

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Storm Protection Plan Cost Recovery
Clause

Docket No. 20210010-EI

Filed: July 12, 2021

**FLORIDA POWER & LIGHT COMPANY’S
PREHEARING STATEMENT**

Florida Power & Light Company (“FPL”), representing the merged and consolidated operations of FPL and the former Gulf Power Company (“Gulf”),¹ by and through its undersigned counsel, hereby submits this Prehearing Statement pursuant to Order No. PSC-2021-0083-PCO-EI, and states:

1. FPL WITNESSES

A. Direct Testimony

<u>Witness</u>	<u>Subject Matter - Direct</u>	<u>Issue #</u>
Michael Jarro	Presents and supports FPL’s 2021 actual/estimated costs associated with the programs and projects included in FPL’s 2020-2029 SPP. Presents and supports Gulf’s 2021 actual/estimated costs associated with the programs and projects included in Gulf’s 2020-2029 SPP. Explains the variances between FPL’s and Gulf’s actual/estimated 2021 SPP costs and the 2021 cost projections approved in Docket No. 20200092-EI. Describes FPL’s and Gulf’s 2022 SPP programs and projects and their associated cost projections and explains how those activities and costs are consistent with the 2020-2029 SPPs approved in Docket Nos. 20200070-EI and 20200071-EI.	2-4

¹ Effective January 1, 2021, Gulf and FPL were legally merged with FPL being the surviving entity. On January 11, 2021, pursuant to Rule 25-9.044, F.A.C., FPL submitted a notice of the change in ownership of Gulf effective January 1, 2021, and FPL’s adoption and ratification of Gulf’s existing rates and tariff on file with the Commission. FPL is representing the merged and consolidated operations of FPL and the former Gulf. “Gulf,” as used in this Petition, has reference to the former Gulf Power Company and/or Gulf as the separate ratemaking entity for purposes of this Petition and the application of the SPP rules and plan, as context would dictate.

Rena Deaton ²	Presents and supports FPL's 2021 Actual/Estimated SPPCRC true-up amount for the period January 1, 2021 through December 31, 2021. Presents and supports Gulf's 2021 Actual/Estimated SPPCRC true-up amount for the period January 1, 2021 through December 31, 2021. Presents and supports the 2022 projected amounts and SPPCRC Factors to be applied to bills issued during the projected period of January 1, 2022 through December 31, 2022.	1-12
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B. Rebuttal Testimony

None. FPL did not file rebuttal testimony in this docket.

2. EXHIBITS

<u>Witness</u>	<u>Proffered</u> <u>By</u>	<u>Exhibit #</u>	<u>Description</u>	<u>Issue #</u>
Michael Jarro	FPL	MJ-1 ³	FPL Storm Protection Plan 2020-2029, approved by the Commission in Docket No. 20200071-EI	2-4
		MJ-2 ⁴	Gulf Storm Protection Plan 2020-2029, approved by the Commission in Docket No. 20200070-EI	2-4
		MJ-3	FPL Actual/Estimated Storm Protection Plan Work to be Completed in 2021	2
		MJ-4	Gulf Actual/Estimated Storm Protection Plan Work to be Completed in 2021	2
		MJ-5	Consolidated FPL Storm Protection Plan Work Projected to be Completed in 2022	3
		MJ-6	Supplemental Standalone FPL Storm Protection Plan Work Projected to be Completed in 2022	3
		MJ-7	Supplemental Standalone Gulf Storm Protection Plan Work Projected to be Completed in 2022	3

² On July 1, 2021, FPL filed an Errata Sheet correcting page 12, line 17 of the direct testimony of FPL witness Deaton to reflect that the 2022 SPPCRC projections reflected the depreciation rates proposed in FPL's 2021 Rate Case pending in Docket No. 20210015-EI. No other changes or correctio have been made to the direct testimony or exhibits of FPL witness Deaton.

³ On May 25, 2021, FPL filed an Errata Sheet correcting the headers on Exhibits MJ-1 and MJ-2 attached to the direct testimony of FPL witness Jarro to remove references to prior dockets and to correct the pagination of each exhibit. No other changes or corrections have been made to the direct testimony or exhibits of FPL witness Jarro.

⁴ See footnote 3.

		RBD-1 Appendix III	Form 6P - Program Description and Progress Report: Describes the program activities, identifies the fiscal expenditures incurred to date, reports on the progress for the current year, and provides a projection of work to be completed and the associated costs for the subsequent year.	2-4
Rena Deaton	FPL	RBD-1 Appendix I	FPL 2021 Actual/Estimated SPPCRC: <ul style="list-style-type: none"> - Form 1E - Summary of Current Period Estimated True-Up - Form 2E - Calculation of True-Up Amount -Form 3E - Calculation of Interest Provision for True-Up Amount - Form 4E - Variance Report of Annual O&M Costs by Program - Form 5E - Calculation of Annual Revenue Requirements for O&M Programs - Form 6E - Variance Report of Annual Capital Investment Costs by Program - Form 7E Summary - Calculation of Annual Revenue Requirements for Capital Investment Programs - Form 7E - Capital - Estimated Revenue Requirements by Program - Form 8E - Approved Capital Structure and Cost Rates 	2, 5
		RBD-1 Appendix II	Gulf 2021 Actual/Estimated SPPCRC: <ul style="list-style-type: none"> - Form 1E - Summary of Current Period Estimated True-Up - Form 2E - Calculation of True-Up Amount -Form 3E - Calculation of Interest Provision for True-Up Amount - Form 4E - Variance Report of Annual O&M Costs by Program - Form 5E - Calculation of Annual Revenue Requirements for O&M Programs - Form 6E - Variance Report of Annual Capital Investment Costs by Program - Form 7E Summary - Calculation of Annual Revenue Requirements for Capital Investment Programs - Form 7E - Capital - Estimated Revenue Requirements by Program 	2, 5

			- Form 8E – Approved Capital Structure and Cost Rates	
		RBD-1 Appendix III	Consolidated FPL 2022 Projections: - Form 1P - Summary of Projected Period Recovery Amount - Form 2P - Calculation of Annual Revenue Requirements for O&M Programs - Form 2P - Projects - Project Listing by Each O&M Program - Form 3P - Calculation of the Total Annual Revenue Requirements for Capital Investment Programs - Form 3P - Projects - Project Listing by Each Capital Program - Form 3P - Capital - Calculation of Annual Revenue Requirements for Capital Investment by Program - Form 4P - Calculation of the Energy & Demand Allocation % By Rate Class - Form 5P - Calculation of the Cost Recovery Factors by Rate Class - Form 7P - Approved Capital Structure and Cost Rates	3-5, 7
		RBD-1 Appendix IV	Retail separation factors	6
		RBD-1 Appendix V	Allocation of implementation costs between transmission and distribution	2
		RBD-2 Appendix I	Supplemental Standalone FPL 2022 Projections: - Form 1P - Summary of Projected Period Recovery Amount - Form 2P - Calculation of Annual Revenue Requirements for O&M Programs - Form 2P - Projects - Project Listing by Each O&M Program - Form 3P - Calculation of the Total Annual Revenue Requirements for Capital Investment Programs - Form 3P - Projects - Project Listing by Each Capital Program - Form 3P - Capital - Calculation of Annual Revenue Requirements for Capital Investment by Program	3-5, 7, 10

			<ul style="list-style-type: none"> - Form 4P - Calculation of the Energy & Demand Allocation % By Rate Class - Form 5P - Calculation of the Cost Recovery Factors by Rate Class - Form 7P - Approved Capital Structure and Cost Rates 	
		RBD-2 Appendix II	Supplemental Standalone Gulf 2022 Projections: <ul style="list-style-type: none"> - Form 1P - Summary of Projected Period Recovery Amount - Form 2P - Calculation of Annual Revenue Requirements for O&M Programs - Form 2P - Projects - Project Listing by Each O&M Program - Form 3P - Calculation of the Total Annual Revenue Requirements for Capital Investment Programs - Form 3P - Projects - Project Listing by Each Capital Program - Form 3P - Capital - Calculation of Annual Revenue Requirements for Capital Investment by Program - Form 4P - Calculation of the Energy & Demand Allocation % By Rate Class - Form 5P - Calculation of the Cost Recovery Factors by Rate Class - Form 7P - Approved Capital Structure and Cost Rates 	3-5, 7, 10

In addition to the above pre-filed exhibits, FPL reserves the right to utilize any exhibit introduced by any other party. FPL additionally reserves the right to introduce any additional exhibit necessary for cross-examination or impeachment at the final hearing.

3. STATEMENT OF BASIC POSITION

FPL’s actual/estimated true-up of its 2021 SPP costs is consistent with the 2021 SPPCRC Factors approved by Commission Order No. PSC-2020-0409-AS-EI, consistent with the FPL SPP approved by Commission Order No. PSC-2020-0293-AS-EI, applies the methodology and prescribed schedules contained in Commission Forms 1E through 9E, and meets the requirements

of Section 366.96, F.S., and Rule 25-6.031(7)(b), F.A.C. Therefore, the Commission should approve FPL's actual/estimated true-up over-recovery amount of \$742,850, including interest, for the period of January 2021 through December 2021

Gulf's actual/estimated true-up of its 2021 SPP costs is consistent with the 2021 SPPCRC Factors approved by Commission Order No. PSC-2020-0409-AS-EI, consistent with the Gulf SPP approved by Commission Order No. PSC-2020-0293-AS-EI, applies the methodology and prescribed schedules contained in Commission Forms 1E through 9E, and meets the requirements of Section 366.96, F.S., and Rule 25-6.031(7)(b), F.A.C. Therefore, the Commission should approve Gulf's actual/estimated true-up over-recovery amount of \$974,333, including interest, for the period of January 2021 through December 2021.

FPL's consolidated 2022 SPPCRC Factors are reasonable, are consistent with the FPL and Gulf 2020-2029 SPPs approved by Commission Order No. PSC-2020-0409-AS-EI, fully comply with the requirements of Section 366.96, F.S., and Rule 25-6.031, F.A.C., and are consistent with the Commission's methodology for calculating the recovery factors. Therefore, subject to and contingent upon the Commission's approval of FPL's request in the 2021 Rate Case pending in Docket No. 20210015-EI to unify rates, the Commission should approve the consolidated 2022 SPPCRC Factors set forth in Appendix III of Exhibit RBD-1 attached to the direct testimony of FPL witness Deaton for application to bills beginning the first billing cycle in January 2022 through the last billing cycle December 2022, and continuing until modified by subsequent order of this Commission.

In the event the Commission declines to approve FPL's pending request for unified rates in Docket No. 20210015-EI, the Commission should approve the standalone FPL and Gulf 2022 SPPCRC Factors set forth in Appendices I and II, respectively, of Exhibit RBD-2 attached to the direct testimony of FPL witness Deaton for application to bills beginning the first billing cycle in

January 2022 through the last billing cycle December 2022, and continuing until modified by subsequent order of this Commission. The standalone FPL and Gulf 2022 SPPCRC Factors are reasonable, are consistent with the FPL and Gulf 2020-2029 SPPs approved by Commission Order No. PSC-2020-0409-AS-EI, fully comply with the requirements of Section 366.96, F.S., and Rule 25-6.031, F.A.C., and are consistent with the Commission's methodology for calculating the recovery factors.

Finally, in the event the Commission adopts any changes or modifications in the 2021 Rate Case pending in Docket No. 20210015-EI that impact the 2022 jurisdictional cost recovery amounts, FPL will include those impacts and adjustment in its 2022 actual/estimated and final true-up filings for Commission review and approval. FPL will have the burden in its 2022 actual/estimated and final true-up filings to demonstrate that any changes or modifications adopted by the Commission in the 2021 Rate Case that impact the 2022 jurisdictional cost recovery amounts have been incorporated into the 2022 actual/estimated and final true-up filings.

4. STATEMENT OF ISSUES AND POSITIONS

A. GENERIC STORM PROTECTION PLAN COST RECOVERY ISSUES

Issue No. 1: What are the final Storm Protection Plan Cost Recovery Clause jurisdictional cost recovery true-up amounts for the period January 2020 through December 2020?

FPL Position: \$0. In the Stipulation and Settlement Agreement approved by Commission Order No. PSC-2020-0293-AS-EI, FPL and Gulf committed they would not seek recovery of the 2020 SPP project costs through the SPPCRC. (*FPL witness Deaton*)

Issue No. 2: What are the actual/estimated Storm Protection Plan Cost Recovery Clause jurisdictional cost recovery true-up amounts for the period January 2021 through December 2021?

FPL Position: FPL's actual/estimated true-up amount for the period of January 2021 through December 2021, including interest, is an over-recovery of \$742,850. Gulf's actual/estimated true-up amount for the period of January 2021 through December 2021, including interest, is an over-recovery of \$974,333. (*FPL witnesses Jarro and Deaton*)

Issue No. 3: What are the projected Storm Protection Plan Cost Recovery Clause jurisdictional cost recovery amounts for the period January 2022 through December 2022?

FPL Position: Subject to and contingent upon the Commission's approval of FPL's pending request for unified rates in Docket No. 20210015-EI, the total costs associated with the consolidated SPP programs projected to be incurred between January 1, 2022 and December 31, 2022, are \$234,663,632.

In the event that the Commission declines to approve FPL's pending request for unified rates in Docket No. 20210015-EI, the total costs associated with the consolidated SPP programs projected to be incurred between January 1, 2022 and December 31, 2022, are \$215,055,700 for standalone FPL and \$19,568,582 for standalone Gulf.

(*FPL witnesses Jarro and Deaton*)

Issue No. 4: What are the Storm Protection Plan Cost Recovery Clause total jurisdictional cost recovery amounts, including true-ups, to be included in establishing Storm Protection Plan Cost Recovery factors for the period January 2022 through December 2022?

FPL Position: Subject to and contingent upon the Commission's approval of FPL's pending request for unified rates in Docket No. 20210015-EI, the total jurisdictional SPP costs projected to be recovered for consolidated FPL between January 1, 2022 and

December 31, 2022, are \$233,114,170, including prior period true-up amounts and revenue taxes.

In the event that the Commission declines to approve FPL's pending request for unified rates in Docket No. 20210015-EI, the total jurisdictional SPP costs projected to be recovered between January 1, 2022 and December 31, 2022, are \$214,467,156 for standalone FPL and \$18,607,637 for standalone Gulf, including prior period true-up amounts and revenue taxes.

(FPL witnesses Jarro and Deaton)

Issue No. 5: What depreciation rates should be used to develop the depreciation expense included in the total Storm Protection Plan Cost Recovery Clause amounts for the period January 2022 through December 2022?

FPL Position: The depreciation rates used to calculate the depreciation expense should be the Commission-approved depreciation rates that are in effect during the period the allowed capital investment is in service. For the period January 2022 through December 2022, FPL should reflect the final depreciation rates approved by the Commission in FPL's 2021 Rate Case pending in Docket No. 20210015-EI in the 2022 actual/estimated and final true-up filings. See also FPL's position in response to Issue No. 11. *(FPL witness Deaton)*

Issue No. 6: What are the appropriate jurisdictional separation factors for the projected period January 2022 through December 2022?

FPL Position: Subject to and contingent upon the Commission's approval of FPL's pending request for unified rates in Docket No. 20210015-EI, the appropriate FPL consolidated jurisdictional separation factors for the period January 2022 through December 2022 are:

Consolidated FPL

Retail Jurisdictional Factors

a. Distribution Demand Jurisdictional Factor	100.0000%
b. Transmission Demand Jurisdictional Factor	90.2581%
c. General & Intangible Plant Jurisdictional Factor	96.8984%

In the event that the Commission declines to approve FPL's pending request for unified rates in Docket No. 20210015-EI, the appropriate jurisdictional separation factors for standalone FPL and standalone Gulf for the period January 2022 through December 2022 are:

Standalone FPL

Retail Jurisdictional Factors

a. Distribution Demand Jurisdictional Factor	100.0000%
b. Transmission Demand Jurisdictional Factor	90.1706%
c. General & Intangible Plant Jurisdictional Factor	96.2686%

Standalone Gulf

Retail Jurisdictional Factors

a. Distribution Demand Jurisdictional Factor	100.0000%
b. Transmission Demand Jurisdictional Factor	97.4531%
c. General & Intangible Plant Jurisdictional Factor	99.7842%

See also FPL's position in response to Issue No. 11. (*FPL witness Deaton*)

Issue No. 7: What are the appropriate Storm Protection Plan Cost Recovery Clause factors for the period January 2022 through December 2022 for each rate group?

FPL Position: Subject to and contingent upon the Commission's approval of FPL's pending request for unified rates in Docket No. 20210015-EI, the appropriate FPL consolidated SPPCRC Factors for the period January 2022 through December 2022 are:

Consolidated FPL 2022 SPPCRC Factors

Rate Class	SPP Factor (\$/kW)	SPP Factor (\$/kWh)	RDC (\$/KW)	SDD (\$/KW)
RS1/RTR1		0.00214		
GS1/GST1		0.00202		
GSD1/GSDT1/HLFT1	0.64			
OS2		0.00600		
GSLD1/GSLDT1/CS1/CST1/HLFT2	0.73			
GSLD2/GSLDT2/CS2/CST2/HLFT3	0.69			
GSLD3/GSLDT3/CS3/CST3	0.07			
SST1T			0.09	0.04
SST1D1/SST1D2/SST1D3			0.09	0.04
CILC D/CILC G	0.69			
CILC T	0.08			
MET	0.66			
OL1/SL1/SL1M/PL1		0.00221		
SL2/SL2M/GSCU1		0.00136		

In the event that the Commission declines to approve FPL’s pending request for unified rates in Docket No. 20210015-EI, the appropriate standalone FPL and standalone Gulf SPPCRC Factors for the period January 2022 through December 2022 are:

Standalone FPL 2022 SPPCRC Factors

Rate Class	SPP Factor (\$/kW)	SPP Factor (\$/kWh)	RDC (\$/KW)	SDD (\$/KW)
RS1/RTR1		0.00217		
GS1/GST1		0.00197		
GSD1/GSDT1/HLFT1	0.63			
OS2		0.00752		
GSLD1/GSLDT1/CS1/CST1/HLFT2	0.73			
GSLD2/GSLDT2/CS2/CST2/HLFT3	0.66			
GSLD3/GSLDT3/CS3/CST3	0.06			
SST1T			0.09	0.04
SST1D1/SST1D2/SST1D3			0.09	0.04
CILC D/CILC G	0.70			
CILC T	0.06			
MET	0.64			

OL1/SL1/SL1M/PL1		0.00230		
SL2/SL2M/GSCU1		0.00136		

Standalone Gulf 2022 SPPCRC Factors

RATE CLASS	SPP Factors (¢/kWh)	SPP Factors (\$/kW)
RS, RSVP, RSTOU	0.212	
GS	0.209	
GSD, GSDT, GSTOU	0.145	0.46
LP, LPT		0.52
PX, PXT, RTP, SBS	0.112	
OS-I/II	0.099	

See also FPL’s position in response to Issue No. 11. (*FPL witness Deaton*)

Issue No. 8: What should be the effective date of the new Storm Protection Plan Cost Recovery Clause factors for billing purposes?

FPL Position: The 2022 SPPCRC Factors should become effective for application to bills beginning the first billing cycle in January 2022 through the last billing cycle December 2022 and continuing until modified by subsequent order of this Commission. (*FPL witness Deaton*)

Issue No. 9: Should the Commission approve revised tariffs reflecting the new Storm Protection Plan Cost Recovery Clause factors determined to be appropriate in this proceeding?

FPL Position: Yes. FPL will submit to Staff for administrative approval revised tariffs reflecting the SPPCRC amounts and SPPCRC Factors approved in this proceeding. (*FPL witness Deaton*)

B. COMPANY SPECIFIC STORM PROTECTION PLAN COST RECOVERY ISSUES

Florida Power & Light Company

Issue No. 10: In the event that the Commission declines to approve FPL's pending request for unified rates in Docket No. 20210015-EI, what are the appropriate Storm Protection Plan Cost Recovery Clause factors for the period January 2022 through December 2022?

FPL Position: See FPL's position in response to Issue No. 7. (*FPL witness Deaton*)

Issue No. 11: How should the assumptions used to develop FPL's 2022 Storm Protection Plan Cost Recovery Clause factors approved in this proceeding be revised to reflect any changes or modifications adopted by the Commission in the 2021 Rate Case pending in Docket No. 20210015-EI?

FPL Position: In the event the Commission adopts any changes or modifications in the 2021 Rate Case pending in Docket No. 20210015-EI that impact or require adjustments to the consolidated, standalone FPL, or standalone Gulf 2022 SPPCRC jurisdictional amounts, FPL will include those impacts and adjustment in its 2022 actual/estimated and final true-up filings for Commission review and approval. FPL will have the burden in its 2022 actual/estimated and final true-up filings to demonstrate that any changes or modifications adopted by the Commission in the 2021 Rate Case that impact the 2022 SPPCRC jurisdictional amounts have been incorporated into the 2022 actual/estimated and final true-up filings.

C. CLOSE THE DOCKET ISSUE

Issue No. 12: Should this docket be closed?

FPL Position: No. While a separate docket number is assigned each year for administrative convenience, this is a continuing docket and should remain open. (*FPL witness Deaton*)

5. STIPULATED ISSUES

FPL is not aware of any stipulated issues at this time. However, FPL remains willing and available to discuss settlement and/or stipulated facts, issues, witnesses, and exhibits and waiver of cross examination with the parties.

6. PENDING MOTIONS

As of the date of this filing, FPL is not aware of any motions that remain pending.

7. PENDING REQUESTS FOR CONFIDENTIALITY

As of the date of this filing, FPL is not aware of any Requests for Confidential Classification that remain pending.

8. OBJECTIONS TO WITNESS QUALIFICATIONS AS AN EXPERT

FPL has no objections to the qualifications of any witness at this time.

9. REQUEST FOR SEQUESTRATION OF WITNESSES

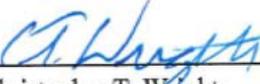
None at this time.

10. STATEMENT OF COMPLIANCE WITH ORDER ESTABLISHING PROCEDURE

There are no requirements of the Order Establishing Procedure with which FPL cannot comply.

Respectfully submitted this 12th day of July 2021,

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Authorized House Counsel No. 1007055

Attorney for Florida Power & Light Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by electronic delivery to the following parties of record this 12th day of July 2021:

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