

STATE OF FLORIDA

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OFFICE OF THE GENERAL COUNSEL
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(850) 413-6199

Public Service Commission

October 4, 2019

Mr. Ken Hoffman
Florida Power & Light Company
134 West Jefferson Street
Tallahassee, FL 32301-1713
Ken.hoffman@fpl.com

STAFF'S FIRST DATA REQUEST TO FPL
via e-mail

RE: Docket No. 2019-0167-EI – Petition to compel Florida Power & Light to comply with Section 366.91, F.S. and Rule 25.6-065, F.A.C., by Floyd Gonzales and Robert Irwin.

Dear Mr. Hoffman:

By this letter, the Commission staff requests that Florida Power & Light Company (FPL) provide responses to the following data requests:

1. Please explain the steps in the process for approval or denial of interconnection applications.
 - a. Please provide each algorithm used to address interconnection applications, if any.
 - b. Please identify each employee or consultant who has reviewed the Petitioners' application and the role played by each person identified.
 - c. Please provide all standard operating procedures that are used by Florida Power & Light Company at each step of the interconnection application process.
2. If an interconnection application is denied, is there an appeals process?
 - a. If yes, please identify each employee or consultant involved in the review of the appeal and the procedures followed at each stage of the review process.

- b. If yes, please identify the standards that apply at each stage of the review process.
 - c. If not, why not?
3. Please identify the specific reason(s) that the Petitioners' interconnection application was denied.
4. Please provide a copy of all written communications that Florida Power & Light Company has had with the Petitioners regarding interconnection.
5. Please provide a written summary of each oral and/or electronic communications Florida Power & Light Company has had with the Petitioners regarding interconnection.
6. Please provide a copy of the construction plans for Petitioners' home that are expected to require electrical consumption beyond historical levels.
7. Please provide a copy of each permit application and/or permit issued for construction identified in response to question 1.
8. What is the time frame for completion of the construction project(s) discussed in response to questions 1 and 2?
9. What is the expected electrical usage at Petitioners' home after the construction project(s) discussed in response to questions 1-3 are completed?
10. Please identify each step Petitioners have taken in an attempt to reach an interconnection agreement with Florida Power & Light Company, prior to petitioning the Commission, and if applicable, thereafter.
11. Please provide the past twelve months of utility bills from Florida Power & Light Company.
12. Please provide all written communications Petitioners have sent to, or received from, Florida Power & Light Company regarding Petitioners' attempt to enter into an interconnection agreement.
13. Please provide a written summary of any oral and/or electronic communications Petitioners have had with Florida Power & Light Company regarding Petitioners' attempt to enter into an interconnection agreement.

Mr. Ken Hoffman

Page 3

October 4, 2019

Please file your responses by email to me at cmurphy@psc.state.fl.us no later than October 21, 2019. Please feel free to call me at (850) 413-6191 if you have any questions.

Respectfully,

/s/ Charles Murphy

Charles Murphy
Senior Attorney

CWM/cf

cc: Office of Commission Clerk
Kenneth M. Rubin (ken.rubin@fpl.com)
Daniel Cordell (dcordell@psc.state.fl.us)

Mr. Ken Hoffman

Page 4

October 4, 2019