BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 170009-EI FLORIDA POWER & LIGHT COMPANY

MAY 1, 2017

IN RE: NUCLEAR POWER PLANT COST RECOVERY FOR THE YEAR ENDING DECEMBER 2018

TESTIMONY & EXHIBITS OF:

JENNIFER GRANT-KEENE

1		BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
2		FLORIDA POWER & LIGHT COMPANY
3		DIRECT TESTIMONY OF JENNIFER GRANT-KEENE
4		DOCKET NO. 170009-EI
5		May 1, 2017
6		
7	Q.	Please state your name and business address.
8	A.	My name is Jennifer Grant-Keene. My business address is 700 Universe
9		Boulevard, Juno Beach, FL 33408.
10	Q.	By whom are you employed and what is your position?
11	А.	I am employed by Florida Power & Light Company ("FPL" or "the
12		Company"). My current title is Accounting Project Manager, Clause
13		Accounting.
14	Q.	Have you previously filed testimony in this docket?
15	A.	Yes.
16	Q.	What is the purpose of your testimony?
17	A.	The purpose of my testimony is to present the final true-up calculation of the
18		2018 revenue requirements. These revenue requirements are summarized in
19		my Exhibit JGK-3 and shown in FPL's Nuclear Filing Requirement Schedules
20		(NFRs) filed in this docket on March 1, 2017. Included in these revenue
21		requirements are FPL's final true-up from the 2015 True-Up (T) Schedules
22		and the final true-up from the 2016 T Schedules, both filed in this docket on
23		March 1, 2017. Unless otherwise noted, the costs I discuss are retail

jurisdictional costs. I also offer testimony to describe the manner in which
 costs incurred beginning in 2017 will be recorded while FPL defers the cost
 recovery it would otherwise be allowed to seek.

4 Q. Please summarize your testimony.

FPL is requesting the Florida Public Service Commission (FPSC or 5 A. 6 "Commission") approve as prudent its 2015 and 2016 costs and the resulting overrecovery of revenue requirements of \$7,305,202 which will reduce the 7 Capacity Cost Recovery Clause (CCRC) charges to customers in 2018. These 8 9 revenue requirements are based on: (1) the final true-up of 2015 costs resulting in an over-recovery of \$1,306,211; and 2) the final true-up of 2016 10 costs resulting in an over-recovery of \$5,998,991. FPL is 11 not seeking recovery of 2017 actual/estimated or 2018 projected costs at this time. 12 Therefore, I have not included 2017 Actual/Estimated (A/E) or 2018 Projected 13 14 (P) Schedules with my testimony. Instead, FPL is seeking approval to defer these costs incurred for future review by the Commission and future recovery 15 through the clause. 16

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Q. Are you sponsoring or co-sponsoring any exhibits in this case?

- 18 A. Yes. I am sponsoring the following exhibit:
- Exhibit JGK-3, 2018 Revenue Requirements which summarizes the
 revenue requirements requested to be reflected in the 2018 CCRC charge
 to customers. These amounts include the results of the 2015 T NFRs and
 2016 T NFRs filed in this docket on March 1, 2017.

I additionally sponsor or co-sponsor some of the NFRs included in Exhibit SDS-9, Turkey Point 6 & 7 Site Selection and Pre-construction NFR Schedules. These consist of 2017 True-Up to Original (TOR) Schedules, and one Projection (P) schedule presenting the 2018 revenue requirement bill impact. The NFRs contain a table of contents listing the schedules sponsored and co-sponsored by FPL Witness Scroggs and myself, respectively.

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NUCLEAR FILING REQUIREMENT SCHEDULES

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11 Q. Please describe the NFRs you are filling with this testimony.

FPL is filing its 2017 TOR Schedules, reflecting current project information. 12 A. 13 The TOR Schedules provide an updated summary of the cumulative project 14 costs. The TOR Schedules provide the actual to date project costs and 15 projected total costs for the duration of the project based on the best available information prior to this filing. Schedule TOR-2 provides the information 16 17 required by Rule 25-6.0423(9)(f). FPL also is filing Schedule P-8, which 18 presents the 2018 bill impact from the true-up of 2015 and 2016 costs.

19 Q. What is the amount of sunk costs that FPL has incurred as of the end of 20 2016?

- A. FPL's sunk costs for the Project are approximately \$308 million as of
 December 31, 2016, as shown on Schedule TOR-2.
- 23

1		REVENUE REQUIREMENTS OVERVIEW
2		
3	Q.	What is the total amount FPL is requesting to recover in its 2018 CCRC
4		factors for the TP 6 & 7 Project?
5	A.	FPL is requesting to include in its 2018 CCRC charge an overrecovery of
6		\$7,305,202 of revenue requirements. This total amount represents an
7		overrecovery from the final true-up of 2015 costs of \$1,306,211 and an
8		overrecovery of \$5,998,991 resulting from the final true-up of 2016 costs as
9		described in my March 1, 2017 testimony.
10		
11		ACCOUNTING FOR PROJECT COSTS BEGINNING IN 2017
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13	Q.	Has FPL included A/E or P schedules for the years 2017 and 2018,
14		respectively?
15	A.	No. Because FPL is not seeking the Commission's review or the recovery of
16		2017 or 2018 activities and costs at this time, FPL is not filing the AE or P
17		Schedules associated with those years.
18		
	Q.	How does FPL intend to account for TP 6 & 7 Pre-construction and Site
19	Q.	How does FPL intend to account for TP 6 & 7 Pre-construction and Site Selection Project costs beginning in 2017?
19 20	Q. A.	
	-	Selection Project costs beginning in 2017?
20	-	Selection Project costs beginning in 2017? Assuming the Commission finds that the Company's decision to complete

under the NCR Rule, but defer recovery of those costs. FPL will continue to
capitalize these TP 6 & 7 project costs as incurred and accrue allowance for
funds used during construction (AFUDC). FPL also will continue to record a
return on the related Deferred Tax Asset. All current methods of computing
carrying costs will continue to be followed, as presently represented in FPL's
NFRs.

- Q. When does FPL anticipate it will seek Commission review and recovery
 of the costs incurred beginning in 2017?
- 9 A. FPL anticipates it will seek Commission review and recovery when it makes a
 10 decision regarding initiation of pre-construction work. At that time, it will
 11 provide the requisite information for costs incurred for the Commission's
 12 prudence review and for recovery through the NCR process.
- Q. Please discuss the application of FPL's accounting controls to project
 costs in 2017 and the years that follow.
- A. As discussed in my March 1, 2017 testimony, FPL has a robust system of
 accounting controls that apply to this Project. FPL will continue to utilize and
 apply these controls during the time in which FPL is deferring review and
 recovery of Project costs.
- 19 **Q.** Does this conclude your testimony?
- 20 A. Yes.

Florida Power Light Company 2018 Revenue Requirements (In Jurisdictional \$) Exhibit JGK-3

		(1)	(2)	(3)=(1)+(2)	(4)	(5)	(6)=(4)+(5)	(7)=(3)+(6)
		Dkt. # 150009 2015 Actual/Estimated Costs	Dkt. # 170009 2015 Actual Costs	Dkt. #170009 2015 (Over)/Under Recovery	Dkt. # 150009 2016 Projected Costs	Dkt. # 170009 2016 Actual Costs	Dkt. # 170009 2016 (Over)/Under Recovery	Net Costs to be Recovered/(Returned) in 2018
Line No.	Turkey Point 6 & 7 Site Selection							
1 2 3	Site Selection Costs	\$0	\$0	\$0	\$0	\$0	\$0	\$0
4	Carrying Costs (b)	\$158	\$158	\$0	\$27	(\$183)	(\$210)	(\$210)
5	Carrying Costs on DTA/DTL (c)	\$159,586	\$159,930	\$344	\$159,561	\$159,578	\$17	\$361
6 7	Total Carrying Costs	\$159,744	\$160,088	\$345	\$159,588	\$159,395	(\$193)	\$151
8 9	Recovery of Costs & Carrying Costs	\$159,744	\$160,088	\$345	\$159,588	\$159,395	(\$193)	\$151
10 11	Turkey Point 6 & 7 Preconstruction							
12 13 14	Pre-Construction Costs (a)	\$18,638,220	\$17,309,494	(\$1,328,727)	\$21,057,310	\$15,673,982	(\$5,383,328)	(\$6,712,054)
14	Carrying Costs (b)	(\$62,774)	(\$57,109)	\$5,665	\$246,400	\$26,460	(\$219,940)	(\$214,274)
16	Carrying Costs on DTA/DTL (c)	\$6,709,332	\$6,725,838	\$16,505	\$7,376,121	\$6,980,591	(\$395,530)	(\$379,024)
17 18	Total Carrying Costs/ O&M and interest	\$6,646,558	\$6,668,729	\$22,171	\$7,622,521	\$7,007,051	(\$615,469)	(\$593,299)
18 19 20	Recovery of Costs & Carrying Costs (d)	\$25,284,779	\$23,978,223	(\$1,306,556)	\$28,679,830	\$22,681,033	(\$5,998,797)	(\$7,305,353)
20 21 22	Total Turkey Point 6 & 7	\$25,444,523	\$24,138,311	(\$1,306,211)	\$28,839,419	\$22,840,428	(\$5,998,991)	(\$7,305,202)
22 23 24								
24	Total Recovery	\$25,444,523	\$24,138,311	(\$1,306,211)	\$28,839,419	\$22,840,428	(\$5,998,991)	(\$7,305,202)

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29 Notes:

30 (a) Pre-construction Costs are expenditures on major tasks performed.

31 (b) Carrying Costs are costs calculated on the average of the sum of CWIP Charges, Adjustments and Unamortized Carrying Costs from prior years less Monthly Amortization at the most recent effective AFUDC Rate.

32 (c) Current Year Carrying Costs on Deferred Tax Asset/Deferred Tax Liability are costs calculated on the average recovered costs excluding AFUDC/Transfer to Plant at the most recent AFUDC Rate.

33 (d) FPL is not seeking FPSC review or recovery of 2017 and 2018 costs at this time.

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37 *Totals may not add due to rounding

CERTIFICATE OF SERVICE DOCKET NO. 170009-EI

I HEREBY CERTIFY that a true and correct copy of FPL's Testimony and Exhibits of Jennifer Grant-Keene was served electronically this 1st day of May, 2017, to the following:

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