BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Florida Power & Light Company.	DOCKET NO. 160021-EI
In re: Petition for approval of 2016-2018 storm hardening plan, by Florida Power & Light Company.	DOCKET NO. 160061-EI
In re: 2016 depreciation and dismantlement study by Florida Power & Light Company.	DOCKET NO. 160062-EI
In re: Petition for limited proceeding to modify and continue incentive mechanism, by Florida Power & Light Company.	DOCKET NO. 160088-EI
	DATED: September 19, 2016

LARSON POST-HEARING STATEMENT AND BRIEF

Pursuant to Order No. PSC-16-0125-PCO-EI, issued on March 25, 2016, as modified by Order Nos. PSC-16-0182-PCO-EI, PSC-16-0182-PCO-EI, and PSC-16-0300-PCO-EI issued on May 4, May 27, and July 27, 2016; respectively, as subsequently amended at hearing, and pursuant to Rule 28-106.215, Florida Administrative Code ("F.A.C."), Mr. Daniel R. Larson and Mrs. Alexandria Larson ("Larson"), by and though undersigned counsel, hereby submit their Post-Hearing Statement and Brief.

STATEMENT OF BASIC POSITION

The Florida Power & Light ("FPL") rate request is excessive and should be properly denied by the Florida Public Service Commission ("Commission") based upon the record evidence adduced at hearing. Specifically, the Return on Equity ("ROE") requested by FPL is excessive and far greater than necessary to attract capital under the holdings in *Bluefield* and

Hope.[1] The mid-point ROE for FPL has been held constant at 10.5% since the FPL Rate Case Settlement in 2010. During the past six (6) years, FPL has made billions of dollars of investment under the 10.5% ROE. FPL's assertion that a higher ROE is required to make additional investments is self-serving and without merit based upon the past six (6) years of making the same investments at a lower ROE. FPL's existing higher than average equity ratio, also weighs against the Commission granting a higher ROE. If a higher ROE is granted the requested equity ratio should be reduced. An ROE adder for superior service is unwarranted and should be denied. The fact that a Texas utility can deliver 1,000 kWh of electricity at approximately half the cost that FPL charges its residential customers leaves much room for improvement.

ISSUES AND POSITIONS

LEGAL ISSUES

ISSUE 1: Does the Commission possess the authority to grant FPL's proposal to continue utilizing the storm cost recovery mechanism that was part of the settlement agreements approved in Order Nos. PSC-11-0089-S-EI and PSC-13-0023-S-EI?

No. Section 366.8260, Florida Statutes, Storm-recovery financing, sets forth the statutory requirements for storm cost recovery.

ISSUE 2: Does the Commission have the authority to approve FPL's requested limited scope adjustment for the new Okeechobee Energy Center in June of 2019?

The Larsons' do not specifically contesting the authority of the Commission to approve a limited scope adjustment in this proceeding, but assert that a limited scope adjustment is not appropriate or required consistent with the position taken by the Office of Public Counsel ("OPC") on this specific issue and should be further reserved for use in settlements

ISSUE 3: Does the Commission possess the authority to adjust FPL's authorized return on equity based on FPL's performance?

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[1] *Federal Power Comm'n v. Hope Natural Gas Co*., 320 U.S. 591 (1944); *Bluefield Water Works & Improvement Co. v. Pub. Serv. Comm'n of West Virginia*, 262 U.S. 679 (1923).

No. The midpoint Return on Equity ("ROE") used by the Commission already provides FPL with the opportunity to earn an ROE up to 100 basis points higher than the midpoint ROE through performance and capturing operational efficiencies.

ISSUE 4: Does the Commission have the authority to include non-electric transactions in an incentive mechanism?

*No. The Commission would exceed its authority by approving this request. See *Citizens v. Graham*, 191 So. 3d 897 (Fla 2016) (cost recovery is permissible only for costs arising from the generation, transmission, or distribution of electricity).*

ISSUE 5: Does the Commission have the authority to approve proposed depreciation rates to be effective January 1, 2017, based upon a depreciation study that uses year-end 2017 plant balances?

No. The use of this study would violate the regulatory principal of matching costs with rates.

ISSUE 6: Are Commercial Industrial Load Control (CILC) and Commercial/Industrial Demand Reduction (CDR) credits subject to adjustment in this proceeding?

No CILC and CDR credits should be addressed via a separate docket.

STORM HARDENING ISSUES

ISSUE 7: Does the Company's Storm Hardening Plan (Plan) comply with the National Electric Safety Code (ANSI C-2) (NESC) as required by Rule 25-6.0345, F.A.C.?

The Larsons adopt OPC's position on this issue.

ISSUE 8: Does the Company's Plan address the extreme wind loading standards specified in Figure 250-2(d) of the 2012 edition of the NESC for new distribution facility construction as required by Rule 25-6.0342(3)(b)1, F.A.C.?

The Larsons adopt OPC's position on this issue.

ISSUE 9: Does the Company's Plan address the extreme wind loading standards specified by Figure 250-2(d) of the 2012 edition of the NESC for major planned work on the distribution system, including expansion, rebuild, or relocation of existing facilities, assigned on or after the effective date of this rule distribution facility construction as required by Rule 25-6.0342(3)(b)2, F.A.C.?

The Larsons adopt OPC's position on this issue.

ISSUE 10: Does the Company's Plan address the extreme wind loading standards specified by Figure 250-2(d) of the 2012 edition of the NESC for distribution facilities serving critical infrastructure facilities and along major thoroughfares taking into account political and geographical boundaries and other applicable operational considerations as required by Rule 25-6.0342(3)(b)3, F.A.C.?

The Larsons adopt OPC's position on this issue.

ISSUE 11: Is the Company's Plan designed to mitigate damages to underground and supporting overhead transmission and distribution facilities due to flooding and storm surges as required by Rule 25-6.0342(3)(c), F.A.C.?

The Larsons adopt OPC's position on this issue.

ISSUE 12: Does the Company's Plan address the extent to which the placement of new and replacement distribution facilities facilitate safe and efficient access for installation and maintenance as required by Rule 25-6.0342(3)(d), F.A.C.?

The Larsons adopt OPC's position on this issue.

ISSUE 13: Does the Company's Plan provide a detailed description of its deployment strategy including a description of the facilities affected; including technical design specifications, construction standards, and construction methodologies employed as required by Rules 25-6.0341 and 25-6.0342(4)(a), F.A.C.?

The Larsons adopt OPC's position on this issue.

ISSUE 14: Does the Company's Plan provide a detailed description of its deployment strategy as it relates to the communities and areas within the utility's service area where the electric infrastructure improvements, including facilities identified by the utility as critical infrastructure and along major thoroughfares are to be made as required by Rules 25-6.0342(3)(b)3 and 25-6.0342(4)(b), F.A.C.?

The Larsons adopt OPC's position on this issue.

ISSUE 15: Does the Company's Plan provide a detailed description of its deployment strategy to the extent that the electric infrastructure improvements involve joint use facilities on which third-party attachments exist as required by Rule 25-6.0342(4)(c), F.A.C.?

The Larsons adopt OPC's position on this issue.

ISSUE 16: Does the Company's Plan provide a reasonable estimate of the costs and benefits to the utility of making the electric infrastructure improvements, including the effect on reducing storm restoration costs and customer outages as required by Rule 25-6.0342(4)(d), F.A.C.?

The Larsons adopt OPC's position on this issue.

ISSUE 17: Does the Company's plan provide an estimate of the costs and benefits to third-party attachers affected by the electric infrastructure improvements, including the effect on reducing storm restoration costs and customers outages realized by the third-party attachers as required by Rule 25-6.0342(4)(e), F.A.C.?

The Larsons adopt OPC's position on this issue.

ISSUE 18: Does the Company's Plan include a written Attachment Standards and Procedures addressing safety, reliability, pole loading capacity, and engineering standards and procedure for attachments by others to the utility's electric transmission and distribution poles that meet or exceed the edition of the National Electrical Safety Code (ANSI C-2) that is applicable as required by Rule 25-6.0342(5), F.A.C.?

The Larsons adopt OPC's position on this issue.

WOODEN POLE INSPECTION PROGRAM

ISSUE 19: Does the Company's eight-year wooden pole inspection program comply with Order No. PSC-06-0144-PAA-EI, issued on February 27, 2006, in Docket No. 060078-EI, and Order No. PSC-06-0778-PAA-EU, issued on September 18, 2006, in Docket No. 060531-EU?

The Larsons adopt OPC's position on this issue.

10 POINT STORM PREPAREDNESS INITIATIVES

ISSUE 20: Does the Company's 10-point initiatives plan comply with Order No. PSC-06-0351-PAA-EI, issued on April 25, 2006; Order No. PSC-06-0781-PAA-EI, issued on September 19, 2006; and Order No. PSC-07-0468-FOF-EI, issued on May 30, 2007, in Docket No. 060198-EI?

The Larsons adopt OPC's position on this issue.

APPROVAL OF STORM HARDENING PLAN

ISSUE 21: Should the Company's Storm Hardening Plan for the period 2016 through 2018 be approved?

To the extent the plan is based on excessive and unnecessary levels of expenditures, the plan as submitted by FPL should not be approved.

COSTS FOR STORM HARDENING AND 10 POINT INITIATIVES

ISSUE 22: What adjustments, if any, should be made to rate base associated with the storm hardening Rule 25-6.0342, F.A.C., and 10 point initiatives requirements?

The Larsons adopt OPC's position on this issue.

ISSUE 23: What adjustments, if any, should be made to operating expenses associated with the storm hardening Rule 25-6.0342, F.A.C., and 10 point initiatives requirements?

The Larsons adopt OPC's position on this issue.

TEST PERIOD AND FORECASTING

ISSUE 24: Is FPL's projected test period of the 12 months ending December 31, 2017, appropriate?

The Larsons adopt OPC's position on this issue.

ISSUE 25: Do the facts of this case support the use of a subsequent test year ending December 31, 2018 to adjust base rates?

The Larsons adopt OPC's position on this issue.

ISSUE 26: Has FPL proven any financial need for rate relief in any period subsequent to the projected test period ending December 31, 2017?

The Larsons adopt OPC's position on this issue.

ISSUE 27: Is FPL's projected subsequent test period of the 12 months ending December 31, 2018, appropriate?

The Larsons adopt OPC's position on this issue.

ISSUE 28: Are FPL's forecasts of Customers, KWH, and KW by Rate Schedule and Revenue Class, for the 2017 projected test year appropriate?

No. The forecasts understate revenue driving a higher revenue requirement

ISSUE 29: Are FPL's forecasts of Customers, KWH, and KW by Rate Schedule and Revenue Class, for the 2018 projected test year appropriate, if applicable?

No. The forecasts understate revenue driving a higher revenue requirement

ISSUE 30: Are FPL's forecasts of Customers, KWH, and KW by Rate Schedule and Revenue Class, for the period June 2019 to May 2020, appropriate, if applicable?

No. The forecasts understate revenue driving a higher revenue requirement

ISSUE 31: Are FPL's projected revenues from sales of electricity by rate class at present rates for the 2016 prior year and projected 2017 test year appropriate?

The Larsons adopt OPC's position on this issue.

ISSUE 32: Are FPL's projected revenues from sales of electricity by rate class at present rates for the projected 2018 test year appropriate, if applicable?

The Larsons adopt OPC's position on this issue.

ISSUE 33: What are the appropriate inflation, customer growth, and other trend factors for use in forecasting the 2017 test year budget?

The Larsons adopt OPC's position on this issue.

ISSUE 34: What are the appropriate inflation, customer growth, and other trend factors for use in forecasting the 2018 test year budget, if applicable?

The Larsons adopt OPC's position on this issue.

ISSUE 35: Are FPL's estimated operating and tax expenses, for the projected 2017 test year, sufficiently accurate for purposes of establishing rates?

The Larsons adopt OPC's position on this issue.

ISSUE 36: Are FPL's estimated operating and tax expenses, for the projected 2018 subsequent year, sufficiently accurate for purposes of establishing rates, if applicable?

The Larsons adopt OPC's position on this issue.

ISSUE 37: Are FPL's estimated Net Plant in Service and other rate base elements, for the projected 2017 test year, sufficiently accurate for purposes of establishing rates?

The Larsons adopt OPC's position on this issue.

ISSUE 38: Are FPL's estimated Net Plant in Service and other rate base elements, for the projected 2018 subsequent year, sufficiently accurate for purpose of establishing rates, if applicable?

The Larsons adopt OPC's position on this issue.

QUALITY OF SERVICE

ISSUE 39: Is the quality of the electric service provided by FPL adequate taking into consideration: a) the efficiency, sufficiency and adequacy of FPL's facilities provided and the services rendered; b) the cost of providing such services; c) the value of such service to the public; d) the ability of the utility to improve such service and facilities; e) energy conservation and the efficient use of alternative energy resources; and f) any other factors the Commission deems relevant.

The quality of service is adequate for general ratemaking purposes. The quality service is no better than what FPL customers have already paid for in rates and which FPL is obligated to provide under the regulatory compact. The current quality of service is not sufficient to justify a higher ROE.

DEPRECIATION STUDY

ISSUE 40: What, if any, are the appropriate capital recovery schedules?

The Larsons adopt OPC's position on this issue.

ISSUE 41: What is the appropriate depreciation study date?

The Larsons adopt OPC's position on this issue.

ISSUE 42: If the appropriate depreciation study date is not December 31, 2017, what action should the Commission take?

The Larsons adopt OPC's position on this issue.

ISSUE 43: Should accounts 343 and 364 be separated into subaccounts and different depreciation rates be set for the subaccounts using separate parameters? If so, how should the accumulated depreciation reserves be allocated and what parameters should be applied to each subaccount?

The Larsons adopt OPC's position on this issue.

ISSUE 44: What are the appropriate depreciation parameters (e.g., service lives, remaining lives, net salvage percentages, and reserve percentages) and resulting depreciation rates for the accounts and subaccounts related to each production unit?

The Larsons adopt OPC's position on this issue.

ISSUE 45: What are the appropriate depreciation parameters (e.g., service lives, remaining lives, and net salvage percentages) and resulting depreciation rates for each transmission, distribution, and general plant account, and subaccounts, if any?

The Larsons adopt OPC's position on this issue.

ISSUE 46: Based on the application of the depreciation parameters and resulting depreciation rates that the Commission deems appropriate, and a comparison of the theoretical reserves to the book reserves, what are the resulting imbalances?

The Larsons adopt OPC's position on this issue.

ISSUE 47: If the Commission accepts FPL's depreciation study for purposes of establishing its proposed depreciation rates and related expense, what adjustments, if any, are necessary?

The Larsons adopt OPC's position on this issue.

ISSUE 48: What, if any, corrective reserve measures should be taken with respect to the imbalances identified in Issue 46?

The Larsons adopt OPC's position on this issue.

ISSUE 49: What should be the implementation date for revised depreciation rates, capital recovery schedules, and amortization schedules?

The Larsons adopt OPC's position on this issue.

ISSUE 50: Should FPL's currently approved annual dismantlement accrual be revised?

The Larsons adopt OPC's position on this issue.

ISSUE 51: What, if any, corrective dismantlement reserve measures should be approved?

The Larsons adopt OPC's position on this issue.

ISSUE 52: What is the appropriate annual accrual and reserve for dismantlement:

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year?

The Larsons adopt OPC's position on this issue.

RATE BASE

ISSUE 53: Should the revenue requirement associated with West County Energy Center Unit 3 currently collected through the Capacity Cost Recovery Clause be included in base rates?

The Larsons adopt OPC's position on this issue.

ISSUE 54: Has FPL appropriately accounted for the impact of the Cedar Bay settlement agreement:

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year?

The Larsons adopt OPC's position on this issue.

ISSUE 55: Has FPL made the appropriate adjustments to remove all non-utility activities from Plant in Service, Accumulated Depreciation and Working Capital

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year?

The Larsons adopt OPC's position on this issue.

ISSUE 56: What is the appropriate amount of Plant in Service for FPL's Large Scale Solar Projects?

The Larsons adopt OPC's position on this issue.

ISSUE 57: Is FPL's replacement of its peaking units reasonable and prudent?

The Larsons adopt OPC's position on this issue.

ISSUE 58A: Is FPL's DOT5 combustion turbine upgrade reasonable and prudent?

The Larsons adopt Sierra Club's position on this issue.

ISSUE 59: If adjustments are made to FPL's proposed depreciation and dismantling expenses, what is the impact on rate base:

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year?

The Larsons adopt OPC's position on this issue.

ISSUE 60: What is the appropriate level of Plant in Service (Fallout Issue)

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year?

The Larsons adopt OPC's position on this issue.

ISSUE 61: What is the appropriate level of Accumulated Depreciation (Fallout Issue)

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year?

The Larsons adopt OPC's position on this issue.

ISSUE 62: Are FPL's proposed adjustments to move certain CWIP projects from base rates to the Environmental Cost Recovery Clause appropriate?

The Larsons adopt OPC's position on this issue.

ISSUE 63: Are FPL's proposed adjustments to move certain CWIP projects from base rates to the Energy Conservation Cost Recovery Clause appropriate?

No. The proposed adjustments should be denied.

ISSUE 64: Is the company's proposed adjustment to remove Fukushima-related costs from the rate base and recover all Fukushima-related capital costs in the Capacity Cost Recovery Clause appropriate?

No. The proposed adjustments should be denied.

ISSUE 65: What is the appropriate level of Construction Work in Progress to be included in rate base:

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year?

The Larsons adopt OPC's position on this issue.

ISSUE 66: Are FPL's proposed reserves for Nuclear End of Life Material and Supplies and Last Core Nuclear Fuel appropriate:

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year?

The Larsons adopt OPC's position on this issue.

ISSUE 67: What is the appropriate level of Nuclear Fuel (NFIP, Nuclear Fuel Assemblies in Reactor, Spent Nuclear Fuel less Accumulated Provision for Amortization of Nuclear Fuel Assemblies, End of Life Materials and Supplies, Nuclear Fuel Last Core)

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year?

The Larsons adopt OPC's position on this issue.

ISSUE 68: What is the appropriate level of Property Held for Future Use:

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year?

The Larsons adopt OPC's position on this issue.

ISSUE 69: What is the appropriate level of fossil fuel inventories:

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year?

The Larsons adopt OPC's position on this issue.

ISSUE 70: Should the unamortized balance of Rate Case Expense be included in Working Capital and, if so, what is the appropriate amount to include:

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year

The Larsons adopt OPC's position on this issue.

ISSUE 71: What is the appropriate amount of injuries and damages (I&D) reserve to include in rate base?

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year

The Larsons adopt OPC's position on this issue.

ISSUE 72: What is the appropriate amount of deferred pension debit in working capital for FPL to include in rate base

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year?

The Larsons adopt OPC's position on this issue.

ISSUE 73: Should the unbilled revenues be included in working capital

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year?

The Larsons adopt OPC's position on this issue.

ISSUE 74: What is the appropriate methodology for calculating FPL's Working Capital:

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year?

The Larsons adopt OPC's position on this issue.

ISSUE 75: If FPL's balance sheet approach methodology for calculating its Working Capital is adopted, what adjustments, if any, should be made to FPL's proposed Working Capital:

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year?

The Larsons adopt OPC's position on this issue.

ISSUE 76: Should FPL's requested change in methodology for recovering nuclear maintenance outage costs from accrue-in-advance to defer-and-amortize be approved? If so, are any adjustments necessary:

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year?

The Larsons adopt OPC's position on this issue.

ISSUE 77: What is the appropriate level of Working Capital (Fallout Issue)

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year?

The Larsons adopt OPC's position on this issue.

ISSUE 78: What is the appropriate level of rate base:

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year?

The Larsons adopt OPC's position on this issue.

COST OF CAPITAL

ISSUE 79: What is the appropriate amount of accumulated deferred taxes to include in the capital structure and should a proration adjustment to deferred taxes be included in capital structure:

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year?

The Larsons adopt OPC's position on this issue.

ISSUE 80: What is the appropriate amount and cost rate of the unamortized investment tax credits to include in the capital structure:

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year?

The Larsons adopt OPC's position on this issue.

ISSUE 81: What is the appropriate amount and cost rate for short-term debt to include in the capital structure:

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year?

The Larsons adopt OPC's position on this issue.

ISSUE 82: What is the appropriate amount and cost rate for long-term debt to include in the capital structure:

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year?

The Larsons adopt OPC's position on this issue.

ISSUE 83: What is the appropriate amount and cost rate for customer deposits to include in the capital structure:

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year?

The Larsons adopt OPC's position on this issue.

ISSUE 84: What is the appropriate equity ratio to use in the capital structure for ratemaking purposes:

A. For the 2017 projected test year?

The appropriate equity ratio is 50% for the 2017 projected test year. The ROE is increased, the higher equity ratio requested by FPL should be rejected.

B. If applicable, for the 2018 subsequent projected test year?

The appropriate equity ratio is 50% for the 2017 projected test year. The ROE is increased, the higher equity ratio requested by FPL should be rejected.

ISSUE 85: Should FPL's request for a 50 basis point performance adder to the authorized return on equity be approved?

No. The requested 50 basis point adder requested by FPL should be rejected by the Commission.

ISSUE 86: What is the appropriate authorized return on equity (ROE) to use in establishing FPL's revenue requirement:

A. For the 2017 projected test year?

The appropriate authorized midpoint ROE to use to establish the FPL revenue requirement for the 2017 projected test year is 10.0 – 10.5%. The 11.0% midpoint ROE and 0.5% adder requested by FPL, along with the 59.6% equity ratio is excessive and unwarranted under existing market conditions.

B. If applicable, for the 2018 subsequent projected test year?

If applicable, appropriate authorized midpoint ROE to use to establish the FPL revenue requirement for the 2018 subsequent projected test year is 10.0 – 10.5%. The 11.0% midpoint ROE and 0.5% adder requested by FPL, along with the 59.6% equity ratio is excessive and unwarranted under existing market conditions.

ISSUE 87: What is the appropriate weighted average cost of capital to use in establishing FPL's revenue requirement?

A. For the 2017 projected test year?

As calculated using a 10.0 – 10.5% ROE with a 50% equity ratio and using appropriate market based rates for the cost of long-term and short-term debt.

B. If applicable, for the 2018 subsequent projected test year?

If applicable, as calculated using a 10.0 – 10.5% ROE with a 50% equity ratio and using appropriate market based rates for the cost of long-term and short-term debt.

NET OPERATING INCOME

ISSUE 88: What are the appropriate projected amounts of other operating revenues:

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year?

The Larsons adopt OPC's position on this issue.

ISSUE 89: What is the appropriate level of Total Operating Revenues:

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year?

The Larsons adopt OPC's position on this issue.

ISSUE 90: Has FPL made the appropriate test year adjustments to remove fuel revenues and fuel expenses recoverable through the Fuel Adjustment Clause:

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year?

The Larsons adopt OPC's position on this issue.

ISSUE 91: Has FPL made the appropriate test year adjustments to remove capacity revenues and capacity expenses recoverable through the Capacity Cost Recovery Clause:

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year?

The Larsons adopt OPC's position on this issue.

ISSUE 92: Has FPL made the appropriate test year adjustments to remove environmental revenues and environmental expenses recoverable through the Environmental Cost Recovery Clause:

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year?

The Larsons adopt OPC's position on this issue.

ISSUE 93: Has FPL made the appropriate test year adjustments to remove conservation revenues and conservation expenses recoverable through the Energy Conservation Cost Recovery Clause:

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year?

The Larsons adopt OPC's position on this issue.

ISSUE 94: Has FPL made the appropriate adjustments to remove all non-utility activities from operating revenues and operating expenses:

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year?

The Larsons adopt OPC's position on this issue.

ISSUE 95: What is the appropriate percentage value (or other assignment value or methodology basis) to allocate FPL shared corporate services costs and/or expenses to its affiliates:

A. For the 2017 projected test year?

FPL shared corporate services costs and/or expenses should be fully burdened to its affiliates at actual cost and not subsidized by FPL customers.

B. If applicable, for the 2018 subsequent projected test year?

If applicable, FPL shared corporate services costs and/or expenses should be fully burdened to its affiliates at actual cost and not subsidized by FPL customers.

ISSUE 96: What is the appropriate amount of FPL shared corporate services costs and/or expenses (including executive compensation and benefits) to be allocated to affiliates:

A. For the 2017 projected test year?

FPL shared corporate services costs and/or expenses should be fully burdened to its affiliates at actual cost and not subsidized by FPL customers.

B. If applicable, for the 2018 subsequent projected test year?

If applicable, FPL shared corporate services costs and/or expenses should be fully burdened to its affiliates at actual cost and not subsidized by FPL customers.

ISSUE 97: Should any adjustments be made to FPL's operating revenues or operating expenses for the effects of transactions with affiliated companies:
A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year?

The Larsons adopt OPC's position on this issue.

ISSUE 98: What is the appropriate amount of FPL's vegetation management expense:

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year?

The Larsons adopt OPC's position on this issue.

ISSUE 99: What is the appropriate level of generation overhaul expense:

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year?

The Larsons adopt OPC's position on this issue.

ISSUE 100: What is the appropriate amount of FPL's production plant O&M expense

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year?

The Larsons adopt OPC's position on this issue.

ISSUE 101: What is the appropriate amount of FPL's transmission O&M expense:

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year?

The Larsons adopt OPC's position on this issue.

ISSUE 102: What is the appropriate amount of FPL's distribution O&M expense:

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year?

The Larsons adopt OPC's position on this issue.

ISSUE 103: Should the Commission approve FPL's proposal to continue the interim storm cost recovery mechanism that was part of the settlement agreements approved in Order Nos. PSC-11-0089-S-EI and PSC-13-0023-S-EI?

The Larsons adopt OPC's position on this issue.

ISSUE 104: What is the appropriate annual storm damage accrual and storm damage reserve:

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year?

The Larsons adopt OPC's position on this issue.

<u>ISSUE 105</u>: What is the appropriate amount of Other Post Employment Benefits expense:

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year?

The Larsons adopt OPC's position on this issue.

<u>ISSUE 106</u>: What is the appropriate amount of FPL's requested level of Salaries and Employee Benefits

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year?

The Larsons adopt OPC's position on this issue.

<u>ISSUE 107</u>: What is the appropriate amount of Pension Expense:

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year?

The Larsons adopt OPC's position on this issue.

<u>ISSUE 107A</u>: Should an adjustment be made to the amount of the Directors and Officers Liability Insurance expense that FPL included in the 2017 and, if applicable,2018 projected test year(s)?

The Larsons adopt OPC's position on this issue.

<u>ISSUE 108</u>: What is the appropriate amount and amortization period for Rate Case Expense:

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year?

The Larsons adopt OPC's position on this issue.

ISSUE 109: What is the appropriate amount of uncollectible expense and bad debt rate

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year?

The Larsons adopt OPC's position on this issue.

ISSUE 110: Has FPL included the appropriate amount of costs and savings associated with the AMI smart meters:

A. For the 2017 projected test year?

No.

B. If applicable, for the 2018 subsequent projected test year?

If applicable, no.

ISSUE 111: If the proposed change in accounting to defer and amortize the nuclear maintenance reserve is approved, is the company's proposed adjustment to nuclear maintenance expense appropriate?

The Larsons adopt OPC's position on this issue.

ISSUE 112: What are the appropriate expense accruals for: (1) end of life materials and supplies and 2) last core nuclear fuel:

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year?

The Larsons adopt OPC's position on this issue.

ISSUE 113: What are the appropriate projected amounts of injuries and damages (I&D) expense accruals:

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year?

The Larsons adopt OPC's position on this issue.

ISSUE 114: What is the appropriate level of O&M Expense (Fallout Issue)

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year?

The Larsons adopt OPC's position on this issue.

ISSUE 115: What is the appropriate amount of depreciation, amortization, and fossil dismantlement expense (Fallout Issue)

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year?

The Larsons adopt OPC's position on this issue.

ISSUE 116: What is the appropriate level of Taxes Other Than Income (Fallout Issue)

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year?

The Larsons adopt OPC's position on this issue.

ISSUE 117: What is the appropriate level of Income Taxes

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year?

The Larsons adopt OPC's position on this issue.

ISSUE 118: What is the appropriate level of (Gain)/Loss on Disposal of utility property:

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year?

The Larsons adopt OPC's position on this issue.

ISSUE 119: What is the appropriate level of Total Operating Expenses? (Fallout Issue)

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year?

The Larsons adopt OPC's position on this issue.

ISSUE 120: Is the company's proposed net operating income adjustment to remove Fukushima-related O&M expenses from base rates and recover all Fukushima-related expenses in the capacity cost recovery clause appropriate?

The Larsons adopt OPC's position on this issue.

ISSUE 121: What is the appropriate level of Net Operating Income (Fallout Issue)

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year?

The Larsons adopt OPC's position on this issue.

REVENUE REQUIREMENTS

ISSUE 122: Is the Section 199 Manufacturer's deduction properly reflected in the revenue expansion factor?

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year?

The Larsons adopt OPC's position on this issue.

ISSUE 123: What are the appropriate revenue expansion factor and the appropriate net operating income multiplier, including the appropriate elements and rates for FPL

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year?

The Larsons adopt OPC's position on this issue.

ISSUE 124: What is the appropriate annual operating revenue increase or decrease (Fallout Issue)

A. For the 2017 projected test year?

The Larsons adopt OPC's position on this issue.

B. If applicable, for the 2018 subsequent projected test year?

The Larsons adopt OPC's position on this issue.

OKEECHOBEE LIMITED SCOPE ADJUSTMENT

ISSUE 125: Should the Commission approve or deny a limited scope adjustment for the new Okeechobee Energy Center? And if approved, what conditions/adjustments, if any should be included?

The Commission should deny the limited scope adjustment.

ISSUE 126: Has FPL proven any financial need for single-issue rate relief in 2019, based upon only the additional costs associated with the Okeechobee generating unit, and with no offset for anticipated load and revenue growth forecasted to occur in 2019?

No.

ISSUE 127: What are the appropriate depreciation rates for the Okeechobee Energy Center?

The Larsons adopt OPC's position on this issue.

ISSUE 128: What is the appropriate treatment for deferred income taxes associated with the Okeechobee Energy Center?

The Larsons adopt OPC's position on this issue.

<u>ISSUE 129</u>: Is FPL's requested rate base of $1,063,315,000 for the new Okeechobee Energy Center appropriate?

The Larsons adopt OPC's position on this issue.

<u>ISSUE 130</u>: What is the appropriate weighted average cost of capital, including the proper components, amounts and cost rates associated with the capital structure, to calculate the limited scope adjustment for the new Okeechobee Energy Center?

The Larsons adopt OPC's position on this issue.

<u>ISSUE 131</u>: Is FPL's requested net operating loss of $33.868 million for the new Okeechobee Energy Center appropriate?

The Larsons adopt OPC's position on this issue.

<u>ISSUE 132</u>: What is the appropriate Net Operating Income Multiplier for the new Okeechobee Energy Center? (Fallout)

The Larsons adopt OPC's position on this issue.

<u>ISSUE 133</u>: Is FPL's requested limited scope adjustment of $209 million for the new Okeechobee Energy Center appropriate?

The Larsons adopt OPC's position on this issue.

<u>ISSUE 134</u>: What is the appropriate effective date for implementing FPL's limited scope adjustment for the new Okeechobee Energy Center?

None. The limited scope adjustment should not be approved by the Commission.

<u>ASSET OPTIMIZATION INCENTIVE MECHANISM</u>

<u>ISSUE 135</u>: Should the asset optimization incentive mechanism as proposed by FPL be approved?

No.

<u>COST OF SERVICE AND RATE DESIGN ISSUES</u>

<u>ISSUE 136</u>: Is FPL's proposed separation of costs and revenues between the wholesale and retail jurisdictions appropriate?

The Larsons adopt OPC's position on this issue.

ISSUE 137: What is the appropriate methodology to allocate production costs to the rate classes?

The Larsons adopt OPC's position on this issue.

ISSUE 138: What is the appropriate methodology to allocate transmission costs to the rate classes?

The Larsons adopt OPC's position on this issue.

ISSUE 139: What is the appropriate methodology to allocate distribution costs to the rate classes?

The Larsons adopt OPC's position on this issue.

ISSUE 140: Is FPL's proposal to recover a portion of fixed distribution costs through the customer charge instead of energy charge appropriate for residential and general service non-demand rate classes?

The Larsons adopt OPC's position on this issue.

ISSUE 141: How should the change in revenue requirement be allocated to the customer classes?

The Larsons adopt OPC's position on this issue.

ISSUE 142: What are the appropriate service charges (initial connection, reconnect for nonpayment, connection of existing account, field collection)

A. Effective January 1, 2017?

The Larsons adopt OPC's position on this issue.

B. Effective January 1, 2018?

The Larsons adopt OPC's position on this issue.

ISSUE 143: Is FPL's proposed new meter tampering penalty charge, effective on January 1, 2017, appropriate?

The Larsons adopt OPC's position on this issue.

ISSUE 144: What are the appropriate temporary construction service charges:

A. Effective January 1, 2017?

The Larsons adopt OPC's position on this issue.

B. Effective January 1, 2018?

The Larsons adopt OPC's position on this issue.

ISSUE 145: What is the appropriate monthly kilowatt credit for customers who own their own transformers pursuant to the Transformation Rider

A. Effective January 1, 2017?

The Larsons adopt OPC's position on this issue.

B. Effective January 1, 2018?

The Larsons adopt OPC's position on this issue.

ISSUE 146: What is the appropriate monthly credit for Commercial/Industrial Demand Reduction (CDR) Rider customers effective January 1, 2017?

The Larsons adopt OPC's position on this issue.

ISSUE 147: What are the appropriate customer charges:

A. Effective January 1, 2017?

The Larsons adopt OPC's position on this issue.

B. Effective January 1, 2018?

The Larsons adopt OPC's position on this issue.

ISSUE 148: What are the appropriate demand charges:

A. Effective January 1, 2017?

The Larsons adopt OPC's position on this issue.

B. Effective January 1, 2018?

The Larsons adopt OPC's position on this issue.

ISSUE 149: What are the appropriate energy charges:

A. Effective January 1, 2017?

The Larsons adopt OPC's position on this issue.

B. Effective January 1, 2018?

The Larsons adopt OPC's position on this issue.

<u>ISSUE 150</u>: What are the appropriate charges for the Standby and Supplemental Services (SST-1, ISST-1) rate schedules

A. Effective January 1, 2017?

The Larsons adopt OPC's position on this issue.

B. Effective January 1, 2018?

The Larsons adopt OPC's position on this issue.

<u>ISSUE 151</u>: What are the appropriate charges for the Commercial Industrial Load Control (CILC) rate schedule

A. Effective January 1, 2017?

The Larsons adopt OPC's position on this issue.

B. Effective January 1, 2018?

The Larsons adopt OPC's position on this issue.

<u>ISSUE 152</u>: What are the appropriate lighting rate charges

A. Effective January 1, 2017?

The Larsons adopt OPC's position on this issue.

B. Effective January 1, 2018?

The Larsons adopt OPC's position on this issue.

<u>ISSUE 153</u>: Is FPL's proposal to close the customer-owned street lighting service option of the Street Lighting (SL-1) rate schedule to new customers appropriate?

The Larsons adopt OPC's position on this issue.

<u>ISSUE 154</u>: Is FPL's proposal to close the current Traffic Signal (SL-2) rate schedule to new customers appropriate?

The Larsons adopt OPC's position on this issue.

ISSUE 155: Is FPL's proposed new metered Street Lighting (SL-1M) rate schedule appropriate and what are the appropriate charges

A. Effective January 1, 2017?

The Larsons adopt OPC's position on this issue.

B. Effective January 1, 2018?

The Larsons adopt OPC's position on this issue.

ISSUE 156: Is FPL's proposed new metered Traffic Signal (SL-2M) rate schedule appropriate and what are the appropriate charges

A. Effective January 1, 2017?

The Larsons adopt OPC's position on this issue.

B. Effective January 1, 2018?

The Larsons adopt OPC's position on this issue.

ISSUE 157: Is FPL's proposed allocation and rate design for the new Okeechobee Energy Center limited scope adjustment, currently scheduled for June 1, 2019, reasonable?

The Larsons adopt OPC's position on this issue.

ISSUE 158: Should FPL's proposal to file updated base rates in the 2018 Capacity Clause proceeding to recover the Okeechobee Energy Center limited scope adjustment be approved?

The Larsons adopt OPC's position on this issue.

ISSUE 159: Should the Commission approve the following modifications to tariff terms and conditions that have been proposed by FPL:

a. Close relamping option for customer-owned lights for Street Lighting (SL-1) and Outdoor Lighting (OL-1) customers;

b. Add a willful damage clause, require an active house account and clarify where outdoor lights can be installed for the Outdoor Lighting (OL-1) tariff;

c. Clarify the tariff application to pre-1992 parking lot customers and eliminate the word "patrol" from the services provided on the Street Lighting (SL-1) tariff;

d. Remove the minimum 2,000 Kw demand from transmission–level tariffs;

e. Standardize the language in the Service section of the distribution level tariffs to include three phase service and clarify that standard service is distribution level; and

f. Add language to provide that surety bonds must remain in effect to ensure payments for electric service in the event of bankruptcy or other insolvency.

The Larsons adopt OPC's position on this issue.

ISSUE 160: Should the Commission require FPL to develop a tariff for a distribution substation level of service for qualifying customers?

The Larsons adopt OPC's position on this issue.

ISSUE 161: Should the Commission give staff administrative authority to approve tariffs reflecting Commission approved rates and charges effective January 1, 2017, January 1, 2018, and tariffs reflecting the commercial operation of the new Okeechobee Energy Center (June 1, 2019)?

The Larsons adopt OPC's position on this issue.

ISSUE 162: What are the effective dates of FPL's proposed rates and charges?

The Larsons adopt OPC's position on this issue.

OTHER ISSUES

ISSUE 163: Should the Commission approve FPL's proposal to transfer the Martin-Riviera pipeline lateral to Florida Southeast Connection (FSC)?

No. FPL has not demonstrated or guaranteed cost savings to FPL customers.

ISSUE 164: What requirements, if any, should the Commission impose on FPL if it approves FPL's proposed transfer of the Martin-Riviera pipeline lateral to Florida Southeast Connection?

The Larsons adopt OPC's position on this issue.

ISSUE 165: Did FPL's Third Notice of Identified Adjustments remove the appropriate amount associated with the Woodford project and other gas reserve costs?

The Larsons adopt OPC's position on this issue.

ISSUE 166: Should FPL be required to file, within 90 days after the date of the final order in this docket, a description of all entries or adjustments to its annual report, rate of return reports, and books and records which will be required as a result of the Commission's findings in this rate case?

*****The Larsons adopt OPC's position on this issue.*

<u>ISSUE 167</u>: Should this docket be closed?

*****The Larsons adopt OPC's position on this issue.*

<u>CONCLUSION</u>

For the reasons stated herein, the Commission should deny FPL's request for a rate increase as set forth by the Intervenors in this docket.

Respectfully submitted this 19th day of September, 2016.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been filed with the Commission Clerk and furnished to the parties of record and interested parties indicated below via electronic mail on September 19, 2016:

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