



**BEN ALBRITTON**  
*President of the Senate*

**STATE OF FLORIDA**  
**OFFICE OF PUBLIC COUNSEL**

C/O THE FLORIDA LEGISLATURE  
111 WEST MADISON ST.  
SUITE 812  
TALLAHASSEE, FLORIDA 32399-1400  
850-488-9330  
  
EMAIL: OPC\_WEBSITE@LEG.STATE.FL.US  
WWW.FLORIDAOPC.GOV



**DANIEL PEREZ**  
*Speaker of the House of Representatives*

March 12, 2025

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

**Re: Docket No. 20250014-EI**  
**Florida Power & Light Company 2026-2035 Storm Protection Plan**

Dear Mr. Teitzman:

Please find enclosed for filing in the above referenced docket the Direct Testimony and Exhibits of Kevin J. Mara. This filing is being made via the Florida Public Service Commission's web-based electronic filing portal.

If you have any questions or concerns, please do not hesitate to contact me. Thank you for your assistance in this matter.

Sincerely,

Walt Trierweiler  
Public Counsel

/s/Charles J. Rehwinkel  
Charles J. Rehwinkel  
Deputy Public Counsel  
rehwinkel.charles@leg.state.fl.us

**CERTIFICATE OF SERVICE**  
**DOCKET NOS. 20250014-EI, 20250015-EI,**  
**20250016-EI, and 20250017-EI**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail on this 12<sup>th</sup> day of March, 2025, to the following:

Jacob Imig  
Timothy Sparks  
Jennifer Augspurger  
Saad Farooqi  
Carlos Marquez  
Florida Public Service Commission  
Office of General Counsel  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850  
jimig@psc.state.fl.us  
tsparks@psc.state.fl.us  
jaugspur@psc.state.fl.us  
sfarooqi@psc.state.fl.us  
cmarquez@psc.state.fl.us  
discovery-gcl@psc.state.fl.us

Kenneth A. Hoffman  
Florida Power & Light Company  
134 West Jefferson Street  
Tallahassee, FL 32301-1713  
ken.hoffman@fpl.com

Christopher T. Wright  
Florida Power & Light Company  
700 Universe Boulevard  
Juno Beach, FL 33408-0420  
christopher.wright@fpl.com

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

Matthew R. Bernier  
Stephanie Cuello  
Duke Energy Florida, LLC  
106 East College Avenue, Suite 800  
Tallahassee, FL 32301  
matt.bernier@duke-energy.com  
stephanie.cuello@duke-energy.com  
FLRegulatoryLegal@duke-energy.com

J. Jeffrey Wahlen  
Malcolm N. Means  
Virginia Ponder  
Ausley McMullen  
P. O. Box 391  
Tallahassee, FL 32302  
jwahlen@ausley.com  
mmeans@ausley.com  
vponder@ausley.com

James W. Brew  
Laura Wyn Baker  
Sarah B. Newman  
Stone Mattheis Xenopoulos & Brew  
1025 Thomas Jefferson Street, NW  
Suite 800 West  
Washington, DC 20007-5201  
jbrew@smxblaw.com  
lwb@smxblaw.com  
sbn@smxblaw.com

Robert Pickels  
Duke Energy Florida, LLC  
106 East College Avenue, Suite 800  
Tallahassee, FL 32301-7740  
robert.pickels@duke-energy.com

Paula K. Brown  
Tampa Electric Company  
P. O. Box 111  
Tampa, FL 33601-0111  
regdept@tecoenergy.com

Beth Keating  
Gunster, Yoakley & Stewart, P.A.  
215 South Monroe Street, Suite 601  
Tallahassee, FL 32301-1839  
bkeating@gunster.com

Mark Cutshaw  
Florida Public Utilities Company  
780 Amelia Island Parkway  
Fernandina Beach, FL 32034  
mcutshaw@fpuc.com

Michelle D. Napier  
Florida Public Utilities Company  
208 Wildlight Avenue  
Yulee, FL 32097  
mnapier@fpuc.com

Mike Cassel  
Florida Public Utilities Company  
208 Wildlight Avenue  
Yulee, FL 32097  
mcassel@fpuc.com

/s/ Charles J. Rehwinkel  
Charles J. Rehwinkel  
Deputy Public Counsel  
Rehwinkel.charles@leg.state.fl.us

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

**In re: Review of 2026-2035 Storm Protection Plan, pursuant to Rule 25-6.030, F.A.C., Florida Power & Light Company.**

**DOCKET NO.: 20250014-EI**

In re: Review of 2026-2035 Storm Protection Plan, pursuant to Rule 25-6.030, F.A.C., Duke Energy Florida, LLC.

DOCKET NO.: 20250015-EI

In re: Review of 2026-2035 Storm Protection Plan, pursuant to Rule 25-6.030, F.A.C., Tampa Electric Company.

DOCKET NO.: 20250016-EI

In re: Review of 2026-2035 Storm Protection Plan, pursuant to Rule 25-6.030, F.A.C., Florida Public Utilities Company.

DOCKET NO.: 20250017-EI

FILED: March 12, 2025

**DIRECT TESTIMONY**

**OF**

**KEVIN J. MARA, P.E.**

**ON BEHALF OF THE CITIZENS OF THE STATE OF FLORIDA**

Walt Trierweiler  
Public Counsel

Charles J. Rehwinkel  
Deputy Public Counsel

Office of Public Counsel  
c/o The Florida Legislature  
111 West Madison Street, Suite 812  
Tallahassee, FL 32399-1400  
(850) 488-9330

*Attorneys for the Citizens  
of the State of Florida*

## TABLE OF CONTENTS

I.	INTRODUCTION .....	1
II.	DISCUSSION.....	5

### EXHIBITS

Curriculum Vitae .....	KJM-1
DEF Response to Staff's First Set of Interrogatories, No. 7.....	KJM-2
FPL Response to Staff's First Set of Interrogatories, No. 16 .....	KJM-3
Excerpt from FPL Response to OPC's First Request for Production of Documents, Nos. 3-4.....	KJM-4

1 **DIRECT TESTIMONY**

2 **OF**

3 **KEVIN J. MARA**

4 On Behalf of the Office of Public Counsel

5 Before the

6 Florida Public Service Commission

7 DOCKET NO. 20250014-EI

8

9 **I. INTRODUCTION**

10 **Q. WHAT IS YOUR NAME, OCCUPATION, AND BUSINESS ADDRESS?**

11 A. My name is Kevin J. Mara. My business address is 1850 Parkway Place, Suite 800,  
12 Marietta, Georgia 30067. I am the Executive Vice President of the firm GDS Associates,  
13 Inc. (“GDS”) and Principal Engineer for a GDS company doing business as Hi-Line  
14 Engineering. I am a registered professional engineer (P.E.) in Florida and 22 additional  
15 states.

16

17 **Q. PLEASE STATE YOUR PROFESSIONAL EXPERIENCE.**

18 A. I received a Bachelor of Science degree in Electrical Engineering from Georgia Institute  
19 of Technology in 1982. Between 1983 and 1988, I worked at Savannah Electric and Power  
20 as a distribution engineer designing new services to residential, commercial, and industrial  
21 customers. From 1989-1998, I was employed by Southern Engineering Company as a  
22 planning engineer providing planning, design, and consulting services for electric  
23 cooperatives and publicly-owned electric utilities. In 1998, I, along with a partner, formed  
24 a new firm, Hi-Line Associates, which specialized in the design and planning of electric  
25 distribution systems. In 2000, Hi-Line Associates became a wholly owned subsidiary of

1 GDS Associates, Inc. and the name of the firm was changed to Hi-Line Engineering, LLC.  
2 In 2001, we merged our operations with GDS Associates, Inc., and Hi-Line Engineering  
3 became a department within GDS. I serve as the Principal Engineer for Hi-Line  
4 Engineering and am Executive Vice President of GDS. I have field experience in the  
5 operation, maintenance, and design of transmission and distribution systems. I have  
6 performed numerous planning studies for electric cooperatives and municipal systems. I  
7 have prepared short circuit models and overcurrent protection schemes for numerous  
8 electric utilities. I have also provided general consulting, underground distribution design,  
9 and territorial assistance.

10

11 **Q. PLEASE DESCRIBE GDS ASSOCIATES, INC.**

12 A. GDS is an engineering and consulting firm with offices in Marietta, Georgia; Austin,  
13 Texas; Auburn, Alabama; Bedford, New Hampshire; Augusta, Maine; Orlando, Florida;  
14 Folsom, California; Redmond, Washington; and Madison, Wisconsin. GDS has over 180  
15 employees with backgrounds in engineering, accounting, management, economics,  
16 finance, and statistics. GDS provides rate and regulatory consulting services in the electric,  
17 natural gas, water, and telephone utility industries. GDS also provides a variety of other  
18 services in the electric utility industry including power supply planning, generation support  
19 services, financial analysis, load forecasting, and statistical services. Our clients are  
20 primarily publicly owned utilities, municipalities, customers of privately-owned utilities,  
21 groups or associations of customers, and government agencies.

22

23 **Q. HAVE YOU TESTIFIED BEFORE ANY REGULATORY COMMISSIONS?**

24 A. Yes, I have submitted testimony before the following regulatory bodies:

25

- Vermont Department of Public Service;

- 1 • Federal Energy Regulatory Commission (“FERC”);
- 2 • District of Columbia Public Service Commission;
- 3 • Public Utility Commission of Texas;
- 4 • Maryland Public Service Commission;
- 5 • Corporation Commission of Oklahoma;
- 6 • Public Service Commission of South Carolina; and
- 7 • Florida Public Service Commission.

8 I have also submitted expert opinion reports before United States District Courts in  
9 Alabama, California, South Carolina, and New Mexico.

10

11 **Q. HAVE YOU PREPARED AN EXHIBIT DESCRIBING YOUR QUALIFICATIONS**  
12 **AND EXPERIENCE?**

13 A. Yes. I have attached Exhibit KJM-1, which is a summary of my regulatory experience and  
14 qualifications.

15

16 **Q. ON WHOSE BEHALF ARE YOU APPEARING?**

17 A. GDS was retained by the Florida Office of Public Counsel (“OPC”) to provide technical  
18 assistance and expert testimony regarding the Florida Power & Light Company’s (“FPL”  
19 or “Company”) 2026-2035 Storm Protection Plan, pursuant to Rule 25-6.030, Florida  
20 Administrative Code (“F.A.C.”). Accordingly, I am appearing on behalf of the Citizens of  
21 the State of Florida. Accordingly, I am appearing on behalf of the Citizens of the State of  
22 Florida.



1 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?**

2 A. I am presenting my expert opinion regarding the reasonableness of FPL's proposed  
3 2026 - 2035 Storm Protection Plan ("SPP" or "Plan") and its consistency with the  
4 applicable standards for the Commission to consider the SPP.

5 The fact that I do not address any specific element of the company's SPP or address  
6 any other particular issues in my testimony or am silent with respect to any portion of the  
7 company's direct testimony in this proceeding should not be interpreted as an approval of  
8 any position taken by that company in the testimony to which I have had an opportunity to  
9 respond.

10

11 **Q. WHAT INFORMATION DID YOU REVIEW IN PREPARATION OF YOUR**  
12 **TESTIMONY?**

13 A. I reviewed the Company's filing, including the direct testimony and exhibits. I also  
14 reviewed the Company's responses to OPC's discovery (including deposition testimony),  
15 the Company's responses to the Florida Public Service Commission ("PSC" or  
16 "Commission") Staff's discovery, and other materials pertaining to the SPP and its impacts  
17 on the Company. In addition, I reviewed section 366.96, Florida Statutes ("F.S."), which  
18 requires the filing of the SPP and authorized the Commission to adopt the relevant rules,  
19 including Rule 25-6.030, F.A.C., which addresses the Commission's approval of a  
20 Transmission and Distribution SPP that covers a utility's immediate 10-year planning  
21 period.

22

23 **Q. PLEASE SUMMARIZE YOUR RECOMMENDATIONS.**

24 A. I have no specific recommended adjustments to any program. I do make a recommendation  
25 regarding the ability of the company to make moderate reductions in its SPP spending

1 while maintaining the objectives of the SPP standards. In my opinion, it is not unreasonable  
2 and would be consistent with the public interest for the Commission to order a reduction  
3 in the pace of the SPP which limits feeder hardening to 75 feeders, limits lateral  
4 undergrounding to 1,100 laterals annually, and limits transmission structure replacement  
5 to 350 annually.

6

7 **II. DISCUSSION**

8 **Q. WITH REGARD TO THE FLORIDA SUPREME COURT’S 2024 DECISION IN**  
9 **CITIZENS OF STATE V. FAY, 396 SO. 3D 549 (FLA. 2024), THAT A PRUDENCE**  
10 **OR COST EFFECTIVENESS DETERMINATION WAS NOT REQUIRED AND**  
11 **THUS NOT A PROPER SUBJECT OF INTERVENOR TESTIMONY, WAS**  
12 **THERE ANY ANALYSIS THAT YOU BELIEVED WAS THUS BARRED THAT**  
13 **WOULD HAVE OTHERWISE BEEN HELPFUL OR NECESSARY TO THE**  
14 **COMMISSION TO DETERMINE WHETHER THE SPP OF FPL IS IN THE**  
15 **PUBLIC INTEREST AND MEETS THE INTENT OF THE LEGISLATURE AS**  
16 **EXPRESSED IN THE SPP STATUTE?**

17 A. Rule 25-6.030, F.A.C. (“SPP Rule”), sets forth comprehensive requirements for a Utility’s  
18 Storm Protection Plan. Specifically, Rule 25-6.030(3)(d)(1), F.A.C., and Rule 25-  
19 6.030(3)(d)(3), F.A.C., calls for benefit and cost estimates for each Program within the  
20 Plan, and Rule 25-6.030(3)(d)(4), F.A.C., calls for cost to benefit comparison for each  
21 Program. In light of the Florida Supreme Court’s interpretation of section 366.96, F.S.,  
22 and the SPP Rule, I believe it is necessary for me to express my opinion that without the  
23 requirement of an up-front prudence or cost-effectiveness determination, consumers are at  
24 risk of exposure to runaway budgets and expenditures over the life of these plans. With no  
25 evidence allowed or taken on prudence or cost effectiveness, substantial changes in SPP

1 Programs and Program budgets may be overlooked and may not be considered, resulting  
2 in an increased burden on the rate payers. This scenario effectively cuts the Commission  
3 off from determining whether enormous sums of money are being spent to achieve  
4 diminishing returns both in the form of benefits to customers and in the interest of the State  
5 of Florida as a whole.

6

7 **Q. DID FPL INCLUDE ANY NEW OR MODIFIED PROGRAMS IN THE 2026 SPP?**

8 A. No. FPL did not modify their approach to their program, and they did not add any new  
9 programs. They have substantially increased in the budget for two programs: Distribution  
10 Feeder Hardening and Substation Flood Mitigation.

11

12 **Q. DO YOU HAVE ANY RECOMMENDATIONS REGARDING THE SUBSTATION  
13 FLOOD MITIGATION PROGRAM?**

14 A. No. The increase in cost is in response to flooding to five additional substations based on  
15 recent extreme weather events.<sup>1</sup>

16

17 **Q. WHAT IS YOUR UNDERSTANDING OF THE INCREASE IN COSTS FOR THE  
18 DISTRIBUTION FEEDER HARDENING PROGRAM?**

19 A. FPL updates the construction costs based on experience, but more importantly, in the  
20 proposed Feeder Hardening program, FPL reclassified 850 miles of laterals as feeders.<sup>2</sup> In  
21 addition, FPL's 2023 SPP had the Feeder Hardening program ending in 2031 with the  
22 average capital cost per year of \$103.3 million for the years 2026 to 2031. In the proposed  
23 2026 SPP, the Feeder Hardening program with 850 miles of additional laterals classified

---

<sup>1</sup> Exhibit MJ-1 Page 43 of 50.

<sup>2</sup> Exhibit MJ-1 Page 23 of 50.

1 as feeders with a projected completion date of 2034 projected an average annual cost of  
2 \$216.6 million.<sup>3</sup> This is a significant increase in spending for this program.

3

4 **Q. DOES FPL EXPLAIN HOW THIS INCREASE IN COSTS FOR FEEDER**  
5 **HARDENING IS OFFSET BY ANOTHER PROGRAM?**

6 A. Yes, FPL contends that this increase will be partially offset by a reduction in the estimated  
7 average cost per project under the Distribution Lateral Hardening Program over the 2026-  
8 2035 plan period.<sup>4</sup> FPL is forecasting a reduction in the cost per lateral.<sup>5</sup> So the cost of  
9 underground laterals appears to have gained efficiencies, but FPL is proposing to increase  
10 the number of laterals to be undergrounded at a rate which reduces the annual spend to help  
11 mitigate the increase in the Feeder Hardening program cost.

12

13 **Q. CAN YOU DESCRIBE STAFF'S FIRST SET OF INTERROGATORIES NO. 16?**

14 A. Staff inquired about reducing the SPP by the following parameters:

- 15 1. Limiting the number of feeders to be hardened to 75 feeders per year,
- 16 2. Limiting the Lateral Hardening to 1,100 laterals per year, and
- 17 3. Limiting transmission structure upgrades to 350 structures per year.

18 FPL's Feeder Hardening program proposed a significant number of feeders to harden in  
19 the first two years of the program and then tailed off to a pace of 25 to 75 feeders per year.<sup>6</sup>  
20 For the Lateral Hardening program, FPL projected hardening between 900 to 1,600 laterals  
21 per year. For Transmission structure replacements, FPL budgeted for the replacement of  
22 roughly 400 to 550 structures per year.

---

<sup>3</sup> Exhibit MJ-1, Appendix C.

<sup>4</sup> Direct Testimony of Michael Jarro, p. 7, lines 6-8.

<sup>5</sup> Direct Testimony of Michael Jarro, p. 7, lines 18-20.

<sup>6</sup> Exhibit MJ-1, Appendix C.

1           In my opinion, the slow down scenario suggested by the Staff's interrogatory has  
2 merit.

3

4 **Q. DID FPL PROVIDE THE RATE IMPACT FOR THE REDUCTION IN SCOPE**  
5 **POSED IN THE STAFF'S FIRST SET OF INTERROGATORIES, NO. 16?**

6 A. No. FPL did not provide the rate impact.<sup>7</sup> I will note that the Staff had a similar  
7 interrogatory for Duke Energy Florida who was able to clearly respond with a rate impact  
8 as shown in Exhibit KJM-2.<sup>8</sup>

9

10 **Q. WOULD YOU SUPPORT A REDUCTION IN PACE FOR ROLL OUT OF THE**  
11 **FPL SPP?**

12 A. Yes. A reduction in the pace will not materially affect the response to major events in the  
13 near term and will tend to make electric service for all FPL customers more affordable.

14

15 **Q. DO YOU HAVE ANY OBSERVATIONS ABOUT FPL'S ASSERTIONS ABOUT**  
16 **THE CORRELATION BETWEEN STORM HARDENING EFFORTS TO-DATE**  
17 **AND THE RESTORATION TIMES REPORTED BY THE COMPANY OVER THE**  
18 **LAST FEW YEARS?**

19 A. Yes. Based on my review of FPL's storm analyses and forensic reports<sup>9</sup> and from my  
20 experience, I agree that efforts to harden the grid have undoubtedly lent themselves to  
21 reducing outage times and perhaps restoration costs. I would caution the Commission to  
22 carefully evaluate the claims of reductions based solely on the hardening efforts. Although  
23 I am not an expert in the logistics of storm restoration activity, I am aware that it is often a

---

<sup>7</sup> See Exhibit KJM-3, FPL Response to Staff's First Set of Interrogatories, No. 16.

<sup>8</sup> See Exhibit KJM-2, Duke Energy Florida, LLC's Response to Staff's First Set of Interrogatories, No. 7.

<sup>9</sup> See, for example, Exhibit KJM-4, Excerpt from FPL Response to OPC's First Production of Documents, Nos. 3-4.

1 very labor-intensive process. The cost of labor for restoration efforts may or may not be  
2 directly correlated to the level of hardening of the system. There may be occasions where  
3 a major event impacts systems that have not been significantly hardened and additional  
4 resources are needed to achieve a reasonable restoration time. However, in other situations  
5 where the expected impact is less severe, significant labor costs for restoration may be  
6 incurred but little or no facilities damage occurs. The takeaway here is that apparent  
7 improvement in restoration time and cost cannot always be attributed to storm hardening  
8 efforts. Likewise, depending on the objective, storm restoration costs could actually  
9 increase even if restoration time decreases and facilities hardening is substantially  
10 increased, depending on the number of contractors temporarily brought into the territory to  
11 assist with restoration.

12

13 **Q. ARE THERE ANY OTHER ELEMENTS OF THE FILING AND OR**  
14 **INFORMATION PROVIDED THAT YOU BELIEVE THE COMMISSION**  
15 **SHOULD TAKE INTO ACCOUNT FOR FPL'S SPP?**

16 A. Yes. In the petition, FPL states, “[t]hus, the Florida Legislature has already found and  
17 determined that storm hardening the T&D system is a *prudent* action for the Florida electric  
18 utilities to undertake.” (Emphasis added.) In accord with the aforementioned  
19 Florida Supreme Court decision, I will not substantively respond to this assertion.  
20 However, if the Commission allows the Company to nevertheless introduce the concept  
21 of “prudence” in the decision making, I believe it would be necessary for me to  
22 provide supplemental testimony in that regard.

23

24 **Q. DOES THIS COMPLETE YOUR PREFILED TESTIMONY?**

25 A. Yes, it does.



# KEVIN MARA

EXECUTIVE VICE PRESIDENT &  
PRINCIPAL ENGINEER, P.E.



## PROFILE

Mr. Mara has over 30 years of experience as a distribution engineer. He worked six years at Savannah Electric as a Distribution Engineer and ten years with Southern Engineering Company as a Project Manager. At Savannah Electric, Mr. Mara gained invaluable field experience in the operation, maintenance, and design of transmission and distribution systems. While at Southern Engineering, Mr. Mara performed planning studies, general consulting, underground distribution design, territorial assistance, and training services. Presently, Mr. Mara is a Vice President at GDS Associates, Inc. and serves as the Principal Engineer for GDS Associates' engineering services company known as its trade name Hi-Line Engineering.

**Overhead Distribution System Design.** Mr. Mara is in responsible charge of the design of distribution lines for many different utilities located in a variety of different terrains and loading conditions. Mr. Mara is in responsible charge of the design of over 500 miles of distribution line conversions, upgrades, and line re-insulation each year. Many of these projects include acquisition of right-of-way, obtaining easements, and obtaining permits from various local, state and federal agencies. In addition, Mr. Mara performs inspections at various stages of completion of line construction projects to verify compliance of construction and materials with design specifications and applicable codes and standards.

**Underground Distribution System Design.** Mr. Mara has developed underground specifications for utilities and was an active participant on the Insulated Conductor Committee for IEEE. He has designed underground service to subdivisions, malls, commercial, and industrial areas in various terrains. These designs include concrete-encased ductlines, direct-burial, bridge attachments, long-bores, submarine, and tunneling projects. He has developed overcurrent and overvoltage protection schemes for underground systems for a variety of clients with different operating parameters.

## TRAINING SEMINARS

Mr. Mara has developed engineering training courses on the general subject of distribution power line design. These seminars have become extremely popular with more than 25 seminars being presented annually and with more than 4,000 people having attended seminars presented by Mr. Mara. A 3-week certification program is offered by Hi-Line Engineering in eleven states. The following is a list of the training material developed and/or presented:

- Application and Use of the National Electric Safety Code
- How to Design Service to Large Underground Subdivisions
- Cost-Effective Methods for Reducing Losses/Engineering Economics
- Underground System Design
- Joint-Use Contracts – Anatomy of Joint-Use Contract
- Overhead Structure Design
- Easement Acquisition
- Transformer Sizing and Voltage Drop

**Construction Specifications for Electric Utilities.** Mr. Mara has developed overhead construction specifications including overhead and underground systems for several different utilities. The design included overcurrent protection for padmounted and pole mounted transformers. The following is a representative list of past and present clients:

- Cullman EMC, Alabama
- Blue Ridge EMC, South Carolina
- Buckeye Rural Electric Cooperative, Ohio
- Three Notch EMC, Georgia
- Little River ECI, South Carolina
- Lackland Air Force Base
- Maxwell Air Force Base

## CONTACT

- 770-425-8100
- Kevin.mara@gdsassociates.com
- gdsassociates.com
- Marietta GA 30067

## EDUCATION

Bachelor of Science, Electrical Engineering, Georgia Institute of Technology, 1982

## PROFESSIONAL AFFILIATIONS / CERTIFICATIONS

Registered Professional Engineer in Alabama, Arkansas, Georgia, Florida, Idaho, Indiana, Kansas, Kentucky, Louisiana, Michigan, Mississippi, Missouri, North Carolina, Ohio, Oregon, Pennsylvania, South Carolina, South Dakota, Tennessee, Texas, Virginia, Washington, and Wisconsin

Institute of Electrical and Electronic Engineers Power Engineering Society: Senior Member

National Electric Safety Code Subcommittee 5: Alternate Member

Past Member: Insulated Conductor Committee

## EXPERTISE

Overhead & Underground Distribution Design

Distribution System Planning

Power System Modeling & Analysis

Training



# KEVIN MARA

Docket No. 20250014-EI  
Curriculum Vitae  
Exhibit KJM-1  
Page 2 of 6

EXECUTIVE VICE PRESIDENT &  
PRINCIPAL ENGINEER, P.E.

## CONTACT

- 770-425-8100
- Kevin.mara@gdsassociates.com
- gdsassociates.com
- Marietta GA 30067

## SYSTEM PRIVATIZATION/EVALUATION

### *Central Electric Power Cooperative, Columbia, SC*

- 2017 Independent Certification of Transmission Asset Valuation, Silver Bluff to N Augusts 115kV
- 2015 Independent Certification of Transmission Asset Valuation, Wadmaw 115kV

### *Choctawhatchee Electric Cooperative, DeFuniak Springs, FL*

- Inventory and valuation of electrical system assets at Eglin AFB prior to 40-year lease to private-sector entity

## PUBLICATIONS

- Co-author of the NRECA “Simplified Overhead Distribution Staking Manual” including editions 2, 3 and 4.
- Author of “Field Staking Information for Overhead Distribution Lines”
- Author of four chapters of “TVPPA Transmission and Distribution Standards and Specifications”

## TESTIMONIES & DEPOSITIONS

Mr. Mara has testified as an expert at trial or by deposition in the following actions:

- *Deposition related to condemnation of property*, Newberry ECI v. Fretwell, 2005, State of South Carolina
- *Testimony in Arbitration regarding territory dispute*, Newberry ECI v. City of Newberry, 2003, State of South Carolina, Civil Action No. 2003-CP-36-0277
- *Expert Report and Deposition, 2005*, United States of America v. Southern California Edison Company, Case No CIV F-01-5167 OWW DLB
- *Expert Report and Deposition, 2005*, Contesting a transmission condemnation, Moore v. South Carolina Electric and Gas Company, United States District Court of South Carolina, Case No. 1:05-1509-MBS
- *Affidavit October 2007*, FERC Docket No. ER04-1421 and ER04-1422, Intervene in Open Access Transmission Tariff filed by Dominion Virginia Power
- *Affidavit February 26, 2008*, FERC Docket No. ER08-573-000 and ER08-574-000, Service Agreement between Dominion Virginia Power and WM Renewable Energy, LLC
- *Direct Filed Testimony* date December 15, 2006, before the Public Utility Commission of Texas, SOAH Docket No 473-06-2536, PUC Docket No. 32766
- *Expert Report and Direct Testimony* April 2008, United States Tax Court, Docket 25132-06, Entergy Corporation v. Commissioner Internal Revenue
- *Direct Testimony* September 17, 2009, Public Service Commission of the District of Columbia, Formal Case 1076, Reliability Issues
- *Filed Testimony regarding the prudence of hurricane restoration costs on behalf of the City of Houston, TX*, 2009, Cozen O’Connor P.C., TX PUC Docket No. 32093 – Hurricane Restoration Costs
- *Technical Assistance and Filed Comments regarding line losses and distributive generation, interconnection issues*, 2011, Office of the Ohio Consumer’s Counsel, OCC Contract 1107, OBM PO# 938 for Energy Efficiency T & D





# KEVIN MARA

Docket No. 20250014-EI  
Curriculum Vitae  
Exhibit KJM-1  
Page 3 of 6

EXECUTIVE VICE PRESIDENT &  
PRINCIPAL ENGINEER, P.E.

## CONTACT

- 770-425-8100
- Kevin.mara@gdsassociates.com
- gdsassociates.com
- Marietta GA 30067

## TESTIMONIES & DEPOSITIONS [continued]

- *Technical Assistance, Filed Comments, and Recommendations evaluating Pepco's response to Commission Order 15941 concerning worst reliable feeders in the District of Columbia, 2011, 2012 Office of the People's Counsel of the District of Columbia, Formal Case No. 766*
- *Technical Assistance, Filed Comments, and Recommendations on proposed rulemaking by the District of Columbia PSC amending the Electric Quality of Service Standards (EQSS), 2011, Office of the People's Counsel of the District of Columbia, Formal Case No. 766*
- *Yearly Technical Review, Filed Comments, and Recommendations evaluating Pepco's Annual Consolidated Report for 2011 through 2024, Office of the People's Counsel of the District of Columbia, Formal Case Nos. 766; 766-ACR; PEPACR{YEAR}*
- *Technical Evaluation, Filed Comments, and Recommendations evaluating Pepco's response to a major service outage occurring May 31, 2011. (2011), Office of the People's Counsel of the District of Columbia, Formal Case Nos. 766 and 1062*
- *Technical Assistance, Filed Comments, and Recommendations evaluating Pepco's response to Commission Order 164261 concerning worst reliable neighborhoods in the District of Columbia, 2011, Office of the People's Counsel of the District of Columbia, Formal Case No. 766*
- *Technical Review, Filed Comments, and Recommendations on Pepco's Incident Response Plan (IRP) and Crisis Management Plan (CMP), 2011, Office of the People's Counsel of the District of Columbia*
- Formal Case No. 766
- *Technical Assistance, Filed Comments, and Recommendations assessing Pepco's Vegetation, Management Program and trim cycle in response to Order 16830, 2012, Office of the People's Counsel of the District of Columbia, Formal Case No. 766*
- *Technical Review, Filed Comments, and Recommendations on Pepco's Secondary Splice Pilot Program in response to Order 16426, 2012, Office of the People's Counsel of the District of Columbia, Formal Case No. 766 and 991*
- *Technical Review, Filed Comments, and Recommendations on Pepco's Major Storm Outage Plan (MSO), 2012 – active, Office of the People's Counsel of the District of Columbia, Formal Case No. 766*
- *Technical Assistance and Direct Filed Testimony for fully litigated rate case, 2011-2012, Office of the People's Counsel of the District of Columbia, Formal Case No. 1087 – Pepco 2011 Rate Case, Hearing transcript date: February 12, 2012.*
- *Evaluation of and Filed Comments on Pepco's Storm Response, 2012, Office of the People's Counsel of the District of Columbia, Storm Dockets SO-02, 03, and 04-E-2012*
- *Technical Assistance and Direct Filed Testimony for fully litigated rate case, 2013 – 2014, Office of the People's Counsel of the District of Columbia, Formal Case No. 1103 – Pepco 2013 Rate Case. Hearing transcript date: November 6, 2013.*
- *Evaluation of and Filed Comments on Prudence of 2011 and 2012 Storm Costs, 2013 – 2014, State of New Jersey Division of Rate Counsel, BPU Docket No. AX13030196 and EO13070611*



# KEVIN MARA

Docket No. 20250014-EI  
Curriculum Vitae  
Exhibit KJM-1  
Page 4 of 6

EXECUTIVE VICE PRESIDENT &  
PRINCIPAL ENGINEER, P. E.

## CONTACT

- 770-425-8100
- Kevin.mara@gdsassociates.com
- gdsassociates.com
- Marietta GA 30067

## TESTIMONIES & DEPOSITIONS [continued]

- *Technical Assistance and Direct Filed Testimony for DTE Acquisition of Detroit Public Lighting Department*, 2013 – 2014, Office of the State of Michigan Attorney General, Docket U-17437, Evaluation of and Filed Comments on the Siemens Management Audit of Pepco System Reliability and the Liberty Management Audit, 2014, Office of the People's Counsel of the District of Columbia, Formal Case No. 1076
- *Expert witness for personal injury case*, District of Columbia, Koontz, McKenney, Johnson, DePaolis & Lightfoot LLP, Ghafoorian v Pepco 2013 – 2016, Plaintive expert assistance regarding electric utility design, operation of distribution systems and overcurrent protection systems.
- *Technical Assistance and Direct Filed Testimony in the Matter of the Application for approval of the Triennial Underground Infrastructure Improvement Projects Plan*, 2014 – 2017, Office of the People's Counsel of the District of Columbia, Formal Case No. 1116
- *Technical Assistance and Direct Filed Testimony in the Matter of the Merger of Exelon Corporation, Pepco Holdings, Inc., Potomac Electric Power Company, Exelon Energy Delivery Company, LLC and New Special Purpose Entity, LLC*, 2014 – 2016, Office of the People's Counsel of the District of Columbia, Formal Case No. 1119. Hearing transcript date: April 21, 2015.
- *Technical Assistance to Inform and advise the OPC in the matter of the investigation into modernizing the energy delivery system for increased sustainability*. 2015 – active, Office of the People's Counsel of the District of Columbia, Formal Case No 1130.
- *Technical Assistance and Direct Filed Testimony in the Matter of the Merger of Exelon Corporation and Pepco Holdings, Inc.*, 2014 – 2016, State of Maryland and the Maryland Energy Administration, Case No. 9361.
- *Technical Assistance and Direct Filed Testimony for fully litigated rate case*, 2015 – 2016, State of Oklahoma Office of the Attorney General, Cause No. PUD 201500273 - OG&E 2016 Rate Case, Hearing transcript date: May 17, 2016.
- *Technical Assistance and Filed Comments on Notice of Inquiry, The Commission's Investigation into Electricity Quality of Service Standards and Reliability Performance*, 2016 – 2018, Office of the People's Counsel of the District of Columbia, Formal Case No. 1076; RM36-2016-01-E.
- *Technical Assistance and Direct Filed Testimony for fully litigated rate case*, 2016 – 2017, Office of the People's Counsel of the District of Columbia, Formal Case No. 1139 – Pepco 2016 Rate Case. Hearing transcript date: March 21, 2017.
- *Technical Assistance in the Matter of the Application for approval of the Biennial Underground Infrastructure Improvement Projects Plan*, 2017- active, Office of the People's Counsel of the District of Columbia, Formal Case No. 1145
- *Technical Assistance to Inform and advise the OPC Regarding Pepco's Capital Grid Project*, 2017 – active, Office of the People's Counsel of the District of Columbia, Formal Case No. 1144. Confidential Comments and Confidential Affidavit filed November 29, 2017.
- *Expert witness for personal injury case Mecklenburg County, NC, Tin, Fulton, Walker & Owen, PLLC, Norton v Duke, Witness testimony* December 1, 2017, Technical assistance and pre-filed Direct Testimony on behalf of the Joint Municipal Intervenor in a rate case before the Indiana Utility Regulatory Commission, Cause No. 44967. Testimony filed November 7, 2017.
- *Prefiled Direct Testimony and Prefiled Surrebuttal Testimony on behalf of the Vermont Department of Public Service in a case before the State of Vermont Public Utility Commission, Tariff Filing of Green Mountain Power Corp.*, Case No. 18-0974-TF. Direct Testimony Filed August 10, 2018. Surrebuttal Testimony Filed October 8, 2018.



# KEVIN MARA

Docket No. 20250014-EI  
Curriculum Vitae  
Exhibit KJM-1  
Page 5 of 6

EXECUTIVE VICE PRESIDENT &  
PRINCIPAL ENGINEER, P.E.

## CONTACT

770-425-8100  
Kevin.mara@gdsassociates.com  
gdsassociates.com  
Marietta GA 30067

## TESTIMONIES & DEPOSITIONS [continued]

- *Technical assistance and pre-filed Direct Testimony on behalf of McCord Development, Inc. and Generation Park Management District against CenterPoint Energy Houston Electric, LLC in a case before the State Office of Administrative Hearings of Texas, TX PUC Docket No. 48583. Direct Testimony filed April 5, 2019.*
- *Technical Assistance, Direct Filed Testimony, Rebuttal Testimony, Surrebuttal Testimony, and Supplemental Testimony for fully litigated rate case, 2019 – active, Office of the People’s Counsel of the District of Columbia, Formal Case No. 1156 – Pepco 2019 Rate Case. Direct Testimony Filed March 6, 2020. Rebuttal Testimony Filed April 8, 2020. Surrebuttal Testimony Filed June 1, 2020. Supplemental Testimony filed July 27, 2020*
- *Technical assistance and pre-filed Direct Testimony on behalf of The State of Florida Public Counsel for Review of 2020-2029 Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Docket No. 20200071-EI, Gulf Power SPP. Direct Testimony filed May 26, 2020, Florida Power& Light Company SPP. Direct Testimony filed May 28, 2020.*
- *Prefiled Direct Testimony on behalf of the Vermont Department of Public Service in a case before the State of Vermont Public Utility Commission, Petition of Green Mountain Power for approval of its climate Plan pursuant to the Multi-Year Regulation Plan, Case No. 20-0276-PET. Direct Testimony Filed May 29, 2020.*
- *Technical assistance and Filed Comments on behalf of East Texas Electric Cooperative on a Proposal for Publication by the Public Utility Commission of Texas on Project 51841 Review of 16 TAC § 25.53 Relating to Electric Service Emergency Operations Plans, Project 51841. Comments filed January 4, 2022.*
- *Technical assistance, filed affidavit and direct testimony on behalf of Bloomfield, NM in an action concerning Bloomfield’s exercise of its right to acquire from Farmington the electric utility system serving Bloomfield, Bloomfield v Farmington, NM. State of New Mexico, County of San Juan, Eleventh Judicial District Court Action No. D-1116-CV-1959-07581.*
- *Technical assistance and pre-filed Direct Testimony on behalf of Sawnee EMC in a territorial dispute with Electrify America, Public Service Commission State of Georgia, Sawnee Electric Membership Corporation v Georgia Power Corporation, Docket No. 43899. Direct Testimony Filed September 9, 2021*
- *Prefiled Direct Testimony on behalf of the Vermont Department of Public Service in a case before the State of Vermont Public Utility Commission, Petition of Green Mountain Power for approval of a Multi-Year Rate Plan pursuant to 30 V.S.A. Sections 209, 218, and 218d, Case No. 21-3707-PET. Direct Testimony Filed April 20, 2022.*
- *Technical assistance and pre-filed Direct Testimony on behalf of The State of Florida Public Counsel for Review of Storm Protection Plans pursuant to Rule 25-6.030, F.A.C., all testimony filed May 31, 2022*
  - Docket No. 20220048-EI Tampa Electric Company
  - Docket No. 20220049-EI Florida Public Utilities Company
  - Docket No. 20220050-EI Duke Energy Florida
  - Docket No. 20220051-EI Florida Power & Light
- *Technical assistance and pre-filed Direct Testimony on behalf of The State of Florida Public Counsel for Review of Storm Protection Plan Cost Recovery Clause, Docket No. 20220010-EI. Testimony filed September 2, 2022*



# KEVIN MARA

Docket No. 20250014-EI  
Curriculum Vitae  
Exhibit KJM-1  
Page 6 of 6

EXECUTIVE VICE PRESIDENT &  
PRINCIPAL ENGINEER, P.E.

## CONTACT

- 770-425-8100
- Kevin.mara@gdsassociates.com
- gdsassociates.com
- Marietta GA 30067

## TESTIMONIES & DEPOSITIONS [continued]

- *Prefiled Direct Testimony on behalf of the Vermont Department of Public Service in a case before the State of Vermont Public Utility Commission, Petition of Green Mountain Power for approval of its zero outages initiative as a strategic opportunity pursuant to 30 V.S.A. § 218d and GMP's multi-year rate plan, Case No. 23-3501-PET. Direct Testimony Filed March 15, 2021.*
- *Prefiled Direct Testimony and Rebuttal Testimony on behalf of South Carolina Office of Regulatory Staff with the Public Service Commission of South Carolina, regarding Duke Energy Carolinas, LLC's Application for Increase in Electric Rates, Adjustments in Electric Rate Schedules and Tariffs, and Request for an Accounting Order, Docket No. 2023-388-E and 2023-403-E. Direct Testimony Filed April 8, 2024. Rebuttal Testimony Filed April 29, 2024.*
- *Technical assistance and pre-filed Direct Testimony on behalf of The State of Florida Public Counsel in a case before the Florida Public Service Commission, Petition for Rate Increase by Duke Energy Florida, LLC, Docket No. 20240025-EI. Direct Testimony filed June 11, 2024.*
- *Technical assistance and pre-filed Direct Testimony on behalf of The State of Florida Public Counsel in a case before the Florida Public Service Commission, Petition for Rate Increase by Tampa Electric Company, Docket No. 20240026-EI. Direct Testimony filed June 6, 2024.*



1. Beyond 2026, DEF does not have a final prioritized list by location.
2. Many of DEF's SPP programs include multiple subprograms that have various units of measure. While DEF has summed these for purposes of this response, the overall number of projects/activities per SPP program does not contain consistent units of measure. For example, the Feeder Hardening Program number of projects/activities shown in the table sums Feeder Hardening rebuilds (miles), Feeder Hardening Pole Inspections (inspection per pole) and Feeder Hardening Pole Replacements (poles).

Please see the populated table in the following attachment bearing Bates numbers 20250015-DEF-00000616. The Excel version is also attached.

7. Please refer to Exhibit BML-1. What would be the estimated revenue requirements and rate impacts for the SPP if the following schedule of components were completed in lieu of the Utility's proposed plan if:
  - a. 105 feeders were hardened per year;
  - b. 122 laterals were hardened per year, and;
  - c. 462 transmission structures were hardened per year.

**Response:**

To truly understand the implications of a reduction in DEF's proposed plan, DEF would have to re-run the prioritization model. A reduction in the 10-year deployment of the hardening projects would also reduce customer benefits, or at a minimum drastically delay their realization by customers.

- a. Hardening only 105, instead of approximately 150, miles of feeders per year would add roughly 20 years to the subprogram's deployment timeline. This delay will also create a delay in the Lateral Hardening program by delaying the shift in resources.
- b. Hardening only 122, instead of approximately 130, miles of laterals per year would add roughly 10-15 years to the subprogram's deployment timeline and incrementally delay the benefits of hardening efforts to those customers whose laterals will be completed later than currently proposed.
- c. Limiting deployment to 462 transmission structures (i.e., poles and towers) over the entire 10-year plan (2026 through 2035) would delay expected benefits to customers by extending the risk of non-hardened structure failures through an additional 6 to 7 storm seasons. This could lead to prolonged system impacts during extreme weather events, affecting a multitude of critical customers such as urgent care and medical centers, fire stations, law enforcement and prisons, cell towers, fuel, and cement plants, assisted living and hospice facilities, schools, shelters, and financial institutions.

With the adjustments to the specific subprograms, as described above, the revenue requirements and rate impacts would be as follows:

<b>Estimated Annual Jurisdictional Revenue Requirements for Each Year of the Storm Protection Plan</b>										
	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035
<i>(\$ Millions)</i>	\$ 363.9	\$ 427.5	\$ 489.9	\$ 552.2	\$ 614.5	\$ 674.1	\$ 733.0	\$ 789.8	\$ 847.1	\$ 904.8

<b>Estimated SPP Rate Impacts</b>			
	2026	2027	2028
<b>(1) Typical Residential % Increase from prior year Bill</b>	<b>1.9%</b>	<b>1.3%</b>	<b>1.2%</b>
<b>(2) Typical Commercial % Increase from prior year Bill</b>	<b>1.6%-1.9%</b>	<b>1.1%-1.3%</b>	<b>1.0%-1.3%</b>
<b>(3) Typical Industrial % Increase from prior year Bill</b>	<b>1.6%-2.2%</b>	<b>1.1%-1.4%</b>	<b>1.0%-1.4%</b>

Note: Residential Rate is based on \$/1,000 kWh



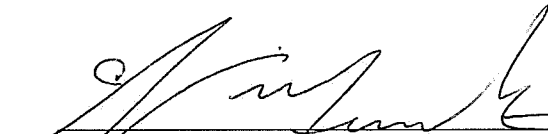
**AFFIDAVIT**

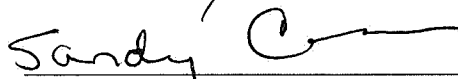
STATE OF FLORIDA

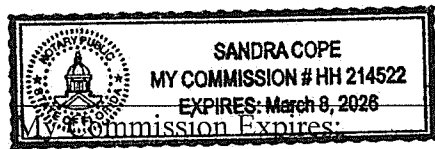
COUNTY OF PINELLAS

I hereby certify that on this 27<sup>th</sup> day of February, 2025, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared **CHRISTOPHER A. MENENDEZ**, who is personally known to me or provided \_\_\_\_\_ as identification, and he acknowledged before me that he provided the answers to interrogatory numbers 5 and 7a through 7c. in Staff's First Set of Interrogatories to Duke Energy Florida (NOS.1-7) in Docket No. 20250015-EI, and that the responses are true and correct based on his personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this 27<sup>th</sup> day of February, 2025.

  
\_\_\_\_\_  
Christopher A. Menendez

  
\_\_\_\_\_  
Sandy Cope  
Notary Public  
State of Florida, at Large



**Florida Power & Light Company**  
**Docket No. 20250014-EI**  
**Staff's First Set of Interrogatories**  
**Interrogatory No. 16**  
**Page 1 of 1**

QUESTION:

Please refer to Exhibit MJ-1, page 49, and Appendix C, Page 2 of 2. What would the estimated revenue requirements, rate impacts, and length of the programs for the SPP if the following components, on an average over the ten years, were completed in lieu of the Utility's proposed plan:

- a. If 75 feeders were hardened per year;
- b. If 1,100 laterals were hardened per year, and;
- c. If 350 transmission structures were hardened per year.

RESPONSE:

FPL's 2026 SPP is a continuation of the same existing eight programs in FPL's 2023 SPP that were found to be in the public interest and approved by the Commission in Docket No. 20220051-EI and affirmed by the Florida Supreme Court in *Citizens of the State of Fla. vs. Fay*, 396 So.3d 549 (Fla. 2024). As explained in Exhibit MJ-1, FPL is not proposing any material modifications to these existing SPP programs as part of the proposed 2026 SPP.

FPL has not undertaken or prepared an analysis of the estimated revenue requirements, rate impacts, and length of the SPP programs if the number of projects to be completed each year for the Distribution Feeder Hardening Program, Distribution Lateral Hardening Program, and Transmission Hardening Program were decreased as reflected in Staff's First Set of Interrogatories, No. 16. At a high level, if the number of projects to be completed were decreased as reflected in Staff's First Set of Interrogatories No. 16, all things being equal, FPL expects there would be a decrease in the estimated revenue requirements and rate impacts, an increase in the length of these programs, and an increase in the time these programs would be recovered in rates. Importantly, FPL also expects that such a decrease in the SPP projects to be completed would result in a delay in when customers would realize the important benefits of reductions in outages, outage times, and restoration costs associated with extreme weather events, as well as a delay of ancillary non-hardening benefits, such as improved day-to-day reliability and individual and community aesthetics associated with these hardening projects. Notably, the impacts associated with delaying these SPP projects, *i.e.*, delay in when customers and communities would realize these important benefits, could be significant for years with multiple extreme weather events, such as the 2022 and 2024 hurricane seasons.



**DECLARATION**

I Richard Hume, co-sponsor the answer to **Interrogatory No. 16** from Staff's First Set of Interrogatories to Florida Power & Light Company in Docket No. 20250014-EI, and the response is true and correct based on my personal knowledge.

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

  
\_\_\_\_\_

Richard Hume

Date: 2/25/25

**Florida Power & Light Company**  
**Docket No. 20250014-EI**  
**OPC's First Request for Production**  
**Request No. 3**  
**Page 1 of 2**

QUESTION:

Provide, both separately by storm and in the aggregate of one or more storms to the extent maintained that way, the documents containing all reports, memos, and presentations containing, discussing, describing, and analyzing the benchmarking studies, reports, presentations, etc. on the performance of FPL's system through the following events;

- a. Hurricane Ian.
- b. Hurricane Nicole.
- c. Hurricane Ida.
- d. Hurricane Debby.
- e. Hurricane Helene.
- f. Hurricane Milton.

RESPONSE:

a.-f. Please refer to the following responsive document(s):

- "2023 FPL Hurricane Preparedness Presentation" to the FPSC
- "2024 FPL Hurricane Preparedness Presentation" to the FPSC
- "FPL Resiliency Presentation for FL House Select Committee - February 2023"
- "FPL Resiliency Presentation for Texas PUC - August 2023"
- "FPL Resiliency SERC – April 2023"
- "FPL Town Hall Presentation (Hurricane Response) - October 2024"
- "FPL Town Hall Presentation (Storm Preparedness) - April 2024"
- "FPSC Staff Hurricane Ian and Nicole Audit Report – 2023"
- "Hurricane Nicole Presentation (EP) - April 2023"
- "NEE Town Hall Presentation (SPP) - July 2023"
- "All Employee Town Hall 12-13-2022"
- "Hurricane Ian Presentation - Oct. 2022"
- "Investor Relations -Earnings Call 3Q 2024 Slides"
- "Investor Relations - 2024 EEI Investor Presentation"
- "Investor Relations - 3Q 2022 Slides"
- "Investor Relations - Investor Conference 2024"
- "Board - FPL 2022-10 Hurricane Ian"
- "Board - FPL 2022-12 Hurricane Nicole"
- "Board - FPL 2023-10 Hurricane Idalia"
- "Board - FPL 2024-10 Hurricanes Debby Helene Milton"
- "FPL Presentation to NATF on Strengthening Resiliency, Reliability, and

**Florida Power & Light Company  
Docket No. 20250014-EI  
OPC's First Request for Production  
Request No. 3  
Page 2 of 2**

Adaptability”

- “2023 Hurricane Response Overview (EP)”
- “2024 Storm Preparedness (External Affairs)”
- “MOPR – Responding to Hurricane Ian”
- “MOPR – Hurricane Ian After Effects”
- “FPL Grid Modernization and Resiliency 2023”
- “USMA – Power Delivery 2023”
- “SEE 2023 Annual Conference Hurricane Ian Storm Panel”

Lastly, please refer to FPL’s Forensic Reports for the hurricanes listed above, which are provided in OPC’s First Request for Production of Documents, No. 4. Please note that FPL’s forensic analyses of Hurricanes Debby, Helene, and Milton are on-going and will not be completed until later in calendar year 2025. As such, the information provided in FPL’s response to OPC’s First Set of Interrogatories, No. 2 regarding the performance of FPL’s system during each of these storms is preliminary and based on the best information available at this time.

**Florida Power & Light Company**  
**Docket No. 20250014-EI**  
**OPC's First Request for Production**  
**Request No. 4**  
**Page 1 of 1**

QUESTION:

Provide, both separately by storm and in the aggregate of one or more storms to the extent maintained that way, the documents containing all reports, memos, and discussing, describing, and analyzing the FPL post-storm forensic analyses through the following events;

- a. Hurricane Ian.
- b. Hurricane Nicole.
- c. Hurricane Ida.
- d. Hurricane Debby.
- e. Hurricane Helene.
- f. Hurricane Milton.

RESPONSE:

a.-c. Please refer to attached responsive document(s):

- “Forensic Report – 2022 Hurricane Ian”
- “Forensic Report – 2022 Hurricane Nicole”
- “Forensic Report – 2023 Hurricane Idalia”

As shown in these Post-Hurricane Forensic Reports, FPL's Commission-approved SPP programs have provided and will continue to provide increased Transmission and Distribution infrastructure resiliency, reduced restoration time, and reduced restoration cost when FPL is impacted by extreme weather events, such as hurricanes.

- d.-f. FPL's forensic analyses of Hurricanes Debby, Helene, and Milton are on-going and will not be completed until later in calendar year 2025. Please note that the information provided in FPL's response to OPC's First Set of Interrogatories, No. 2 regarding the performance of FPL's system during each of these storms is preliminary and based on the best information available at this time.

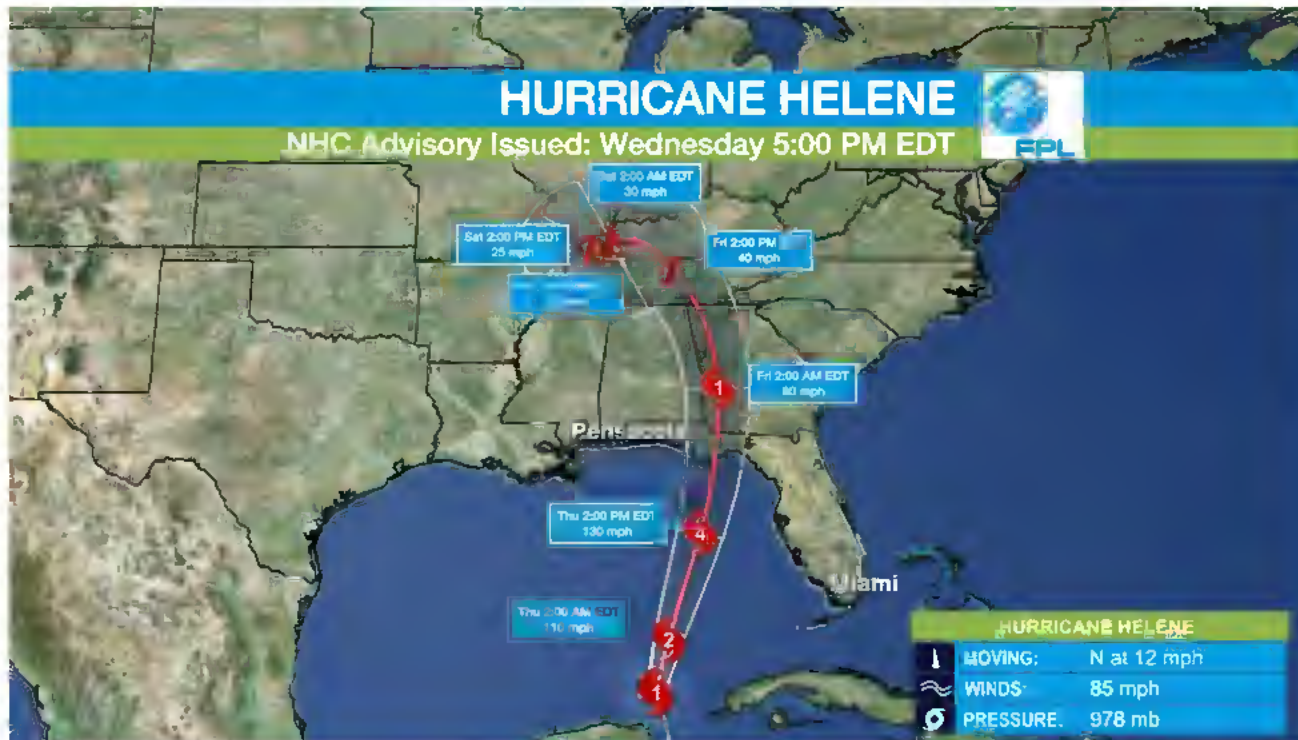


# **FPL Business Review**

**Armando Pimentel**  
**President and CEO**  
**October 24, 2024**

## Hurricane Helene made landfall in the Florida Big Bend region on September 26, as a Category 4 storm

### Hurricane Helene Characteristics

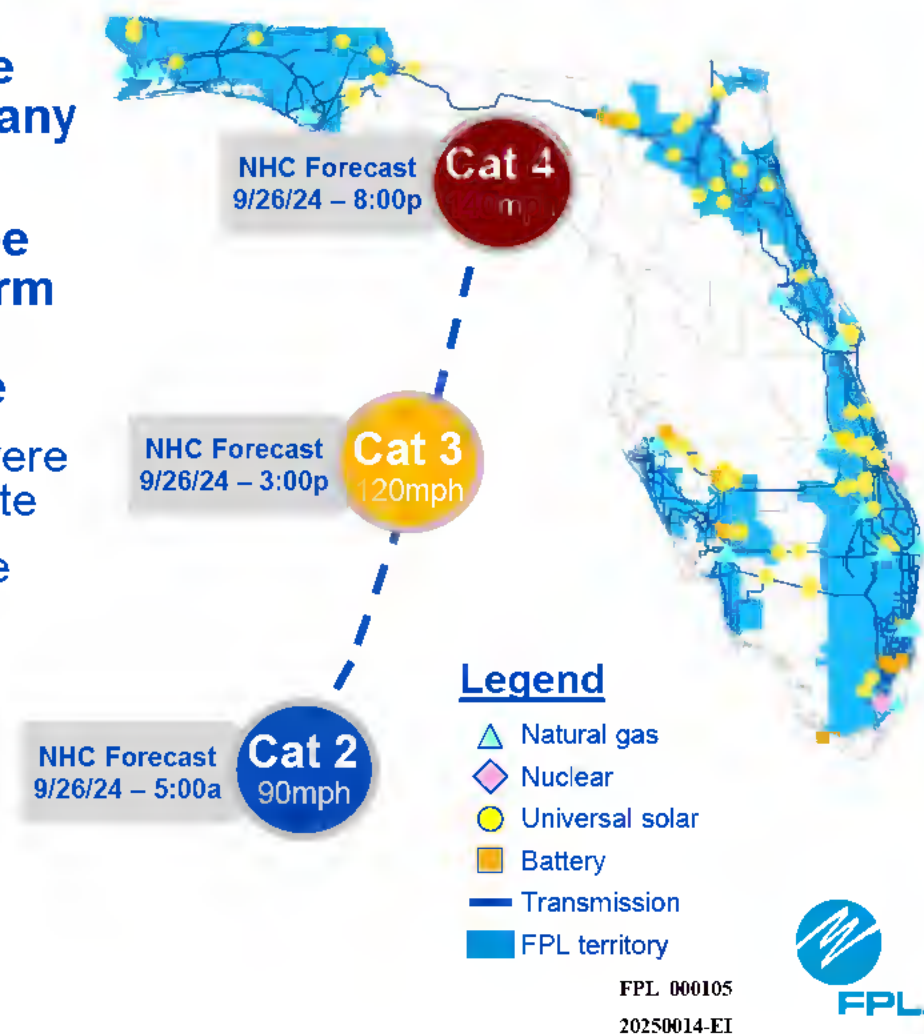


Approximately 680,000 FPL customers were impacted by Hurricane Helene and were essentially restored within three days

## FPL's power generation fleet was largely outside Hurricane Helene's track and experienced no material impact

### FPL Power Generation Performance

- FPL's fossil plants did not experience any storm force winds and did not sustain any significant damage
- 27 FPL solar sites and three storage sites recorded storm force winds, but did not sustain significant damage
  - Maximum recorded winds were 58 mph at a North Florida site
  - 0.014% of solar panels were damaged
  - 0.03% of inverters were temporarily out of service but were restored within 24 hours



## Impacts due to fallen trees were the primary cause of transmission system damage from Hurricane Helene

### FPL Transmission System Performance

- **No transmission structures failed during Hurricane Helene**
  - 20 transmission line sections (12 lines) were de-energized during the storm
- **Fallen trees were the main cause of transmission line outages**
  - North Florida has narrow rights-of-way in heavily vegetated areas
- **13 substations were proactively de-energized for transmission outages**
  - All critical stations were restored within 24 hours
  - Solar stations were restored within 48 hours





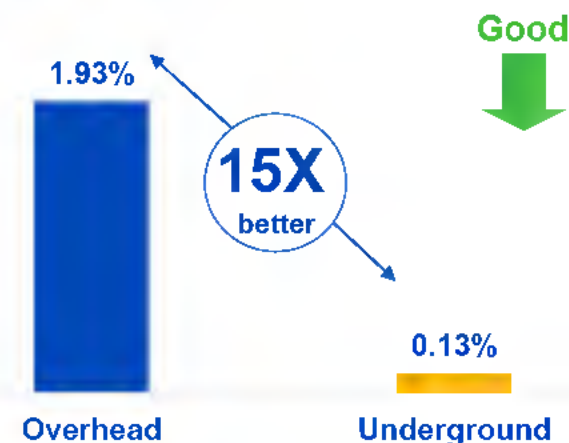
## Underground distribution facilities continue to perform better than overhead distribution facilities under extreme weather events

### North Florida Distribution System Performance

- Vegetation and debris were the primary causes of damage to overhead distribution facilities in the hardest-hit areas
- Underground laterals across the state performed ~15 times better than overhead laterals
  - Improved performance due to undergrounding through the Storm Secure Underground program (SSUP)

Percentage of FPL Neighborhood Lines Impacted by Hurricane Helene<sup>(1)</sup>

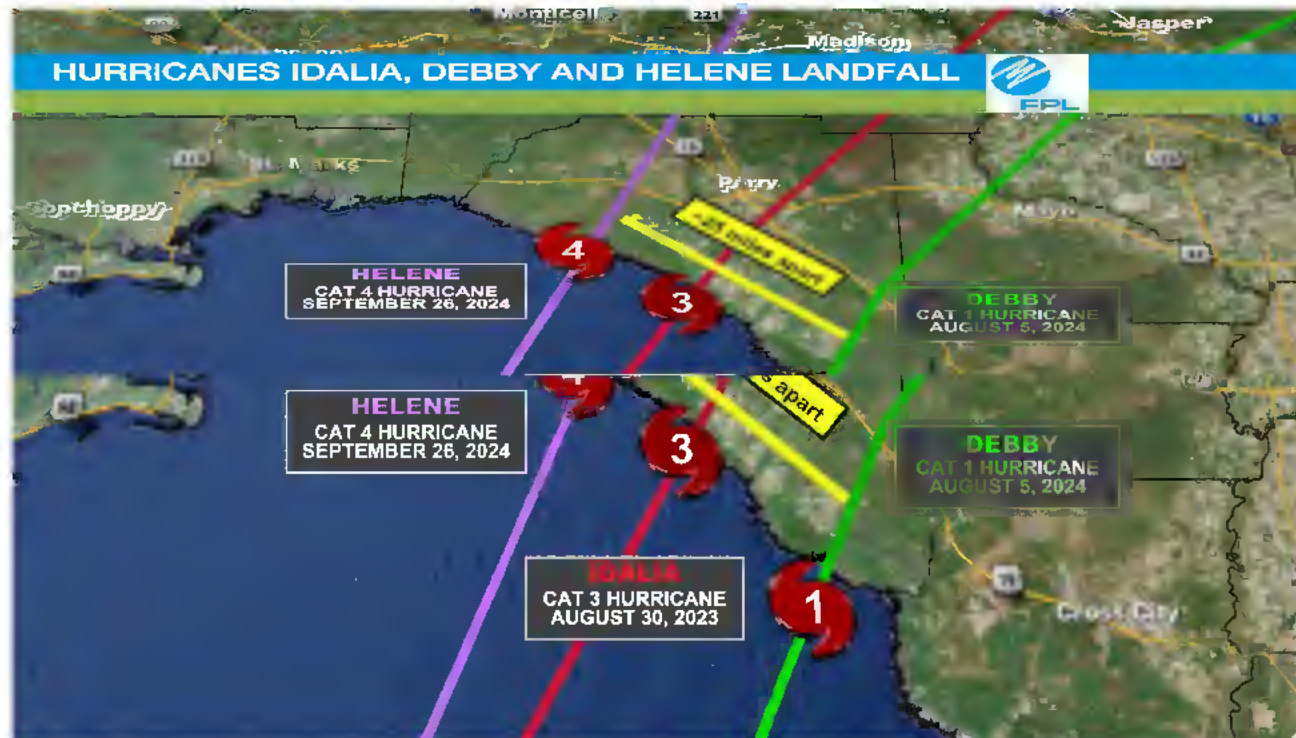
(Entire State)



FPL expects that investments in undergrounding will continue to improve overall storm performance and restoration times

## Hurricane Helene was the third hurricane to strike the Big Bend area since 2023

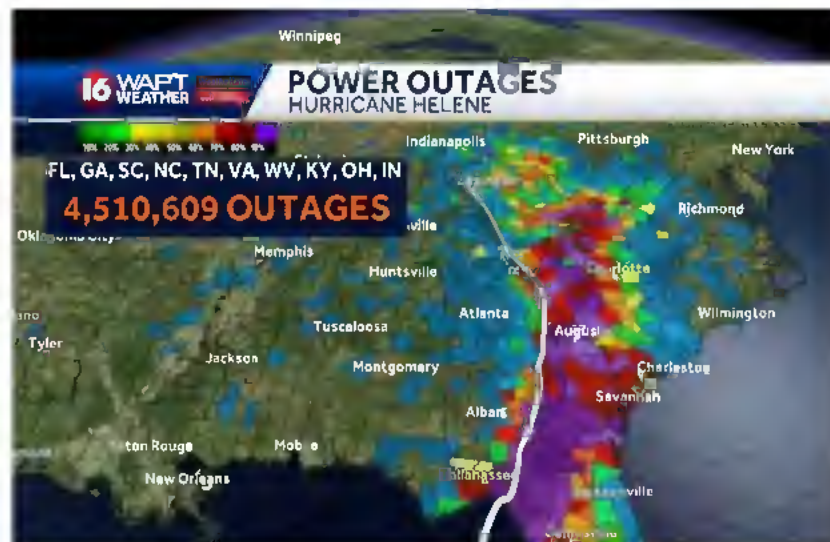
### Three Hurricanes in 13 Months



Hurricanes Idalia, Debby and Helene made landfall within 25 miles of each other

## Hurricane Helene devastated much of the Southeastern United States

### Helene's Widespread Impacts



- **By the numbers**
  - 42 trillion gallons of rain poured over the Southeast during Helene
    - Equivalent to the flow of Niagara Falls for 1.75 years
  - Path of destruction nearly 500 miles
  - 230 fatalities across six states
- **Mutual assistance**
  - Sent over 350 FPL lineworkers and contractors to support Georgia Power and other co-ops

**After our crews restored essentially all FPL customers, they deployed to other Southeastern states to help other utilities restore power**

**Hurricane Milton made landfall on Florida's west coast on October 9 as a Category 3 storm and exited Florida's east coast as a Category 1 storm**

## Hurricane Milton Characteristics



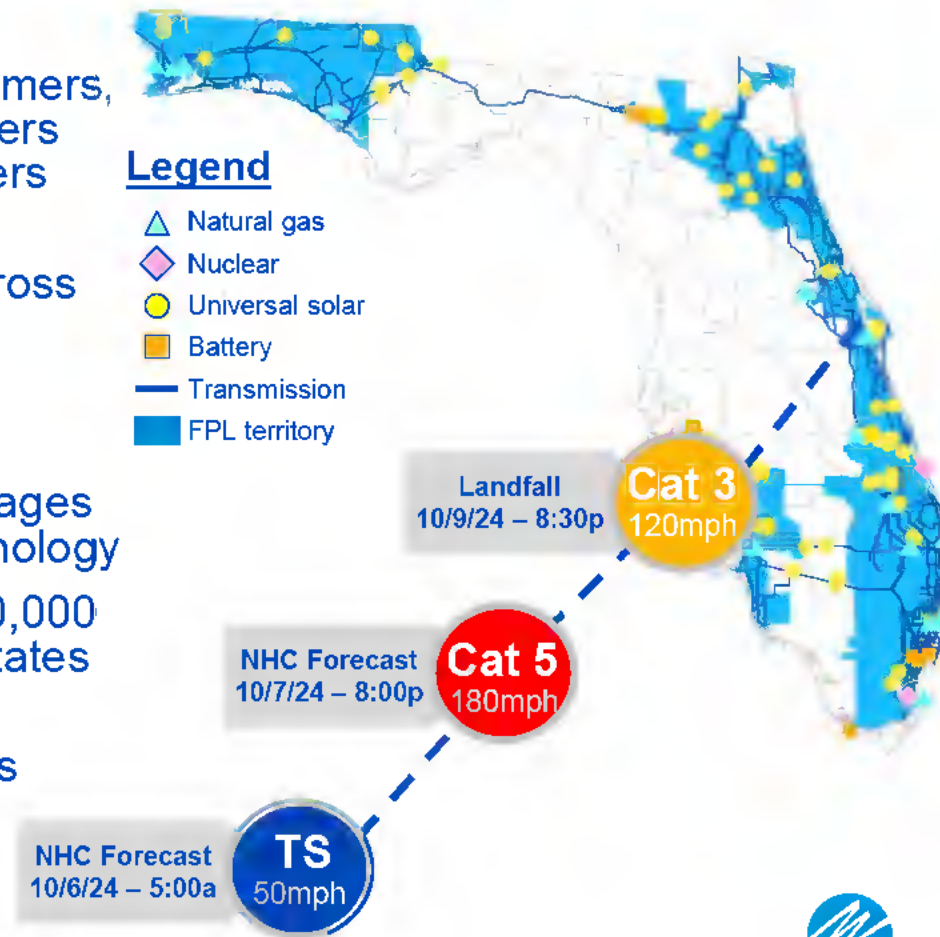
**Over 2 million FPL customers were affected by Hurricane Milton and were essentially restored within five days**



# Hurricane Milton required a significant restoration effort across the state

## Milton's Impacts to Florida

- **By the numbers<sup>(1)</sup>**
  - More than 2 MM FPL customers, 1 MM Duke Florida customers and ~600 K TECO customers were impacted
  - 36 confirmed tornadoes across South Florida
  - FPL essentially completed restoration within 5 days
  - Approximately 554,000 outages avoided by smart grid technology
  - Restoration workforce of 20,000 men and women from 41 states and Canada
  - 30 staging and parking sites
  - 22 customer relief sites across the state



1) Preliminary data subject to change

## Essentially all of FPL's customers impacted by recent hurricanes were restored in six days or less

### Hurricane Restoration Performance

