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December 19, 2025

-VIA ELECTRONIC DELIVERY-

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. 20240149-EI
Petition for limited proceeding for recovery of incremental storm restoration costs
related to Hurricanes Debby, Helene, and Milton, by Florida Power & Light
Company

Dear Mr. Teitzman:

Attached for electronic filing in the above docket is Florida Power & Light Company's ("FPL") Petition for Approval of the Actual Incremental Storm Restoration Costs Associated with Hurricanes Debby, Helene, and Milton and Associated True-Up Process. The accompanying prepared testimony and exhibits of FPL witnesses Michael Jarro, Amin Mohomed, Amber De Lucenay, and Edward J. Anderson will be filed under separate cover.

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

Sincerely,

/s/ Joel T. Baker

Joel T. Baker
Fla. Bar No. 0108202

cc: Counsel for Parties of Record

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for limited proceeding for recovery
of incremental storm restoration costs related to
Hurricanes Debby, Helene, and Milton, by Florida
Power & Light Company

Docket No. 20240149-EI

Filed: December 19, 2025

**PETITION OF FLORIDA POWER & LIGHT COMPANY FOR APPROVAL
OF THE ACTUAL INCREMENTAL STORM RESTORATION COSTS
ASSOCIATED WITH HURRICANES DEBBY, HELENE, AND MILTON
AND ASSOCIATED TRUE-UP PROCESS**

Florida Power & Light Company (“FPL” or the “Company”), pursuant to Section 366.076(1), Florida Statutes, Rules 25-6.0143 and 25-6.0431, Florida Administrative Code (“F.A.C.”), and the Stipulation and Settlement approved by the Florida Public Service Commission (“Commission”) in Order No. PSC-2024-0078-FOF-EI¹ (the “2021 Settlement”), respectfully requests the Commission: (i) find the actual retail incremental storm restoration costs of \$88.3 million associated with Hurricane Debby were reasonable and prudent; (ii) find the actual retail incremental storm restoration costs of \$167.6 million associated with Hurricane Helene were reasonable and prudent; (iii) find the actual retail incremental storm restoration costs of \$774.4 million associated with Hurricane Milton were reasonable and prudent; (iv) find that the final total amount to be recovered through the Interim Storm Restoration Recovery Charge (“Interim Storm Charge”) is \$1.13 billion (the “Recoverable Storm Amount”); and (v) approve the process for refunding any over-recovery or collecting any under-recovery of the Recoverable Storm Amount through the Interim Storm Charge. In support, FPL states:

¹ Order No. PSC-2024-0078-FOF-EI supplements Order No. PSC-2021-0446-S-EI, as amended by Order No. PSC-2021-0446A-S-EI.

I. INTRODUCTION

1. The name and address of the Petitioner is:

Florida Power & Light Company
700 Universe Boulevard
Juno Beach, Florida 33408

2. Any pleading, motion, notice, order, or other document required to be served upon

FPL or filed by any party to this proceeding should be served upon the following individual(s):

Christopher T. Wright
Assistant General Counsel
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3. FPL is a corporation organized and existing under the laws of the State of Florida and is an electric utility as defined in Section 366.02(4), Florida Statutes.

4. The Commission has jurisdiction pursuant to Sections 366.04, 366.05, 366.06, and 366.076, Florida Statutes, and Rules 25-6.0143 and 25-6.0431, F.A.C.

5. This Petition is being filed consistent with Rule 28-106.201, F.A.C. The agency affected is the Commission, located at 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399. This case does not involve reversal or modification of an agency or an agency's proposed action. Therefore, subparagraph (c) and portions of subparagraphs (b), (e), (f) and (g) of subsection (2) of that rule are not applicable to this Petition. In compliance with subparagraph (d), FPL states that it is not aware at this time whether there will be any disputed issues of material fact in this proceeding. The discussion below demonstrates how the Petitioner's substantial interests will be affected by the agency determination.

II. BACKGROUND AND OVERVIEW

6. On October 29, 2024, FPL filed a petition in the above-captioned docket for approval to implement the Interim Storm Charge. As set forth therein, FPL proposed an Interim Storm Charge to recover an initial estimate of \$1.2 billion for the incremental storm restoration costs related to Hurricanes Debby, Helene, and Milton and to replenish the Company's storm reserve.

7. Paragraphs 7 through 31 of FPL's October 29, 2024 Petition describe: the impacts of Hurricanes Debby, Helene, and Milton; FPL's restoration efforts and processes in response to Hurricanes Debby, Helene, and Milton; the preliminary estimate of the storm restoration costs associated with Hurricanes Debby, Helene, and Milton; and the calculation of the Interim Storm Charge. Paragraphs 7 through 31 of the October 29, 2024 Petition are incorporated by reference as though fully set forth herein.

8. On December 17, 2024, the Commission issued Order No. PSC-2024-0503-PCO-EI approving the Interim Storm Charge to recover the estimated \$1.2 billion of combined incremental storm restoration costs and to replenish the storm reserve. The Interim Storm Charge was approved for the 12-month recovery period of January 2025 through December 2025, subject to true-up once the final total actual storm costs are known.

9. FPL and the Office of Public Counsel ("OPC") reached a set of joint stipulations whereby FPL would engage an outside independent auditor to audit the storm restoration costs associated with Hurricane Milton, similar to the review performed for the Hurricane Ian storm costs as prescribed by Section 18 of the Stipulation and Settlement of FPL's Hurricane Irma storm restoration costs approved by Commission Order No. PSC-2019-0319-S-EI in Docket No.

20180049-EI (“Irma Settlement”).² Given that FPL used the same internal protocols and procedures to review and process the storm restoration efforts and invoices associated with Hurricanes Debby, Helene, and Milton and given that Hurricane Milton had a significantly greater impact on FPL’s system, OPC and FPL jointly agreed that the independent review of the storm restoration costs associated with Hurricane Milton was a reasonable and prudent approach to evaluate the storm restoration process and procedures used by FPL for all three hurricanes and determine whether the appropriate processes and controls were in place for compliance with the Incremental Cost and Capitalization Approach (“ICCA”) methodology prescribed in Rule 25-6.0143, F.A.C. Prior to filing the joint stipulations in this docket, FPL and OPC consulted with Commission Staff, which concurred with this approach subject to further review and evaluation of the findings and recommendations from the outside independent auditor’s review of the storm restoration costs.

10. Consistent with the joint stipulation submitted by FPL and OPC, FPL engaged the outside independent audit firm to perform the agreed-upon review of the processes, procedures, and invoices associated with the storm restoration costs incurred for Hurricane Milton. A copy of the October 10, 2025 Engagement Letter is provided as Exhibit AM-5 attached to the direct testimony of FPL witness Amin Mohomed. Upon completion of the examination, the outside independent auditor issued its attestation report on December 10, 2025 (“Attestation Report”), with no adverse findings or recommendations regarding the accuracy of the incremental storm restoration costs associated with Hurricane Milton. A copy of the Attestation Report is provided as Exhibit AM-6 attached to the direct testimony of FPL witness Mohomed.

² The joint stipulations were originally filed in this docket on August 13, 2025, and later amended on October 20, 2025 to reflect Deloitte & Touche LLP as the outside independent audit firm to perform the review. [DN 14694-2025]

11. In approving the Interim Storm Charge, the Commission ordered that the above-captioned docket should remain open and, “[o]nce the total actual storm costs are known, FPL shall be required to file documentation of the storm costs for our review and true-up of any excess or shortfall.” *See* Commission Order No. PSC-2024-0503-PCO-EI, p. 2. Consistent therewith, FPL seeks approval of: (i) the actual incremental storm restoration costs associated with Hurricanes Debby, Helene, and Milton; (ii) the final total Recoverable Storm Amount; and (iii) the process to true-up any excess or shortfall of the Recoverable Storm Amount recovered through the Interim Storm Charge.

12. Submitted herewith in support of the final actual incremental storm restoration costs and proposed true-up process are the direct testimonies and exhibits of FPL witnesses Michael Jarro, Amin Mohomed, Amber De Lucenay, and Edward J. Anderson.

III. RECOVERABLE STORM AMOUNT AND FPL’S STORM ACCOUNTING PROCESSES AND CONTROLS

13. FPL appropriately committed resources to the restoration effort and thereafter performed a thorough review in determining the incremental restoration costs incurred to respond to Hurricanes Debby, Helene, and Milton. FPL’s internal review and processing of storm restoration costs associated with the storms were done consistently with the Company’s obligations under the Irma Settlement,³ and FPL’s calculation of the Hurricane Milton costs was analyzed and affirmed through an examination by an independent auditor.

14. The direct testimony and supporting exhibits of FPL witness Jarro explain FPL’s emergency preparedness plan and restoration process, and support the reasonableness and

³ In Order No. PSC-2024-0227-S-EI issued July 8, 2024, in Docket No. 20230017-EI, the Commission approved stipulations between FPL and OPC regarding the incremental storm restoration costs associated with Hurricanes Ian and Nicole, which provided, among other things, that “FPL will continue to implement and update the process provisions set forth in Sections 5 through 17 of the [Irma Settlement].”

prudence of FPL's storm restoration activities and costs associated with Hurricanes Debby, Helene, and Milton. FPL witness Jarro provides details regarding FPL's preparations, response and restoration efforts, follow-up work activities necessary to restore FPL's facilities to their pre-storm condition, and the storm restoration costs associated with Hurricanes Debby, Helene, and Milton. FPL witness Jarro also discusses FPL's overall performance in restoring service to the customers that experienced an outage due to Hurricanes Debby, Helene, and Milton.

15. FPL witness De Lucenay explains FPL's process of reviewing, approving, and, where applicable, adjusting line and vegetation contractor invoices associated with Hurricanes Debby, Helene, and Milton. FPL witness De Lucenay describes the responsibilities and activities of the cost finalization team and details the full scope of FPL's invoice review process, including individual invoice review to ensure that invoices were paid in conformance with contractor-specific contract terms. FPL witness De Lucenay also describes FPL's compliance with applicable provisions of the Irma Settlement, including FPL's use of the StormForce Application for recording and approving or rejecting contractor costs.⁴ FPL witness De Lucenay's testimony demonstrates that FPL followed detailed, deliberate, and comprehensive processes and controls to review contractor invoices associated with Hurricanes Debby, Helene, and Milton in accordance with the Irma Settlement.

16. FPL witness Mohomed calculates and sponsors the final actual Recoverable Storm Amount and demonstrates it is consistent with the ICCA methodology prescribed in Rule 25-6.0143, F.A.C. FPL witness Mohomed also describes the engagement of and results from the

⁴ Each contractor's flat file is an extract from the StormForce App that contains the electronic timesheet and expense information for line and vegetation contractors. Each flat file contains detailed information for that contractor, including crew information and daily timesheets, crew expenses where applicable, approvals by responsible employees, documentation of exceptions, and, where appropriate, adjustments to vendor invoices. This information is used by the cost finalization team to review, adjust, and approve the final payment to the contractor.

independent outside auditor's attestation of FPL's Hurricane Milton storm restoration costs. As detailed in FPL witness Mohomed's testimony and supporting exhibits, FPL's actual Recoverable Storm Amount totals \$1.13 billion, which includes: (1) \$88.3 million of incremental storm restoration costs associated with Hurricane Debby; (2) \$167.6 million of incremental storm restoration costs associated with Hurricane Helene; (3) \$774.4 million of incremental storm restoration costs associated with Hurricane Milton; (4) \$19.0 million of accrued interest on the unrecovered storm costs for the period January 2025 through November 2025; and (5) \$150 million to replenish the storm reserve as allowed under paragraph 10 of the 2021 Settlement.⁵ FPL witness Mohomed's testimony demonstrates that FPL's control processes ensure proper storm accounting and ratemaking, and that the actual Recoverable Storm Amount was calculated in accordance with the ICCA methodology, the Irma Settlement, and the 2021 Settlement.

17. Together, FPL witnesses Jarro, De Lucenay, and Mohomed demonstrate that the Company's actions and activities before, during, and after Hurricanes Debby, Helene, and Milton were prudent and consistent with "what a reasonable utility manager would do in light of the conditions and circumstances which he knew or reasonably should have known at the time the decision was made." *In Re Fuel & Purchased Power Cost Recovery Clause*, Docket No. 080001-EI, Order No. PSC-2009-0024-FOF-EI, 2009 WL 692572 (FPSC Jan. 7, 2009). The collective testimony and exhibits further demonstrate the reasonableness of the storm restoration costs, processes, and controls associated with FPL's actual Recoverable Storm Amount for Hurricanes Debby, Helene and Milton, as well as compliance with the Irma Settlement and Rule 25-6.0143, F.A.C.

⁵ See Exhibit AM-4 attached to the direct testimony of FPL witness Mohomed.

IV. DETERMINATION AND IMPLEMENTATION OF TRUE-UP

18. FPL witness Anderson explains FPL's process to true-up any excess or shortfall of the Recoverable Storm Amount recovered through the Interim Storm Charge.

19. The Commission-approved Interim Storm Charge is subject to true-up once the final total actual storm costs are known. *See* Commission Order No. PSC-2024-0503-PCO-EI, p. 3.

20. As explained by FPL witness Anderson, FPL will file a supplemental exhibit on or before February 13, 2026, that provides the final total revenues collected under the Interim Storm Charge, which was effective for the period of January through December 2025.

21. Once the Commission has made its final determination of the final actual Recoverable Storm Amount in this proceeding, FPL will compare that approved amount to the final total revenues collected under the Interim Storm Charge and determine any excess or shortfall in recovery. Consistent with Rule 25-6.109, F.A.C., interest will be applied to any excess or shortfall at the 30-day commercial paper rate.

22. Thereafter, FPL will make a compliance filing with the Commission that sets forth the calculation of the appropriate true-up of the final total revenues collected through the Interim Storm Charge. The true-up rates will be designed in a manner that is consistent with the cost allocation used in the original Interim Storm Charge rates filed and approved in this docket.

23. Consistent with that compliance filing, FPL will apply the true-up through the non-fuel energy charge on customers' bills starting on Cycle Day 1 of the first month that is more than thirty days after Commission approval. FPL submits that it is appropriate to promptly implement that true-up to minimize the interest accrued on any excess or shortfall.

24. FPL will provide customers with notice of the true-up through a bill message in customers' monthly bills issued at least 30 days in advance of the true-up, as well as provide information on FPL's website.

WHEREFORE, FPL respectfully requests that the Commission:

- (a) Find the actual retail incremental storm restoration costs of \$88.3 million associated with Hurricane Debby was reasonable and prudent;
- (b) Find the actual retail incremental storm restoration costs of \$167.6 million associated with Hurricane Helene was reasonable and prudent;
- (c) Find the actual retail incremental storm restoration costs of \$774.4 million associated with Hurricane Milton was reasonable and prudent;
- (d) Find that \$1.13 billion is the final total Recoverable Storm Amount to be recovered through the Interim Storm Charge, including the replenishment of the storm reserve;
- (e) Find that FPL's Recoverable Storm Amount was calculated in compliance with the ICCA methodology required by Rule 25-6.0143, Florida Administrative Code;
- (f) Approve the Company's proposed process for determining and applying a true-up of the actual revenues collected under the Interim Storm Charge;
- (g) Authorize the Commission Staff to review and verify the final true-up rates contained in FPL's proposed compliance filing; and
- (h) Grant such other relief the Commission deems appropriate and necessary for this docket.

Respectfully submitted this 19th day of December 2025.

By: s/Joel T. Baker

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Counsel for Florida Power & Light Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copies of the foregoing have been furnished by Electronic Mail to the following parties of record this 19th day of December 2025:

Jennifer Crawford Suzanne Brownless Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399 jcrawfor@psc.state.fl.us sbrownle@psc.state.fl.us <i>For Commission Staff</i>	Walt Trierweiler Charles J. Rehwinkel Mary A. Wessling c/o The Florida Legislature 111 West Madison Street, Room 812 Tallahassee, FL 32399-1400 Trierweiler.walt@leg.state.fl.us rehwinkel.charles@leg.state.fl.us wessling.mary@leg.state.fl.us <i>For Office of Public Counsel</i>
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s/ Joel T. Baker

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