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April 28, 2025

-VIA ELECTRONIC FILING-

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

RE: Docket No. 20250056-EQ
FPL's Response to Staff's First Data Request

Dear Mr. Teitzman:

Attached is Florida Power & Light Company's response to Staff's First Data Request (Nos. 1-3) in Docket No. 20250056-EQ.

Please contact me should you or your staff have any questions regarding this filing.

Sincerely,

/s/ *Joel T. Baker*
Joel T. Baker
Fla. Bar No. 0108202

JTB
Enclosure

Cc: Orlando Wooten, PSC Staff, Division of Engineering
Phillip Ellis, PSC Staff, Division of Engineering
discovery-gcl@psc.state.fl.us

QUESTION:
Verify if FPL's avoided unit was determined to be needed to meet FPL's reliability criteria using FPL's proposed Stochastic Loss of Load Probability methodology. As part of your response, provide the amount of planning and generation-only reserve margins (in megawatts and percent peak demand) with and without the proposed 2032 combustion turbines.

RESPONSE:
The 2032 combustion turbine (CT) unit provides firm capacity intended to satisfy each of FPL's reliability criteria, including LOLP as calculated using the stochastic LOLP methodology. The planned 2032 CT will provide capacity for anticipated long-term load growth and help achieve all of FPL's reliability criteria over the long term.

FPL's standard reserve margin calculations for 2032-2034, with and without the 2032 CT, are presented below.

	With 2032 CT				**Without 2032 CT**			
	Standard Reserve Margin (MW)	Standard Reserve Margin (%)	Generation-Only Reserve Margin (MW)	Generation-Only Reserve Margin (%)	Standard Reserve Margin (MW)	Standard Reserve Margin (%)	Generation-Only Reserve Margin (MW)	Generation-Only Reserve Margin (%)
2032	7,282	25.4	5,121	16.6	6,813	23.8	4,652	15.1
2033	7,404	25.5	5,215	16.7	6,935	23.9	4,746	15.2
2034	7,396	25.1	5,179	16.3	6,927	23.5	4,710	14.9

QUESTION:
Please complete the following table describing payments to a renewable provider based on the proposed tariffs included in the Utility's revised standard offer contract for each of the five scenarios listed below. For the calculations, assume a renewable generator with a 50 MW output providing firm capacity with an in-service date of January 1, 2026, operating at the minimum capacity factor required for full capacity payments and a contract duration of 20 years. As part of your response, state the capacity factor assumed for the calculations. Please calculate the total Net Present Value (NPV) of all payments in 2026 dollars, and also provide an explanation of the method and rate used to calculate the NPV.

- As-available energy (energy only payments)
- Normal capacity payments
- Levelized payments
- Early payments
- Early levelized payments

Year	Energy (MWh)	Capacity Rate ($/kw-mo)	Total Capacity Payments ($)	Energy Rate ($/MWh)	Total Energy Payments ($)	Total Payments ($)

RESPONSE:
Please see Attachment 1 to this request. Capacity payments were calculated based on Rule 25-17.250, F.A.C., which requires a minimum of 10 years from in-service date from the avoided unit up to the maximum of the life of the avoided unit. The payments for years 2043-2045 show same capacity payment rates as year 2042.

2032 CT Avoided Unit

Committed Capacity (MW)	50
Capacity Factor (%)	94%
Payment Type:	**Energy Only**

Calendar Year	Energy	Capacity Rates	Total Capacity Payments	Energy Rates	Total Energy Payments	Total Payments
Jan. 1 - Dec. 31,	*(MWh)*	*($/kW-mo)*	*($)*	*($/MWh)*	*($)*	*($)*
2026	411,720	-	-	26.32	10,834,745	10,834,745
2027	411,720	-	-	30.61	12,603,167	12,603,167
2028	412,848	-	-	28.91	11,935,931	11,935,931
2029	411,720	-	-	42.20	17,376,498	17,376,498
2030	411,720	-	-	31.63	13,022,277	13,022,277
2031	411,720	-	-	42.08	17,324,133	17,324,133
2032	412,848	-	-	44.37	18,319,485	18,319,485
2033	411,720	-	-	38.06	15,670,498	15,670,498
2034	411,720	-	-	20.40	8,400,807	8,400,807
2035	411,720	-	-	47.26	19,459,625	19,459,625
2036	412,848	-	-	29.54	12,194,714	12,194,714
2037	411,720	-	-	35.79	14,736,353	14,736,353
2038	411,720	-	-	22.52	9,271,019	9,271,019
2039	411,720	-	-	49.32	20,304,551	20,304,551
2040	412,848	-	-	45.53	18,797,865	18,797,865
2041	411,720	-	-	43.91	18,078,725	18,078,725
2042	411,720	-	-	27.32	11,246,763	11,246,763
2043	411,720	-	-	63.09	25,975,127	25,975,127
2044	412,848	-	-	67.69	27,945,715	27,945,715
2045	411,720	-	-	49.44	20,353,991	20,353,991
Total	8,240,040				323,851,987	323,851,987
Total NPV @ 8.15% Discount Rate					**$146,419,899**	**$146,419,899**

Committed Capacity (MW)	50
Capacity Factor (%)	94%
Payment Type:	**Normal**

Calendar Year *(Jan. 1 - Dec. 31)*	Energy *(MWh)*	Capacity Rates *($/kW-mo)*	Total Capacity Payments *($)*	Energy Rates *($/MWh)*	Total Energy Payments *($)*	Total Payments *($)*
2026	411,720	-	-	26.32	10,834,745	10,834,745
2027	411,720	-	-	30.61	12,603,167	12,603,167
2028	412,848	-	-	28.91	11,935,931	11,935,931
2029	411,720	-	-	42.20	17,376,498	17,376,498
2030	411,720	-	-	31.63	13,022,277	13,022,277
2031	411,720	-	-	42.08	17,324,133	17,324,133
2032	412,848	9.75	3,413,724	44.37	18,319,485	21,733,209
2033	411,720	9.95	5,921,948	38.06	15,670,498	21,592,446
2034	411,720	10.16	6,043,126	20.40	8,400,807	14,443,933
2035	411,720	10.36	6,166,796	47.26	19,459,625	25,626,421
2036	412,848	10.58	6,293,010	29.54	12,194,714	18,487,724
2037	411,720	10.79	6,421,820	35.79	14,736,353	21,158,173
2038	411,720	11.01	6,553,280	22.52	9,271,019	15,824,298
2039	411,720	11.24	6,687,445	49.32	20,304,551	26,991,995
2040	412,848	11.47	6,824,370	45.53	18,797,865	25,622,235
2041	411,720	11.70	6,964,114	43.91	18,078,725	25,042,838
2042	411,720	11.94	7,106,733	27.32	11,246,763	18,353,496
2043	411,720	12.19	7,252,289	63.09	25,975,127	33,227,416
2044	412,848	12.44	7,400,841	67.69	27,945,715	35,346,556
2045	411,720	12.69	3,173,400	49.44	20,353,991	23,527,391
Total	8,240,040		86,222,895		323,851,987	410,074,883
Total NPV @ 8.15% Discount Rate					**146,419,899**	**177,198,777**

Note:

Avoided Unit-based capacity and energy rates begin on June 1st (the in-service day of the avoided unit) of each year and continue for 12 months. In the table above total capacity payments in each calendar year are determined with the prior year's rate for January through May and the current year's rate for June through December.

2032 CT Avoided Unit

Committed Capacity (MW)	50
Capacity Factor (%)	94%
Payment Type:	**Early**

Calendar Year *(Jan. 1 - Dec. 31)*	Energy *(MWh)*	Capacity Rates *($/kW-mo)*	Total Capacity Payments *($)*	Energy Rates *($/MWh)*	Total Energy Payments *($)*	Total Payments *($)*
2026	411,720	-	-	26.32	10,834,745	10,834,745
2027	411,720	-	-	30.61	12,603,167	12,603,167
2028	412,848	5.64	1,975,374	28.91	11,935,931	13,911,304
2029	411,720	5.76	3,426,774	42.20	17,376,498	20,803,271
2030	411,720	5.88	3,496,890	31.63	13,022,277	16,519,167
2031	411,720	6.00	3,568,441	42.08	17,324,133	20,892,574
2032	412,848	6.12	3,641,456	44.37	18,319,485	21,960,942
2033	411,720	6.25	3,715,965	38.06	15,670,498	19,386,464
2034	411,720	6.37	3,791,999	20.40	8,400,807	12,192,806
2035	411,720	6.50	3,869,588	47.26	19,459,625	23,329,213
2036	412,848	6.64	3,948,765	29.54	12,194,714	16,143,479
2037	411,720	6.77	4,029,562	35.79	14,736,353	18,765,915
2038	411,720	6.91	4,112,013	22.52	9,271,019	13,383,031
2039	411,720	7.05	4,196,150	49.32	20,304,551	24,500,700
2040	412,848	7.20	4,282,009	45.53	18,797,865	23,079,874
2041	411,720	7.34	4,369,624	43.91	18,078,725	22,448,349
2042	411,720	7.49	4,459,033	27.32	11,246,763	15,705,796
2043	411,720	7.49	4,495,083	63.09	25,975,127	30,470,211
2044	412,848	7.49	4,494,000	67.69	27,945,715	32,439,715
2045	411,720	7.49	1,872,500	49.44	20,353,991	22,226,491
Total	8,240,040		67,745,226		323,851,987	391,597,214
Total NPV @ 8.15% Discount Rate					**146,419,899**	**175,187,164**

Note:

Avoided Unit-based capacity and energy rates begin on June 1st (the in-service day of the avoided unit) of each year and continue for 12 months. In the table above total capacity payments in each calendar year are determined with the prior year's rate for January through May and the current year's rate for June through December.

2032 CT Avoided Unit

Committed Capacity (MW)	50
Capacity Factor (%)	94%
Payment Type:	**Levelized**

Calendar Year *(Jan. 1 - Dec. 31)*	Energy *(MWh)*	Capacity Rates *($/kW-mo)*	Total Capacity Payments *($)*	Energy Rates *($/MWh)*	Total Energy Payments *($)*	Total Payments *($)*
2026	411,720	-	-	26.32	10,834,745	10,834,745
2027	411,720	-	-	30.61	12,603,167	12,603,167
2028	412,848	-	-	28.91	11,935,931	11,935,931
2029	411,720	-	-	42.20	17,376,498	17,376,498
2030	411,720	-	-	31.63	13,022,277	13,022,277
2031	411,720	-	-	42.08	17,324,133	17,324,133
2032	412,848	10.56	3,697,517	44.37	18,319,485	22,017,002
2033	411,720	10.56	6,338,600	38.06	15,670,498	22,009,098
2034	411,720	10.56	6,338,600	20.40	8,400,807	14,739,407
2035	411,720	10.56	6,338,600	47.26	19,459,625	25,798,225
2036	412,848	10.56	6,338,600	29.54	12,194,714	18,533,314
2037	411,720	10.56	6,338,600	35.79	14,736,353	21,074,953
2038	411,720	10.56	6,338,600	22.52	9,271,019	15,609,618
2039	411,720	10.56	6,338,600	49.32	20,304,551	26,643,150
2040	412,848	10.56	6,338,600	45.53	18,797,865	25,136,465
2041	411,720	10.56	6,338,600	43.91	18,078,725	24,417,324
2042	411,720	10.56	6,338,600	27.32	11,246,763	17,585,363
2043	411,720	10.56	6,338,600	63.09	25,975,127	32,313,727
2044	412,848	10.56	6,338,600	67.69	27,945,715	34,284,315
2045	411,720	10.56	2,641,083	49.44	20,353,991	22,995,075
Total	8,240,040		82,401,799		323,851,987	406,253,786
Total NPV @ 8.15% Discount Rate					**146,419,899**	**176,497,445**

Note:

Avoided Unit-based capacity and energy rates begin on June 1st (the in-service day of the avoided unit) of each year and continue for 12 months. In the table above total capacity payments in each calendar year are determined with the prior year's rate for January through May and the current year's rate for June through December.

2032 CT Avoided Unit

Committed Capacity (MW)	50
Capacity Factor (%)	94%
Payment Type:	**Early Levelized**

Calendar Year	Energy	Capacity Rates	Total Capacity Payments	Energy Rates	Total Energy Payments	Total Payments
(Jan. 1 - Dec. 31)	*(MWh)*	*($/kW-mo)*	*($)*	*($/MWh)*	*($)*	*($)*
2026	411,720	-	-	26.32	10,834,745	10,834,745
2027	411,720	-	-	30.61	12,603,167	12,603,167
2028	412,848	6.30	2,204,063	28.91	11,935,931	14,139,994
2029	411,720	6.30	3,778,394	42.20	17,376,498	21,154,891
2030	411,720	6.30	3,778,394	31.63	13,022,277	16,800,670
2031	411,720	6.30	3,778,394	42.08	17,324,133	21,102,527
2032	412,848	6.30	3,778,394	44.37	18,319,485	22,097,879
2033	411,720	6.30	3,778,394	38.06	15,670,498	19,448,892
2034	411,720	6.30	3,778,394	20.40	8,400,807	12,179,201
2035	411,720	6.30	3,778,394	47.26	19,459,625	23,238,019
2036	412,848	6.30	3,778,394	29.54	12,194,714	15,973,108
2037	411,720	6.30	3,778,394	35.79	14,736,353	18,514,747
2038	411,720	6.30	3,778,394	22.52	9,271,019	13,049,412
2039	411,720	6.30	3,778,394	49.32	20,304,551	24,082,944
2040	412,848	6.30	3,778,394	45.53	18,797,865	22,576,259
2041	411,720	6.30	3,778,394	43.91	18,078,725	21,857,118
2042	411,720	6.30	3,778,394	27.32	11,246,763	15,025,157
2043	411,720	6.30	3,778,394	63.09	25,975,127	29,753,521
2044	412,848	6.30	3,778,394	67.69	27,945,715	31,724,109
2045	411,720	6.30	1,574,331	49.44	20,353,991	21,928,322
Total	8,240,040		64,232,696		323,851,987	388,084,683
Total NPV @ 8.15% Discount Rate					**146,419,899**	**174,677,923**

Note:

Avoided Unit-based capacity and energy rates begin on June 1st (the in-service day of the avoided unit) of each year and continue for 12 months. In the table above total capacity payments in each calendar year are determined with the prior year's rate for January through May and the current year's rate for June through December.

QUESTION:
Please identify what FPL's next avoidable fossil generating unit would be using the planning reserve margin and probabilistic LOLP methodologies contained in the 2024 Ten-Year Site Planning process with updated forecasts for 2025.

a. Please provide information like that included in FPL's Ten-Year Site Plan Schedules 7.1, 7.2, 8 and 9 used to determine the avoided unit identified above.

b. Provide a version of Attachments D and E based on the avoided unit identified above.

c. Please complete the following table describing payments to a renewable provider based on the avoided unit identified above if it for each of the five scenarios listed below. For the calculations, assume a renewable generator with a 50 MW output providing firm capacity with an in-service date of January 1, 2026, operating at the minimum capacity factor required for full capacity payments and a contract duration of 20 years. As part of your response, state the capacity factor assumed for the calculations. Please calculate the total NPV of all payments in 2026 dollars, and also provide an explanation of the method and rate used to calculate the NPV.

- As-available energy (energy only payments)
- Normal capacity payments
- Levelized payments
- Early payments
- Early levelized payments

Year	Energy (MWh)	Capacity Rate ($/kw-mo)	Total Capacity Payments ($)	Energy Rate ($/MWh)	Total Energy Payments ($)	Total Payments ($)
2026						
2027						
2028						
2029						
2030						
2031						
2032						
2033						
2034						
2035						
2036						
2037						
2038						
2039						

2040						
2041						
2042						
2043						
2044						
2045						
Total (Nominal)						
Total (NPV)						

RESPONSE:

a.-c. FPL's avoided unit would remain the same regardless of whether LOLP is calculated through the stochastic or probabilistic methodologies in conjunction with the standard reserve margin criterion. The planned 2032 CT is intended to provide capacity for anticipated load growth and help achieve all of FPL's reliability criteria over the long-term.