



Joel T. Baker
Senior Attorney
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408
(561) 691-7255
Joel.baker@fpl.com

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 the prepared testimony and exhibits of Florida Power & Light Company ("FPL") witness Michael Jarro. This testimony is submitted in support of FPL's Petition for Approval of the Actual Incremental Storm Restoration Costs Associated with Hurricanes Debby, Helene, and Milton and Associated True-Up Process.

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

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 jcrowfor@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

Joel T. Baker
Fla. Bar No. 0108202

Attorney for Florida Power & Light Company

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
FLORIDA POWER & LIGHT COMPANY
DIRECT TESTIMONY OF MICHAEL JARRO
DOCKET NO. 20240149-EI
DECEMBER 19, 2025

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1 **I. INTRODUCTION**

2 **Q. Please state your name and business address.**

3 A. My name is Michael Jarro. My business address is Florida Power & Light Company,
4 15430 Endeavor Drive, Jupiter, Florida 33478.

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 Vice
7 President of Power Delivery.

8 **Q. Please describe your duties and responsibilities in that position.**

9 A. As Vice President of Power Delivery, I am responsible for the planning, engineering,
10 construction, operation, maintenance, and restoration of FPL's transmission and
11 distribution ("T&D") electric grid. This includes the systems, processes, analyses, and
12 standards utilized to ensure FPL's T&D facilities are safe, reliable, secure, effectively
13 managed and in compliance with regulatory requirements. FPL's service area is
14 divided into nineteen distribution management areas with approximately 82,000 miles
15 of distribution lines and 1.4 million distribution poles and serves approximately 6
16 million customer accounts representing more than half of our state's population. The
17 functions and operations within my area are quite diverse and include transmission and
18 distribution operations, major projects and construction services, power quality,
19 meteorology, and other operations that together are responsible for providing service
20 to FPL's customers.

21 **Q. Please describe your educational background and professional experience.**

22 A. I graduated from the University of Miami with a Bachelor of Science Degree in
23 Mechanical Engineering and Florida International University with a Master of Business

1 Administration. I joined FPL in 1997 and have held multiple leadership positions in
2 distribution operations and customer service, including serving as distribution
3 reliability manager, manager of distribution operations for the south Miami-Dade area,
4 control center general manager, director of network operations, senior director of
5 customer strategy and analytics, senior director of power delivery central maintenance
6 and construction, vice president of transmission and substations, and vice president of
7 distribution operations.

8

9 I have over 28 years of storm restoration leadership experience, including performing
10 many roles of increasing responsibility during the historic 2004-2005 storm season,
11 serving as distribution incident commander during Tropical Storm Ernesto, and control
12 center general manager during Tropical Storm Bonnie and Hurricane Matthew.
13 Additionally, I helped coordinate FPL's response plans in support of Hurricane Maria,
14 which devastated Puerto Rico, and I have provided storm restoration leadership for
15 recent storms that impacted Florida, including Hurricane Irma, Hurricane Isaias,
16 Hurricane Sally, Hurricane Ian, Hurricane Nicole, Hurricane Idalia, Hurricane Debby,
17 Hurricane Helene, and Hurricane Milton.

18 **Q. Are you sponsoring any exhibits in this case?**

19 A. Yes. I am sponsoring the following exhibits:

- 20 • Exhibit MJ-1 – Hurricane Debby – National Hurricane Center's Forecast Track
- 21 • Exhibit MJ-2 – Hurricane Debby – Satellite View
- 22 • Exhibit MJ-3 – Hurricane Helene – National Hurricane Center's Forecast Track
- 23 • Exhibit MJ-4 – Hurricane Helene – Satellite View

- Exhibit MJ-5 – Hurricane Milton – National Hurricane Center’s Forecast Track
- Exhibit MJ-6 – Hurricane Milton – Satellite View
- Exhibit MJ-7 – FPL’s T&D Hurricane Debby Restoration Costs
- Exhibit MJ-8 – FPL’s T&D Hurricane Helene Restoration Costs
- Exhibit MJ-9 – FPL’s T&D Hurricane Milton Restoration Costs

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to provide an overview of FPL’s emergency preparedness plan and restoration process and support the reasonableness and prudence of FPL’s storm restoration activities and associated costs. I provide details for the work and costs incurred by FPL in connection with Hurricanes Debby, Helene, and Milton. Specifically, I describe FPL’s storm preparations, response and restoration efforts, follow-up work activities necessary to restore FPL’s facilities to their pre-storm condition, and details on the associated storm restoration costs. Finally, I discuss FPL’s overall successful performance in restoring service to those customers that experienced an outage due to Hurricanes Debby, Helene, and Milton.

II. EMERGENCY PREPAREDNESS PLAN & RESTORATION PROCESS

Q. What is the objective of FPL’s emergency preparedness plan and restoration process?

A. The primary objective of FPL’s emergency preparedness plan and restoration process is to safely restore critical infrastructure and to restore power to the greatest number of customers in the least amount of time, allowing customers and communities served by FPL to return to their normal, pre-storm lives and activities as soon as reasonably

1 practicable. Achieving this objective requires extensive planning, training, adherence
2 to established storm restoration processes, and execution that can be promptly scaled to
3 match each storm's particular challenges.

4 **Q. What are the key components of FPL's emergency preparedness plan?**

5 A. FPL's emergency preparedness plan is the product of years of planning, study, and
6 refinement based upon actual experience. Key components of this plan include:

- 7 • Disaster response policies and procedures;
- 8 • Scalable internal organizational structures based on the required response;
- 9 • Planned timelines of activities to ensure rapid notification and response;
- 10 • Mutual assistance agreements and vendor contracts and commitments;
- 11 • Plans and logistics for the staging and movement of resources, personnel,
12 materials, and equipment to areas requiring service restoration;
- 13 • Communication and notification plans for employees, customers, community
14 leaders, emergency operation centers, and regulators;
- 15 • An established centralized command center with an organization for command
16 and control of emergency response resources;
- 17 • Checklists and conference call agendas to organize, plan, and report situational
18 status;
- 19 • Damage assessment modeling and reporting procedures;
- 20 • Field and aerial patrols to assess damage;
- 21 • Comprehensive circuit patrols to gather vital information needed to identify the
22 resources required for effective restoration; and

- 1 • Systems necessary to support outage management processes and customer
2 communications.

3 FPL's plan is comprehensive and well-suited for the purpose of facilitating prompt and
4 effective responses to emergency conditions, such as hurricanes, to restore power safely
5 and as soon as reasonably practicable.

6 **Q. Does FPL update its emergency preparedness plan?**

7 A. Yes. Prior to each annual storm season, FPL reviews its emergency preparedness plan.
8 FPL's emergency preparedness plan includes comprehensive annual restoration process
9 reviews and incorporates lessons learned, new technologies, and extensive training
10 activities to ensure FPL's employees are well prepared. To ensure rapid restoration, the
11 Company's emergency preparedness plan addresses: staffing the storm response
12 organization, preparing logistics support, enhancing customer communication methods,
13 and ensuring that required computer and telecommunication systems are in place. As
14 part of this update process, all business units within FPL identify personnel for staffing
15 the emergency response organization. In many cases, employees assume roles different
16 than their regular responsibilities. Training is conducted for employees each year,
17 regardless of whether they are in a new role or a role in which they have served many
18 times. This includes training on processes that range from clerical to field operations.

19

1 In the logistics support area, preparations include: (1) increasing material inventory; (2)
2 verifying and securing adequate lodging arrangements; (3) securing staging sites;¹ (4)
3 verifying staging site plans; and (5) securing any necessary agreements and contracts
4 for these support services. These activities are essential to ensuring availability and on-
5 time delivery of critical items at a reasonable cost.

6

7 Collectively, these planning and preparation processes provide FPL with the foundation
8 necessary to be ready to successfully begin any restoration effort.

9 **Q. Does FPL regularly test its emergency preparedness plan?**

10 A. Yes. Each year FPL tests its readiness during a hurricane “dry run” exercise. This event
11 simulates a storm (or multiple storms/hurricanes) impacting FPL’s service area. The
12 purpose is to provide a realistic, challenging scenario that causes the organization to
13 react to situations and to practice functions not generally performed during normal
14 operations. It is a full-scale exercise, executed with active participation by employees
15 representing every business unit in the company, as well as with external organizations,
16 local government officials, and media representatives.² After months of preparation, the
17 formal exercise activities begin 96 hours before the forecasted date and time of impact
18 from the mock hurricane. FPL’s Command Center is fully mobilized and staffed. Field
19 patrollers are required to complete simulated damage assessments that are then utilized
20 by office staff to practice updating storm systems, acquiring resources, and developing

¹ Staging sites are temporary work sites opened to serve as operational hubs for Incident Management Teams to plan, coordinate, and execute area restoration plans. Staging sites may provide parking, food, laundry service, medical care and, if necessary, housing for large numbers of external and internal restoration resources.

² FPL regularly invites representatives from the Commission to observe FPL’s dry run.

1 estimated times of restoration. The exercise also includes simulating customer and other
2 external communications, as well as updating the Company's outage management
3 system and other storm-specific applications. This preparatory exercise is conducted as
4 part of FPL's ordinary approach to business and the costs of these activities are not
5 charged to storm costs.

6 **Q. How does FPL respond when a storm threatens its service area?**

7 A. FPL responds by taking well-tested actions at specified intervals prior to the expected
8 impact of a storm. When a storm is developing in the Atlantic Ocean or the Gulf of
9 America, our staff meteorologist continuously monitors conditions and communicates
10 with various departments throughout the Company in initiating preliminary
11 preparations for addressing internal and external resource requirements, logistics
12 needs, and system operation conditions.

13
14 At 96 to 72 hours prior to the projected impact to FPL's system, FPL's activities
15 include: activating the FPL Command Center; alerting all storm personnel; forecasting
16 resource requirements; developing initial restoration plans; activating contingency
17 resources; and identifying available resources from mutual assistance utilities. In
18 addition, all FPL work locations begin to prepare their facilities for the impact of the
19 storm.

20
21 At 72 to 48 hours, computer models are run based on the projected intensity and path
22 of the storm and asset data of the T&D system to forecast expected damage, restoration
23 workload, and potential customer outages. Based on the modeled results, commitments

1 are confirmed for restoration personnel, materials, and logistics support. Staging site
2 locations are then identified and confirmed based on the storm's expected path.
3 Primary communication lines are established for the staging sites and backup
4 communications, including via satellite, are implemented to improve communications
5 efforts. External resources are activated and begin moving toward the FPL service
6 areas that are expected to be impacted by the storm and internal personnel may be
7 moved closer to areas expected to be impacted.

8

9 At 24 hours, the focus turns to pre-positioning personnel and supplies to begin
10 restoration as soon as it is safe to do so. As the path and strength of the storm changes,
11 FPL regularly re-runs the damage model and adjusts its plans accordingly. Also, FPL
12 contacts community leaders and County Emergency Operations Centers ("EOCs") for
13 coordination and to review and reinforce FPL's restoration plans. This outreach
14 includes confirming the assignment of FPL personnel to the County EOCs for the
15 remainder of the storm and identifying restoration personnel to assist with road clearing
16 and search-and-rescue efforts. FPL also has personnel assigned to the State EOC to
17 coordinate support and provide information to State leaders. Throughout the process,
18 FPL also provides critical information (*e.g.*, public safety messages, storm preparation
19 tips, and guidance if an outage occurs) to customers, community leaders, and the media.

20 **Q. Prior to the 2024 storm season, had FPL previously executed its emergency**
21 **preparedness plan and overall restoration process?**

22 A. Yes. FPL had implemented its full-scale emergency preparedness plan and restoration
23 process in response to numerous hurricanes and storms impacting FPL's service area

1 and customers during the previous 2016 through 2023 storm seasons.

2 **Q. Has FPL implemented improvements to its emergency preparedness plans and**
3 **restoration process based on experience from prior storms?**

4 A. Yes. Every restoration event is different, and each event presents opportunities to learn
5 and continue to refine and improve our processes and planning. Consistent with FPL's
6 culture of continuous improvement, FPL implemented several enhancements to its
7 processes based upon the experiences and lessons learned during the prior 2016 through
8 2023 storm seasons. Enhancements adopted and utilized by FPL during the recent
9 hurricane seasons, including during Hurricanes Debby, Helene, and Milton, include,
10 but are not limited to:

- 11 • Expanded the use of sleeper trailers and cot sites, allowing FPL to lodge external
12 crews in areas with limited hoteling options.
- 13 • Equipped FPL's emergency response equipment, specifically its mobile office
14 containers ("cFORTS") and mobile command centers ("MCC"), with Starlink
15 satellite internet connections that enabled FPL's use of 10 terabytes of data
16 during the 2024 hurricane season.³ After a successful pilot of Starlink devices
17 during Hurricane Ian, deployment was expanded to outfit more equipment,
18 which improved connectivity, including in remote areas or while
19 communication networks were impacted.
- 20 • Prior to storm season, FPL performed an enhanced review to identify customer-
21 owned vaults with increased exposure to potential storm surge or flooding. Prior

³ cForts and MCCs allow FPL to position resources within miles of the hardest hit areas – expediting damage assessment and incident command.

1 to each of the hurricane landfalls, FPL worked with property owners to help
2 them better secure vault doors for improved fortification of electrical equipment
3 housed in the vaults.

- 4 • Implemented “wash trucks” to address post-landfall salt contamination
5 challenges on the transmission and distribution systems. The wash trucks were
6 particularly instrumental in responding to Hurricane Milton, which pushed dry
7 air combined with aerosolized salt from the ocean to create a conductive film
8 across insulators. The wash trucks helped to mitigate the increased potential
9 for line trips, outages, and reclosing failures due to this conductive film.
- 10 • Performed inspection and cleaning of pad-mounted transformers in areas
11 impacted by storm surge to clear contaminants such as salt and sand. Without
12 clearing these contaminants, flashes and faults (outages) may occur days or
13 weeks following energization.

14 These enhancements are examples of FPL’s culture of continuous improvement in storm
15 preparation and response.

16 **Q. How does FPL ensure the emergency preparedness plan and restoration process**
17 **are consistently followed?**

18 A. FPL has standardized many core field operations, including work-site organization,
19 work preparation and prioritization, and damage assessment. For external crew
20 personnel, FPL provides an orientation that includes safety rules, work practices, and
21 engineering standards. Additionally, procedures to ensure rapid preparation and
22 mobilization of remote staging sites have been developed to allow FPL to establish
23 these sites in the most heavily damaged areas.

1

2 Storm restoration plans are documented in a variety of media including manuals, on-
3 line procedures, checklists, job aids, process maps, and detailed instructions. System
4 data is continually monitored and analyzed throughout the storm. FPL conducts
5 multiple daily conference calls, utilizing structured checklists and agendas, with FPL
6 Command Center leadership and all FPL business units to confirm process discipline,
7 discuss overall progress, and identify issues to be resolved. Conference calls are also
8 held twice a day with all field restoration and logistics locations to ensure critical
9 activities are performed as planned and timely communications occur at all levels
10 throughout the organization. Also, each organization within FPL conducts its own
11 daily conference call(s) to ensure plans are executed appropriately and issues are being
12 quickly identified and resolved. Overall monitoring and performance management of
13 field operations are performed through the FPL Command Center. In addition, FPL
14 Command Center personnel routinely conduct field visits once restoration has begun
15 to validate restoration process discipline and application, assess progress at remote
16 work sites, and identify any adjustments that may be required.

17 **Q. How does FPL assess its workload requirements?**

18 A. There are a variety of factors that impact restoration workload. Historical responses to
19 similar events, team experiences with both on-system and off-system events, and the
20 framework of the emergency preparedness plan are all utilized to determine preliminary
21 workload requirements. In each storm, FPL utilizes its storm damage model to forecast
22 system damage and hours of work required to restore service. These forecasts are based
23 on the location and status/condition of FPL facilities, the weather forecast associated

1 with the storm's projected path, and the effects of varying wind strengths on the electric
2 infrastructure. As the storm conditions change, the damage model is updated. The
3 workload projections are matched with resource factors, such as availability and
4 location, and FPL's capacity to efficiently and safely manage and support available
5 resources. As soon as the storm passes, certain employees are tasked with determining
6 and assessing the damage. Additionally, FPL utilizes damage assessments obtained
7 through aerial and field patrols and customer outage information contained in FPL's
8 outage management system.

9 **Q. How does FPL begin to acquire resources?**

10 A. Normally, 96 to 72 hours prior to the expected storm impact, FPL begins to contact
11 selected contractors to assess their availability. Additionally, as a member of the
12 Southeastern Electric Exchange ("SEE") and Edison Electric Institute ("EEI"), FPL
13 begins to utilize formalized industry processes to request mutual assistance resources.
14 At 72 to 48 hours, depending on the storm track certainty and forecasted intensity, FPL
15 may begin to financially commit to acquire necessary resources and request they
16 initiate travel to and within Florida. Resource needs are continually reviewed and
17 adjusted, if necessary, based on changes in the storm's path, intensity, and
18 corresponding damage model results.

19 **Q. Please provide details on how FPL acquires additional resources.**

20 A. As previously mentioned, an important component of each restoration effort is FPL's
21 ability to scale and adjust resources to match the anticipated workload. This includes
22 acquiring external contractors and mutual assistance resources from affiliate
23 companies, other utilities within the state of Florida (*e.g.*, other Florida investor-owned,

1 municipal, and cooperative utilities), and other utilities outside the state of Florida.
2 FPL is a participating member of the SEE Mutual Assistance Group. While this group
3 is a non-binding entity, it provides FPL and other members with guidelines on
4 requesting assistance from a group of approximately 50 utilities, primarily located in
5 the southern and eastern United States. The guidelines require reimbursement for direct
6 costs of payroll and other expenses, including roundtrip travel costs (*i.e.*,
7 mobilization/demobilization), when providing mutual aid in times of an emergency. In
8 addition, FPL participates with EEI to gain access to other utilities during major events
9 that have a national impact. Resource requests may include line and vegetation
10 contractors, patrol personnel, crew supervisors, material-handling personnel, and, in
11 some cases, logistics support.

12
13 FPL's Integrated Supply Chain business unit also has multiple contractual agreements
14 with line and vegetation contractors throughout the U.S. Many of these agreements are
15 with contractors utilized by FPL during normal operations. Depending on the severity
16 of the storm and the resources needed, additional line and vegetation companies may
17 be contracted to provide support pending their release from the utilities for which they
18 normally work. If these additional line and vegetation contractors are needed, FPL
19 negotiates rates with the new contractors on an as-needed basis prior to the
20 commencement of work.

21 **Q. How does FPL take cost into account when acquiring resources for storm**
22 **restoration?**

23 A. The objective of safely restoring electric service as soon as reasonably practicable is

1 not a “least cost” proposition. Said in a different manner, restoration of electric service
2 at the lowest possible cost will not result in the most rapid restoration. However, FPL
3 is always mindful of costs and prudently acquires resources.

4
5 For line and vegetation contractors, FPL seeks to acquire resources with pre-negotiated
6 storm contracts based on a low-to-high cost ranking and, to the greatest extent
7 practicable, releases these same resources from storm restoration assistance in reverse
8 cost order subject to the overriding objective of safely and quickly restoring power to
9 customers. FPL also considers travel distance when procuring and releasing storm
10 restoration resources, as longer distances require increased drive times and can result
11 in higher mobilization/demobilization costs. Final contractor and mutual-aid resource
12 decisions take into consideration the number, availability, relative labor costs, and
13 travel distances of required resources. This information is then evaluated relative to
14 the expected time to restore customers.

15 **Q. Describe FPL’s plan for the deployment and management of the incoming**
16 **external resources.**

17 A. The deployment and movement of resources is coordinated through the FPL Command
18 Center to monitor execution of the plan. Daily management of the crews is performed
19 by the field operations organization, which is responsible for executing FPL’s
20 restoration strategy. Decisions on opening staging sites to position the restoration
21 workforce in impacted areas are based primarily on the arrival times of the external
22 resources. Daily analysis of workload execution and restoration progress permits
23 dynamic resource management. This enables a high degree of flexibility and mobility

1 in allocating and deploying resources in response to changing conditions and
2 requirements. Another critical factor is FPL's ability to assemble trained and
3 experienced management teams to direct field activities. As part of the storm
4 organization, management teams include Incident Commanders and crew supervisors
5 to directly oversee fieldwork.

6 **Q. What controls are in place for the acquisition of resources?**

7 A. FPL has centralized all external resource acquisition within the FPL Command Center
8 organization. This organization approves resource acquisition targets, which are
9 continually monitored by the Planning Section Chief, who reports to me and keeps me
10 informed during the entire restoration process.

11 **Q. What processes and controls are in place to ensure the proper tracking of the work
12 performed by these resources and the time charged for that work?**

13 A. The external resources initially report to a Processing Site for verification of rosters
14 and equipment before being assigned to an FPL Storm Production Lead associated with
15 a designated staging site. The Storm Production Lead is responsible for verifying crew
16 rosters as FPL accepts these resources onto its system. The Storm Production Lead is
17 then responsible for reviewing and electronically approving timesheets to ensure that
18 time and personnel counts are recorded accurately. Timesheets that have exceptions
19 (*e.g.*, over 16 hours) are then electronically routed to the Finance Section Chief at the
20 staging site. All timesheets are then sent to FPL's Cost Finalization team for the final
21 validation of contractor invoices for payment. FPL witness Mohomed describes the
22 role and responsibilities of the Finance Section Chief, and FPL witness De Lucenay
23 describes the role and responsibilities of the Cost Finalization team.

1 **Q. What logistics support and activities are required to support the overall**
2 **restoration effort?**

3 A. Logistics support and activities serve a key role in any successful restoration effort by
4 ensuring basic needs and supplies are adequately available and provided to the
5 thousands of restoration personnel involved. These functions include, but are not
6 limited to, the acquisition, preparation, and coordination of staging sites, environmental
7 services, salvage, lodging, laundry, buses, caterers, ice and water, office trailers, light
8 towers, generators, portable toilets, security guards, communications, and fuel delivery.
9 Agreements with primary vendors are in place prior to the storm season as part of FPL's
10 comprehensive storm-planning process. FPL personnel from all parts of the company
11 meet additional logistics staffing needs. These employees are pre-identified, trained,
12 and assigned to provide site logistics management and support other restoration
13 workforce needs. FPL contracts for additional logistics resources for larger restoration
14 efforts that exceed internal logistics support capabilities.

15 **Q. Does FPL have controls in place to ensure that necessary items for logistics are**
16 **procured and appropriately accounted for?**

17 A. Yes. FPL's logistics organization is responsible for overseeing and coordinating the
18 procurement of resources required at our staging sites. The Logistics Section Chief
19 and logistics team ensure that each staging site's resource requirements are initially
20 procured and received. The Finance Section Chief also provides guidance and
21 assistance to help ensure active, real-time financial controls are in effect and adhered
22 to during the restoration event. These processes are discussed in more detail by FPL
23 witness Mohomed.

III. HURRICANE DEBBY

Q. Please provide an overview of Hurricane Debby as it developed and began to threaten Florida.

A. Hurricane Debby was the fourth named storm and the second hurricane of the 2024 hurricane season.⁴ The National Hurricane Center (“NHC”) began issuing advisories on Tropical Cyclone Debby on August 2, 2024, and projected that it would bring tropical storm conditions and heavy rains to portions of the Florida Peninsula. Florida Governor Ron DeSantis declared a state of emergency for 54 counties, which was subsequently extended to 61 counties due to the significant impacts and hazards from the torrential rainfall and strong winds. On August 4, 2024, the storm became a hurricane with warnings from the NHC that further strengthening was anticipated. In the morning of August 5, 2024, Hurricane Debby made landfall in Steinhatchee, Florida, which is approximately 15 miles from where Hurricane Idalia made landfall less than a year earlier. At the time of landfall, Hurricane Debby was a Category 1 hurricane with maximum sustained winds of 80 mph.

As Hurricane Debby traversed the State of Florida, it remained well-organized with hurricane-force winds extending outward to 25 miles and tropical storm force winds extending approximately 140 miles from its center. Hurricane Debby brought cyclone winds, storm surge, and flooding to a significant portion of FPL’s service area, producing widespread outages and fallen trees. In the late afternoon on August 5, 2024,

⁴ See National Hurricane Center, Tropical Cyclone Report: Hurricane Debby (February 4, 2025), available at https://www.nhc.noaa.gov/data/tcr/AL042024_Debby.pdf.

1 the storm entered Southeast Georgia as a tropical storm. The path and satellite image
2 of Hurricane Debby's movement through Florida are provided in Exhibit MJ-1 and
3 Exhibit MJ-2, respectively.

4
5 Hurricane Debby's slow-moving approach subjected much of Florida's west coast and
6 the Big Bend region to storm surge caused by elevated water levels and significant
7 waves. Due to the lingering devastating impacts of Hurricane Idalia the previous year,
8 the beaches along the west coast were less protected from waves and the soil was
9 oversaturated and prone to flooding, resulting in additional damage to infrastructure
10 near the coastline. Additionally, Hurricane Debby produced a wide swath of heavy
11 rainfall that caused major, and in some instances historic, flash and river flooding
12 inland. For example, the highest storm total rainfall recorded was 16.98 inches in
13 Sarasota, Florida.

14 **Q. Please describe FPL's preparations to respond to the potential impacts of**
15 **Hurricane Debby.**

16 A. FPL's emergency preparedness teams closely monitored the approach of the storm and
17 initiated preliminary preparations in advance of its formation. FPL's first weather
18 update occurred on July 31, 2024 (96-hour call based on the NHC forecast track at the
19 time). On August 2, 2024, the day the storm formed into a tropical depression in the
20 Caribbean Sea, FPL activated its emergency response organization, staffed its
21 Command Center, and initiated the cadence of daily planning and management meetings
22 to ensure the efficient and timely execution of all pre-landfall checklists and preparation
23 activities. Additionally, FPL initiated customer communications and outreach, urging

1 customers to prepare for Hurricane Debby's impacts, including potentially prolonged
2 power outages. On August 3, 2024, the NHC forecasted further strengthening and
3 issued hurricane warnings for portions of Florida's Gulf coast. As a result, FPL
4 strategically opened staging sites and positioned resources based on the forecasted path
5 of the storm within its service area. The next day, Debby intensified into a Category 1
6 hurricane and continued to move toward Florida's Gulf coast before making landfall on
7 August 5, 2024.

8

9 Through its pre-landfall planning activities and based on the forecasted path, size, and
10 intensity of Hurricane Debby, FPL worked to anticipate projected outcomes and began
11 to commit to resources for restoration support.

12 **Q. How did FPL respond to the impact of Hurricane Debby?**

13 A. FPL understands that hurricanes cause interruption to the lives of our customers and
14 local communities. As a result, FPL sets out to restore power safely and as quickly as
15 reasonably practicable so daily life can return to normal.

16

17 FPL followed its well-developed, systematic, and well-tested plan to respond to
18 Hurricane Debby, which included obtaining and pre-staging resources in advance of the
19 storm. As with any approaching storm, there was uncertainty in the ultimate path and
20 intensity of Hurricane Debby. However, FPL's training and pre-landfall preparations
21 ensured it was ready to execute a rapid restoration.

22

1 As FPL has learned through decades of restoration efforts, assembling and properly
2 positioning personnel and equipment is key to restoring power safely and as quickly as
3 reasonably practicable. To respond to the forecasted impacts of Hurricane Debby, FPL
4 pre-positioned necessary materials, equipment, and a workforce of approximately
5 9,600 personnel (including mutual assistance from 16 states) to support the restoration
6 effort. Hurricane Debby was a devastating storm that required a comprehensive
7 restoration workforce and logistics plan. These crews worked around the clock and
8 between feeder bands when conditions were safe to do so.

9 **Q. How did FPL's T&D system perform during Hurricane Debby?**

10 A. While no electrical system can be made completely resistant to the impacts of hurricanes
11 and other extreme weather events, FPL's continued investments in its storm hardening
12 programs and smart grid technology provided increased T&D infrastructure resiliency
13 during Hurricane Debby and reduced restoration times.

14
15 No FPL transmission structures failed during Hurricane Debby and only five
16 transmission line sections became de-energized due to a detected fault. In addition,
17 there was no major damage to the Company's substation equipment. Notably, with
18 Hurricane Debby arriving less than a year after Hurricane Idalia, trees in impacted areas
19 were left weakened and more susceptible to damage and falling. Nonetheless, FPL's
20 system showed tremendous resilience. During Hurricane Debby, overhead feeders and
21 laterals performed well, with a combined total of only 40 distribution poles requiring
22 replacement due primarily to wind-driven vegetation falling from outside the right of
23 way into distribution facilities. FPL's underground laterals performed 8.3 times better

1 than overhead laterals and provided valuable system resilience. In addition, smart grid
2 devices installed along FPL's energy grid helped to restore service to customers before
3 it was safe to send crews into the field, avoiding more than 85,000 outages.

4 **Q. Can you give an overview of the impact to FPL's customers as a result of Hurricane**
5 **Debby and FPL's storm restoration response?**

6 A. Yes. Even before Hurricane Debby arrived, many customers, as well as the
7 environment, were still trying to recover from the lingering impacts of Hurricane Idalia
8 less than a year before. In total, FPL restored service to approximately 250,000
9 customers following Hurricane Debby. Approximately 99% of these customers were
10 restored within the first full day of restoration. By August 7, 2024 (*i.e.*, within two days
11 of restoration), FPL fully restored power to all affected customers that could feasibly
12 receive power. FPL's quick restoration effort was a clear demonstration that FPL's
13 planning, drilling, sustained investment in storm hardening programs and smart grid
14 technology, and unrelenting focus on restoration made a clear difference for customers.

15

16 **IV. HURRICANE HELENE**

17 **Q. Please provide an overview of Hurricane Helene as it developed and began to**
18 **threaten Florida.**

19 A. Hurricane Helene was the eighth named storm, fifth hurricane, and second major
20 hurricane of the 2024 hurricane season.⁵ As a Category 4 storm, Hurricane Helene was

⁵ Hurricanes Helene, Debby, and Idalia all made landfall within 25 miles of each other.

1 one of the largest-sized (diameter) storms to impact Florida, and the deadliest hurricane
2 in the contiguous U.S. since Hurricane Katrina in 2005.⁶

3

4 The NHC began issuing advisories on Tropical Cyclone Helene on September 23,
5 2024, and projected that it would make landfall as a major hurricane in Florida. Florida
6 Governor DeSantis declared a state of emergency for 41 counties, which was
7 subsequently extended to 61 counties due to the projected size and magnitude of the
8 storm.

9

10 On September 24, 2024, the NHC issued hurricane watches and, later in the day,
11 warnings as Helene continued to rapidly intensify. On September 25, 2024, Helene
12 officially became a hurricane with warnings from the NHC that “potentially
13 catastrophic hurricane-force winds are expected.” By the late evening of September
14 26, 2024, the National Oceanic and Atmospheric Administration (“NOAA”) identified
15 that Hurricane Helene had reached its peak intensity as a strong Category 4 hurricane
16 only minutes before making landfall. Hurricane Helene made landfall near Perry,
17 Florida, with maximum sustained winds of 140 mph. At the time Hurricane Helene
18 made landfall, most of the Florida peninsula already had been engulfed by the storm
19 for hours, as hurricane-force winds extended approximately 60 miles outward from the
20 center of the storm, and tropical storm-force winds extended up to 310 miles. The path

⁶ See National Hurricane Center, Tropical Cyclone Report: Hurricane Helene (April 8, 2025),
available at https://www.nhc.noaa.gov/data/tcr/AL092024_Helene.pdf.

1 and satellite image of Hurricane Helene’s movement through Florida are provided in
2 Exhibit MJ-3 and Exhibit MJ-4, respectively.

3

4 Due to its historic size, Hurricane Helene battered nearly all of FPL’s peninsular service
5 area and unleashed destructive winds, unprecedented storm surge, heavy rainfall, and
6 substantial flooding that impacted FPL’s customers. Storm surge along Florida’s Gulf
7 Coast swelled to 12 to 16 feet above ground level in Keaton Beach and Steinhatchee,
8 where small Florida coastal communities were devastated. Dangerous storm surges
9 also reached densely populated areas south of the point of landfall, such as Sarasota in
10 Southwest Florida and Cedar Key, which measured its highest recorded water level
11 (more than 9 feet) at the NOAA tide gauge station since 1914. Additionally, Southwest
12 Florida was impacted by not only significant storm surge, but by sand drifts as high as
13 3 to 5 feet, which were deposited by the storm surge. The sand overwash covered not
14 only roadways but proved to be a unique challenge during the 2024 hurricane season.

15

16 Hurricane Helene was the deadliest hurricane in the contiguous United States since
17 Hurricane Katrina in 2005, causing extensive damage and loss of life in Florida,
18 Georgia, South Carolina, North Carolina, Tennessee, Virginia, and Indiana.⁷ As a
19 result of Hurricane Helene’s significant impact to multiple states, EEI for the first time
20 activated its National Response Event (“NRE”) framework to meet the challenge of

⁷ See *id.* (“Helene brought life-threatening wind gusts much farther inland across the southeastern United States than other hurricanes due to its fast forward motion and large size”).

1 supporting members' restoration resource needs during major outages that have a
2 national impact and resulted in the national-level allocation of restoration resources.

3 **Q. Please describe FPL's preparations to respond to the potential impacts of**
4 **Hurricane Helene.**

5 A. FPL's first weather update call occurred on September 23, 2024 – the same day the
6 NHC began issuing advisories on Tropical Cyclone Helene – which was 72-hours
7 before the projected landfall. On September 24, 2024, FPL activated its emergency
8 response organization, staffed its Command Center, and initiated the cadence of daily
9 planning and management meetings to ensure the efficient and timely execution of all
10 pre-landfall checklists and preparation activities. Based on the NHC forecasts, FPL
11 began pre-positioning resources across the state prior to the anticipated landfall. FPL
12 also initiated customer communications and outreach, urging customers to prepare for
13 Hurricane Helene, including the potential for prolonged power outages.

14
15 Through its pre-landfall planning activities and based on the forecasted path, size, and
16 intensity of Hurricane Helene, FPL worked to anticipate projected outcomes and began
17 to commit resources for restoration support. In anticipation of landfall, FPL began
18 opening staging sites and pre-positioning resources throughout its service area.

19 **Q. How did FPL respond to the impact of Hurricane Helene?**

20 A. As with Hurricane Debby, FPL followed its well-developed, systematic, and well-tested
21 plan for Hurricane Helene, which included obtaining and pre-staging resources in
22 advance of the storm. As with any approaching storm, there was uncertainty in the
23 ultimate path and intensity of Hurricane Helene. However, given that the forecasted

1 path indicated that much of FPL’s service area would be impacted by Hurricane Helene,
2 including some of the most populated regions of the state, FPL could not take a “wait
3 and see” approach. FPL had to be prepared to respond to what was projected to be a
4 historic and deadly impact to FPL’s customers.

5
6 Hurricane Helene was a catastrophic storm that required a substantial restoration
7 workforce and logistics plan as a result of its significant impact to the Southeastern
8 United States. FPL mobilized a workforce of approximately 11,000 personnel
9 (including mutual assistance from 23 states) dedicated to the restoration effort. These
10 crews worked around the clock and between feeder bands when conditions were safe
11 to do so. After crews restored essentially all FPL customers, they were deployed to
12 other Southeastern states to help other utilities and co-ops restore power.

13
14 The FPLAir drone program provided FPL’s emergency preparedness teams with
15 focused and detailed information on the impacts to FPL’s system and surrounding
16 conditions, including areas that were inaccessible to the damage surveyors. Drones
17 allowed FPL to navigate areas that were inaccessible due to flooding, road washouts,
18 trees on the road, and other barriers which prevented crews from accessing the affected
19 areas.

20 **Q. How did FPL’s T&D system perform during Hurricane Helene?**

21 A. FPL’s continued investments in its storm hardening programs and smart grid technology
22 provided increased T&D infrastructure resiliency during Hurricane Helene and reduced
23 restoration times.

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As a result of FPL’s transmission hardening efforts, there were zero transmission structures that failed during Hurricane Helene and only 20 transmission line sections were impacted due to a detected fault. Only 334 distribution poles failed during Hurricane Helene, due primarily to wind-driven vegetation or debris. Notably, the majority of the distribution poles (299) that failed were non-hardened poles. Repetitive storm winds impacting trees in the affected areas, combined with above-average rainfall and soil saturation throughout the summer months, resulted in many trees being uprooted and falling onto overhead lines. FPL’s underground laterals performed 14.5 times better than overhead laterals. In addition, smart grid devices installed along FPL’s energy grid helped to restore service to customers before it was safe to send crews into the field, avoiding more than 184,000 outages during Hurricane Helene.

Q. Can you give an overview of the impact to FPL’s customers as a result of Hurricane Helene and FPL’s storm restoration response?

A. Yes. FPL restored service to approximately 680,000 customers impacted by Hurricane Helene. Approximately 91% of these customers were restored within the first full day of restoration. By September 30, 2024 (*i.e.*, within four days of restoration), FPL fully restored power to all affected customers that could feasibly receive power. FPL’s planning, drilling, sustained investment in storm hardening programs and smart grid technology, and unrelenting focus on restoration made a clear difference with Hurricane Helene.

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A. Hurricane Milton was the 13th named storm, ninth hurricane, fourth major hurricane, and second Category 5 hurricane of the extremely active 2024 Atlantic hurricane season. Hurricane Milton was one of the strongest hurricanes on record in the Atlantic basin, with a minimum central pressure below 900 millibars.⁸ Hurricane Milton made landfall as a Category 3 storm along the west coast of Florida in close proximity to the location of Hurricane Ian's landfall in 2022. Notably, Hurricane Milton made landfall only two weeks after Hurricane Helene, which resulted in many of the same areas in Sarasota and Southwest Florida experiencing severe impacts twice within a short time frame.

On October 6, 2024, the storm officially became a hurricane with warnings from the NHC that further strengthening was anticipated. On October 7, 2024, tropical storm,

29

1 hurricane, and storm surge watches were issued by the NHC along Florida's west coast.
2 By late that afternoon, the storm had rapidly intensified to become a Major Hurricane
3 (Category 5, with windspeeds up to 180 mph) with the NHC warning of potentially
4 devastating hurricane-force winds along portions of the west coast. In the hours before
5 landfall, Hurricane Milton's wind field broadened, and Florida was raked by multiple
6 tornadic supercells that caused significant damage over the southern and central
7 portions of the Florida peninsula. In the evening of October 9, 2024, Hurricane Milton
8 made landfall as a major Category 3 hurricane near Siesta Key, Florida with maximum
9 sustained winds of 120 mph. At the time of landfall, most of the Florida peninsula had
10 been engulfed by the storm for hours, as hurricane-force winds extended approximately
11 35 miles outward from the center of the storm, and tropical storm-force winds extended
12 up to 255 miles. The path and satellite image of Hurricane Milton are provided in
13 Exhibits MJ-5 and MJ-6, respectively.

14
15 Due to its size and path, Hurricane Milton battered and unleashed destructive winds,
16 historic storm surge, heavy rain, substantial flooding, and a significant tornado
17 outbreak (including 45 known tornadoes of various intensity up to EF-3) on the east
18 coast. Storm surge on the west coast reached heights of 6 to 9 feet above ground level
19 from Venice southward to Boca Grande, with a peak of up to 10 feet reported near
20 Manasota Key. This region had also experienced significant storm surge from
21 Hurricane Helene just two weeks earlier. Additionally, storm surge flooding severely
22 impacted coastal communities near and south of Hurricane Milton's landfall. Similar

1 to Hurricane Helene, strong winds and high surge levels pushed a substantial amount
2 of sand inland.

3

4 Heavy rainfall across the region from Tampa Bay to Daytona Beach reached totals of
5 up to 20 inches. Hurricane Milton maintained its hurricane status as it slowly crossed
6 Florida for 12 hours, moving from the Gulf of America to the Atlantic Ocean.

7

8 Hurricane Milton resulted in EEI's second ever activation of its NRE framework – with
9 Hurricane Helene being the first – to ensure the allocation of all available restoration
10 resources across the nation. Available resources were particularly constrained during
11 Hurricane Milton due to the ongoing restoration efforts in the Carolinas and Mid-
12 Atlantic region following Hurricane Helene.

13 **Q. Please describe FPL's preparations to respond to the potential impacts of**
14 **Hurricane Milton.**

15 A. Shortly after the NHC began issuing advisories on Tropical Depression Milton on
16 October 5, 2024, FPL's emergency preparedness teams initiated preliminary
17 preparations. FPL's first weather update call occurred on October 5, 2024, which was
18 96-hours before the projected landfall. On October 6, 2024, FPL activated its
19 emergency response organization, staffed its Command Center, and initiated the
20 cadence of daily planning and management meetings to ensure the efficient and timely
21 execution of all pre-landfall checklists and preparation activities. Based on NHC
22 forecasts, FPL began pre-positioning resources across the state prior to the anticipated
23 landfall. FPL also initiated customer communications and outreach, urging customers

1 to prepare for Hurricane Milton, including the potential for prolonged power outages.

2

3

4 Through its pre-landfall planning activities and based on the forecasted path, size, and
5 intensity of Hurricane Milton, FPL worked to anticipate projected outcomes and began
6 to commit to resources for restoration support. In anticipation of landfall, FPL began
7 strategically opening staging sites and pre-positioning resources based on the forecasted
8 path of the storm within its service area.

9 **Q. How did FPL respond to the impacts of Hurricane Milton?**

10 A. As with Hurricanes Debby and Helene, FPL followed its well-developed, systematic,
11 and well-tested plan to respond to Hurricane Milton, which includes obtaining and pre-
12 staging resources in advance of the storm. As with any approaching storm, there was
13 uncertainty in the ultimate path and intensity of Hurricane Milton. However, given that
14 the forecasted path indicated that much of FPL's service area would be impacted,
15 including some of the most populated regions of the state, FPL, again, could not take a
16 "wait and see" approach. FPL had to be prepared to respond to what was projected to
17 be a historic and deadly impact to FPL's customers.

18

19 Hurricane Milton was a catastrophic storm that required a tremendous restoration
20 workforce and logistics plan. FPL mobilized a workforce of approximately 20,000
21 personnel (including mutual assistance from 41 states and Canada) dedicated to the
22 restoration effort. These crews worked around the clock and between feeder bands when
23 conditions were safe to do so.

1

2 The FPLAir drone program provided FPL's emergency preparedness teams with
3 focused and detailed information of the impacts to FPL's system and surrounding
4 conditions, including areas that were inaccessible to the damage surveyors. During
5 Hurricane Milton, FPL deployed its fixed-wing drone, FPLAir One, for storm response,
6 conducting two missions for a total of approximately 13.5 flight hours and 1,100 miles
7 flown. Drones allowed FPL to navigate areas that were inaccessible due to road
8 washouts, trees obstructing the road, and other barriers that prevented crews from
9 accessing the affected areas.

10 **Q. How did FPL's T&D system perform during Hurricane Milton?**

11 A. Again, FPL's storm hardening investments proved their value. Three transmission
12 structures failed during Hurricane Milton (the center of the eye of Hurricane Milton
13 passed ~3.6 miles from these structures), and only 84 transmission line sections became
14 de-energized due to a detected fault, which were largely attributable to wind-blown
15 debris from hurricane-force winds and tornadic activity. Of the over 1.4 million poles
16 in FPL's system, Hurricane Milton's path affected only 1,848 distribution poles, due
17 primarily to tornadic activity, saturated soil conditions, and wind-driven vegetation or
18 debris. Repetitive storm wind impact to trees in the affected areas, combined with
19 saturated soil conditions from storm surge, excessive rainfall, and flooding, resulted in
20 many trees being uprooted and falling into overhead lines. FPL's underground laterals
21 performed 5.3 times better than overhead laterals. In addition, smart grid devices
22 installed along FPL's energy grid helped to restore service to customers before it was
23 safe to send crews into the field, avoiding approximately 554,000 outages during

1 Hurricane Milton.

2 **Q. Can you give an overview of the impact to FPL’s customers as a result of Hurricane**
3 **Milton and FPL’s storm restoration response?**

4 A. Yes. In total, FPL restored service to more than 2 million customers. Approximately
5 74% of these customers were restored within the first full day of restoration and 90% of
6 these customers were restored within the first three full days of restoration. By October
7 16, 2024 (*i.e.*, within six full days of restoration), FPL fully restored power to all
8 customers that could feasibly receive power. FPL’s planning, drilling, sustained
9 investment in storm hardening programs and smart grid technology, and unrelenting
10 focus on restoration made a clear difference with Hurricane Milton.

11

12

VI. T&D RESTORATION COSTS

13 **Q. What were the final Hurricanes Debby, Helene, and Milton T&D restoration**
14 **costs?**

15 A. As provided in Exhibits MJ-7 through MJ-9, FPL’s total T&D restoration costs for
16 Hurricanes Debby, Helene, and Milton were \$101.3 million, \$188.2 million, and \$844.2
17 million, respectively.

18

19

Hurricane Debby–T&D Restoration Costs by Category (\$000s)

	Total	%
Regular Payroll and Related Costs	\$ 2,440	2%
Overtime Payroll and Related Costs	\$ 7,720	8%
Contractors	\$ 71,914	71%
Vehicle & Fuel	\$ 3,585	4%
Materials & Supplies	\$ 3,044	3%
Logistics	\$ 11,036	11%
Other	\$ 1,524	2%
Total T&D	\$ 101,264	100%

1 Hurricane Helene –T&D Restoration Costs by Category (\$000s)

	Total	%
Regular Payroll and Related Costs	\$ 3,995	2%
Overtime Payroll and Related Costs	\$ 9,919	5%
Contractors	\$ 131,309	70%
Vehicle & Fuel	\$ 6,279	3%
Materials & Supplies	\$ 9,122	5%
Logistics	\$ 24,834	13%
Other	\$ 2,755	1%
Total T&D	\$ 188,213	100%

2 Hurricane Milton –T&D Restoration Costs by Category (\$000s)

	Total	%
Regular Payroll and Related Costs	\$ 9,223	1%
Overtime Payroll and Related Costs	\$ 21,419	3%
Contractors	\$ 606,643	72%
Vehicle & Fuel	\$ 21,554	3%
Materials & Supplies	\$ 40,487	5%
Logistics	\$ 38,757	16%
Other	\$ 6,100	1%
Total T&D	\$ 844,183	100%

3 In total, FPL’s combined cost including T&D follow-up work associated with
4 Hurricanes Debby, Helene, and Milton was \$1.1 billion. While costs for T&D-related
5 follow-up work are spread among most major cost categories, approximately \$862.5
6 million, or 76% of these costs, were associated with the Contractors (\$809.9 million)
7 and Materials & Supplies (\$52.7 million) categories. The major drivers for these two
8 cost categories are associated with (i) assessments (*e.g.*, overhead line inspections,
9 thermovision, streetlights, etc.) to identify the repairs/replacements necessary to restore
10 FPL’s facilities to their pre-storm condition and (ii) the labor, equipment, and materials
11 required to complete the identified work.

12

1 **Q. Please provide a brief description of the T&D costs by categories for restoration**
2 **work performed as a result of Hurricanes Debby, Helene, and Milton.**

3 A. The categories of T&D storm restoration costs incurred for Hurricanes Debby, Helene,
4 and Milton are:

- 5 • T&D “Regular Payroll and Related Costs” and “Overtime Payroll and Related
6 Costs” are costs associated with FPL employees who directly supported the
7 T&D service restoration efforts and follow-up work. These include FPL
8 linemen, patrollers, other field support personnel, and T&D staff personnel.
- 9 • T&D “Contractors” includes costs associated with external line contractors,
10 mutual assistance utilities, FPL embedded contractors, vegetation contractors,
11 and other contractors (*e.g.*, contractors performing overhead line patrols and
12 environmental assessments), including mobilization and de-mobilization costs,
13 that supported FPL’s service restoration efforts and follow-up work to restore
14 facilities to their pre-storm condition.
- 15 • T&D “Vehicle & Fuel” includes vehicle utilization and fuel costs for FPL and
16 contractor vehicles in direct support of storm restoration.
- 17 • T&D “Materials & Supplies” includes costs associated with items such as wire,
18 transformers, poles, and other electrical equipment used to restore electric
19 service for customers and repair and restore storm-impacted FPL facilities to
20 their pre-storm condition.
- 21 • T&D “Logistics” includes costs associated with staging and processing sites and
22 other support needs, such as meals, lodging, buses and transportation, and rental

1 equipment used by employees and contractors in direct support of storm
2 restoration.

- 3 • T&D “Other” category includes costs not previously captured, such as freight
4 charges and other miscellaneous costs, including payroll and related overheads
5 from affiliate personnel directly supporting storm restoration.

6 **Q. Please describe the follow-up work required for the T&D facilities as a result of**
7 **Hurricanes Debby, Helene, and Milton.**

8 A. As previously discussed, the primary objective of FPL’s emergency preparedness plan
9 and restoration process is to safely restore critical infrastructure and the greatest number
10 of customers in the least amount of time. At times, this means utilizing temporary fixes
11 (*e.g.*, bracing a cracked pole or cross arm) and/or delaying certain repairs (*e.g.*, replacing
12 lightning arrestors and repairing streetlights) that are not required to restore service
13 expeditiously. However, these conditions must be subsequently addressed after the
14 initial restoration is complete during the restoration follow-up work phase in order to
15 restore the assets to their pre-storm condition. FPL performed the required follow-up
16 work for Hurricanes Debby, Helene, and Milton.

17
18 Restoring FPL’s T&D facilities to their pre-storm condition is generally a two-step
19 process: (i) assessing/identifying the necessary follow-up work to be completed; and
20 (ii) executing the identified work.

1 **Q. Were the T&D activities and associated costs incurred in response to Hurricanes**
2 **Debby, Helene, and Milton reasonable and prudent?**

3 A. Yes. The T&D storm restoration activities, follow-up work, and associated costs were
4 necessary and crucial components to safely restore critical infrastructure to the greatest
5 number of customers as soon as reasonably practicable and to restore the T&D facilities
6 to their pre-storm condition.

7
8 **VII. NON-T&D RESTORATION COSTS**

9 **Q. Please provide an overview of FPL's non-T&D business units that engaged in**
10 **storm preparation and restoration activities related to Hurricanes Debby, Helene,**
11 **and Milton.**

12 A. The majority of FPL's efforts in preparing for, responding to, and restoring service
13 after Hurricanes Debby, Helene, and Milton were related to T&D restoration.
14 However, nearly every other business unit across FPL was actively involved in pre-
15 storm planning and preparation, as well as post-storm restoration activities for all three
16 storms. These collective efforts were essential to the overall success of the restoration
17 operations. The non-T&D business units that supported these efforts, together with the
18 corresponding costs incurred in connection with Hurricanes Debby, Helene and Milton,
19 are identified in the direct testimony and exhibits (Exhibits AM-1, AM-2, and AM-3)
20 of FPL witness Mohomed.

21
22 A breakdown of Non-T&D Restoration Costs for Hurricanes Debby, Helene, Milton is
23 shown in the tables below.

Hurricane Debby– Breakdown of the Non-T&D Restoration Costs (\$000s)

Customer Service	\$	184
General	\$	1,550
Nuclear	\$	0
Power Generation Division (“PGD”)	\$	4,182

Hurricane Helene – Breakdown of the Non-T&D Restoration Costs (\$000s)

Customer Service	\$	472
General	\$	2,164
Nuclear	\$	406
PGD	\$	1,668

Hurricane Milton – Breakdown of the Non-T&D Restoration Costs (\$000s)

Customer Service	\$	1,850
General	\$	9,038
Nuclear	\$	1,744
PGD	\$	19,300

The majority of these costs are related to payroll and services provided by contractors.

Q. Please summarize the storm restoration expenses incurred by PGD for Hurricanes Debby, Helene, and Milton.

A. The majority of FPL’s PGD-associated costs were related to payroll, contractor services, materials, and logistics necessary to stabilize and restore generation resources. PGD activated site-specific storm procedures, secured equipment across multiple sites, and deployed personnel to support pre- and post-landfall operations.

For Hurricane Milton, PGD’s restoration activities spanned multiple technologies and facilities. Across numerous solar sites in the East and West regions, crews replaced

1 storm-damaged photovoltaic panels,⁹ made repairs due to erosion and civil impacts,
2 conducted helicopter and drone flyovers to evaluate conditions and prioritize
3 restoration work, and performed storm-related repairs to various facilities.

4 **Q. Please describe expenses incurred by Nuclear for Hurricanes Debby, Helene, and**
5 **Milton.**

6 A. FPL's Nuclear storm-related costs encompassed storm preparation, storm rider
7 deployment, and various repairs at the St. Lucie and Turkey Point Nuclear Plants.
8 These efforts included regular payroll expenses for storm riders, storm preparation,
9 fleet support, and pre/post-landfall activities, along with overtime payroll in similar
10 categories. Contractors were also engaged for specific restoration and repair tasks. The
11 entrance building to the Turkey Point Plant sustained damage during Hurricane Milton,
12 necessitating a complete roof replacement and interior water remediation on the top
13 floor. At the St. Lucie Plant, storm damage during Hurricane Milton required multiple
14 restoration efforts, including external inspection and repair of a damaged turbine lube
15 oil tank, comprehensive infrastructure repairs, extensive vegetation removal, pavilion
16 rescreening, door installation at the Land Utilization Building, fuel tank repairs, and
17 restoration of damaged signage, site wire, and beach signs, along with environmental
18 services support.

19
20 All of the costs incurred by Nuclear represent a comprehensive approach to hurricane
21 preparation, response, and recovery. These pre- and post-storm activities are a critical

⁹ Approximately 0.06% of FPL's photovoltaic panels were damaged as a result of Hurricane Milton.

1 part of FPL's commitment to ensuring the safety and functionality of its nuclear
2 facilities.

3 **Q. Please provide an overview of the "General" category related to Hurricanes**
4 **Debby, Helene, and Milton.**

5 A. The business units grouped under the "General" category include Marketing and
6 Communications ("M&C"), Information Technology ("IT"), Corporate Real Estate
7 ("CRE"), Human Resources ("HR"), and External Affairs and Economic Development
8 ("EA").

9
10 During Hurricanes Debby, Helene, and Milton, M&C was responsible for all aspects
11 of communications, both internally with employees and externally with customers and
12 stakeholders. Over 30 communication channels were utilized, including but not limited
13 to email, automated calls, text messaging, social media updates, media events, news
14 conferences, news releases to the media, and communications to local leaders, state and
15 federal elected officials, regulators, and large commercial customers.

16
17 IT was responsible for the delivery and support of system business solutions,
18 technology infrastructure (client services, mobile services, servers, network, etc.), and
19 both wired and wireless technology.

20
21 CRE was responsible for preparing all buildings and substations for potential storm
22 impacts, assessing damage to buildings and sites following the storm, and repairing
23 damage caused by the storm. CRE also provided all janitorial, facilities, and food

1 service to critical storm support locations. Several locations, including the Port Orange
2 and Ormond Service Centers, required major reconstruction and interior restoration
3 projects due to water intrusion and structural damage from Hurricane Milton.

4
5 HR supported the storm efforts with a large focus on employee support and
6 communication. The HR compensation and payroll teams provided communication,
7 policy, and procedure updates to employees and answered their inquiries.

8
9 EA worked closely and coordinated with local government partners and county EOCs
10 in FPL's service area.

11
12 Additionally, contractors were engaged to support the Company's efforts under the
13 "General" category. M&C employed contractors to assist with visual communication,
14 media relations, social media staffing, and technical support for digital
15 communications. IT utilized a contractor to support the Trouble Call Management
16 System, which tracks outage tickets and trouble reports during restoration. CRE
17 retained and managed contractors to provide building services and maintenance.
18 Contractors were also engaged to perform debris removal at corporate offices,
19 substations, and service centers, as well as to replace damaged vegetation in accordance
20 with local regulations.

1 **Q. Please explain Customer Service’s role related to Hurricanes Debby, Helene, and**
2 **Milton.**

3 A. The majority of FPL’s Customer Service storm-related expenses are associated with
4 payroll and services provided by employees and contractor resources. Customer
5 Service primarily handled and resolved customer inquiries regarding outages and
6 hazardous conditions, complaints, and communications with governmental entities. In
7 addition, Customer Service evaluated the communication status of metering network
8 devices, made any necessary repairs or replaced non-communicating devices, and
9 conducted back-office analyses and field investigations.

10 **Q. Were the activities of and associated costs incurred by the Non-T&D business**
11 **units in response to Hurricanes Debby, Helene, and Milton reasonable and**
12 **prudent?**

13 A. Yes. The activities and associated costs incurred by these non-T&D business units
14 were a necessary component of storm preparation and the execution of storm
15 restoration efforts and support functions.

16
17 **VIII. EVALUATING FPL’S RESTORATION RESPONSE**

18 **Q. Were FPL’s storm restoration responses for Hurricanes Debby, Helene and**
19 **Milton effective in safely and quickly restoring power to customers?**

20 A. Yes. As mentioned previously, FPL’s primary goal is to safely restore critical
21 infrastructure to the greatest number of customers as soon as reasonably practicable,
22 which is a critical step for the customers and communities served by FPL to return to
23 their normal, pre-storm lives and activities. Hurricane Debby impacted approximately

1 250,000 FPL customers and FPL fully restored power to all customers within two full
2 days of restoration. Hurricane Helene impacted approximately 680,000 FPL customers
3 and the Company fully restored power to all customers within four full days of
4 restoration. Hurricane Milton impacted approximately 2 million FPL customers, and
5 the Company fully restored power to all customers within six full days of restoration.
6 During Hurricanes Debby, Helene and Milton, FPL's restoration plans, preparedness,
7 and execution were effective in quickly restoring power to the affected customers and
8 communities served by FPL.

9 **Q. What factors contributed to the effective execution of FPL's restoration plans for**
10 **Hurricanes Debby, Helene, and Milton?**

11 A. The rapid restoration following the storms was in large part a result of FPL's pre-storm
12 preparation for the expected damage to FPL's service area based on forecasts from the
13 NHC. Key factors to the overall successful restoration effort included, but were not
14 limited to:

- 15 • Strong centralized command, solid plans and processes, and consistent
16 application of FPL's overall restoration strategy (*e.g.*, focusing first on restoring
17 critical infrastructure and devices that serve the largest number of customers).
- 18 • Use of FPL's damage-forecasting model, along with aerial patrols and ground
19 assessments, to promptly identify the number and location of needed resources.
- 20 • Aggressive and prudent acquisition, pre-positioning, and redeployment of
21 restoration resources.
- 22 • Prepositioning of critical equipment and logistical support closer to the areas
23 expected to be affected by the approaching storms.

- 1 • Strong alliances with vendors, which assured an ample, readily available supply
2 of materials.
- 3 • Pre-staged mobile sleepers for availability once the storm had passed, with the
4 goal of reducing travel time and increasing restoration productivity.
- 5 • Identified large, fixed facilities that were used as alternative lodging sites in
6 areas with constrained hotel availability.
- 7 • Increased physical fuel inventory and improved fuel delivery capabilities (both
8 FPL and vendor-supplied resources).
- 9 • Improved coordination with County EOCs, including designating restoration
10 personnel pre-storm to assist with road-clearing efforts and ensuring key critical
11 infrastructure facilities requiring restoration prioritization are identified.
12 Continued utilization of an online government portal that allows government
13 officials to obtain the latest news releases and information on customer outages,
14 estimated restoration times, FPL crew resources, outage maps, and other
15 information. These improved features enabled EOCs to better serve their
16 respective communities' needs.
- 17 • Provided accurate, timely information to FPL customers via automated voice
18 calls, storm updates utilizing social and broadcast media, daily news briefings,
19 and embedded reporters at the FPL Command Center.
- 20 • Robust outage management through system functionality and real-time
21 information, which allowed FPL to continually gauge restoration progress and
22 make adjustments as changing conditions and requirements warranted.
- 23 • Scaled the pool of drone pilots after the success of utilizing drones during recent

1 years. FPL's vegetation team benefited from the use of drones to better
2 understand the volume and the need for additional crews. In addition, FPL was
3 able to use an internal application that allowed the drone pilots to upload all
4 their images and sort the pictures by location on a map to help improve the
5 speed and quality of damage assessments.

- 6 • Retained a robust list of staging sites at multiple locations throughout the state
7 and maintained contact with site owners to ensure availability and use.
- 8 • Expanded the pre-provisioning and capital enhancements (*e.g.*, paved parking
9 lots, installed technology) of strategic staging site locations for faster set-up and
10 activation, which enabled rapid activation of these sites to support restoration
11 work.
- 12 • Previous storm restoration experience, application of lessons learned, process
13 enhancements, regular practice and training, and employee skill and
14 commitment.

15 **Q. What are your conclusions regarding FPL's storm restoration efforts for**
16 **Hurricanes Debby, Helene, and Milton?**

17 A. The 2024 Atlantic Hurricane season saw 18 named storms, with 11 that became
18 hurricanes and five that became major hurricanes. FPL prepared for and effectively and
19 efficiently responded to Hurricanes Debby, Helene, and Milton.

20
21 Our commitment to continuous improvement was instrumental in achieving this
22 excellent performance. Further, FPL's existing and ongoing storm hardening programs
23 and smart grid technology provided increased T&D infrastructure resiliency during

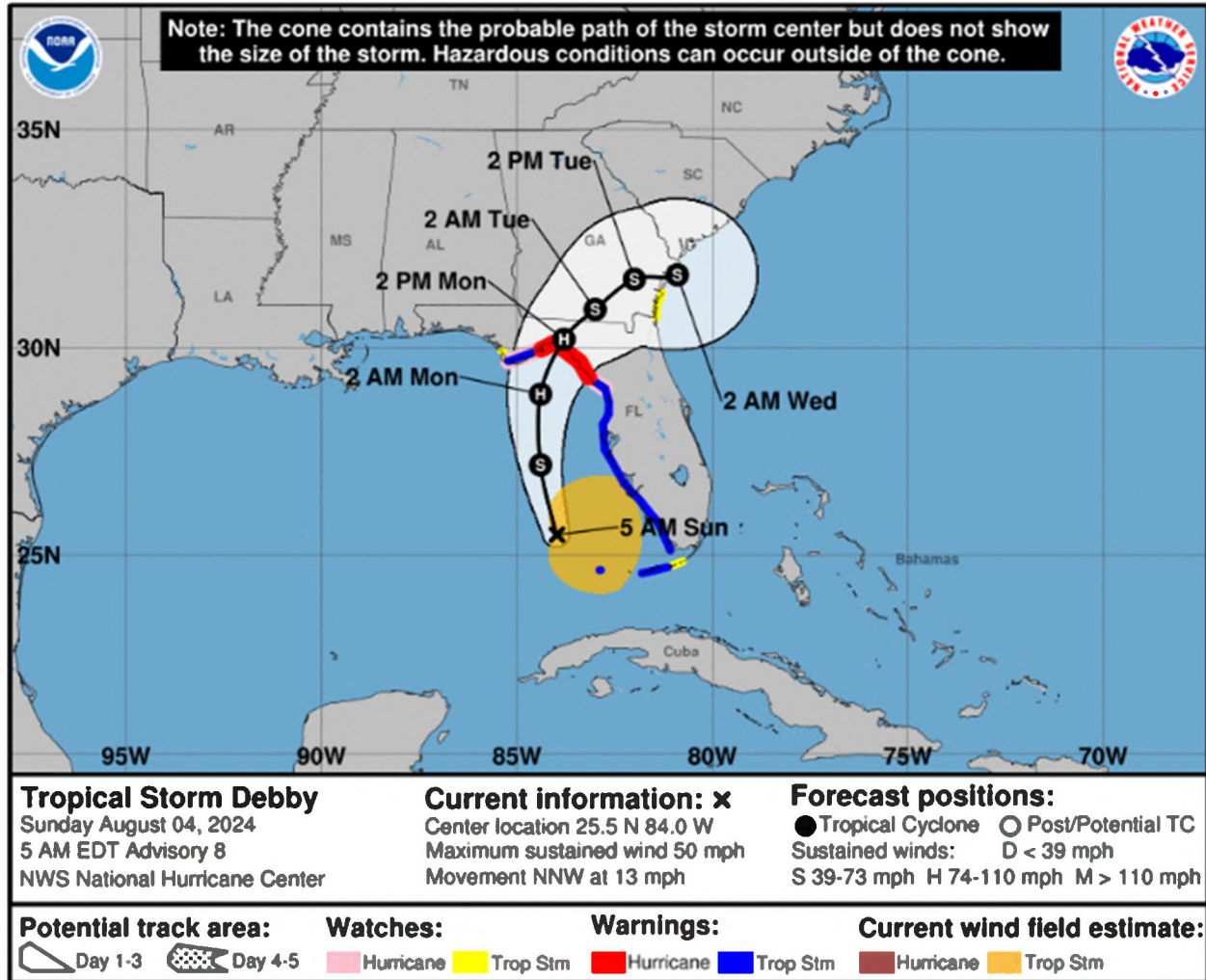
1 Hurricanes Debby, Helene, and Milton. For example, approximately 823,000 outages
2 were avoided during Hurricanes Debby, Helene, and Milton due to investments in smart
3 grid technology (*e.g.*, automated feeder switches). Together, FPL's storm hardening
4 programs and emergency preparedness plan and restoration process provided significant
5 benefits and contributed to the remarkable achievement of quickly restoring service to
6 the customers and communities affected by Hurricanes Debby, Helene, and Milton.

7
8 I believe the entire restoration team, which included FPL employees, contractors, and
9 mutual assistance utilities personnel, performed extremely well. This allowed FPL to
10 meet our overarching objective to safely restore critical infrastructure and the greatest
11 number of customers in the least amount of time. Storm restoration is a dynamic and
12 challenging process that tests the fortitude of each person involved. I am exceptionally
13 proud and extremely grateful to have been associated with such a committed and
14 dedicated restoration team.

15 **Q. Does this conclude your direct testimony?**

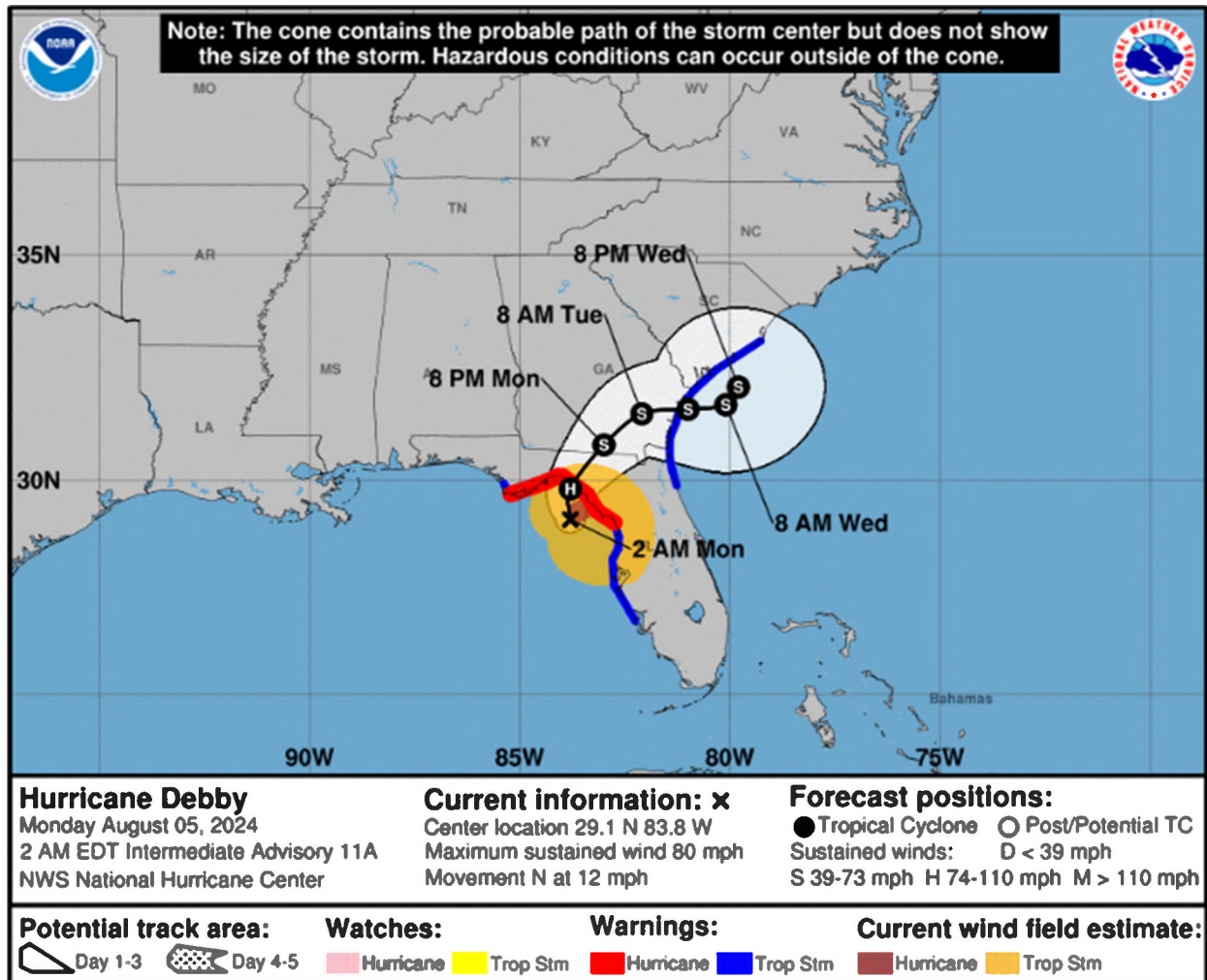
16 **A. Yes.**

Hurricane Debby - National Hurricane Center's Forecast Track Sunday, August 4, 2024



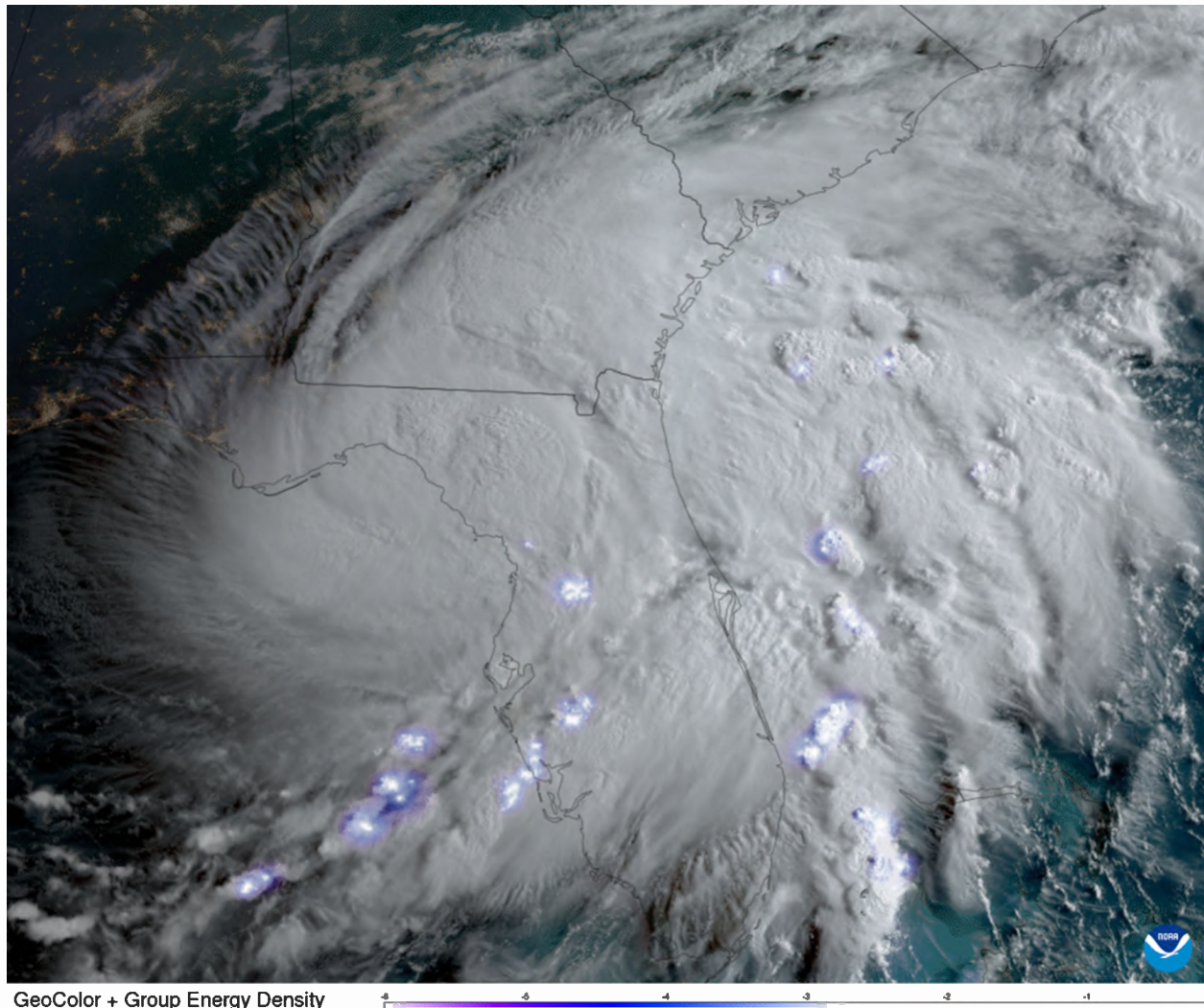
Source: National Hurricane Center, Debby Graphics Archive, available at
https://www.nhc.noaa.gov/archive/2024/FOUR_graphics.php.

**Hurricane Debby - National Hurricane Center's Forecast Track
Monday, August 5, 2024**



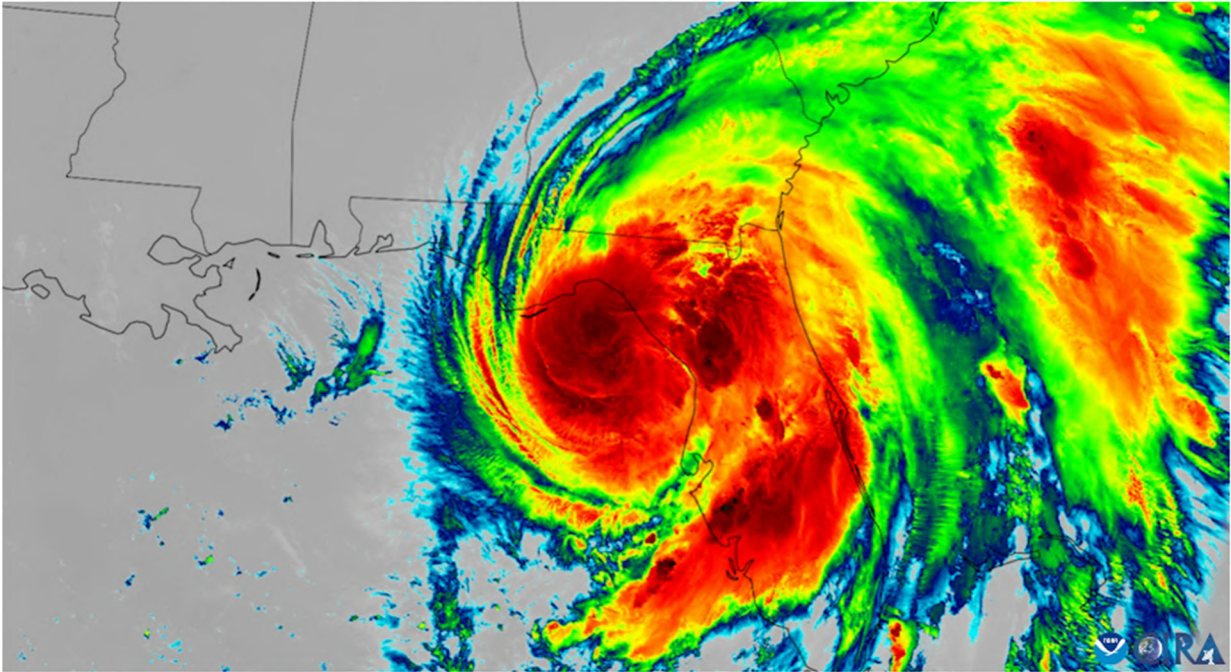
Source: National Hurricane Center, Debby Graphics Archive, available at
https://www.nhc.noaa.gov/archive/2024/FOUR_graphics.php.

**Hurricane Debby – Satellite View
Monday, August 5, 2024**



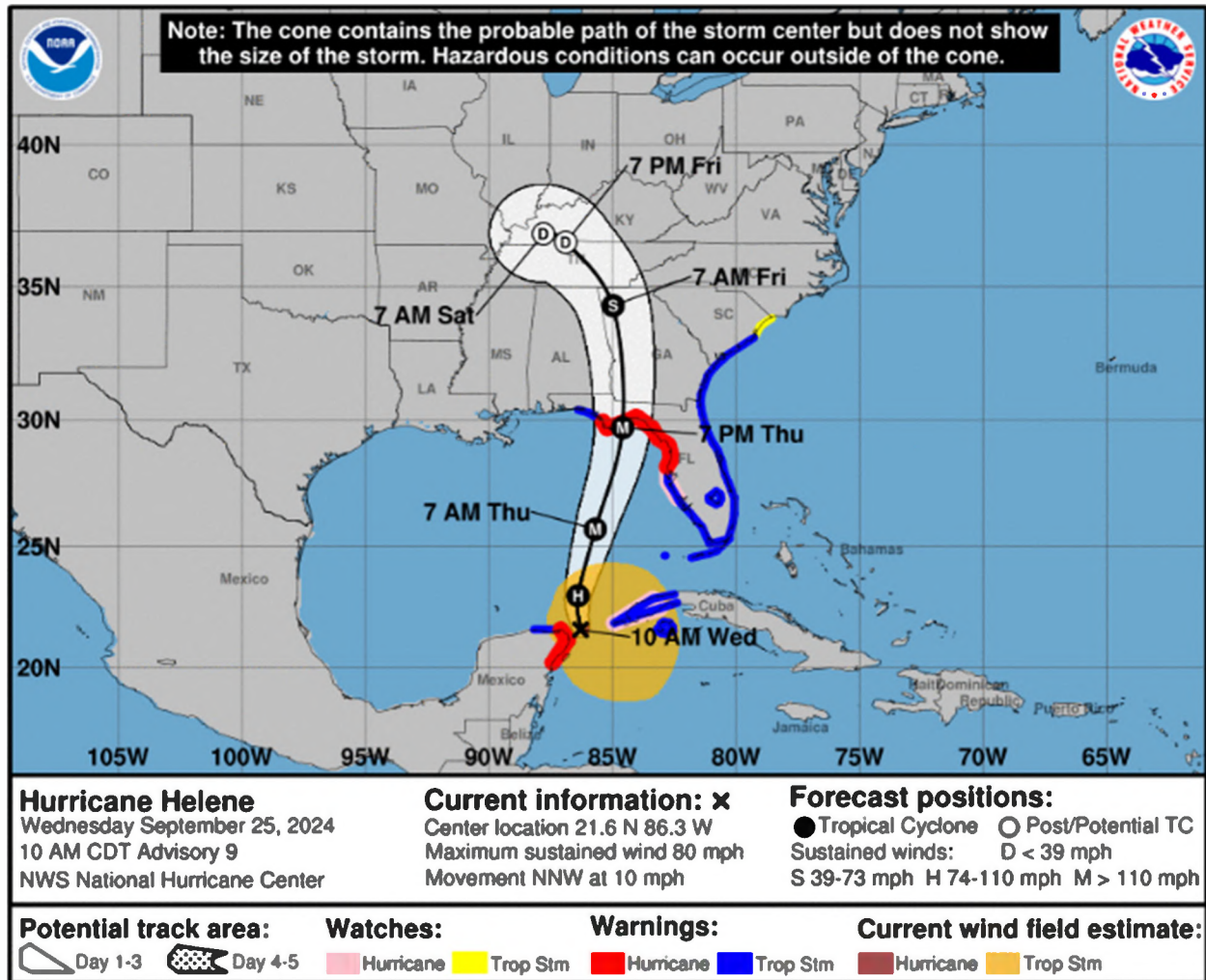
Source: CIRA Satellite Library, available at: https://satlib.cira.colostate.edu/wp-content/uploads/sites/23/2024/07/202408050731-202408051201_g16_conus_geoclorglm_debby-makes-landfall_labels.gif.

**Hurricane Debby – Satellite (IR) View
Monday, August 5, 2024**



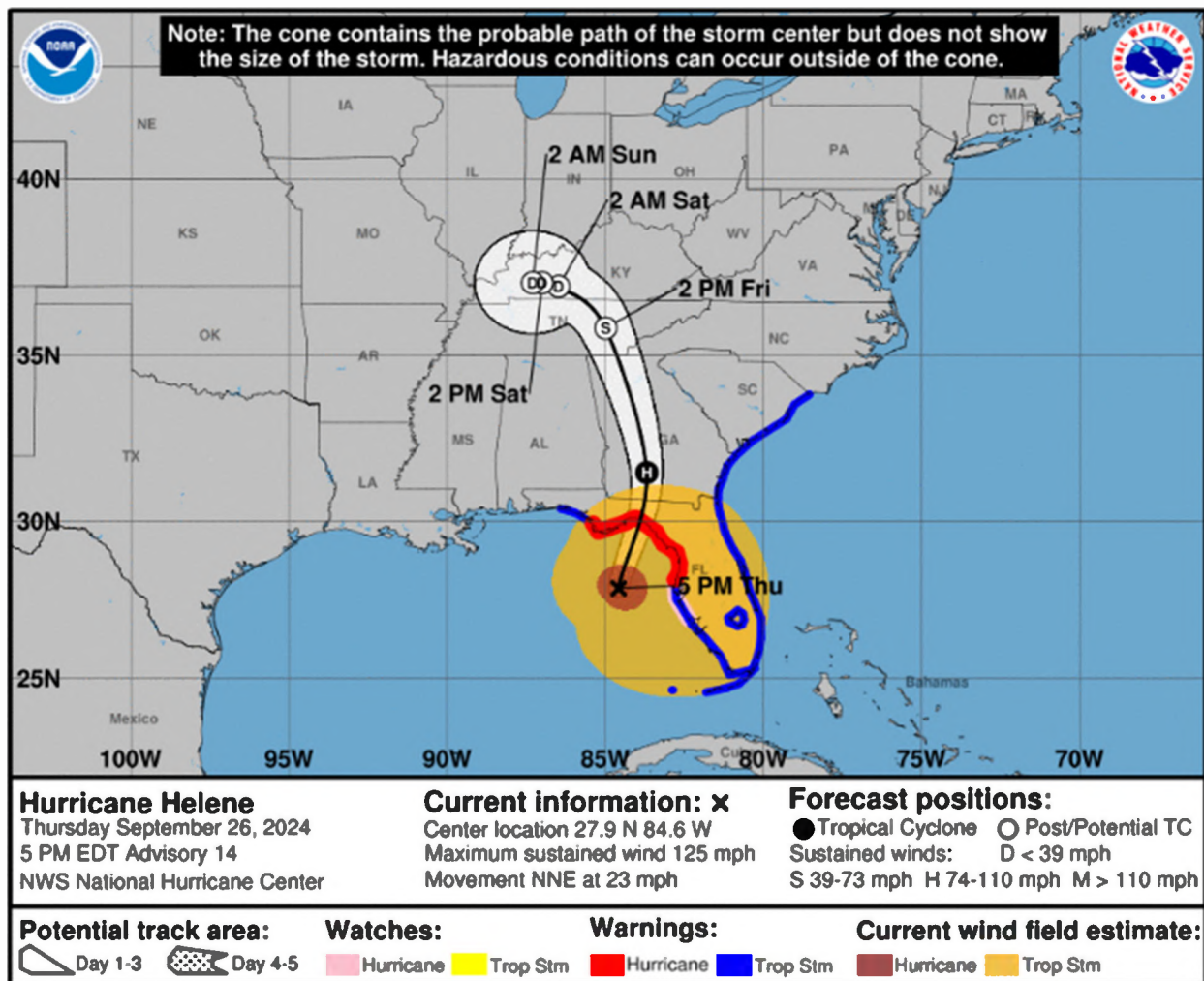
Source: CIRA Satellite Library, available at Source: https://satlib.cira.colostate.edu/wp-content/uploads/sites/23/2024/07/20240805080055-20240805120954_g16_abi_meso_ir13_debbylandfall_labels.mp4.

**Hurricane Helene - National Hurricane Center's Forecast Track
Wednesday, September 25, 2024**



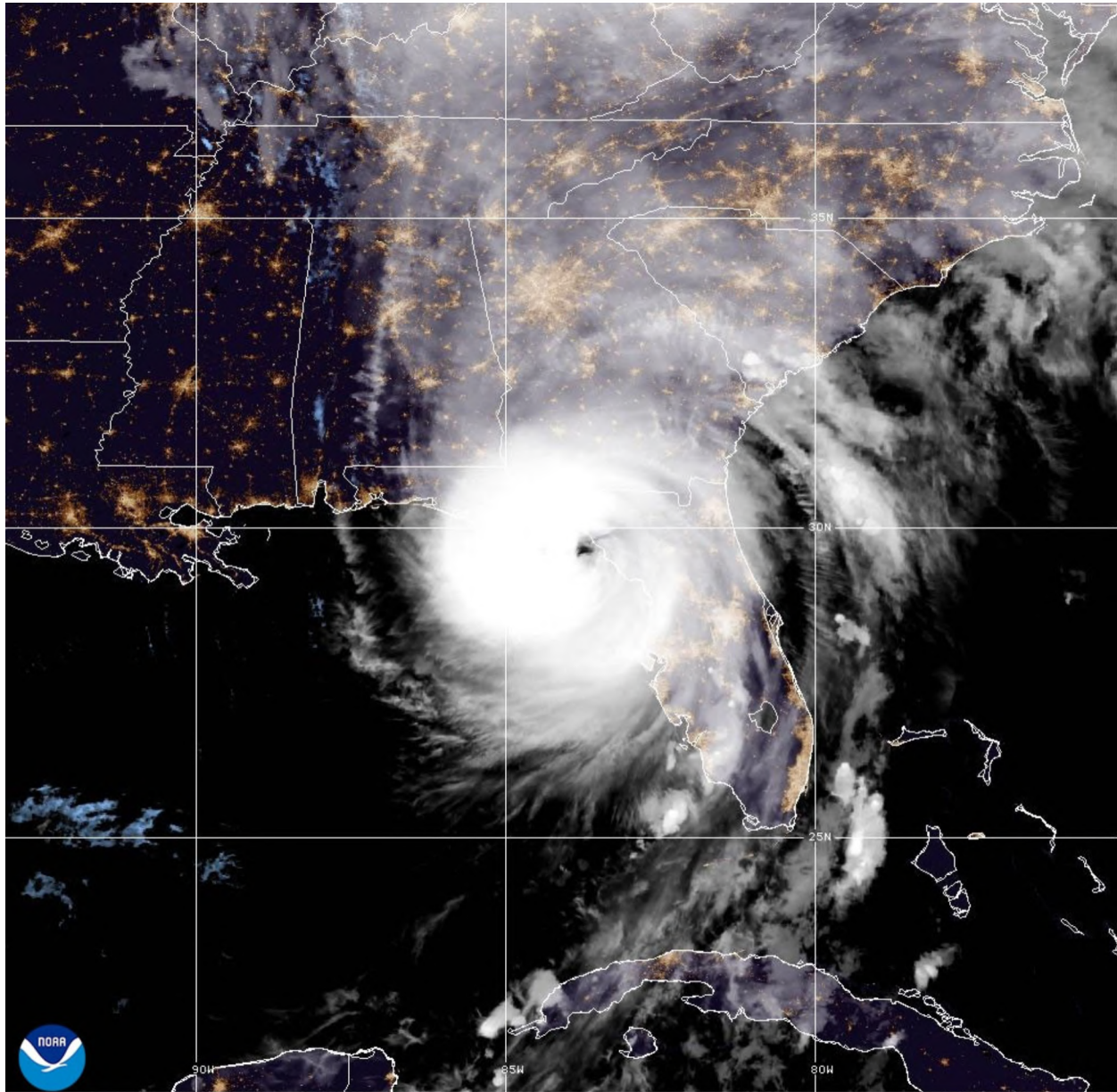
Source: National Hurricane Center, Helene Graphics Archive, available at
https://www.nhc.noaa.gov/archive/2024/HELENE_graphics.php

Hurricane Helene - National Hurricane Center's Forecast Track Thursday, September 26, 2024



Source: National Hurricane Center, Helene Graphics Archive, available at
https://www.nhc.noaa.gov/archive/2024/HELENE_graphics.php

**Hurricane Helene – Satellite View
Thursday, September 26, 2024**

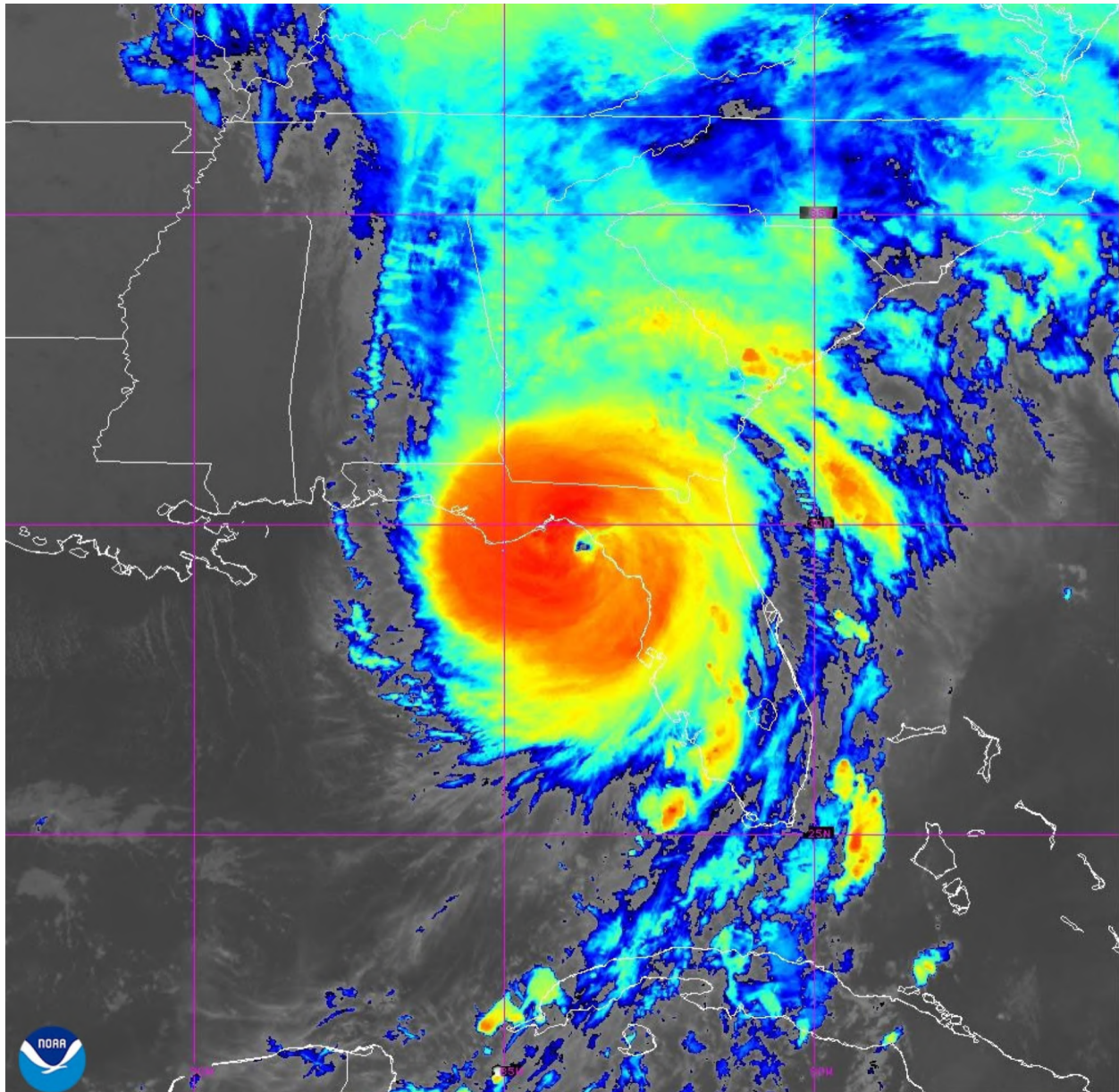


27 Sep 2024 02:00Z - NOAA/NESDIS/STAR - GOES-East - GEOCOLOR Composite - AL092024

Source: NOAA, available at:

<https://www.star.nesdis.noaa.gov/goes/floater.php?stormid=AL092024>.

**Hurricane Helene – Satellite (IR) View
Thursday, September 26, 2024**



27 Sep 2024 02:00Z - NOAA/NESDIS/STAR - GOES-East - Sandwich Composite - AL092024

Source: NOAA, available at:

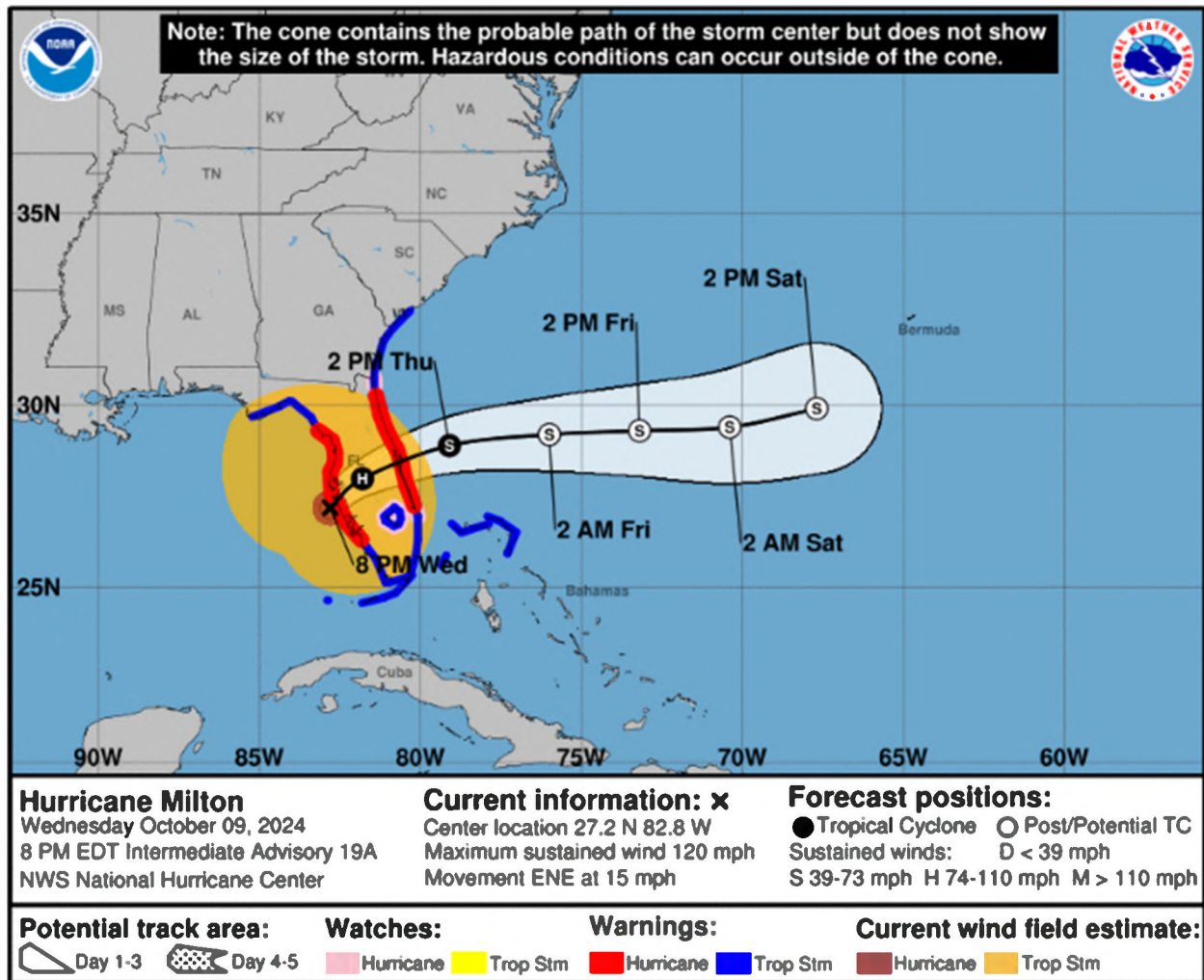
<https://www.star.nesdis.noaa.gov/goes/floater.php?stormid=AL092024>.

**Hurricane Milton - National Hurricane Center's Forecast Track
Tuesday, October 8, 2024**



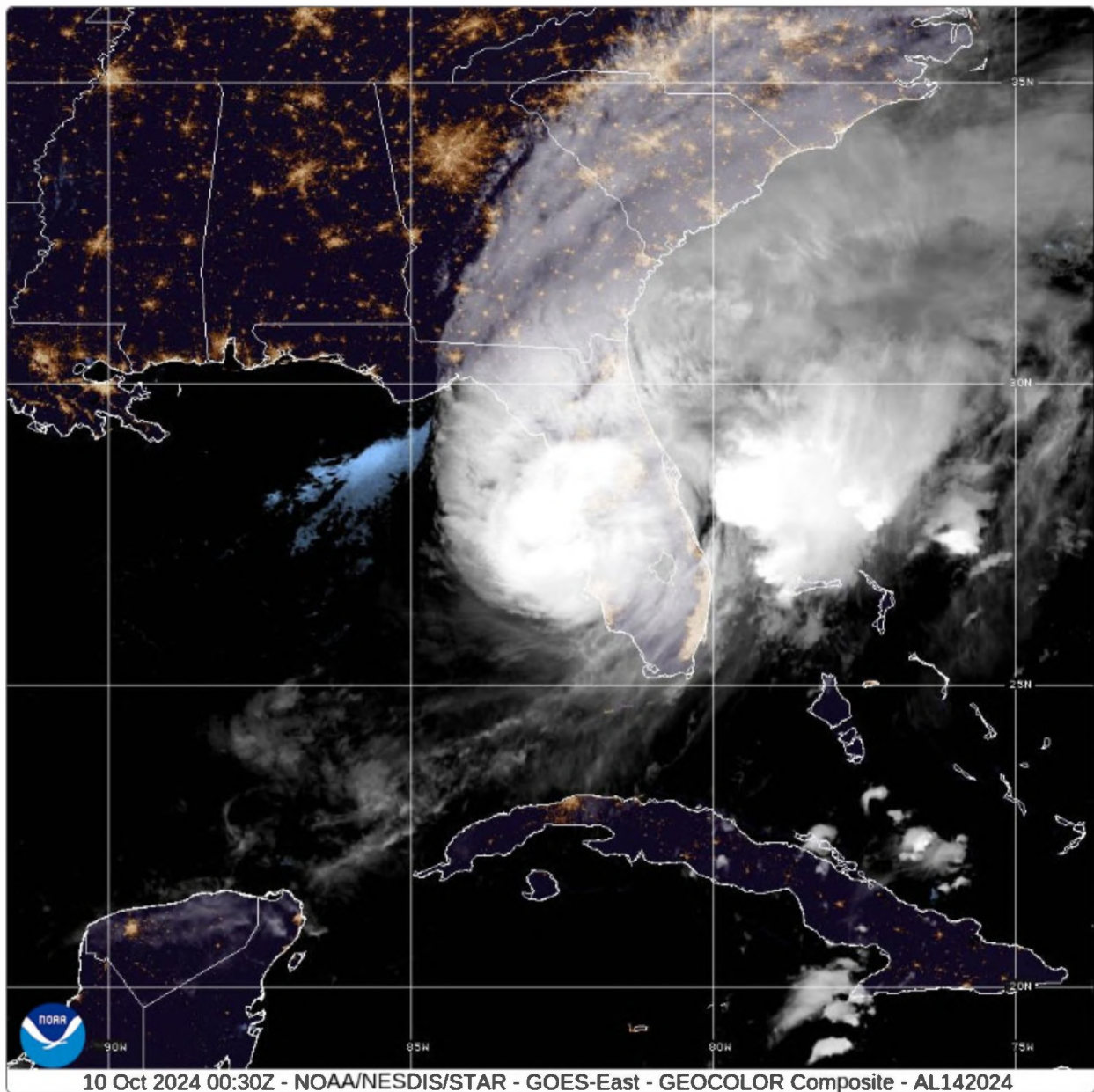
Source: National Hurricane Center, Milton Graphics Archive, available at
https://www.nhc.noaa.gov/archive/2024/MILTON_graphics.php.

**Hurricane Milton - National Hurricane Center's Forecast Track
Wednesday, October 9, 2024**



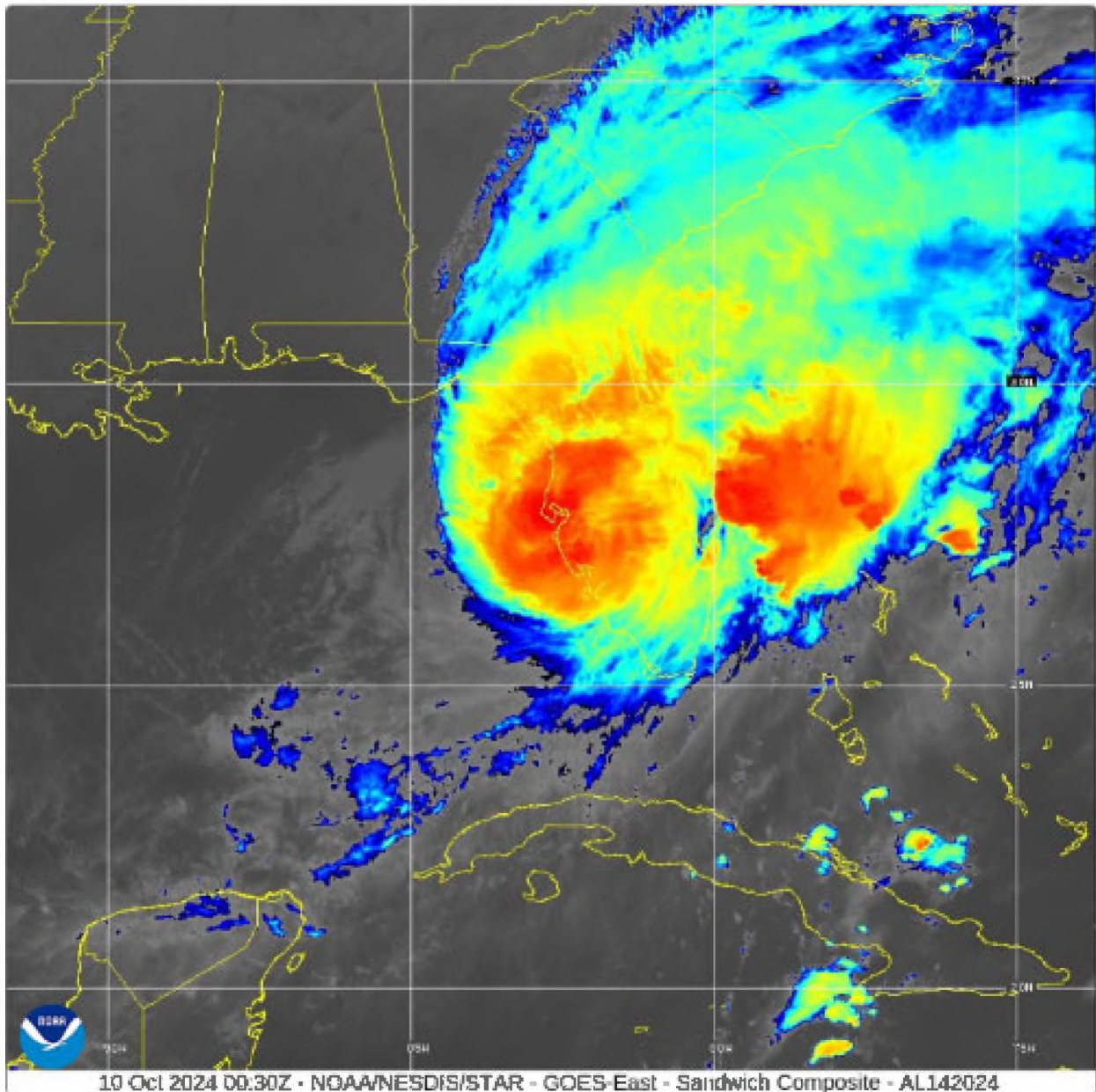
Source: National Hurricane Center, Milton Graphics Archive, available at
https://www.nhc.noaa.gov/archive/2024/MILTON_graphics.php.

**Hurricane Milton – Satellite View
Wednesday, October 9, 2024**



Source: NOAA, available at:
<https://www.star.nesdis.noaa.gov/goes/floater.php?stormid=AL142024>.

**Hurricane Milton – Satellite (IR) View
Wednesday, October 9, 2024**



Source: NOAA, available at:
<https://www.star.nesdis.noaa.gov/goes/floater.php?stormid=AL142024>.

FPL's T&D Hurricane Debby Restoration Costs (A) (\$000s)
Storm Costs through June 1, 2025

	<u>Transmission</u>	<u>Distribution</u>	<u>Total T&D (E)</u>	<u>% (E)</u>
Regular Payroll and Related Costs (B)	\$ 213	\$ 2,227	\$ 2,440	2%
Overtime Payroll and Related Costs (B)	\$ 665	\$ 7,055	\$ 7,720	8%
Contractors (C)	\$ 1,982	\$ 69,932	\$ 71,914	71%
Vehicle & Fuel	\$ 59	\$ 3,526	\$ 3,585	4%
Materials & Supplies	\$ 57	\$ 2,988	\$ 3,044	3%
Logistics	\$ 40	\$ 10,996	\$ 11,036	11%
Other (D)	\$ 135	\$ 1,388	\$ 1,524	2%
Total (E)	\$ 3,151	\$ 98,112	\$ 101,264	100%

(A) Includes costs associated with follow up work

(B) Represents total payroll charged to business unit (function) being supported – see Exhibit AM-1 (Debby) footnote (C)

(C) Includes line clearing of \$641 for Transmission and \$22,425 for Distribution

(D) Includes other miscellaneous costs, including payroll and related overheads from affiliate personnel directly supporting storm restoration

(E) Totals might not add due to rounding

FPL's T&D Hurricane Helene Restoration Costs (A) (\$000s)
Storm Costs through June 1, 2025

	<u>Transmission</u>	<u>Distribution</u>	<u>Total T&D (E)</u>	<u>% (E)</u>
Regular Payroll and Related Costs (B)	\$ 335	\$ 3,660	\$ 3,995	2%
Overtime Payroll and Related Costs (B)	\$ 932	\$ 8,988	\$ 9,919	5%
Contractors (C)	\$ 5,301	\$ 126,008	\$ 131,309	70%
Vehicle & Fuel	\$ 69	\$ 6,210	\$ 6,279	3%
Materials & Supplies	\$ 62	\$ 9,060	\$ 9,122	5%
Logistics	\$ 7	\$ 24,826	\$ 24,834	13%
Other (D)	\$ 223	\$ 2,532	\$ 2,755	1%
Total (E)	\$ 6,929	\$ 181,284	\$ 188,213	100%

(A) Includes costs associated with follow up work

(B) Represents total payroll charged to business unit (function) being supported – see Exhibit AM-2 (Helene) footnote (C)

(C) Includes line clearing of \$1,627 for Transmission and \$29,022 for Distribution

(D) Includes other miscellaneous costs, including payroll and related overheads from affiliate personnel directly supporting storm restoration

(E) Totals might not add due to rounding

FPL's T&D Hurricane Milton Restoration Costs (A) (\$000s)
Storm Costs through June 1, 2025

	<u>Transmission</u>	<u>Distribution</u>	<u>Total T&D (E)</u>	<u>% (E)</u>
Regular Payroll and Related Costs (B)	\$ 882	\$ 8,341	\$ 9,223	1%
Overtime Payroll and Related Costs (B)	\$ 1,692	\$ 19,727	\$ 21,419	3%
Contractors (C)	\$ 17,035	\$ 589,607	\$ 606,643	72%
Vehicle & Fuel	\$ 223	\$ 21,331	\$ 21,554	3%
Materials & Supplies	\$ 672	\$ 39,815	\$ 40,487	5%
Logistics	\$ 94	\$ 138,663	\$ 138,757	16%
Other (D)	\$ 557	\$ 5,543	\$ 6,100	1%
Total (E)	\$ 21,157	\$ 823,026	\$ 844,183	100%

(A) Includes costs associated with follow up work

(B) Represents total payroll charged to business unit (function) being supported – see Exhibit AM-3 (Milton) footnote (C)

(C) Includes line clearing of \$5,588 for Transmission and \$142,717 for Distribution

(D) Includes other miscellaneous costs, including payroll and related overheads from affiliate personnel directly supporting storm restoration

(E) Totals might not add due to rounding