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KEITH C. HETRICK
GENERAL COUNSEL
(850) 413-6199

Public Service Commission

March 23, 2021

William P. Cox, Esquire
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, Florida 33408
Will.cox@fpl.com

STAFF'S SECOND DATA REQUEST

via email

Re: Docket No. 20200257-EI - Petition for approval of 2020 nuclear decommissioning study.

Dear Mr. Cox:

By this letter, Commission staff requests the following information from Florida Power & Light Company (FPL or Company):

1. Please refer to the St. Lucie Decommissioning Study, Section 11, Page 7 and the Turkey Point Decommissioning Study, Section 10, Page 7.
 - a) Please describe how the site-specific plant systems and building inventories were obtained and how they are used in developing a decommissioning cost estimate.
 - b) Please describe what Unit Cost Factors are, how they are developed, and how they are used in developing a decommissioning cost estimate.
 - c) Please describe what historical data is being referred to and how that data is used in developing a decommissioning cost estimate.
 - d) Please elaborate on what the execution strategies are and how they are used in developing a decommissioning cost estimate.
2. Please refer to the St. Lucie Decommissioning Study, Section 12, Page 7 and the Turkey Point Decommissioning Study, Section 11, Page 7. Please explain the differences in security staffing that contribute to the decrease in security costs compared to the 2015 Study.

3. Please refer to the St. Lucie Decommissioning Study, Section 11, Pages 16-17 and the Turkey Point Decommissioning Study, Section 10, Pages 16-17. Please elaborate on the various factors that led to the reduction in the Contingency Allowances used in the 2020 Study from the 2015 Study.
4. Please refer to the Turkey Point Decommissioning Study, Section 11, Pages 3 and 5. Please confirm that the 2015 dollar amounts referenced on those pages reflected the original TLG 2015 Decommissioning Cost Study, and not the amounts approved in Order No. PSC-16-0250-PAA-EI.
5. Please refer to the St. Lucie Decommissioning Study, Section 11, Page 34 and the Turkey Point Decommissioning Study, Section 10, Page 35. Please provide the 2019 RS Means labor rates referenced on those pages.
6. Please refer to FPL's 2020 St. Lucie Decommissioning Study, Section 12, Page 3 of 10, as well as FPL's 2020 Turkey Point Decommissioning Study, Section 11, Page 3 of 10. In the fourth paragraph, the Summary states, "The cost elements were assigned to one of three subcategories: License Termination, Spent Fuel Management, and Site Restoration." For each cost element identified in FPL's Response to Staff's First Data Request (Document No. 02585-2021), No. 70.a, please identify the subcategory to which the cost element belongs.
7. Please refer to FPL's Response to Staff's First Data Request (Document No. 02585-2021), No. 71.e. Please explain how FPL determines whether a SNF management cost is a DOE recoverable cost.
8. Please refer to FPL's 2020 St. Lucie Decommissioning Study, Section 2, Page 10 of 11, FPL's 2020 Turkey Point Decommissioning Study, Section 2, Page 8 of 9, as well as FPL's Response to Staff's First Data Request (Document No. 02585-2021), No. 74.a. for the following questions.
 - a. In FPL's 2020 St. Lucie and Turkey Point Decommissioning Studies' Assumptions section, under Spent Nuclear Fuel Storage, the narratives state, "Consistent with the Commission's prior findings, this updated 2020 decommissioning study includes the costs relating to the *construction*, operation, and dismantlement of an on-site independent spent fuel storage installation (ISFSI) that is required to accommodate the timely decommissioning of the St. Lucie/Turkey Point units," [emphasis added]. However, this statement appears to be contradicted in FPL's Response to Staff's First Data Request, as FPL states, "The 2020 DCEs for Turkey Point and St. Lucie assume any required ISFSI buildout will be complete prior to permanent plant shutdown, and therefore such costs are not included as decommissioning costs." Please explain this as well as how ISFSI construction costs and potential expansion costs are/will be recorded.

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- b. If ISFSI construction/expansion cost reimbursements are rejected by the DOE, please explain how and when such ISFSI construction/expansion costs will be recovered.

Please file all responses electronically no later than April 7, 2021, via the Commission's Electronic Filing Web Form. Please contact me at sbrownle@psc.state.fl.us or at (850) 413-6218 if you have any questions or need any further information regarding this matter.

Very truly yours,

Suzanne Brownless
Special Counsel

cc: Commission Clerk