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STATE OF FLORIDA



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# Public Service Commission

September 17, 2020

Commission Staff Data Request  
*Sent Via E-mail*

David M. Lee  
Florida Power & Light Company  
700 Universe Blvd.  
Juno Beach, FL 33408  
[David.Lee@fpl.com](mailto:David.Lee@fpl.com)

Kenneth A. Hoffman  
Florida Power & Light Company  
134 W. Jefferson Street  
Tallahassee, FL 32301  
[Ken.Hoffman@fpl.com](mailto:Ken.Hoffman@fpl.com)

RECEIVED-FPSC  
2020 SEP 17 PM 3:30  
COMMISSION  
CLERK

**RE: DOCKET NO. 20200211-EI – PETITION FOR TEMPORARY VARIANCE FROM OR WAIVER OF RULE 25-6.097(3), F.A.C., TEMPORARY WAIVER OF SECTION 6.3 OF TARIFF, AND REQUEST FOR EXPEDITED RULING, BY FLORIDA POWER & LIGHT COMPANY.**

Dear Mr. Lee and Mr. Hoffman

By this letter, Commission staff is requesting your responses to the following:

1. If the petition for temporary rule variance/waiver or tariff waiver is granted in this docket, what basis point impacts will it have on the company's weighted average cost rate of customer deposits and total weighted average cost of capital?
2. Section 6.3 of Tariff Sheet No. 6.050 references a required Security Deposit. Please provide the portion of FPL's Tariff that requires a residential customer to provide the Security Deposit referenced in this Section.
3. Please explain how FPL's proposal for a one-time accelerated refund of deposits does not constitute preferential treatment to those customers (compared to customers that have to wait 23 months for the deposit).

4. Paragraph 10 of the petition states that the proposed one-time refund of deposits will only apply to those residential customers who have cash deposits. Please state the number of customers who have paid cash deposits to FPL and would qualify for this refund. What is the percentage of these customers from FPL's total residential base?
5. What is the time period to process the accelerated refunding of customer deposits and accrued interest? What is the anticipated cost to FPL to process these refunds?
6. Paragraph 13 of the petition states that the requested rule waiver will benefit those customers receiving the deposit refund and will "likely provide indirect benefits to others." Please discuss this statement and describe the anticipated indirect benefits from the refund of deposits.
7. Paragraph 14 of the petition states that this rule waiver is to be applied to Tariff Sheet No. 6.050, and is temporary in nature. What is the beginning and ending period of this requested temporary rule waiver and how will the company revert back to its current tariff sheet?
8. Please explain in detail how FPL intends to implement the refund of deposits to the eligible customers.
9. Will the waiver occur on a specific date, and if so, will only customers with a deposit on file for 12 months *as of that specific date* be refunded? (i.e., Please clarify if a customer with a deposit on file for 11 months, 28 days would still fall under the 23-month provision.)
10. Does the company believe that refunding deposits early could place an increased risk on the general body of ratepayers if the customers who receive early refunds under the petition are unable to maintain a good payment history in the near term? Please explain.

Please file all responses electronically no later than September 22, 2020, via the Commission's website at [www.floridapsc.com](http://www.floridapsc.com) by selecting the Clerk's Office tab and Electronic Filing Web Form. Direct your responses to the Docket No. 20200211-EI. Please contact me at [aharper@psc.state.fl.us](mailto:aharper@psc.state.fl.us) or at 850-413-6082 if you have any questions.

Sincerely,

/s/ *Adria E. Harper*

Adria E. Harper  
Senior Attorney

Cc: Office of the Commission Clerk