periods and consistent with Section
13 14 15 16		adjustments in its calculation of the revenue requirements for the 2026 Projected Test Year or 2027 Projected Test Year? Yes. As reflected on MFR D-1a for their respective periods and consistent with Section 1.167(1)-1(h)(6) of the Internal Revenue Service Treasury Regulations, ⁵ FPL has
13 14 15 16 17		adjustments in its calculation of the revenue requirements for the 2026 Projected Test Year or 2027 Projected Test Year? Yes. As reflected on MFR D-1a for their respective periods and consistent with Section 1.167(1)-1(h)(6) of the Internal Revenue Service Treasury Regulations, ⁵ FPL has incorporated an adjustment to decrease the amount of Accumulated Deferred Income
 13 14 15 16 17 18 		adjustments in its calculation of the revenue requirements for the 2026 Projected Test Year or 2027 Projected Test Year? Yes. As reflected on MFR D-1a for their respective periods and consistent with Section 1.167(1)-1(h)(6) of the Internal Revenue Service Treasury Regulations, ⁵ FPL has incorporated an adjustment to decrease the amount of Accumulated Deferred Income Tax ("ADIT") included in the calculation of FPL's weighted average cost of capital.
 13 14 15 16 17 18 19 		adjustments in its calculation of the revenue requirements for the 2026 Projected Test Year or 2027 Projected Test Year? Yes. As reflected on MFR D-1a for their respective periods and consistent with Section 1.167(l)-1(h)(6) of the Internal Revenue Service Treasury Regulations, ⁵ FPL has incorporated an adjustment to decrease the amount of Accumulated Deferred Income Tax ("ADIT") included in the calculation of FPL's weighted average cost of capital. ADIT that is treated as zero cost capital or a component of rate base in determining a
 13 14 15 16 17 18 19 20 		adjustments in its calculation of the revenue requirements for the 2026 Projected Test Year or 2027 Projected Test Year? Yes. As reflected on MFR D-1a for their respective periods and consistent with Section 1.167(1)-1(h)(6) of the Internal Revenue Service Treasury Regulations, ⁵ FPL has incorporated an adjustment to decrease the amount of Accumulated Deferred Income Tax ("ADIT") included in the calculation of FPL's weighted average cost of capital. ADIT that is treated as zero cost capital or a component of rate base in determining a utility's cost of service must be calculated based on the same period used in

⁵ See 26 C.F.R. § 1.167(l)-1(h)(6).

1	in calculating these two amounts, but the periods used must be consistent. If the
2	amounts are computed using projected data, in whole or in part, and the rates go into
3	effect during the projected period, then the utility must use the formula provided in
4	Section 1.167(l)-1(h)(6)(ii) of the Internal Revenue Service Treasury Regulations to
5	calculate the amount of ADIT to be included for ratemaking purposes. ⁶ Because FPL
6	is presenting a change in base rates at the beginning of both the 2026 Projected Test
7	Year and 2027 Projected Test Year, the Company is required to comply with these
8	Treasury Regulations.

Please describe the required formula FPL must follow to adjust ADIT in the 2026

remaining in the period at the time such increase or decrease is to be accrued,

and the denominator of which is the total number of days in the period.⁷

9

10

Q.

- Projected Test Year and 2027 Projected Test Year.
- A. Section 1.167(l)-1(h)(6)(ii) of the Internal Revenue Service Treasury Regulations
 contain a precise formula ("Proration Requirement") for computing the amount of
 depreciation-related ADIT to be treated as zero cost capital when a future test period is
 used. The Proration Requirement is as follows:
 The pro rata portion of any increase to be credited or decrease to be charged
 during a future period...shall be determined by multiplying any such increase
 or decrease by a fraction, the numerator of which is the number of days
- 19 20

⁶ See 26 C.F.R. § 1.167(l)-1(h)(6)(ii).

 $^{^{7}}$ Id.

Q. Please explain the calculation of the Proration Requirement and its impact to
 FPL's capital structure for the 2026 Projected Test Year and 2027 Projected Test
 Year.

- 4 A. As reflected on page 1 of Exhibit LF-5, the calculations of the Proration Requirement 5 for ADIT for the 2026 Projected Test Year and 2027 Projected Test Year begin with 6 prorated average balances of (\$256) million and (\$291) million, respectively. FPL then 7 compared the prorated average balances to the per-book 13-month average ADIT balances for 2026 and 2027 of (\$275) million and (\$313) million, respectively. The 8 9 difference results in an adjustment to ADIT of \$19 million for the 2026 Projected Test 10 Year and \$22 million for the 2027 Projected Test Year, which are reflected as decreases 11 to ADIT on MFR D-1a for their respective periods.
- 12
- 13

V. PLANT DANIEL UNITS 1 AND 2

14 Q. Please summarize FPL's request related to the Plant Daniel Units 1 and 2 15 currently pending before the Commission.

16 On November 8, 2024, FPL filed a Petition in Docket No. 20240155-EI seeking A. 17 approval from the Commission to establish a regulatory asset associated with the 18 transfer of FPL interests in Plant Daniel Units 1 and 2 ("Plant Daniel Petition"). As 19 explained in that Petition, FPL entered into a purchase and sale agreement with 20 Mississippi Power Company ("MPC") that provides FPL will pay up to \$45 million to 21 MPC and relinquish its 50% ownership interest in Units 1 and 2 to MPC. FPL has 22 requested the establishment of a regulatory asset for up to \$45 million, of which \$39.3 23 million would be base rate recoverable and \$5.7 million would be ECRC recoverable.

1 **Q**. Has the Commission approved FPL's request to establish a regulatory asset in 2 Docket No. 20240155-EI? 3 No. As of the time I prepared and filed my testimony, FPL's Plant Daniel Petition A. 4 remains pending before the Commission. 5 Q. Has FPL included the impact associated with the Plant Daniel transaction in this 6 proceeding? 7 A. No, it has not because the Plant Daniel Petition has not yet been approved by the 8 Commission. 9 Q. If the Plant Daniel Petition is approved by the Commission, how does FPL propose 10 to incorporate that approval in this proceeding? 11 A. If the Plant Daniel Petition is approved prior to the record being closed in this 12 proceeding, FPL proposes that it be allowed to appropriately reflect the impact 13 associated with the Plant Daniel transaction in this proceeding. As reflected on Exhibit 14 LF-6, FPL would need to make the following changes to the 2026 Projected Test Year 15 and 2027 Projected Test Year: (i) add the unamortized balance of the Plant Daniel 16 regulatory asset to rate base and related amortization to total amortization expense; and 17 (ii) remove O&M expenses, property taxes, and insurance associated with Plant Daniel 18 that FPL will no longer incur. If necessary, FPL will provide an adjustment to its 19 revenue requirement calculations for 2026 and 2027 either in rebuttal testimony or 20 promptly after the Commission renders a decision on the Plant Daniel Petition. 21 Does this conclude your direct testimony? Q. 22 Yes. A.

MFR	Period	Title
SOLE SPONSO	R:	
A-01	2026 Projected Test Year 2027 Projected Test Year	FULL REVENUE REQUIREMENTS INCREASE REQUESTED
B-01	2024 Historic Year 2025 Prior Year 2026 Projected Test Year 2027 Projected Test Year	ADJUSTED RATE BASE
В-03	2024 Historic Year	13 MONTH AVERAGE BALANCE SHEET - SYSTEM BASIS
B-04	2024 Historic Year 2027 Projected Test Year	TWO YEAR HISTORICAL BALANCE SHEET
B-18	2024 Historic Year	FUEL INVENTORY BY PLANT
B-21	2024 Historic Year	ACCUMULATED PROVISION ACCOUNTS - 228.1, 228.2 and 228.4
C-01	2024 Historic Year 2025 Prior Year 2026 Projected Test Year 2027 Projected Test Year	ADJUSTED JURISDICTIONAL NET OPERATING INCOME
C-02	2024 Historic Year 2025 Prior Year	NET OPERATING INCOME ADJUSTMENTS
C-07	2026 Projected Test Year 2027 Projected Test Year	OPERATION AND MAINTENANCE EXPENSES - TEST YEAR
C-09	2024 Historic Year 2027 Projected Test Year	FIVE YEAR ANALYSIS - CHANGE IN COST
C-13	2027 Projected Test Year	MISCELLANEOUS GENERAL EXPENSES
C-18	2024 Historic Year 2026 Projected Test Year 2027 Projected Test Year	LOBBYING EXPENSES, OTHER POLITICAL EXPENSES AND CIVIC/CHARITABLE CONTRIBUTIONS
C-22	2024 Historic Year	STATE AND FEDERAL INCOME TAX CALCULATION
C-24	2024 Historic Year	PARENT(S) DEBT INFORMATION

MFR	Period	Title
SOLE SPONSO	R:	
C-26	2024 Historic Year 2027 Projected Test Year	INCOME TAX RETURNS
C-28	2024 Historic Year	MISCELLANEOUS TAX INFORMATION
C-38	2026 Projected Test Year 2027 Projected Test Year	O & M ADJUSTMENTS BY FUNCTION
C-39	2024 Historic Year 2027 Projected Test Year	BENCHMARK YEAR RECOVERABLE O & M EXPENSES BY FUNCTION
C-44	2026 Projected Test Year 2027 Projected Test Year	REVENUE EXPANSION FACTOR
D-01a	2024 Historic Year	COST OF CAPITAL - 13-MONTH AVERAGE
D-01b	2026 Projected Test Year 2027 Projected Test Year	COST OF CAPITAL - ADJUSTMENTS
CO-SPONSOR:		
B-02	2024 Historic Year 2025 Prior Year 2026 Projected Test Year 2027 Projected Test Year	RATE BASE ADJUSTMENTS
B-06	2024 Historic Year 2026 Projected Test Year 2027 Projected Test Year	JURISDICTIONAL SEPARATION FACTORS - RATE BASE
B-17	2026 Projected Test Year 2027 Projected Test Year	WORKING CAPITAL - 13 MONTH AVERAGE
B-19	2026 Projected Test Year 2027 Projected Test Year	MISCELLANEOUS DEFERRED DEBITS
B-20	2026 Projected Test Year 2027 Projected Test Year	OTHER DEFERRED CREDITS
B-22	2026 Projected Test Year 2027 Projected Test Year	TOTAL ACCUMULATED DEFERRED INCOME TAXES
B-23	2026 Projected Test Year 2027 Projected Test Year	INVESTMENT TAX CREDITS - ANNUAL ANALYSIS
C-02	2026 Projected Test Year 2027 Projected Test Year	NET OPERATING INCOME ADJUSTMENTS
C-03	2024 Historic Year 2025 Prior Year 2026 Projected Test Year 2027 Projected Test Year	JURISDICTIONAL NET OPERATING INCOME ADJUSTMENTS

MFR	Period	Title
CO-SPONSOR:		
C-04	2024 Historic Year 2026 Projected Test Year 2027 Projected Test Year	JURISDICTIONAL SEPARATION FACTORS-NET OPERATING INCOME
C-06	2026 Projected Test Year 2027 Projected Test Year	BUDGETED VERSUS ACTUAL OPERATING REVENUES AND EXPENSES
C-10	2026 Projected Test Year	DETAIL OF RATE CASE EXPENSES FOR OUTSIDE CONSULTANTS
C-12	2026 Projected Test Year 2027 Projected Test Year	ADMINISTRATIVE EXPENSES
C-13	2024 Historic Year	MISCELLANEOUS GENERAL EXPENSES
C-14	2024 Historic Year	ADVERTISING EXPENSES
C-15	2024 Historic Year	INDUSTRY ASSOCIATION DUES
C-16	2024 Historic Year	OUTSIDE PROFESSIONAL SERVICES
C-17	2026 Projected Test Year 2027 Projected Test Year	PENSION COST
C-20	2024 Historic Year 2025 Prior Year 2026 Projected Test Year 2027 Projected Test Year	TAXES OTHER THAN INCOME TAXES
C-21	2026 Projected Test Year 2027 Projected Test Year	REVENUE TAXES
C-23	2026 Projected Test Year 2027 Projected Test Year	INTEREST IN TAX EXPENSE CALCULATION
C-25	2026 Projected Test Year 2027 Projected Test Year	DEFERRED TAX ADJUSTMENT
C-36	2026 Projected Test Year 2027 Projected Test Year	NON-FUEL OPERATION AND MAINTENANCE EXPENSE COMPARED TO CPI
C-37	2026 Projected Test Year 2027 Projected Test Year	O & M BENCHMARK COMPARISON BY FUNCTION

MFR	Period	Title						
CO-SPONSOR:								
C-41	2026 Projected Test Year 2027 Projected Test Year	O & M BENCHMARK VARIANCE BY FUNCTION						
C-42	2026 Projected Test Year	HEDGING COSTS						
C-43	2026 Projected Test Year 2027 Projected Test Year	SECURITY COSTS						
D-01a	2025 Prior Year 2026 Projected Test Year 2027 Projected Test Year	COST OF CAPITAL - 13-MONTH AVERAGE						
D-06	2024 Historic Year	CUSTOMER DEPOSITS						
F-05	2026 Projected Test Year 2027 Projected Test Year	FORECASTING MODELS						
F-08	2026 Projected Test Year 2027 Projected Test Year	ASSUMPTIONS						

Schedule 2026 Pro	e A-1 jected Test Year	rease Requested	Page 1 of 1	
FLORIDA	A PUBLIC SERVICE COMMISSION EXPLA	NATION: Provide the calculation c full revenue requirements increa	•	Type of Data Shown: <u>X</u> Projected Test Year Ended: 12/31/26 Prior Year Ended: //
COMPAN	IY: FLORIDA POWER & LIGHT COMPANY AND SUBSIDIARIES			_ Historical Test Year Ended: _/_/_
DOCKET	NO.: 20250011-EI			Witness: Liz Fuentes
	(1)	(2)	(3)	
Line No.	DESCRIPTION	SOURCE	AMOUNT (\$000)	
1	JURISDICTIONAL ADJUSTED RATE BASE	SCHEDULE B-1	\$ 75,129,876	
2	RATE OF RETURN ON RATE BASE REQUESTED	SCHEDULE D-1A	7.63%	
3	JURISDICTIONAL NET OPERATING INCOME REQUES	TE LINE 1 X LINE 2	\$ 5,731,953	
4	JURISDICTIONAL ADJUSTED NET OPERATING INCOM	IE SCHEDULE C-1	\$ 4,580,123	
5	NET OPERATING INCOME DEFICIENCY (EXCESS)	LINE 4 - LINE 5	\$ 1,151,831	
6	EARNED RATE OF RETURN	LINE 4 / LINE 1	6.10%	
7	NET OPERATING INCOME MULTIPLIER	SCHEDULE C-44	1.34115	
8	REVENUE REQUIREMENT ⁽¹⁾	LINE 5 X LINE 7	\$ 1,544,780	

Note: ⁽¹⁾Total requested increase, excluding the effect of proposed Company adjustments related to cost recovery clauses shown on MFR B-2 and C-2, is \$1,638,085.

Supporting Schedules: B-1, B-2, C-1, C-2, C-44, D-1A

Recap Schedules:

	PUBLIC SERVICE COMMISSION EXPLANATION: Provide the full revenue re full revenue re Y: FLORIDA POWER & LIGHT COMPANY AND SUBSIDIARIES	e calculation of the requ quirements increase.	ested		Type of Data Shown: _ Projected Test Year Ended: _/_/_ _ Prior Year Ended: _/ /_ _ Historical Test Year Ended: _/ _/_ <u>X</u> Projected Test Year Ended: 12/31/27
OCKET	NO.: 20250011-EI				Witness: Liz Fuentes
	(1)	(2)		(3)	
Line No.	DESCRIPTION	SOURCE	AM	DUNT (\$000)	
1	JURISDICTIONAL ADJUSTED RATE BASE	SCHEDULE B-1	\$	80,751,580	
2	RATE OF RETURN ON RATE BASE REQUESTED	SCHEDULE D-1A		7.64%	
3	JURISDICTIONAL NET OPERATING INCOME REQUESTED	LINE 1 X LINE 2	\$	6,173,269	
4	JURISDICTIONAL ADJUSTED NET OPERATING INCOME	SCHEDULE C-1	\$	4,325,766	
5	NET OPERATING INCOME DEFICIENCY (EXCESS)	LINE 3 - LINE 4	\$	1,847,502	
6	EARNED RATE OF RETURN	LINE 4 / LINE 1		5.36%	
7	NET OPERATING INCOME MULTIPLIER	SCHEDULE C-44		1.34113	
8	REVENUE REQUIREMENT	LINE 5 X LINE 7	\$	2,477,747	
9	2026 REVENUE INCREASE REQUESTED (1)	SEE NOTE 1	\$	1,550,393	
10	RATE INCREASE REQUESTED (AFTER FULL 2026 RATE INCREASE)	LINE 8 - LINE 9	\$	927,354	
	<u>Notes:</u> ⁽¹⁾ Represents the 2026 Revenue increase of \$1,544,780 requested on the 20 ⁽²⁾ Total requested increase, excluding the effect of proposed company adjus				

FLORIDA POWER & LIGHT COMPANY LIST OF PROPOSED COMPANY ADJUSTMENTS⁽¹⁾ (\$000's)

	(1)	(2)		(3)	(4) = (3) X (1-Tax Rate)	(5)		(6)		(7) = (6) X -Tax Rate)	(8)	(9)
Line No.	Company Adjustment	2026 Rate Base MFR B-2) ⁽²⁾	I	2026 Expense	2026 NOI Adjustment (MFR C-3)	2027 Rate Base MFR B-2) ⁽²⁾		2027 Expense	Α	2027 NOI djustment (MFR C-3)	Adjustment Description	Sponsoring Witness
1		\$ (67,401)	\$	135,503	\$ 101,160	\$ (205,984)	\$	141,839	\$	105,890	FPL proposes to increase base depreciation expense to reflect the application of FPL's proposed depreciation rates contained in the 2025 Depreciation Study beginning January 1, 2026.	Keith Ferguson (KF - 2)
2	Depreciation	\$ -	\$	(3,709)	\$ (3,709)	\$ -	\$	(3,716)	\$	(3,716)	FPL proposes to increase EADIT amortization due to an increase in depreciation expense resulting from the application of FPL's proposed depreciation rates.	Liz Fuentes
3		\$ -	\$	(1,801)	\$ (1,801)	\$ -	\$	(1,801)	\$	(1,801)	FPL proposes to increase ITC amortization to align with the decrease in lives of certain solar equipment reflected in the 2025 Depreciation Study.	Liz Fuentes
4		\$ -	\$		\$ 242	\$ -	\$		\$		FPL proposes an increase to deferred income taxes to take into account permanent timing differences resulting from changes in book depreciation.	Liz Fuentes
5		\$ (67,401)	\$	130,235	\$ 95,892	\$ (205,984)	\$	136,579	\$	100,630	Total FPL proposes to increase base dismantlement	
6		\$ (29,778)	\$	59,556	\$ 44,462	\$ (89,334)	\$	59,556	\$	44,462	expense to reflect the application of the proposed dismantlement accruals contained in the 2025 Dismantlement Study beginning January 1, 2026.	Keith Ferguson (KF - 4)
7	Dismantlement	\$ 11,520	\$	-	\$-	\$ 12,481	\$	-	\$	-	FPL proposes to transfer dismantlement reserves: 1) between units and 2) between base and ECRC, in order to minimize the increase in the proposed dismantlement accruals.	Keith Ferguson (KF - 4)
8		\$ (18,258)	\$	59,556	\$ 44,462	\$ (76,854)	\$	59,556	\$	44,462	Total	
9		\$ (969)	\$	1,938	\$ 1,447	\$ (2,908)	\$	1,938	\$	1,447	Plant Daniel Units 1 and 2 - FPL is requesting to amortize the base portion of unrecovered early retired investment over a 10-year period beginning on January 1, 2026.	Keith Ferguson (KF - 3)
10		\$ (2,117)	¢								500 kV System (2024 & 2025) - FPL is requesting to	
			φ	4,235	\$ 3,161	\$ (6,352)	\$	4,235	\$	3,161	amortize the balance of unrecovered early retired investment and related cost of removal as of December 31, 2025 over a 10-year period.	Keith Ferguson (KF - 3)
11	Capital Recovery Schedule (Base Portions Only)	\$ (498)			\$ 3,161 \$ 744	\$ (6,352)			\$	3,161	investment and related cost of removal as of	
11		\$ (498)				,	\$		\$		investment and related cost of removal as of December 31, 2025 over a 10-year period. 500 kV Tranches (2026 & 2027) - FPL requests permission for the continuation to accumulate amounts of unrecovered plant and related cost of removal each year in tranches and amortize over a 10-year period beginning on January 1st of the following year (i.e. amortization of tranches). Customer Billing System (CIS) - FPL is requesting to amortize all unrecovered investment over a 10-year period beginning on January 1, 2027 related to existing CIS.	(KF - 3) Keith Ferguson
		(498) - -	\$		\$ 744 \$ -	\$ (1,671)	\$	1,351	\$	1,008	investment and related cost of removal as of December 31, 2025 over a 10-year period. 500 kV Tranches (2026 & 2027) - FPL requests permission for the continuation to accumulate amounts of unrecovered plant and related cost of removal each year in tranches and amortize over a 10-year period beginning on January 1st of the following year (i.e. amortization of tranches). Customer Billing System (CIS) - FPL is requesting to amortize all unrecovered investment over a 10-year period beginning on January 1, 2027 related to existing CIS. FPL proposes to increase EADIT amortization due to an increase in amortization expense resulting from the proposed Capital Recovery Schedules requested in this docket.	(KF - 3) Keith Ferguson (KF - 3) Keith Ferguson
12		\$ (498) - - - - -	\$ \$ \$	996	\$ 744 \$ -	\$ (1,671)	\$ \$ \$	1,351 4,474 (1,157)	\$ \$ \$	1,008	investment and related cost of removal as of December 31, 2025 over a 10-year period. 500 kV Tranches (2026 & 2027) - FPL requests permission for the continuation to accumulate amounts of unrecovered plant and related cost of removal each year in tranches and amortize over a 10-year period beginning on January 1st of the following year (i.e. amortization of tranches). Customer Billing System (CIS) - FPL is requesting to amortize all unrecovered investment over a 10-year period beginning on January 1, 2027 related to existing CIS. FPL proposes to increase EADIT amortization due to an increase in amortization expense resulting from the proposed Capital Recovery Schedules requested in this docket. FPL proposes an increase to deferred income taxes to take into account permanent timing differences resulting from Capital Recovery Schedules amortization.	(KF - 3) Keith Ferguson (KF - 3) Keith Ferguson (KF - 3)

Docket No. 20250011-EI List of Proposed Company Adjustments for the 2026 and 2027 Projected Test Year Exhibit LF-3, Page 1 of 2

FLORIDA POWER & LIGHT COMPANY LIST OF PROPOSED COMPANY ADJUSTMENTS⁽¹⁾ (\$000's)

	(1)		(2)	(3)		(4) = (3) X (1-Tax Rate)		(5)	(6)	((7) = (6) X 1-Tax Rate)	(8)	(9)
Line No.	Company Adjustment		2026 Rate Base MFR B-2) ⁽²⁾	2026 Expense		2026 NOI Adjustment (MFR C-3)		2027 Rate Base MFR B-2) ⁽²⁾	2027 Expense		2027 NOI Adjustment (MFR C-3)	Adjustment Description	Sponsoring Witness
16	Rate Case Expense Amortization	\$	(629)	\$1,	257	\$ 939	\$	(1,886)	\$ 1,257	\$	939	FPL has reflected the deferral of rate case expenses related to this docket in rate base and proposes to amortize them over a 4-year period beginning on January 1, 2026.	Liz Fuentes
17			-	\$ (!	597)	\$ (445)	\$	-	\$ (596)	\$	(445)	FPL proposes an adjustment to transfer expenses associated with the SPP transmission visual patrols program from base to clause which were inadventently included in base rates in FPL's last rate case.	Liz Fuentes/ Ed De Varona
18		\$	(1,117)	\$	-	\$-	\$	(1,263)	\$ -	\$	-	FPL proposes to directly assign and recover wire and cable materials related to SPP projects in its SPPCRC.	Liz Fuentes/ Ed De Varona
19	Storm Protection Plan Cost Recovery Clause (SPPCRC)	\$	(58,475)	\$	-	\$-	\$	(61,502)	\$ -	\$	-	FPL proposes to transfer its inventory balance related to SPP projects from base rates to its SPPCRC.	Liz Fuentes
20		\$	(7,041)	\$	-	\$-	\$	(22,718)	\$ -	\$	-	FPL proposes to cease recording retirements and cost of removal associated with SPP projects in base rates and record these amounts in FPL's SPPCRC.	Keith Ferguson
21		\$	-	\$ (85,-	148)	\$ (63,791)	\$	-	\$ (103,877)	\$	(77,549)	FPL proposes to recover property taxes associated with SPP projects in FPL's SPPCRC.	Liz Fuentes
22		\$	(66,634)	\$ (86,)44)	\$ (64,236)	\$	(85,483)	\$ (104,473)	\$	(77,994)	Total	
23		\$	-	\$	(54)	\$ (40)	\$	-	\$ (58)	\$	(43)	FPL proposes to move certain air emission fees for some generation sites from base to ECRC in order to align recovery under one mechanism.	Liz Fuentes
24	Environmental Cost Recovery Clause (ECRC)	\$	-	\$ (3,9	925)	\$ (2,930)	\$	-	\$ (4,018)	\$	(3,000)	FPL proposes to move spill response expenses related to substations from base to ECRC in order to align recovery under one mechanism.	Liz Fuentes
25		\$	(499)	\$ (4	19)	\$ (313)	\$	(530)	\$ (419)	\$	(313)	FPL proposes to move St. Lucie turtle net costs and expenses from base to ECRC in order to align recovery of all turtle nets under one mechanism.	Liz Fuentes
26		\$	(499)	\$ (4,3	397)	\$ (3,283)	\$	(530)	\$ (4,495)	\$	(3,355)	Total	
27	Net Metering Annual Payment	\$	-	\$ ()	722)	\$ (539)	69	-	\$ (722)	\$		FPL proposes to recover the payments made to customers for any unused energy credits annually through FPL's FCR instead of base rates. These payments are equivalent to payments made to other qualifying facilities for the purchase of power and recovered through FPL's FCR.	Liz Fuentes
Total	Per Book Adjustments	\$	(157,004)	\$ 105,9	68	\$ 77,500	\$	(383,904)	\$ 98,663	\$	72,061		

 $\underline{\text{Notes:}}^{(1)}$ Amounts on this exhibit are Per Book amounts and have not been jurisdictionalized.

⁽²⁾ Amounts reflected are 13-month average.

FLORIDA POWER & LIGHT COMPANY 2026 AND 2027 RETURN ON EQUITY CALCULATION WITHOUT RATE ADJUSTMENT (\$000)

Line No.		MFR Reference	2026	2027 (A)	2027 (B)
1	Adjusted Jurisdictional Net Operating Income	C-1	\$ 4,580,123	\$ 4,325,766 \$	5,481,798
2	Adjusted Jurisdictional Rate Base	B-1	75,129,876	80,751,580	80,751,580
3 4	Estimated Earned Rate of Return (Line 1 / Line 2)		6.10%	5.36%	6.79%
5 6	Adjusted Jurisdictional Non-Equity Component of Weighted Average Cost of Capital Earnings Available for Common (Lines 3 - 5)	D-1a	1.67% 4.43%	1.68% 3.68%	1.68% 5.11%
7 8	Adjusted Jurisdictional Common Equity Ratio	D-1a	50.07%	50.12%	50.12%
9 10	Jurisdictional Return on Common Equity (Line 6 / Line 8)		8.84%	7.34%	10.19%

 $\underline{\text{Notes:}}^{(A)}$ Calculation assumes the requested base rate increase for 2026 is \underline{not} granted.

 $^{\rm (B)}$ Calculation assumes the requested base rate increase for 2026 is granted.

FLORIDA POWER & LIGHT COMPANY ADIT PRORATION ADJUSTMENT CALCULATION 2026 PROJECTED TEST YEAR

		F	(1) Per Book		(2)	(3)	(4)	F	(5) Prorated		(6)
		AD	IT Activity				Future	I I	Monthly		Prorated
		Ass	ociated with	A	ccumulated	Days to	Days in		Activity	Ac	cumulated
Line		De	preciation		Activity	Prorate	Test Period		4)/Total (3)		Activity
No.	Month		(\$000s)		(\$000s)			((\$000s)		(\$000s)
1	Beg Balance - Dec 31, 20	25								\$	_
2	209 20001,20									Ŧ	
3	Jan-26	\$	(46,659)	\$	(46,659)	31	335	\$	(42,824)	\$	(42,824)
4	Feb-26		(46,969)		(93,628)	28	307		(39,505)		(82,329
5	Mar-26		(46,955)		(140,582)	31	276		(35,506)		(117,835
6	Apr-26		(46,341)		(186,924)	30	246		(31,233)		(149,067
7	May-26		(46,622)		(233,546)	31	215		(27,462)		(176,530)
8	Jun-26		(45,560)		(279,106)	30	185		(23,092)		(199,622)
9	Jul-26		(44,730)		(323,836)	31	154		(18,873)		(218,494
10	Aug-26		(44,293)		(368,129)	31	123		(14,926)		(233,420)
11	Sep-26		(44,209)		(412,338)	30	93		(11,264)		(244,685)
12	Oct-26		(43,556)		(455,894)	31	62		(7,399)		(252,083)
13	Nov-26		(42,780)		(498,674)	30	32		(3,751)		(255,834)
14	Dec-26		(41,804)		(540,478)	31	1		(115)		(255,948)
15	Total	\$	(540,478)			365		\$	(255,948)		
16											
17											
18	13-Month Average			\$	(275,369)						
19			-								
20	Adjustment to Decrease	Per B	ook 13-Mon	th A	verage ADIT	to Prorat	ed Balance			\$	19,420

FLORIDA POWER & LIGHT COMPANY ADIT PRORATION ADJUSTMENT CALCULATION 2027 PROJECTED TEST YEAR

Line No.	Month	AE Ass	(1) Per Book DIT Activity ociated with epreciation (\$000s)	A	(2) ccumulated Activity (\$000s)	(3) Days to Prorate	(4) Future Days in Test Period		(5) Prorated Monthly Activity t(4)/Total (3) (\$000s)	Þ	(6) Prorated Accumulated Activity (\$000s)
			(\$0000)		(\$0000)				(\$0000)		(\$0000)
21	Beg Balance - Dec 31, 202	26								\$	-
22		•	(50,000)	•	(50.000)			•	(10.07.1)	•	(10.07.1)
23	Jan-27	\$	(53,686)	\$	(53,686)	31	335	\$	(49,274)	\$	(49,274)
24	Feb-27		(53,795)		(107,481)	28	307		(45,247)		(94,520)
25	Feb-27		(53,459)		(160,940)	31	276		(40,424)		(134,944)
26	Feb-27		(52,857)		(213,797)	30	246		(35,624)		(170,568)
27	Feb-27		(52,439)		(266,235)	31	215		(30,889)		(201,457)
28	Feb-27		(51,457)		(317,692)	30	185		(26,081)		(227,537)
29	Feb-27		(50,657)		(368,349)	31	154		(21,373)		(248,910)
30	Feb-27		(50,038)		(418,387)	31	123		(16,862)		(265,772)
31	Feb-27		(49,948)		(468,334)	30	93		(12,726)		(278,499)
32	Feb-27		(49,392)		(517,727)	31	62		(8,390)		(286,889)
33	Feb-27		(49,207)		(566,934)	30	32		(4,314)		(291,203)
34	Feb-27		(48,408)		(615,342)	31	1		(133)		(291,335)
35	Total	\$	(615,342)			365		\$	(291,335)		
36			. ,						. ,		
37											
38	13-Month Average			\$	(313,454)						
39	5				<u> </u>						

40 Adjustment to Decrease Per Book 13-Month Average ADIT to Prorated Balance

\$ 22,119

FLORIDA POWER & LIGHT COMPANY 2026 AND 2027 PLANT DANIEL COSTS AND EXPENSES ⁽¹⁾ (\$000)

Line		Rate Base/	FERC			
No.	Costs/Expenses to be Removed ⁽²⁾	NOI	Account	Account Description	2026	2027
1	Common Facilities Expenses	NOI	500	OperSupv Eng Stm	(\$357)	(\$349)
2	•	NOI			()	(· · ·)
-	Common Facilities Expenses		502	SteamExpenses	(\$290)	(\$284)
3	Common Facilities Expenses	NOI	505	ElectricExp Steam	(\$328)	(\$323)
4	Common Facilities Expenses	NOI	506	MiscSteamPowerExp	(\$1,879)	(\$1,840)
5	Common Facilities Expenses	NOI	510	MaintSupv Enginer	(\$533)	(\$522)
6	Common Facilities Expenses	NOI	511	MaintofStructures	(\$292)	(\$286)
7	Common Facilities Expenses	NOI	512	MaintBoilerPlt	(\$1,505)	(\$1,472)
8	Common Facilities Expenses	NOI	513	MaintElectPlt	(\$184)	(\$180)
9	Common Facilities Expenses	NOI	514	MtcMiscSteamPlt	(\$87)	(\$85)
10	Common Facilities Expenses	NOI	925	Injury Damage W CEp	(\$0)	(\$0)
11	Common Facilities Expenses	NOI	926	EmplPension Benfs	(\$2)	(\$2)
12	Payroll Taxes	NOI	408.1	Taxes Other Than Income Taxes - Payroll	(\$2)	(\$2)
13	Property Tax Expense	NOI	408.1	Taxes Other Than Income Taxes - Property	(2,787)	(2,787)
					(\$8,246)	(\$8,131)
		Rate Base/	FERC			
	Costs/Expenses to be Added ⁽³⁾	NOI	Account		2026	2027
14	Regulatory Asset	Rate Base	182.3	Other Regulatory Assets	\$37,326	\$33,397
15	Amortization Expense	NOI	407.3	Regulatory Debits	3,929	3,929

Notes:

⁽¹⁾ Amounts are Per Book and have not been jurisdictionalized.

⁽²⁾ Represents on-going cost obligations associated with FPL's 50% ownership interest in Plant Daniel that would need to be removed from the 2026 Projected Test Year and 2027 Projected Test Year should the Commission approve FPL's request in Docket No. 20240155-EI, Petition for approval of accounting treatment for the transfer of proportional share of Plant Daniel Units 1 and 2 to Mississippi Power Company, by Florida Power & Light Company.

⁽³⁾ Represents the 13-month average base rate regulatory asset and related annual amortization expense that would need to be added to the 2026 Projected Test Year and 2027 Projected Test Year should the Commission approve FPL's request in Docket No. 20240155-EI. See page 2 for additional information.

FLORIDA POWER & LIGHT COMPANY

PLANT DANIEL BASE RATE REGULATORY ASSET⁽¹⁾

(\$000)

Line				
No.	Month	Beginning Balance	Amortization ⁽²⁾	Ending Balance
1	Dec-25	_	_	\$39,291
2	Jan-26	39,291	(327)	38,963
3	Feb-26	38,963	(327)	38,636
4	Mar-26	38,636	(327)	38,308
5	Apr-26	38,308	(327)	37,981
6	May-26	37,981	(327)	37,654
7	Jun-26	37,654	(327)	37,326
8	Jul-26	37,326	(327)	36,999
9	Aug-26	36,999	(327)	36,671
10	Sep-26	36,671	(327)	36,344
11	Oct-26	36,344	(327)	36,016
12	Nov-26	36,016	(327)	35,689
13	Dec-26	35,689	(327)	35,362
14	Total Amortization		(\$3,929)	
15	13-Month Average			\$37,326
16				
17	Jan-27	\$35,362	(327)	35,034
18	Feb-27	35,034	(327)	34,707
19	Mar-27	34,707	(327)	34,379
20	Apr-27	34,379	(327)	34,052
21	May-27	34,052	(327)	33,724
22	Jun-27	33,724	(327)	33,397
23	Jul-27	33,397	(327)	33,070
24	Aug-27	33,070	(327)	32,742
25	Sep-27	32,742	(327)	32,415
26	Oct-27	32,415	(327)	32,087
27	Nov-27	32,087	(327)	31,760
28	Dec-27	31,760	(327)	31,432
29	Total Amortization		(\$3,929)	
30	13-Month Average			\$33,397

Notes:

(1) Represents the base rate recoverable component of up to a total \$45 million transfer price requested to be established as a regulatory asset in Docket No. 20240155-EI. Subject to Commission approval, the final transfer price as reflected in Exhibit C of the Purchase and Sale Agreement filed in the referenced docket will depend on the actual closing date.

(2) Based on a 10-year recovery period requested by FPL in Docket No. 20240155-EI.