



July 24, 2019

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

Re: Ten-Year Site Plan Supplemental Data Request #2 – FMPA Response

Dear Sir/Madam:

Pursuant to the Commission's 2019 Data Request #2 dated July 2, 2019, please find FMPA's responses below.

If you have any questions, please do not hesitate to contact me at (321) 239-1022.

Sincerely,

Chris Gowder
Business Development and Planning Manager

Forecasting

1. With respect to the forecasting methodology, procedure, and accuracy associated with FMPA's forecast of "Total Sales to Ultimate Customers," please specify all the differences/modifications/improvements, if any, between FMPA's 2018 TYSP and 2019 TYSP.

FMPA retains nFront Consulting, LLC ("nFront") to prepare an independent econometric load forecast for the All-Requirements Project that is the basis of our annual TYSP report. As part of this effort, FMPA coordinates with nFront to evaluate trends and emerging issues that may require an evolution of our forecasting methods. Over the past two TYSP planning cycles, examples of issues that have been examined include (i) a time series evaluation of potential trends in load factor, (ii) the impacts that may surface long term as a result of a weaker relationship between personal income and retail sales, (iii) the locational effect of displaced citizens from Puerto Rico on customer counts, and (iv) alternative population forecasts as prepared by the University of Florida. While the core methodology utilized in the 2019 TYSP forecast did not change relative to the 2018 TYSP forecast, the aforementioned factors, in addition to other emerging issues, will continue to be examined to determine if a departure in methods is warranted to explicitly account for impacts not believed to be captured in the econometric process.

Flood Mitigation

2. Please explain the Utility's planning process for flood mitigation for current and proposed power plant sites and transmission/distribution substations.

With respect to flood mitigation for the existing All-Requirements Project generation fleet, only the facilities at Stock Island are within the 100-year flood map. All generating assets at Stock Island are elevated above sea level on concrete padded mounts and securely bolted to the pad. Generation elevations at Stock Island are equal to or greater than the 100-year flood plan risk of 9 feet. One asset, Combustion Turbine #4, has an elevation equal to the 500-year flood plan risk of 11 feet. The Stock Island CTs have additional strapping to mitigate windstorm or flood related floating risk and have been sealed to prevent water intrusion. The Cane Island Power Park and Treasure Coast Energy Center plant sites are outside the 500-year flood zone, and FMPA has not taken any additional flood mitigation steps at these sites.

FMPA does not have any new proposed power plant sites in our current TYSP. FMPA does not operate or manage the transmission and distribution assets of the All-Requirements Project participants nor are we proposing any new transmission substations in our current TYSP.