



Joel T. Baker
Senior Attorney
Florida Power & Light Company
700 Universe Boulevard (LAW/JB)
Juno Beach, FL 33408
(561) 691-7255
(561) 691-7135 (Facsimile)
Joel.baker@fpl.com

May 21, 2026

-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:

Enclosed for filing on behalf of Florida Power & Light Company ("FPL") is FPL's
response to Staff's Third Data Request (Nos. 1-5) in Docket No. 20240149-EI.

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

Sincerely,

/s/ Joel T. Baker

Joel T. Baker
Fla. Bar No. 0108202

JTB
Enclosure

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 21st day of May 2026:

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 discovery-gcl@psc.state.fl.us <i>For Commission Staff</i>	Walt Trierweiler Charles J. Rehwinkel Austin A. Watrous 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 watrous.austin@leg.state.fl.us <i>For Office of Public Counsel</i>
---	--

s/ Joel T. Baker

Joel T. Baker

Fla. Bar No. 0108202

Attorney for Florida Power & Light Company

QUESTION:

Refer to Exhibit AM-1 and Appendix B. For Hurricane Debby, please explain why there was a reduction in costs from the petition to the testimony in the amounts identified below for each of the following categories:

- a. Contractors - \$18.06 million
- b. Line Clearing - \$4.206 million
- c. Vehicle & Fuel - \$0.299 million
- d. Materials & Supplies - \$1.337 million

RESPONSE:

The changes identified by Staff's Third Data Request No. 1 reflect the normal and expected variances from preliminary storm cost estimates to final recorded costs after completion of restoration, invoice review, cost validation, and application of the applicable incremental costing and capitalization methodologies required by Rule 25-6.0143, F.A.C.

As described in FPL witness Mohamed's direct testimony, during a qualifying storm event, as the restoration process continues, FPL accumulates storm costs through dedicated work orders and tracks them across major cost categories, with estimates refined as actual costs are recorded and remaining obligations are identified. Following completion of restoration, estimates transition to a bottom-up approach grounded in recorded actuals, supported by time reporting, vendor documentation, and management review, consistent with Generally Accepted Accounting Principles (GAAP) loss contingency guidance. Even after restoration is substantially complete, costs continue to be reviewed and updated until finalized, with the Company applying incremental costing and capitalization methodologies required by Rule 25-6.0143, F.A.C.

FPL filed its initial petition on October 29, 2024, seeking approval to implement an interim storm surcharge consistent with, and as permitted by, the storm cost recovery mechanism in effect under the 2021 Stipulation and Settlement Agreement approved by the Commission in Order Nos. PSC-2021-0446-S-EI and PSC-2021-0446A-S-EI.¹ Under that mechanism, FPL is permitted to begin recovery of storm costs on an interim basis 60 days after filing a storm cost recovery petition and tariff with the Commission, subject to the applicable storm-cost review and final disposition process. The interim storm surcharge facilitates timely recovery of storm costs, which reduces the total overall cost to customers by reducing the financing costs FPL otherwise would incur if no interim surcharge were authorized.

¹ The same storm-cost recovery framework was later continued in the 2025 Stipulation and Settlement Agreement approved by the Commission in Order Nos. PSC-2026-0022-S-EI and PSC-2026-0117-FOF-EI in Docket No. 20250011-EI.

Florida Power & Light Company
Docket No. 20240149-EI
Staff's Third Data Request
Request No. 1
Page 2 of 2

Consistent with this Commission-approved storm cost recovery framework, FPL's October 29, 2024 petition was filed less than one month after Hurricane Milton impacted Florida and before FPL could complete the detailed cost review necessary to determine final restoration costs for Hurricanes Debby, Helene, and Milton. As a result, the petition necessarily relied on preliminary damage assessments, anticipated resource needs, historical storm experience, and then-available cost information.

In Order No. PSC-2024-0503-PCO-EI issued December 17, 2024, the Commission authorized FPL to implement the interim storm restoration recovery charge subject to refund, approved the associated tariff effective the first billing cycle of January 2025, and expressly stated that the interim surcharges would be subject to final true-up once total actual storm costs are known. As the Commission recognized, approval of the interim charge is preliminary in nature; once actual storm restoration costs are known, those costs are reviewed for prudence and reasonableness and compared to the amounts recovered through the interim charge, with any over- or under-recovery and associated interest addressed later.

The final recoverable storm costs included in FPL's December 19, 2025 petition and supporting testimony are based on completed restoration activities, recorded actual costs, vendor documentation, time reporting, management review, and finalized accounting and regulatory treatment. Upon Commission approval, those final recoverable storm costs will be reconciled against the amounts collected through the interim storm restoration recovery charge, with interest, and any resulting over-recovery refunded to customers or under-recovery collected from customers, as appropriate.

The reductions identified for Hurricane Debby therefore do not reflect a miscalculation in the petition. They reflect the refinement of preliminary estimates into final actual costs consistent with FPL's Commission-approved storm cost recovery mechanism.

For Hurricane Debby, the reductions were as follows:

- a. Contractors – Final costs were \$51.63 million, or 26% less than originally estimated
- b. Line Clearing – Final costs were \$23.06 million, or 15% less than originally estimated
- c. Vehicle and Fuel – Final costs were \$3.90 million, or 7% less than originally estimated
- d. Materials and Supplies – Final costs were \$3.11 million, or 30% less than originally estimated

In short, the variances identified by Staff's Third Data Request No. 1 are the expected result of comparing preliminary estimates developed during an active storm-restoration period against final recoverable storm costs developed after restoration was complete and FPL's detailed cost review and regulatory accounting process had been finalized. The interim surcharge mechanism allowed FPL to begin timely recovery of estimated storm costs, reduced financing costs for customers, and preserved the Commission's authority to review the final storm costs and true up any over- or under-recovery with interest.

**Florida Power & Light Company
Docket No. 20240149-EI
Staff's Third Data Request
Request No. 2
Page 1 of 1**

QUESTION:

Refer to Exhibit AM-1 and Appendix B. For Hurricane Debby, please explain why there was an increase in costs from the petition to the testimony for the Logistics category by \$3.245 million.

RESPONSE:

This variance for the Logistics category related to Hurricane Debby cannot be attributed to any specific, individual cost driver(s), but rather is attributable to the actual costs being \$11.889 million, or 38% greater than those originally estimated through the process described in FPL's response to Staff's Third Data Request, No. 1.

Florida Power & Light Company
Docket No. 20240149-EI
Staff's Third Data Request
Request No. 3
Page 1 of 1

QUESTION:

Refer to Exhibit AM-2 and Appendix C. For Hurricane Helene, please explain why there was a reduction in costs from the petition to the testimony for the Line Clearing category by \$0.654 million.

RESPONSE:

The Line Clearing variance related to Hurricane Helene cannot be attributed to any specific, individual cost driver(s), but rather is attributable to the actual costs being \$30.649 million, or 2% less than those originally estimated through the process described in FPL's Response to Staff's Third Data Request, No. 1.

QUESTION:

Refer to Exhibit AM-2 and Appendix C. For Hurricane Helene, please explain why there was an increase in costs from the petition to the testimony in the amounts identified below for each of the following categories:

- a. Contractors - \$6.984 million
- b. Vehicle & Fuel - \$3.900 million
- c. Materials & Supplies - \$2.426 million
- d. Logistics - \$1.443 million

RESPONSE:

The variances for these costs related to Hurricane Helene cannot be attributed to any specific individual cost driver(s), but rather is a fallout resulting when comparing the actual costs for each category listed to those amounts originally estimated through the process described in FPL's Response to Staff's Third Data Request, No. 1.

- a. Contractors – Final costs were \$101.605 million, or 7% greater than originally estimated
- b. Vehicle and Fuel – Final costs were \$6.456 million, or 153% greater than originally estimated
- c. Materials and Supplies – Final costs were \$9.309 million, or 35% greater than originally estimated
- d. Logistics – Final costs were \$25.771 million, or 6% greater than originally estimated

Florida Power & Light Company
Docket No. 20240149-EI
Staff's Third Data Request
Request No. 5
Page 1 of 1

QUESTION:

Refer to Exhibit AM-3 and Appendix D. For Hurricane Milton, please explain why there was a reduction in the total retail incremental storm costs from the petition to the testimony by \$36.710 million.

RESPONSE:

The variance in the total incremental storm costs related to Hurricane Milton cannot be attributed to any specific individual cost driver(s), but rather is a fallout resulting when comparing the actual costs for each category to those amounts originally estimated through the process described in FPL's Response to Staff's Third Data Request, No. 1. Total retail incremental costs were \$774.372 million, or 5% less than originally estimated.