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May 30, 2025

-VIA ELECTRONIC FILING-

Adam Teitzman
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

RE: Docket No. 20250000-OT
Florida Power & Light Company's 2025-2034 Ten Year Power Plant Site Plan

Dear Mr. Teitzman:

Please find attached Florida Power & Light Company's responses to Staff's Third Data Request (Nos. 1-10).

If there are any questions regarding this transmittal, please contact me at (561) 304-5662.

Sincerely,

/s/ William P. Cox
William P. Cox
Senior Counsel
Fla. Bar No. 00093531

WPC:ec
Enclosures
cc: Philip Ellis, Division of Engineering (via electronic mail *pellis@psc.state.fl.us*)
Greg Davis, Division of Engineering (via electronic mail *gdavis@psc.state.fl.us*)

QUESTION:
Please explain any historic trends or other information as requested below in each of the following:

a. Growth of customers, by customer type (residential, commercial, industrial) as well as Total Customers, and identify the major factors that contribute to the growth/decline of the trends.

b. Average KWh consumption per customer, by customer type (residential, commercial, industrial), and identify the major factors that contribute to the growth/decline of the trends.

c. Total Sales (GWh) to Ultimate Customers, and identify the major factors that contribute to the growth/decline of the trends.

d. Provide a detailed discussion of how Florida Power & Light Company's (FPL or Company) demand-side management program(s) for each customer type impacts the observed trends in gigawatt hour sales (Schedule 3.3).

RESPONSE:
a. Historically, Residential and Commercial customer classes have shown consistent growth, with the exception of a temporary slowdown during the 2009 recession, which impacted new construction and business activity. Since then, both sectors have steadily expanded, reflecting ongoing population growth, housing development, and economic activity within Florida. In contrast, 2024 has shown a decline in industrial customers, which appears to be driven by broader economic uncertainty and a more cautious outlook among large-scale energy users. This trend may be linked to national and global economic conditions that influence manufacturing and heavy industry. The Street & Highway customer class continues to grow modestly, primarily due to infrastructure expansion and municipal development. The "Other" customer class has experienced a gradual, low-paced decline over time, largely attributable to the migration of accounts to other rate schedules.

   In total, there is an overall upward trend in customer counts primarily driven by the residential class, which accounts for approximately 88% of total customers and heavily influences the overall customer trajectory.

b. The Residential customer class, average usage per customer (UPC) has ranged from relatively flat to slightly increasing in recent years. The change in residential consumption is attributable to the relative increased usage of electronics and equipment within residences, which is offset, in part, by continued improvements in energy efficiency, such as higher efficiency building codes, appliances, lighting, and HVAC systems. The Commercial customer class has experienced relatively flat UPC trends over the past couple of years.

Similarly, metro UPC has also remained stable, reflecting consistent demand patterns from government or transit-related accounts that comprise this category. For the Industrial class, UPC has also remained relatively flat in the most recent years. However, when examining a longer historical period, industrial usage shows a slow but steady decline. The historical decline may be linked to shifts in the local industrial base, customer migration, increased energy efficiency, or operational changes among key industrial customers. The Other customer class has shown a noticeable increase in usage. This variation is largely attributed to one specific customer, whose operations have had an outsized impact on the average UPC for the class.

In general, historical underlying trends affecting UPC across all customer classes include weather variability, economic conditions, and changes in customer behavior or operations -- the latter being particularly impactful for smaller customer classes where a single customer's actions can significantly influence average usage.

c. Florida has experienced significant population growth into the state, which has contributed directly to an increase in both the number of customers and total energy sales to customers. As people have relocated to Florida, the demand for housing has surged, resulting in a steady increase in residential electricity consumption. Population growth also fuels economic expansion, as new businesses are drawn to the state or existing companies open new locations to meet the rising retail and service demands of the growing population. As a result, the commercial sector has seen an increase in customer accounts and associated energy usage. While energy efficiency improvements and changes in customer behavior continue to have a moderating effect, the underlying growth in population and economic activity has been the dominant driver of increased electricity demand across the state.

d. FPL offers demand-side management (DSM) programs targeted at reducing energy consumption across Residential and Commercial customer classes. These programs are designed to promote energy efficiency and reduce peak demand through customer participation in energy-saving initiatives. For the residential sector, DSM programs include offerings such as home energy surveys, HVAC efficiency upgrades, and insulation rebates. These programs help customers reduce their overall energy use by improving the efficiency of their homes and encouraging behavioral changes that lead to lower consumption. Similarly, in the commercial sector, DSM programs are focused on lighting retrofits, HVAC optimization, refrigeration improvements, and custom incentives for energy efficiency projects. These programs assist businesses in managing energy use more effectively while lowering operational costs.

The primary effect of DSM on both the Residential and Commercial customer classes is a reduction in gigawatt-hour (GWh) sales relative to what they would have been absent such programs. As customers adopt more efficient technologies and practices, the energy required to meet their needs decreases, resulting in lower sales and peak demand.

QUESTION:
Please explain the forecasted trends or other information as requested below in each of the following:

a. Growth of customers, by customer type (residential, commercial, industrial) as well as Total Customers, and identify the major factors (currently and in the forecasted period) that contribute to the growth/decline of the trends.

b. Average KWh consumption per customer, by customer type (residential, commercial, industrial), and identify the major factors (currently and in the forecasted period) that contribute to the growth/decline of the trends.

c. Total Sales (GWh) to Ultimate Customers, and identify the major factors (currently and in the forecasted period) that contribute to the growth/decline of the trends.

RESPONSE:
a. The forecast projects continued growth in Residential and Commercial customer classes, driven largely by broader economic and demographic trends across the state of Florida. Key indicators—such as ongoing population growth, new housing development, and positive employment trends—all support the expectation of a sustained increase in both residential households and commercial establishments over the forecast period. As Florida remains an attractive destination for relocation and business expansion, these factors contribute to a steady upward trend in customer counts for these classes. The number of Industrial customers is forecasted to gradually decline. The street and highway, other, and metro customer classes are forecasted to remain relatively constant throughout the forecast horizon. These classes represent a small portion of the total customer base and are not expected to experience significant fluctuation in the number of accounts.

   Overall, total customers are expected to grow, with the Residential and Commercial classes accounting for the majority of the increase. The growth is closely tied to Florida's expanding population, housing market, and business activity—all of which are forecasted to remain positive.

b. In the forecast period, average kWh consumption per customer (UPC) is expected to follow varying trends across customer classes. The Residential class UPC is forecasted to decline gradually over time, primarily driven by continued improvements in energy efficiency, such as higher efficiency building codes, appliances, lighting, and HVAC systems. In addition, increasing customer adoption of energy-saving behaviors and technologies (*e.g.*, smart thermostats, solar panels) is expected to further reduce average household energy consumption. The Commercial UPC is also expected to be generally flat to slightly declining, for similar reasons. Energy efficiency standards, advanced building systems, and retrofits are expected to reduce consumption on a per-customer basis though some

commercial customers may see stable or even increasing UPC due to higher operational loads and continued expansion. Industrial UPC is forecasted to increase modestly overall, driven by the expected addition of usage by large load customers. For the other, metro and street and highway classes, UPC is projected to remain flat. These customer classes represent a relatively small portion of total load and are not expected to experience significant operational changes that would affect per-customer energy use.

c. Total energy sales to ultimate customers are forecasted to increase steadily over the forecast period, driven primarily by customer growth in the residential, commercial, and industrial sectors. Florida's strong population growth, housing development, and economic expansion continue to be the main drivers of rising energy demand across the state. The other, metro and street and highway customer classes are expected to remain relatively constant and minimally impact the overall sales trend.

QUESTION:
Please refer to Schedule 3.1, History of Summer Peak Demand IMW), as set forth on page 61 of FPL's 2025 Ten-Year Site Plan (TYSP) for the years 2025 through 2034.

a. The schedule indicates that the MW values for Columns 5 through 9 represent "actual DSM capabilities." Please define this term and explain how the annual (12-month) values of DSM capabilities are determined.

b. For Columns 6 and 8, please explain whether the difference in the values from prior year to the next year, represents the sum total of new DSM savings for that next year netted against the prior year's savings deemed no longer available in the system.

c. When determining cumulative savings in Columns 6 and 8, explain how prior period savings survive to the next year or are eliminated from further estimations of savings going forward.

d. Please provide, in an Excel spreadsheet with formulas intact, the calculations of Columns 6 and 8 data that FPL used to prepare this data in Schedule 3.1.

RESPONSE:
a. "Actual DSM capabilities" refers to the realized summer peak values based on participation in that year. These values are determined based on the participation levels at the end of the year in question and the associated MW reduction values of the various DSM programs. Note that for 2024, participation levels are assumed as of August 2024.

b. Columns 6 and 8 represent the summer peak reduction based on the total participation levels in FPL's load control and demand response programs. These values are based on the participation in each year and do not factor in the savings from previous years.

c. Please see the response to sub-part (b).

d. Please see Attachment 1 for the requested information.

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Schedule 3.1
History of Summer Peak Demand (MW)

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
Year	Total	Wholesale	Retail	Interruptible	Res. Load Management	Residential Conservation	C/I Load Management	C/I Conservation	Net Firm Demand
2015	25,361	1,381	23,980	0	878	1,779	826	1,104	23,657
2016	26,044	1,443	24,601	0	882	1,809	836	1,119	24,326
2017	25,662	1,467	24,194	0	910	1,826	825	1,135	23,927
2018	25,411	1,418	23,993	0	866	1,839	866	1,149	23,679
2019	26,594	1,367	25,227	0	852	1,850	879	1,159	24,863
2020	26,400	1,595	24,805	0	845	1,861	887	1,175	24,668
2021	26,248	1,401	24,847	0	830	1,874	882	1,190	24,536
2022	26,429	1,572	24,857	0	827	1,886	871	1,201	24,731
2023	28,461	1,652	26,808	0	797	1,900	946	1,210	26,718
2024	28,266	1,731	26,535	0	863	1,917	961	1,221	26,442

Historical Values (2015 - 2024):

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Schedule 3.1
Forecast of Summer Peak Demand (MW)

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
August of Year	Total	Wholesale	Retail	Interruptible	Res. Load Management*	Residential Conservation	C/I Load Management*	C/I Conservation	Net Firm Demand
2025	28,312	1,728	26,584	0	937	21	1,025	12	26,317
2026	28,664	1,727	26,937	0	925	40	1,032	19	26,648
2027	28,925	1,723	27,202	0	913	59	1,038	26	26,888
2028	29,333	1,708	27,625	0	902	77	1,043	34	27,277
2029	29,687	1,606	28,081	0	896	95	1,047	41	27,608
2030	29,982	1,484	28,498	0	893	113	1,051	49	27,877
2031	30,301	1,315	28,987	0	891	131	1,055	57	28,168
2032	30,823	1,319	29,504	0	889	148	1,059	65	28,662
2033	31,257	1,323	29,934	0	888	166	1,063	73	29,068
2034	31,677	1,327	30,351	0	887	183	1,067	81	29,459

Projected Values (2025 - 2034):

QUESTION:
Please refer Schedule 3.1, History of Summer Peak Demand (MW), as set forth on page 62 of FPL's 2025 TYSP for the years 2025 through 2034. The Projected Values (2025-2034) notes indicates that the MW values for Columns 5 through 9 represent "cumulative load management, incremental conservation, and load management." Please explain whether load management values in Columns 6 and 8 are cumulative values, and clarify why the schedule notes includes two references to load management.

RESPONSE:
The values shown in Columns 5 through 9 represent cumulative load management and cumulative conservation only. The second reference to load management was inadvertent and should be ignored.

QUESTION:
Please refer to page 91 of FPL's 2025 TYSP filing which states that the Commercial/Industrial Load Control (CILC) program was closed to new participants as of December 31, 2000. Please answer the following:

a. How many participants were enrolled in the CILC program at the time the program was closed to new participants (December 31, 2000)?

b. How many participants were enrolled in the CILC program at the end of 2024 (as of December 31, 2024)?

c. Since this program is currently closed to new participants, what assumptions has FPL made regarding the number of participants that will remain enrolled in this program for the forecasted years of 2025 through 2034?

d. Since this program is currently closed to new participants, what assumptions in Columns 8 and 9 of Schedule 3.1 for Summer Peak Demand Reductions has FPL made for the forecasted years of 2025 through 2034 that are attributable to the CILC program?

e. Since this program is currently closed to new participants, what assumptions in Columns 8 and 9 of Schedule 3.2 for Winter Peak Demand Reductions has FPL made for the forecasted years of 2025 through 2034 that are attributable to the CILC program?

RESPONSE:
a. The earliest date for which FPL can provide participation values for the CILC program is December 31, 2007. As of that date, there were 485 participants enrolled in the program.

b. There were 306 participants enrolled in the CILC program as of December 31, 2024.

c. FPL has assumed that participation and associated MW impacts of the CILC program remain constant throughout the ten-year period. Please see the table below.

	CILC Participants*
2025	310
2026	310
2027	310
2028	310
2029	310
2030	310
2031	310
2032	310
2033	310
2034	310

* Projected MW values were based on customers active on the CILC program at the end of August 2024 at the time of the system peak. The number of participants at year end includes customers exiting the program after August 2024. Year-end customer counts are different due to the forecast being needed prior to year-end.

d. FPL has assumed that participation and associated MW impacts of the CILC program remain constant throughout the ten-year period. Please see the table below.

	CILC - Forecast of Summer Peak Demand (MW)	
	(8)	(9)
Year	C/I Load Management	C/I Conservation
2025	458	0
2026	458	0
2027	458	0
2028	458	0
2029	458	0
2030	458	0
2031	458	0
2032	458	0
2033	458	0
2034	458	0

e. FPL has assumed that participation and associated MW impacts of the CILC program remain constant throughout the ten-year period. Please see the table below.

	CILC - Forecast of Winter Peak Demand (MW)	
	(8)	(9)
Year	C/I Load Management	C/I Conservation
2025	385	0
2026	385	0
2027	385	0
2028	385	0
2029	385	0
2030	385	0
2031	385	0
2032	385	0
2033	385	0
2034	385	0

QUESTION:
Please refer to page 91 of FPL's 2025 TYSP filing which states that the Commercial Curtailable Load program was closed to new participants on December 31, 2021 and answer the following:

a. How many participants were enrolled in the program at the time the program was closed to new participants (December 31, 2021)?

b. How many participants were enrolled in the program at the end of 2024 (as of December 31, 2024)?

c. Since this program is currently closed to new participants, what assumptions has FPL made regarding the number of participants that will remain enrolled in this program for the forecasted years of 2025 through 2034?

d. Since this program is currently closed to new participants, what assumptions in Columns 8 and 9 of Schedule 3.1 for Summer Peak Demand Reductions has FPL made for the forecasted years of 2025 through 2034 that are attributable to that program?

RESPONSE:
a. There were 24 participants enrolled in the program as of December 31, 2021.

b. There were 0 participants enrolled in the program as of December 31, 2024.

c. As there are no longer any participants in this program as of the end of 2024, FPL assumes no further participation or MW impact during the ten-year period.

	CL Participants
2025	0
2026	0
2027	0
2028	0
2029	0
2030	0
2031	0
2032	0
2033	0
2034	0

d. As there are no longer any participants in this program as of the end of 2024, FPL assumes no further participation or MW impact during the ten-year period.

	CL - Forecast of Summer Peak Demand (MW)	
	(8)	(9)
Year	C/I Load Management	C/I Conservation
2025	0	0
2026	0	0
2027	0	0
2028	0	0
2029	0	0
2030	0	0
2031	0	0
2032	0	0
2033	0	0
2034	0	0

QUESTION:
Since the Commercial Curtailable Load program is currently closed to new participants, what assumptions in Columns 8 and 9 of Schedule 3.2 for Winter Peak Demand Reductions has FPL made for the forecasted years of 2025 through 2034 that are attributable to the Commercial Curtailable Load program?

RESPONSE:
As there are no longer any participants in this program as of the end of 2024, FPL assumes no further participation or MW impact during the ten-year period. Please see the table below.

	CL - Forecast of Winter Peak Demand (MW)	
	(8)	(9)
Year	C/I Load Management	C/I Conservation
2025	0	0
2026	0	0
2027	0	0
2028	0	0
2029	0	0
2030	0	0
2031	0	0
2032	0	0
2033	0	0
2034	0	0

QUESTION:
Please refer to page 58 of FPL's 2025 TYSP, Schedule 2.2., Column (16) "Total Sales to Ultimate Customers" for the questions below:

a. Please explain why FPL's projected 2025 Total Sales are 1.26 percent lower than its actual 2024 Total Sales (127,754 GWh vs. 129,386 GWh).

b. Please explain why FPL's projected 2028 Total Sales are 2 percent higher than its projected 2027 Total Sales (131,801 GWh vs. 129,386 GWh).

c. Please explain why FPL's projection of 2029 Total Sales are 2 percent higher than its projected 2028 Total Sales (134,441 GWh vs. 131,801 GWh).

RESPONSE:
a. The projected 2025 Total Sales are based on weather-normalized assumptions, while the 2024 figures represent actual recorded sales, which include the effects of observed weather. The higher total sales in 2024 were driven in part by unusually warm weather, which led to increased cooling demand. When compared to 20-year normal weather, 2024 stands out as a weather anomaly, contributing to the elevated sales figures.

   In addition, the forecast models used to develop the 2025 projection incorporated an economic outlook that anticipates a cooling or slowdown in economic activity relative to the significant growth experienced over the past few years. This anticipated moderation in economic growth contributes to the slightly lower projected sales for 2025.

b. Beginning in 2028, there is a notable increase in expected large load additions, which contributes to the projected growth in total sales. Additionally, the economic outlook for 2028 is more favorable compared to 2027, supporting stronger overall load growth across customer classes.

c. The increase in FPL's projected Total Sales from 2028 to 2029 is primarily driven by the continued addition of expected large load additions. These large customers are expected to expand operations or bring new facilities online, contributing to sustained growth in energy demand.

QUESTION:
Please refer to FPL's response to Staff's Data Request #1, No. 79. The Company states, "Data centers are unique given their significant and constant load requirements and the potential for high costs to extend service to them." Please explain this in greater detail.

RESPONSE:
This statement from FPL's response to Staff's First Data Request No. 79 refers to the fact that data centers typically have very significant load requirements, ranging from approximately 25 MW to over 1.5 GW of demand, and high load factors of approximately 85% or more, which means the data centers would be running their facilities close to full demand for all hours each day. Many data centers will also have the potential to scale up and increase their load requirements ("load ramp") at the same site over time. Further, many data centers require continuous, uninterrupted electric service 24 hours a day, seven days a week. These significant and constant load requirements are unique to data centers and unlike the load requirements of FPL's existing and typical commercial and industrial customers.

Serving customers of this magnitude will have a significant impact on FPL's system and require investment in new incremental generation capacity and new or upgraded facilities in order to provide these potential data center customers with safe and reliable service without jeopardizing or compromising electric service to FPL's existing customers. For example, customers with such significant and constant load requirements may require the addition of new generation resources that are not otherwise needed to serve FPL's general body of customers or to meet FPL's reserve margin. Likewise, customers of this magnitude will require investment in new transmission and distribution facilities in order to connect the customer to FPL's system, including new transmission and distribution substations and transformers, and may require transmission network upgrades in order to accommodate the customer's load and/or the capacity installed on the system to serve the customer's load. Importantly, the incremental generation capacity and new or upgraded facilities necessary to serve these data center customers are unique to each data center customer's individual load requirements and site location and are largely beyond FPL's control. As a result, FPL must undertake an extensive system impact study of each data center customer's request for service to determine the investment in new incremental generation capacity and new or upgraded facilities necessary to serve each data center customer's requested load characteristics and location.

QUESTION:

Please refer to FPL's responses to Staff's Data Request #1- 2025 TYSP, and explain the cause(s) for the reduction in DCFC stations over the forecast horizon in FPL's 2025 TYSP compared to FPL's 2024 TYSP.

FPL 2025 TYSP EV Forecast

Year	Number of PEVs (1)	Number of Public PEV Charging Stations (2)	Number of Public DCFC PEV Charging Stations	Cumulative Impact of PEVs (3)		
				Summer Demand (MW)	Winter Demand (MW)	Annual Energy (GWh)
2025	382,754	24,988	3,084	319	138	1,503
2026	532,485	31,295	3,234	447	194	2,106
2027	712,858	41,894	4,327	604	261	2,843
2028	928,814	54,579	5,638	795	344	3,744
2029	1,183,054	69,526	7,183	1,025	443	4,825
2030	1,471,933	79,859	6,809	1,291	559	6,078
2031	1,802,084	97,778	8,338	1,611	697	7,584
2032	2,165,993	111,946	8,620	1,977	855	9,304
2033	2,556,410	132,124	10,174	2,349	1,016	11,055
2034	2,965,733	153,282	11,803	2,743	1,186	12,910

Notes

1) Number of EVs includes plug-in hybrid electric vehicles and battery electric vehicles. The Company uses third-party sources (Bloomberg and Wood Mackenzie) as the basis for its electric vehicles (EV) growth and for charging station adoptions.
2) Charging Stations represent estimated number of ports in FPL service territory. Public DCFC EV Charging Station ports included in total Number of Public EV Charging Stations.
3) MW and GWh are incremental from the end of 2023.

FPL 2024 TYSP EV Forecast

Year	Number of EVs(1)	Number of Public EV Charging Stations(2)	Number of Public DCFC EV Charging Stations.(3)	Cumulative Impact of EVs		
				Summer Demand (MW)	Winter Demand (MW)	Annual Energy (GWh)
2024	293,845	12,770	3,190	86	37	352
2025	428,132	20,601	4,944	200	87	816
2026	590,749	29,392	6,860	341	147	1,388
2027	787,129	38,516	8,993	514	222	2,093
2028	1,018,957	48,807	11,363	723	313	2,945
2029	1,287,414	60,490	13,951	972	420	3,957
2030	1,589,148	72,659	16,234	1,259	544	5,124
2031	1,929,264	86,389	18,780	1,602	693	6,524
2032	2,300,764	100,511	21,534	1,994	862	8,118
2033	2,695,021	118,956	24,927	2,382	1,030	9,696

Notes

1) Number of EVs includes plug-in hybrid electric vehicles and battery electric vehicles.
2) Charging Stations represent estimated number of ports in FPL service territory. Public DCFC EV Charging Station ports included in total Number of Public EV Charging Stations.
3) MW and GWh are incremental from the end of 2023.

RESPONSE:
As described in FPL's response to Staff's First Set of Data Requests, Nos. 20 and 21, the Company uses third-party sources (Bloomberg New Energy Finance, Wood Mackenzie) as the basis for its electric vehicles (EV) growth. These third-party sources cited uncertainty in policy and political challenges to funding along with developmental limitations in the U.S. market as some of the drivers in the change to the EV forecast. For charging station adoption, the Company inputs the EV projections into the National Renewable Energy Laboratory's (NREL) Electric Vehicle Infrastructure Projection (EVI Pro) Lite Charging Need tool to estimate charging infrastructure need in the Company's service territory.