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July 9, 2025

VIA ELECTRONIC FILING
Adam Teitzman, Commission Clerk
Division of Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 20250011-EI
Petition by Florida Power & Light Company for Base Rate Increase

Dear Mr. Teitzman:

Attached for filing on behalf of Florida Power & Light Company ("FPL") in the above-referenced docket are the rebuttal testimony and exhibits of FPL witness Eduardo De Varona.

Please let me know if you have any questions regarding this submission.

Sincerely,

s/ Maria Jose Moncada
Maria Jose Moncada
Assistant General Counsel
Florida Power & Light Company

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Electronic Mail to the following parties of record this 9th day of July 2025:

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s/ Maria Jose Moncada

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BEFORE THE

FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 20250011-EI

FLORIDA POWER & LIGHT COMPANY

REBUTTAL TESTIMONY OF EDUARDO DE VARONA

Filed: July 9, 2025

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I. INTRODUCTION

Q. Please state your name and business address.

A. My name is Eduardo De Varona. My business address is Florida Power & Light Company ("FPL" or the "Company"), 15430 Endeavor Drive, Jupiter, FL 33478.

Q. Have you previously submitted direct testimony in this proceeding?

A. Yes.

Q. Are you sponsoring any rebuttal exhibits in this case?

A. Yes. I am sponsoring the following exhibit:

- Exhibit EDV-6 – List of PHFU (Power Delivery T&D)
- Exhibit EDV-7 – FPL's Response to OPC's First Set of Interrogatories No. 56

Q. What is the purpose of your rebuttal testimony?

A. The purpose of my rebuttal testimony is to respond to the testimony of Office of Public Counsel ("OPC") witness Helmuth W. Schultz III regarding Property Held for Future Use ("PHFU") and Planned Transmission Capital Maintenance. I will also respond to contentions from the Florida Industrial Power Users Group ("FIPUG") witness Jeffry Pollock regarding FPL's proposed contribution-in-aid-of-construction ("CIAC") tariff modifications and Florida Energy for Innovation Association, Inc. ("FEIA") witness David Loomis concerning FPL's Large Load Contract Service ("LLCS") tariffs.

Q. Please summarize your rebuttal testimony.

A. My testimony rebuts OPC witness Schultz's recommendations to remove certain Transmission & Distribution ("T&D") properties and their associated costs from FPL's 2026 and 2027 forecasted PHFU balances. His proposed T&D PHFU recommendations should be rejected as these properties are essential components for:

meeting future customer and load growth; maintaining reliability; complying with North American Electric Reliability Corporation ("NERC") standards; and/or integrating future generation into the grid. Exclusion of these properties would compromise FPL's ability to implement its dynamic planning process for locating and cost-effectively acquiring properties on which to build essential T&D facilities.

My testimony also supports and reaffirms the Company's proposals for the implementation of its CIAC tariff modification and the appropriate acceptance period for the LLCS tariffs.

Finally, my testimony rebuts OPC witness Schultz's recommendation to reduce FPL's planned transmission capital maintenance. My rebuttal testimony demonstrates that this investment is necessary for the continued reliable operation of FPL's transmission system.

II. PROPERTY HELD FOR FUTURE USE – T&D

Q. You mentioned that FPL's PHFU practices were contested by OPC witness Schultz. What is FPL's practice for acquiring and retaining properties in anticipation of future T&D use?

A. FPL's practice for acquiring T&D properties for future use is guided by the identification of specific system needs and is fundamental to securing needed property at a favorable value for our customers. New T&D substations and transmission lines take years to plan, design and construct. Each of these activities is essential to project

development and occurs well prior to a facility's service to customers. To support future T&D system needs, FPL proactively secures suitable sites and properties to accommodate necessary facilities, ensuring they are in place when needed to deliver reliable service to our customers. Were FPL to not engage in this process, customers would be put at risk of paying increased (or, in the worst case, exorbitant) prices on properties that, if reasonable foresight had been applied, could have been acquired much earlier and for less money.

FPL T&D planners evaluate the usefulness of the T&D PHFU properties as they review plans for upcoming projects. On a monthly basis, FPL T&D planners provide the Company's Property Accounting group updates to the expected in-service dates (as needed) for T&D PHFU properties, according to the outcome of these evaluations.

FPL's acquisition practices take into account that the process to initiate construction can be lengthy and may involve rezoning from local entities and permitting from local, state, and federal agencies. Additionally, the annual planning process is dynamic due to its close link to the Company's load growth forecast and can, and often does, result in modification each year to system expansion plans. In determining whether an acquired parcel is appropriately included in PHFU, the Company considers, based on the planning and factors known to the Company, whether parcel is needed or likely to be needed to support customer-serving T&D investment. Sometimes it is as simple as applying common sense given certain key factors like location, population density, anticipated growth, relative availability of alternative corridors, and proximity or

contiguity to other substations and transmission lines. At other times, the Company must make careful decisions about the likelihood of future need, and balance that consideration with the cost to acquire property.

FPL's property acquisition practices are also consistent with FPL's obligation to provide reliable service to customers over both the near- and long-term. The Commission itself recognized many years ago the need for property to be acquired well in advance for the purpose of long-range planning. In a 1971 Order, the Commission stated the following:

> Suitable sites for generation plants, transmission lines, and substations, are becoming more and more difficult to obtain. Long-range planning for adequate and reliable electric energy requires that every effort be made by electric utilities to make prudent acquisitions of suitable sites for necessary expansion and development. This is a vital part of long-range planning for consumer service and protection.... Prudence requires acquisition of suitable land sites long before definite plans can be developed for specific use. [1]

FPL's acquisition practices are consistent with the Commission-recognized need.

In general, FPL acquires T&D properties using a 10-year forward-looking planning window where possible. For many projects, the 10-year horizon provides FPL perspective on what may be required in terms of design, new builds, or other considerations during that time frame. As I mentioned earlier, if FPL were to wait to

[1] In Re: Investigation of the Earnings & Rates & Charges of Fla. Power & Light Co. for the Purpose of Requiring Such Adjustments, If Any, As May Be Appropriate & Proper As A Result of the Facts Developed Through Said Investigation; Docket No. 9777-EU; Order No. 5280 (F.P.S.C. December 7, 1971)

acquire property for future T&D needs when there is a definitive in-service date for a new substation and/or transmission line or a specific need manifested in the ten-year planning cycle, often we would be left with limited or perhaps no suitable choices and potentially face higher costs (*e.g.*, less preferred and more contested corridors, and/or paying higher prices to sellers who are aware of the time pressure faced to acquire the necessary properties).

Q. Do OPC witness Schultz's contentions regarding FPL's T&D PHFU disregard the critical need to acquire properties in advance of use?

A. Yes. OPC witness Schultz does not take into account the realities of electric system planning and the importance of obtaining and holding property for future T&D needs to meet future growth and ensure reliability. The T&D properties challenged by OPC witness Schultz have been identified by the Company as being geographically and strategically located and necessary to meet future customer load growth, maintain customer reliability, and comply with NERC standards regulating the reliability of the grid and/or integrating future generation into the grid. Denying the inclusion of these properties in PHFU would disincentivize FPL from applying reasonable property acquisition practices that are designed to create value for customers and enable reliable service.

Q. What are the categories of T&D PHFU that OPC witness Schultz challenges?

A. OPC witness Schultz groups his contested T&D parcels into three separate categories: (i) properties that have been held by FPL for longer than 25 years; (ii) properties that are forecasted to be acquired in 2025-2027, and (iii) properties that are denoted as "various" in his Exhibit HWS-3. My testimony addresses the properties identified by

witness Schultz in each of these categories and their appropriateness for inclusion in PHFU.

Q. What are the T&D parcels held for longer than 25 years that are challenged by OPC witness Schultz?

A. OPC witness Schultz contests the inclusion in PHFU of the following properties: (1) Arch Creek; (2) Conservation-Levee 500 kV Line; (3) Levee-South Dade; (4) Rima Sub & Rima Volusia; (5) Desoto-Orange River; (6) Challenger; (7) Terminal; and (8) Satori.

Q. Does FPL have specific plans for the use of these properties?

A. Yes. As demonstrated in my Exhibit EDV-6, all of the properties challenged by witness Schultz that FPL has held for more than 25 years have a specific planned use within the next ten years or have been removed from PHFU.

Q. Does the fact that a property has been held for an extended period indicate that the property has no planned future T&D use?

A. No. The fact that a property has been held for years in advance of use does not mean that there is not a near-term planned use for the property. System planning, and the acquisition of properties to support those plans, evolve together. Whether or not a property should be held for PHFU turns on whether the property has a specific, planned future use and not on the length of time that it is held.

Q. What are the T&D properties forecasted to be acquired in the 2025-2027 timeframe that OPC witness Schultz contests?

A. OPC witness Schultz identifies nine transmission properties and 10 distribution properties that he claims should be excluded from PHFU. Specifically, OPC witness

Schultz identifies the following transmission properties for exclusion: (1) Bickett-Zoysia ROW; (2) Alico-Terry ROW; (3) Valencia ROW; (4) Parker-Callaway ROW; (5) Shalimar Loop ROW; (6) Brook Injection ROW; (7) Punta Gorda Injection ROW; (8) Coast Myakka ROW; and (9) Ft. Myers SC ROW.

The distribution properties OPC witness Schultz identifies for exclusion are the following: (1) Green Cove Substation; (2) Valentine Substation; (3) Wilson Grove Substation; (4) Breakfast Point Substation; (5) Julia Substation; (6) Radiant-Chester Substation; (7) Silverleaf Substation; (8) Wild Heron Substation; (9) Lake Pk Expansion Substation; and (10) Federation Substation.

Q. Do each of these identified T&D properties have a specific and identifiable T&D purpose for which they would be acquired?

A. Yes, the specific purpose of each of these properties is detailed in my Exhibit EDV-6. Also, each of these properties are projected to be in service to customers by no later than January of 2031. For these reasons, these properties are reasonably forecasted to support needed T&D infrastructure and included in FPL's PHFU upon their acquisition.

Q. What types of T&D properties comprise the "various" category of costs?

A. The T&D properties which list "various" as the acquisition and in-service dates in Exhibit HWS-3 include the following three categories: (1) future solar rights of way to support the solar installations described in detail in the direct and rebuttal testimonies of FPL witness Oliver; (2) new transmission rights of way; and (3) new substations.

Q. How are the properties that comprise the "various" categories determined?

A. The "various" properties are determined based on the Company's T&D plans, which are formulated to support new generation and provide safe and reliable service to existing and future customers. To support the needed T&D investment identified in those plans, the Company must acquire, either now or at a future time, land and rights of way to enable construction of future transmission infrastructure. For example, to meet the anticipated demands of customer growth, FPL will make plans to acquire property for new distribution substations or the right of way for transmission lines to serve a substation.

Q. Are the "various" properties needed to support essential future T&D investment?

A. Yes, these properties are required to support identified future transmission and distribution system needs. The specific planned use for each of the properties that comprise the "various" categories is provided in my Exhibit EDV-6. Ultimately, not acquiring these properties in advance of significant forecasted customer growth in the state could be considered imprudent because of the likelihood that the identified properties could be more costly or unavailable if acquisition is delayed into the future. For these reasons, these properties are reasonably forecasted to support needed T&D infrastructure and included in FPL's PHFU upon their acquisition.

Q. Are the properties challenged by OPC witness Schultz appropriate for inclusion in FPL's T&D PHFU?

A. Yes. The effects of increasing population growth and rapid residential and commercial development, permitting challenges, and ensuring and maintaining reliability are some examples of factors that make it more difficult for FPL to find and acquire properties

to build necessary future substations and transmission lines. If sold, these properties could have limited replacement options and result in increased total project costs. The acquisition and retention of the above listed rights-of-way, easements, and land plots are prudent acquisitions due to their strategic locations for the development of critical reliability infrastructure. Therefore, these properties are appropriately included in PHFU.

III. CIAC TARIFF MODIFICATION

Q. What are your general observations about the nature of intervenor challenges to FPL's proposed CIAC tariff modification?

A. The challenges posed to the CIAC tariff modification, in particular from FIPUG witness Pollock, disregard the intent of the modification. The intent of the new CIAC tariff requirement is to better protect the general body of customers from the risks associated with the costs to install new or upgraded facilities to serve significantly large new or incremental loads. The thresholds specified in the tariff, 15 MW or $25 million, were set with the intent that the tariff would apply only to applicants of substantial size, such that enhanced risk mitigation for the general body is appropriate. Given the magnitude of the cost to be incurred to serve a single applicant of this size and having that single applicant as the responsible party for the full payment of those service costs, there is a significant risk to the general body of customers if the forecasted load used to calculate the CIAC does not materialize. If such a situation were to occur, costs in the near term would be borne by the general body of customers. Notably, even witness

Pollock acknowledges that there is "merit in mitigating cost-shifting," but he nonetheless opposes FPL's CIAC proposal.

Q. FIPUG witness Pollock argues that there has been no showing that the current CIAC structure is unworkable. Is that accurate?

A. No. The current CIAC tariff would leave FPL's general body of customers exposed to the significant cost risk that is mitigated through FPL's proposal. By way of scale, and to better understand the size of applicant that the tariff modification affects, it would take approximately 10,000 homes to equate to 15 MW of added electrical load. Applicants with 15 MW of new or incremental load require significant capital investment in new T&D facilities and upgrades, and often involve the need to construct feeders, substations, and/or transmission lines. These are costly facility expenses that can exceed $25 million in grid investment, representing a substantial financial undertaking. The proposed CIAC shifts the cost risk from the general body of customers to the individual cost causer in a way that is consistent with the calculation of the CIAC amount in Rule 25-6.064, Florida Administrative Code (the "CIAC Rule").

Q. FIPUG witness Pollock alleges that the tariff modification will "punish customers who fail to predict their future loads with 100% accuracy." Is that the case?

A. No. This tariff modification is a protective measure, not a punishment. As explained in the direct testimony of FPL witness Cohen, it is the applicant, not FPL or the general body of customers, that controls whether the projected load that caused the costs to be incurred will actually materialize. Ultimately, it is the applicant that drives the CIAC costs. In other words, the costs FPL incurs to serve an applicant are based on the applicant's indicated electrical need, and based on that conveyed need, FPL determines

and constructs the facilities needed to serve the customer. Given that, it is more sensible to place the interim risk of load materializing on the applicant, as opposed to the general body of customers.

Q. How do you respond to FIPUG witness Pollock's contention that FPL has not offered an explanation supporting the 15 MW and $25 million thresholds and how they correlate?

A. Although both thresholds could apply to a single applicant, the 15 MW and $25 million thresholds are independent thresholds designed to reflect the potential significant capital investment required to serve applicants of these magnitudes. As I discussed earlier in my rebuttal testimony, a new or incremental addition of 15 MW or more is a tremendous size for a single customer, representing an equivalent electrical load of approximately 10,000 homes, and would require significant capital investment to serve. Likewise, a capital investment of $25 million or more to serve new or incremental service is, on its face, significant investment. Thus, any customer, whether they are existing or new, that is adding net new incremental load of 15 MW or more on to FPL's system, or that requires the installation of new or upgraded facilities that cost $25 million or more, should be subject to the proposed CIAC tariff to better protect the general body of customers from the risks associated with these costly new or upgraded facilities.

Q. FIPUG witness Pollock also claims that the new CIAC policy should apply when customers request more than 50 MW of new load. Do you have any thoughts on the threshold limits?

A. Yes. While there is no singularly "correct" size threshold to apply to the CIAC tariff modification, FPL considered multiple thresholds but based on its engineering experience determined that a 15 MW threshold is appropriate, as significant investments would be necessary for new/upgraded T&D facilities beyond these thresholds. It is also important to recognize that any increases to FPL's proposed thresholds increase the level of risk borne by FPL's general body of customers. In other words, if witness Pollock's 50 MW threshold were to be adopted, the costs associated with serving new applicants of between 15 MW and 49.9 MW would be held by FPL's general body of customers, whereas under FPL's proposal they would not. Also, to illustrate the magnitude of serving 50 MW of new load, such a threshold increase would equate to the load of more than 33,000 homes, or approximately 23,000 more than under FPL's proposal.

Q. FIPUG witness Pollock recommends delaying implementation of the CIAC modification, suggesting the Commission open a rulemaking to determine CIAC policy. Would this be a wise course of action?

A. No. Given that the CIAC tariff modification is a protective measure, delaying its implementation leaves FPL's general body of customers less protected than if FPL's modification were approved and implemented on January 1, 2026. Also, as made evident in FEIA's five testimonies in this case, there is significant interest from large load customers in potential projects located in FPL's service area. Opening a

rulemaking to determine CIAC policy may result in delays and regulatory uncertainty for prospective large load customers seeking to establish operations in Florida.

Q. FIPUG witness Pollock also questions four specific assumptions concerning the cost-shifting risk held by the general body of customers. Can you please respond to those?

A. Yes. The first assumption FIPUG witness Pollock raises is that FPL assumed that none of the equipment, such as transformers, feeder lines, capacitors, and pull offs, can be kept in inventory to meet emergency needs or repurposed to serve other loads. This position is flawed for several reasons. First, FPL already has a process for maintaining and ensuring it has sufficient 'storm stock' ahead of peak hurricane season. Therefore, additional materials from an unrealized project would be of minimal benefit. Most large load customers would require significant investment in transmission equipment, which is not the type of equipment that typically fails during an extreme weather event and would certainly not be needed in the quantities that would be purchased as part of a prospective large load project. Furthermore, FIPUG witness Pollock is ignoring the more realistic scenario of this inventory being utilized to upgrade T&D facilities ahead of a large load project. If the large load project was ultimately cancelled or the corresponding load was less than forecasted, it may result in the general body of customers bearing the costs of these materials and the corresponding carrying costs to store them.

FIPUG witness Pollock's second allegation is that FPL has not studied or made a precise determination of how much of a customer's projected load must materialize to

prevent cost-shifting. Such a finding, however, does not need to be made. The four-year period used to determine if the total project costs to extend service to customers who request new or upgraded facilities in order to receive electric service is based on the CIAC calculation required by the Commission's CIAC Rule. If load does not materialize such that these costs are recovered over the four-year period, the result is that that customer would receive a subsidy from the general body of customers for the shortfall in revenues received. Therefore, no study of "the load that must materialize" is necessary.

FIPUG witness Pollock's third allegation is that FPL has not demonstrated how the proposed $25 million spending threshold would balance the needs of new and existing customers. As I explained earlier in my rebuttal testimony, applicants spending $25 million for new or incremental load require significant capital investment to our T&D infrastructure, such as a new substation, new transmission lines, rights-of-way, and new feeders. These are significant costs and investments for a single customer that the general body of customers should be shielded from.

The fourth allegation from FIPUG witness Pollock is that an applicant should not be expected to accurately forecast its load five years into the future. As previously explained in my rebuttal and in the direct testimony of FPL witness Cohen, it is the applicant that controls whether the projected load will actually materialize. Also, the fact that load may come in under expectations is exactly the risk that the tariff is intending to address.

Q. Are there other factors not taken into account by FIPUG witness Pollock that support placing the near-term cost risk on the applicant?

A. Yes. It is important to note that some of the applicants requesting engineering impact studies from FPL are not necessarily the end users who would install the large load equipment, but rather developers who may or may not be associated with the larger entities that will use the energy. As a result, these projects in FPL's service area could be subject to cancellation or reduction in size (*i.e.*, reducing energy usage and associated revenue). FPL has already seen prospective large load applicants make material changes to their load, layout, and engineering needs during the engineering impact study phase. Future energy load or technological changes such as more energy efficient chips or advancements in electronic cooling technologies could result in impacts to future energy usage and revenue shortfalls which, without the CIAC modification, would result in the general body of customers bearing the cost of the upfront T&D investments needed to serve these customers. All of these reasons reinforce the Company's decision to modify its CIAC tariff for large load customers and to propose the LLCS tariffs, which allows the Company to effectively balance the need to accommodate prospective large load customers while simultaneously protecting the general body of customers.

Q. FIPUG witness Pollock claims that the proposed CIAC tariff modification could be applicable to replacing equipment needed to maintain service to an existing customer. Is that accurate?

A. No. The proposed CIAC tariff modification is clear that it is only applicable to applicants that require "new or upgraded facilities" – it would not apply to a customer

replacing existing equipment. Furthermore, this proposed CIAC modification is limited to the extension of facilities, it does not address transmission network upgrades that may be necessary to serve a customer under the proposed LLCS-1 tariff. Those transmission network upgrade costs would be allocated to and recovered from FPL's general body of customers, including customers under LLCS-1, because transmission network upgrades benefit the entire system serving all customers, which is consistent with FPL's treatment for network upgrades today.

Q. Could the spending threshold result in "different treatment for otherwise similarly situated customers who may require the same equipment to connect to the FPL system at the point of delivery but at different points in time", as FIPUG witness Pollock alleges?

A. FIPUG witness Pollock's point is not fully clear, but he appears to be trying to argue that industrial and large load customers are similar and as a result the tariff does not need to be modified. However, the proposed tariffs have been purposefully designed by FPL to protect the general body of customers from incurring costs on behalf of large load applicants while establishing energy usage thresholds that avoid inadvertently capturing industrial customers. NERC made a similar distinction in their recent 2025 State of Reliability Report[2], stating, "*The size of individual facilities often represents a step-change increase in the load forecast for a geographic area, often within a two-year timeframe. This is in sharp contrast to the more gradual increase in load due to traditional sources of load growth or more traditional large loads, such as industrial loads, which can take several more years to plan and construct.*" Also, large load

[2]https://www.nerc.com/pa/RAPA/PA/Performance%20Analysis%20DL/NERC_SOR_2025_Overview.pdf

customers typically would connect at a different point of delivery than industrial customers. For example, a large load applicant would typically be served at the transmission level, while industrial customers are served at the distribution or transmission level – as a result industrial customers may utilize different equipment.

Q. Having reviewed the testimony of intervenors, do you see any need to change or revisit any element of the proposed CIAC modification?

A. No. There is risk to the general body of customers if the forecasted load of large load customers used to calculate the CIAC does not materialize. If this situation were to occur, costs in the near term would be borne by the general body of customers who are not causing the costs to be incurred. For that reason, FPL submits the proposed CIAC thresholds of 15 MW or $25 million are reasonable.

IV. LARGE LOAD CONTRACT SERVICE

Q. The duration of the engineering impact study acceptance period contained in the LLCS tariff is contested by FEIA witness Loomis. Can you please explain the engineering process leading up to and including this period?

A. The engineering impact study that is performed by the Company as a result of a potential large load project involves: (i) reviewing documents provided by the applicant that describe electrical needs; (ii) conducting a system load planning study; (iii) identifying required equipment upgrades for both substation and transmission engineering; (iv) creating detailed site plans and electrical layouts; and (v) developing detailed cost estimates, which includes validation with construction vendor(s). Also, during this process prospective large load applicants may provide significant changes

to their engineering needs, resulting in FPL recalculating aspects of the engineering impact study. The cost for FPL to produce the engineering impact study is charged directly to the large load customer that requested the study. Due to the complexity and potentially significant impact on the T&D grid, the engineering impact study currently may take up to 6 months to complete. Once completed, the study is provided to the LLCS applicant to review. Consistent with other customer service requests that require a transmission engineering impact study, FPL intends to provide the LLCS applicants with 6 months to accept the results of the study.

Q. How do you respond to the contention of FEIA witness Loomis that the LLCS acceptance period of 6 months should be extended to 18 months?

A. It is not appropriate to extend this period due to the potential cost and system planning impacts it would entail. The estimated costs for the project include the costs for materials and labor expected at the time the engineering study is prepared, which costs are not static and will change over time. Moreover, the project scope and associated costs are based on the status of FPL's system and the impacts/growth known at the time the engineering study is prepared, which continue to change over time as new demand, generation, and facilities are added to FPL's system. Delayed acceptance by an applicant, even within the 6-month timeframe, may result in the impact study being no longer fully reflective of T&D material costs and new growth in the system since the study was initiated. Extension of the acceptance period, as proposed by FEIA witness Loomis, would exacerbate this issue, and particularly so if additional significant large load customers, such as LLCS customers, seek service between the time the engineering study is completed and accepted.

For example, an extension of the acceptance period from 6 months to 18 months could result in a substantial underestimation of the T&D material costs, which would have been calculated 24 months prior. Such an underestimation could result in costs shifting onto the general body of customers. Furthermore, this 24-month timeframe complicates system planning should multiple competing large load customers request engineering impact studies subject to a combined total load of 3 GW in the Company's service area under LLCS-1. This potential 3 GW represents approximately 10.6% of FPL's 2024 Peak Load (MFR Schedule C-34); a load of this magnitude being subject to acceptance or denial by the applicant for 24 months, instead of the Company's proposed timeframe, negatively impacts the ability of FPL system planners to make planning decisions. Additionally, system conditions and technical parameters change dynamically over time, making study results stale and not fully representative of reliability and operating requirements. Extending the acceptance period beyond the current timeframe of six months would require new studies to ensure reliability criteria is met for all FPL customers.

In summary, the standard 6-month acceptance period in the LLCS tariff should be retained in order for FPL to be able to (1) reflect T&D material costs associated with these projects which ultimately benefits the general body of customers and (2) accurately perform T&D system planning.

V. PLANNED TRANSMISSION CAPITAL MAINTENANCE

Q. How do you respond to OPC witness Schultz's recommendation to use a five-year average variance percentage in recommending a reduction to the planned transmission maintenance?

A. A broad reduction in funding for FPL's planned transmission maintenance, as OPC witness Schultz recommends, is inappropriate and ignores the necessity of the associated transmission maintenance activities. Furthermore, OPC witness Schultz appears to have mistakenly assumed that the planned transmission maintenance is expense instead of capital. FPL's planned transmission capital program primarily consists of multiple items including condition-based follow-up work (reactive work identified in the field), replacement of equipment which is beyond repair, follow-up on industry and manufacturer equipment alerts, and proactive substation equipment replacements. As a result, costs within this program will naturally vary year-to-year. As shown in FPL's response to OPC's First Set of Interrogatories, No. 56, provided as Exhibit EDV-7, FPL proactively reduced the budgeted spend for planned transmission capital maintenance for years 2024-2029 to better align with historical actual costs, as recommended by OPC witness Schultz. Further reduction of the budget, however, would place FPL's transmission and substation equipment at risk due to having insufficient funding to address issues identified as part of this program. Forgoing maintenance would lead to situations where we cannot serve our customers and need to shed or curtail loads on the system. As such, it is imperative that FPL have appropriate funding levels associated with transmission and substation facilities maintenance. OPC witness Schultz raised a similar recommendation associated with

Nuclear and PGD maintenance expenditures, which are addressed and ultimately rejected in FPL witness Laney's rebuttal testimony.

Q. Does this conclude your rebuttal testimony?

A. Yes.

Exhibit EDV-6: T&D PHFU Held Longer Than 25 Years

Project Property	Purpose and Description	County	In-Service Date
Arch Creek	This property allows for the expansion of the existing Arch Creek Substation to accommodate the installation of 230kV line terminal equipment and a 230/138kV autotransformer. This property is in a congested geographical location and a 230kV transmission injection will be warranted to accommodate the load growth in the area. This site provides a practical solution to serve customers in the county.	Miami-Dade	December 2028
Conservation-Levee 500 kV Line	This property was purchased for a future long term 500kV line to provide a second 500kV line into Conservation Substation.	Broward and Dade	Active as of October 2024 (removed from PHFU)[1]
Levee-South Dade	This right-of-way is required for new transmission lines to integrate additional generation at the Turkey Point site into our 500kV transmission backbone along the southeast coast of peninsular Florida. This right-of-way will be used for the construction, operation, and maintenance of overhead electric transmission and distribution lines.	Miami-Dade	June 2032
Rima Sub & Rima Volusia	The Rima Substation property and associated transmission right-of-way was acquired for construction of a 500/230kV transmission substation.	Volusia	March 2034
Desoto-Orange River	This right-of-way was acquired to expand the 500kV transmission system in the Ft. Myers and North areas, and it was sized to accommodate two 500kV lines. The majority of the parcels associated with this property have been developed and 230kV lines were installed. Planned use for the remaining portion of the parcels includes an additional 230kV line.	Lee	December 2034
Challenger	Site is required to relieve customer and load growth in Brevard County, in the area around Titusville Substation, which is nearing build out capacity.	Brevard County	June 2030
Terminal	Property is located adjacent to Terminal Substation and is an additional 2.5 acres.	Palm Beach	June 2030
Satori	Property was purchased for a future distribution substation. However, this property has been moved to non-utility and is no longer included in PHFU as an alternative property will be utilized to serve this customer load growth.	Brevard	Reclassed as non-utility (removed from PHFU)[1]

Note:
(1) PHFU projects filed in FPL's 2025 Rate Case are based on a September 2024 forecast.

Exhibit EDV-6: Transmission Properties

Project Property	Purpose and Description	County	In-Service Date
Bickett-Zoysia ROW	Bickett is a solar project that will require the installation of a 230kV transmission line that will transport the solar energy generated in a rural geographical area to serve customer load in more densely populated areas. This transmission line will also provide a looped path for the energy produced by the solar sites in this area to serve customer load.	Charlotte	December 2028
Alico-Terry ROW	In order to meet future load growth and maintain the reliability needs of FPL's customers in the county, FPL is proposing to construct a new 138kV transmission line between FPL's existing Estero and Terry Substations. The new 138kV line is approximately 14 miles from Estero to Terry Substations.	Collier	December 2028
Valencia ROW	This right-of-way is for the transmission line to tie the Valencia solar plant to Stallion and Crow Substations – this project was renamed Stallion-Crow.	Miami-Dade	December 2028
Parker-Callaway ROW	This right-of-way will accommodate building a second transmission line into Parker Substation. Parker Substation is currently served by a single transmission line. This project will create a looped feed into Parker Substation and improve the service reliability in the county.	Bay	June 2029
Shalimar Loop ROW	This right-of-way will accommodate building a second transmission line into Shalimar Substation. Shalimar Substation is currently served by a single transmission line. This project will create a looped feed into Shalimar Substation and improve the service reliability in the county.	Okaloosa	June 2029
Brook Injection ROW	In order to meet future load growth and maintain the reliability needs of FPL's customers in the county, FPL will construct approximately 11 miles of 115kV transmission line.	St. Johns	December 2029
Punta Gorda Injection ROW	In order to meet future load growth and maintain the reliability needs of FPL's customers, FPL will construct a 230kV line to inject transmission capacity within the Punta Gorda area.	Charlotte	December 2029
Coast Myakka ROW	In order to meet future load growth and maintain the reliability needs of FPL's customers in the county, FPL is proposing to construct a new 138kV transmission line between FPL's existing Coast and McCall Substations.	Sarasota and Charlotte	December 2030
Ft. Myers SC ROW	This right-of-way was acquired in connection with plan to establish a centrally located site in the county, near major transportation routes, that will be improved with a hardened service center, distribution substation, battery storage site, and an interconnected substation.	Lee	January 2031

Exhibit EDV-6: Distribution Properties

Project Property	Purpose and Description	County	In-Service Date
Green Cove Substation	FPL will construct a new 230kV distribution substation. This is a proposed 2.5 mile double circuit 230kV transmission line tap from the existing Oxbow-Leno 230kV transmission line.	Clay	January 2028
Valentine Substation	Parcel will support a new 138kV distribution substation to offload Hillsboro and Boca Raton Substations, which are approaching capacity due to new growth and redevelopment.	Broward and Palm Beach	January 2028
Wilson Grove Substation	Parcel will support a new 230kV distribution substation to support the growth in the west portion in the county.	St. Lucie	July 2028
Breakfast Point Substation	Parcel will support a new 138kV (115kV) distribution substation to support substantial growth in the area. This property is for a new distribution substation in the area that will serve the increased load in the area and improve system reliability. The project also addresses concerns at Long Beach Substation which is almost as capacity when supporting 2 heavily loaded radials.	Bay	November 2028
Julia Substation	Parcel will support a new distribution substation to offload Oslo and Canal Substations due to new growth.	St. Lucie	November 2028
Radiant-Chester Substation	Parcel will support a new distribution substation to offload Yulee Substation, to support new growth in Nassau County.	Nassau	November 2028
Silverleaf Substation	Parcel will support a new 138kV (115kV) distribution substation to offload Orangedale Substation to support new growth in the county.	St. Johns	November 2028
Wild Heron Substation	Parcel will support a new distribution substation to relieve Powell Lake Substation. This substation will help service the increased load in the area and improve system reliability in the county.	Walton	November 2028
Lake Pk Expansion Substation	FPL plans to acquire an approximate 1 acre parcel and expand the existing Lake Park distribution substation or acquire a new approximate 3 to 5 acre substation parcel for a new distribution substation to support new growth in the county.	Palm Beach	December 2028
Federation Substation	Parcel will support a new distribution substation to offload Navarre and East Bay Substations due to new growth in the county. This substation will help service the increased load in the area and improve system reliability in the area.	Santa Rosa	November 2030

Exhibit EDV-6: 'Various' T&D Properties

Type	Project/Property	Purpose and Description	County	In-Service Date	2026 Beginning Balance[3]	2026 Ending Balance[3]	2027 Ending Balance[3]
New Transmission ROW	Argyle-San Destin 230 kV	Extension of the new Laguna Beach-Millers Ferry 230kV to Santa Rosa by building new 22 miles of 230kV line to create Millers Ferry-Santa Rosa 230kV.	Walton	June 2028	$ 17,282,401.92	$ 20,910,639.99	$ 22,035,820.55
New Transmission ROW	Bayou Chico-Devillers Loop 115kV	Provide 115 kV looped transmission service to Romano Substation.	Escambia	December 2028	$ 609,556.53	$ 737,525.79	$ 777,211.32
New Transmission ROW	Buttonwood Solar Interconnection	230kV transmission line from Kiran Substation to Glint Substation for Buttonwood Solar PV Generation site.	Okeechobee	Active as of April 2025 (removed from PHFU)[1]	$ 347,846.68	$ 420,873.02	$ 443,519.78
New Transmission ROW	Caloosahatchee 230 kV Trans Inter	Loop the existing Alva-South Bay 230kV line into Witt Substation.	Hendry	Active as of March 2024 (removed from PHFU)[2]	$ 46,963.98	$ 56,823.52	$ 59,881.13
New Transmission ROW	Coast-Myakka 138kV ROW	For a new 138kV line approximately 9 miles from Coast to McCall Substations.	Charlotte	June 2027	$ 4,531,663.46	$ 5,483,033.18	$ 5,778,069.69
New Transmission ROW	East Crestview Loop 115kV T-Line	Loop 2nd 115 kV transmission line into East Crestview Substation to remove radial and improve reliability.	Okaloosa	December 2028	$ 230,517.03	$ 278,911.38	$ 293,919.32
New Transmission ROW	Holopaw Solar Interconnection	Loop Corbett-Ranch 230kV Line to serve Holopaw Solar PV Generation.	Palm Beach	Active as of April 2025 (removed from PHFU)[1]	$ 476,381.32	$ 576,392.00	$ 607,407.07
New Transmission ROW	Honeybell Solar Interconnection	230kV transmission line from Seville Substation to Glint Substation serving Honeybell Solar PV Generation.	Okeechobee/Indian River	Active as of April 2025 (removed from PHFU)[1]	$ 341,755.88	$ 413,503.53	$ 435,753.74
New Transmission ROW	IPC Tap ROW	Transmission line to provide service to new IPC Distribution Substation.	Bay	December 2026	$ 2,225.27	$ 2,692.44	$ 2,837.32
New Transmission ROW	Maco Substation ROW	Davis-Florida #2 138kV Line to Maco Substation serving Everglades Solar PV Generation.	Miami-Dade	Active as of June 2025 (removed from PHFU)[1]	$ 70,188.37	$ 84,923.59	$ 89,493.25
New Transmission ROW	Mare Branch T-Line	Phase 2: Whiden-Stallion 230kV line to Stallion Substation.	Desoto	November 2025	$ 2,615.81	$ 3,164.97	$ 3,335.27
New Transmission ROW	Maverick Substation	Loop Putnam-Korona 230 kV line into Maverick Substation.	Putnam	Active as of February 2025 (removed from PHFU)[1]	$ 2,782.03	$ 3,366.08	$ 3,547.21
New Transmission ROW	Midway-Sandpiper #2 138kV	Increase ampacity on the Midway-Sandpiper #2 138 kV line to serve new load.	Martin/St. Lucie	Active as of December 2024 (removed from PHFU)[2]	$ (4,370.67)	$ (5,288.24)	$ (5,572.79)
New Transmission ROW	New Fiber Bluewater-Crystal Beach	New ROW for Fiber communication from Bluewater to Crystal Beach	Okaloosa	December 2027	$ 5,674.34	$ 6,865.60	$ 7,235.03
New Transmission ROW	Nubbin-Sweatt 230kV	New 230kV line approximately 10 miles between Nubbin Substation and Sweatt Substation.	Okeechobee	Active as of April 2025 (removed from PHFU)[1]	$ 580,994.22	$ 702,967.16	$ 740,793.12
New Transmission ROW	Pembroke Lauderdale	Reconductor Lauderdale-Pembroke 138kV line.	Broward	June 2027	$ 297,615.93	$ 360,096.92	$ 379,473.37
New Transmission ROW	Pink Trail Solar T-line	Loop Sherman-Treasure #1 230 kV line into Azelea Substation serving Pink Trail Solar PV Generation.	St. Lucie	Active as of April 2025 (removed from PHFU)[1]	$ 30,560.21	$ 36,975.97	$ 38,965.61
New Transmission ROW	Prairie Creek Solar PV Generator In	230 kV line from Bermont Substation to Knott Substation serving Prairie Creek Solar PV Generation.	Charlotte	Active as of March 2024 (removed from PHFU)[2]	$ 4,860.69	$ 5,881.14	$ 6,197.60
New Transmission ROW	Seville-Sweatt 230kV	New 230 kV line approximately 7 miles between Nubbin Substation and Sweatt Substation.	Okeechobee	Active as of April 2025 (removed from PHFU)[1]	$ 204,480.77	$ 247,409.12	$ 260,721.95
New Transmission ROW	Skyline Transmission Line	Loop Lawrence-Miami 138 kV line into new Skyline Distribution Substation.	Miami-Dade	November 2028	$ 97,629.29	$ 118,125.42	$ 124,481.63
New Transmission ROW	State Rd 70 Right of Way Project	Convert approximately 58 miles of exiting 69kV to 230kV line from Bassinger FPL to two new substations: "Waterway" and "Avon", continuing to Whidden Substation.	Various	June 2026	$ 3,341,464.00	$ 4,042,965.27	$ 4,260,513.18
New Substations	Acorn Substation	New Distribution Substation in county to serve new load. Also called Oakridge Substation.	St. Lucie	December 2027	$ 50,187.18	$ 54,965.66	$ 55,656.01
New Substations	Century Substation	Upgrade Century Substation - Exxon 46kV transmission line to 115kV.	Escambia	December 2030	$ 1,071.22	$ 1,173.21	$ 1,187.95
New Substations	Federation Substation	New Distribution Substation in county to serve new load.	Santa Rosa	December 2027	$ 15,488.38	$ 16,963.08	$ 17,176.13
New Substations	Godzilla Substation	New Distribution Substation in county to serve new load.	Escambia	December 2030	$ 139.66	$ 152.96	$ 154.88
New Substations	Horus Substation	New 230kV Transmission Substation to tie to Smith Plant.	Bay	Active as of January 2025 (removed from PHFU)[1]	$ 460.88	$ 504.77	$ 511.11
New Substations	Millers Ferry Trans Substation	New 230kV Transmission Substation to tie to Millers Ferry to Santa Rosa.	Washington	December 2028	$ 11,464.42	$ 12,555.98	$ 12,713.68
New Substations	Mosely Substation	New Distribution Substation in county to serve new load.	Bay	December 2027	$ 377.47	$ 413.40	$ 418.60
New Substations	Pinto Substation	New Distribution Substation in county to serve new load.	Palm Beach	December 2028	$ 18,060.55	$ 19,780.15	$ 20,028.58
New Substations	Platt Substation Expansion	Platt Substation Expansion to allow for new 230kV transmission Line.	Martin	December 2027	$ 24,805.74	$ 27,167.57	$ 27,508.78
New Substations	Serena Substation	138kV Distribution Substation on Lauderdale - Weston Village 138kV Line required to offload Pembroke Substation and Beverly Substation.	Broward	December 2028	$ 10,763,623.85	$ 11,788,462.48	$ 11,936,520.03
New Substations	Simms Substation	New Transmission Substation to connect 230kV line from Titanium to Seminole.	Putnam	Active as of December 2024 (removed from PHFU)[1]	$ 35,348.19	$ 38,713.80	$ 39,200.03
New Substations	Titanium 230kV Solar PV Intercon	230kV transmission line from Titanium Substation to Terrill Substation to serve Terrill Creek Solar PV Generation.	Putnam	Active as of February 2025 (removed from PHFU)[1]	$ 151,264.72	$ 165,667.11	$ 167,747.81
New Substations	Titanium Substation Expansion	Substation Expansion at Titanium Substation to provide for 230kV transmission line from Titanium Substation to Terrill Substation to serve Terrill Creek Solar PV Generation.	Putnam	Active as of February 2025 (removed from PHFU)[1]	$ 956,802.59	$ 1,047,902.78	$ 1,061,063.95
Future Solar ROWs	Valencia ROW	New DeSoto County (Leaf Cutter Solar) Solar Interconnect transmission line from Stallion Substation.	Desoto	January 2029	$ 100,000.00	$ 100,000.00	$ 100,000.00
Future Solar ROWs	Caloosa ROW	230kV transmission line to Caloosahatchee Solar to Mulberry Substation.	Hendry	December 2028	$ 90,500.00	$ 90,500.00	$ 90,500.00
Future Solar ROWs	Mare Branch	Phase 1: 230kV Radial Line from Whidden Substation to Stallion Substation for Mare Branch Solar.	Desoto	October 2025	$ 83,822.00	$ 83,822.00	$ 83,822.00
Future Solar ROWs	Prairie Creek Solar	230kV from Bermont Substation to Mare Branch Solar.	Charlotte	Active as of March 2024 (removed from PHFU)[2]	$ 35,000.00	$ 35,000.00	$ 35,000.00
Future Solar ROWs	Terrill Creek	230kV Transmission Line to Terrill Creek Solar Project.	Clay	Active as of March 2024 (removed from PHFU)[2]	$ 50,000.00	$ 50,000.00	$ 50,000.00

Exhibit EDV-6: 'Various' T&D Properties

Type	Project/Property	Purpose and Description	County	In-Service Date	2026 Beginning Balance[3]	2026 Ending Balance[3]	2027 Ending Balance[3]
Future Solar ROWs	Sweatt - Honeybell Solar 230kV (Seville)	230kV Transmission Line to Honeybell Solar from Sweatt Substation.	Okeechobee	Active as of April 2025 (removed from PHFU)[1]	$ 1,500,000.00	$ 1,500,000.00	$ 1,500,000.00
Future Solar ROWs	Buttonwood Solar Interconnection	230kV Transmission Line from Kirem Sub to Glint Substation to provide interconnect to Buttonwood Substation.	Okeechobee	Active as of April 2025 (removed from PHFU)[1]	$ 2,000,000.00	$ 2,000,000.00	$ 2,000,000.00
Future Solar ROWs	Future Solar ROW	The specific solar-related ROW is for a yet to be finalized future solar project.	Various	Various	$ 100,000.00	$ 100,000.00	$ 100,000.00

Notes:

(1) PHFU projects filed in FPL's 2025 Rate Case are based on a September 2024 forecast.

(2) Reflects trailing amounts for properties previously placed in-service that were inadvertently included as 105 Plant Held for Future Use instead of 101 Plant-In-Service. There is no impact to the revenue requirement as these properties are correctly classified at the functional level.

(3) FPL is providing a more granular breakdown of the 2026 and 2027 beginning/ending balance for "New Transmission ROW", "New Substations", and "Future Solar ROWs" originally provided in FPL's response to OPC's Eighth Set of Interrogatories, No. 230.

Florida Power & Light Company
Docket No. 20250011-EI
OPC's First Set of Interrogatories
Interrogatory No. 56
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QUESTION:
Planned Maintenance. For FPL, please provide for each of the years 2020 through 2024 and for 2025 to-date the actual and budgeted planned transmission maintenance cost, shown separately, with explanations for any variances of more than 15%. Provide a comparable summary for the requested transmission maintenance cost, for projected year 2025, projected test years ending on December 31, 2026, and December 31, 2027, and projected years 2028 and 2029.

RESPONSE:
Total T&S Planned Maintenance ($MM)

Year	Actual	Budget	Act vs Bud %	Comments
2020	$139.2	$152.3	-9%	N/A
2021	$167.4	$187.3	-11%	N/A
2022	$180.0	$190.2	-5%	N/A
2023	$152.7	$198.4	-23%	FPL's planned maintenance program consists of both cyclical maintenance and conditioned based work items (preventative/reactive work identified in the field). Conditioned based work items can result in variation between years and in 2023 resulted in maintenance costs below those budgeted.
2024	$90.7	$93.5	-3%	N/A
2025	N/A	$98.0	N/A	N/A
2026	N/A	$103.3	N/A	N/A
2027	N/A	$123.7	N/A	N/A
2028	N/A	$125.1	N/A	N/A
2029	N/A	$125.9	N/A	N/A