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July 30, 2025

-VIA ELECTRONIC FILING-

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

**RE: Docket No. 20200170-EI: Petition for approval of optional electric vehicle
public charging pilot tariffs, by Florida Power & Light Company**

Dear Mr. Teitzman:

Please find attached discovery responses in Docket No. 20250011-EI, which note corrections to FPL's 2023 and 2024 Public Electric Vehicle (EV) Optional Pilot Tariffs Reports and EVolution Pilot Program Summary previously filed with the Commission.

These responses address the identified discrepancies and provide the corrected information as requested during the discovery process.

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

Sincerely,

s/ William P. Cox
William P. Cox
Fla. Bar No. 0093531

WPC:kw
Attachment
cc: Shaw Stiller, Senior Attorney (sstiller@psc.state.fl.us)

QUESTION:

Please reconcile the apparent difference in the total number of customers that have enrolled in the voluntary demand limiter tariffs since 2021, as stated in the testimony of Tim Oliver (76 customers) and as described in FPL's 2024 Public Electric Vehicle (EV) Optional Pilot Tariffs Report and Evolution Pilot Program Summary, document no. 00576-2025, filed on January 30, 2025.

RESPONSE:

FPL witness Oliver correctly stated that as of December 31, 2024, there are 42 customers enrolled in the tariffs, with 34 successfully transitioning to regular rates (45% of 76). FPL's 2024 EV Report (FPSC Document No. 00576-2025) states 35 customers on GSD-1EV and seven customers on GSLD-1EV with 29 customers transitioning to standard commercial rates (45%). The FPL's 2024 EV Report had an error; specifically, 34 customers have transitioned to standard commercial rates as stated in FPL witness Oliver's testimony.

Please see FPL's response EVgo's First Set of Interrogatories, No. 6 for the most current numbers.

QUESTION:

The interrogatory below (EVgo-FPL 15) refers to the FPL's response to EVgo-FPL 2, and in particular to FPL's 2024 EV Annual Report referenced in its response.

Please refer to Attachment 1 of FPL's 2024 EV Annual Report.

- a. Please confirm the text for footnotes 6 and 7 that appears to be missing or should have appeared in Attachment 1 of FPL's 2024 EV Annual Report, which is the copy marked with Florida PSC Document Number 00576-2025 (Filed Jan. 30, 2025), currently available at the following URL:

<https://www.psc.state.fl.us/library/filings/2025/00576-2025/00576-2025.pdf>.

RESPONSE:

Yes. The text for footnotes numbers 6 and 7 was inadvertently excluded from Attachment 1 of FPL's 2024 EV Annual Report, marked with Florida PSC Document Number 00576-2025 (Filed Jan. 30, 2025). The respective footnotes are as follows:

Footnote (6): Revenue requirements were calculated using FPSC approved base rates for the GSD rate schedule and actual kWh billed to UEV customers from Jan 2024 to Dec 2024.

Footnote (7): Revenue requirements were calculated using FPSC approved clause factors for the GSD rate schedule and actual kWh billed to UEV customers from Jan 2024 to Dec 2024.

QUESTION:

The interrogatory below refers to FPL's response to EVgo-FPL POD 3, and specifically to the spreadsheet that FPL provided in response, titled "20250011 - Evgo 1 POD No 3 - Attachment 1 - UEV Fast Charging Stations 12.2024 Rev Req.xlsm."

Regarding the referenced spreadsheet:

- a. Please admit or deny the following:
 - i. The (1) demand rates and (2) energy rates, shown in, respectively, rows 5 and 6 (and rows 21 and 22) of the "GSD Rates" tab, were incorrectly interchanged when they were linked to rows 13 and 14 of the "Monthly P&L" tab, such that, in the "Monthly P&L" tab, demand rates are incorrectly used to calculate energy revenues, and energy rates are incorrectly used to calculate demand revenues.
 - ii. The demand rates in row 5 of the "GSD Rates" tab are in dollars per kW-month, and thus were incorrectly divided by 100 to produce the demand rates in row 20 of the "GSD Rates" tab, which in turn are used for the energy rates in row 13 of the "Monthly P&L" tab.
- b. If FPL admits that there are any spreadsheet errors in (a), please provide a corrected version of the spreadsheet.
- c. If FPL admits that there are any spreadsheet errors in (a), please confirm that, when these errors are corrected, the corrected total revenue for electricity sold from utility-owned charging stations in 2024, at cell Q14 of the "Summary Monthly Acct" tab, becomes \$2,891,065 with the corrections, instead of the incorrect \$1,661,460 shown.
- d. If FPL admits that there are spreadsheet errors in (a), please confirm that the correct value in line 25 of Attachment 1 to the 2024 EV Report should also reflect the \$2,891,065 value.
- e. If FPL denies that there are errors in this spreadsheet, please explain in detail why FPL believes its calculation is correct.

RESPONSE:

- a. Yes.
 - i. The (1) demand rates and (2) energy rates described in the question were inadvertently interchanged in the Monthly P&L tab and thus were incorrectly used in the calculation of energy and demand revenues.
 - ii. The demand rates were also inadvertently divided by 100.

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- b. Yes. There were spreadsheet errors in the GSD-1 rate calculations and the corrected spreadsheets are provided in Attachment 1 to this response.
- c. No, because the clause rates used to produce demand revenue requirements were also inadvertently divided by 100, the corrected total revenue requirement for electricity sold from charging stations becomes \$3,275,526.
- d. No, because the clause rates used to produce demand revenue requirements were also inadvertently divided by 100, the corrected total revenue requirement for electricity sold from charging stations becomes \$3,275,526.
- e. FPL does not deny that there are errors and is providing corrected spreadsheets in response to this interrogatory.

QUESTION:

The interrogatory below refers to FPL's response to EVgo-FPL POD 3, and specifically to the spreadsheet that FPL provided in response, titled "20250011 - EVgo 1 POD No 3 - Attachment 1 - UEV Fast Charging Stations 12.2024 Rev Req.xlsm."

If FPL has determined that there are corrections necessary to the spreadsheet referenced in EVgo-FPL 29, please identify any changes FPL believes are necessary to any of the following and share corrected copies of:

- a. FPL's 2024 EV Annual Report;
- b. FPL's testimony or responses to discovery in this case;
- c. Other documents, reports, analyses, studies, or workbooks FPL has used to prepare (a) or (b) that contain the same (or a substantially similar) erroneous references or calculations as identified in EVgo-FPL 29 (e.g., in the workbooks used to prepare Appendix 2 in the 2024 EV Annual Report)
- d. Other public documents, reports, analyses, studies, or workbooks that reference, rely on, or reproduce incorrect information from spreadsheets that contain the same (or a substantially similar) erroneous references or calculations as identified in EVgo-FPL 29 (e.g., FPL's past EV Annual Reports).

RESPONSE:

- a. The Revenue Requirements for the 2023 and 2024 EV annual reports, both at page 6 of the reports and Attachment Nos. 1 and 2 to this response, were updated to reflect the corrected revenue requirements, consistent with FPL's response to EVgo's Third Set of Interrogatories, No. 29.
 1. 2023 Revenue Requirements as filed were \$1.6 MM and are corrected to \$1.9 MM.
 2. 2024 Revenue Requirements as filed were \$5.7 MM and are corrected to \$7.4 MM.
- b. No corrections to FPL's testimony or discovery responses in this case.
- c. No responsive documents to provide.
- d. See response to subpart A to this interrogatory. No other responsive documents to provide.

ANNUAL REPORT ⁽¹⁾		
UTILITY OWNED FAST CHARGING STATIONS - UEV PILOT TARIFF		
FOR THE PERIOD: JANUARY THROUGH DECEMBER 2023		
(\$000)		
		Actual 2023
1 Energy Sales (kWh)		1,782,673
2 Capital Expenditures ⁽²⁾		\$ 29,220
3		
4 <u>Charging Station Revenue Requirements</u>		
5 <u>Operating Costs</u>		
6 Depreciation Expense		\$ 437
7 Operating and Maintenance Expenses		219
8 Taxes Other Than Income Taxes (Property and Payroll Taxes)		87
9 Total Operating Costs		\$ 744
10		
11 <u>Capital Costs</u>		
12 Rate Base ⁽³⁾		\$ 6,203
13 Pre Tax Rate of Return ⁽⁴⁾		8.69%
14 Return on Rate Base	Line 12 x Line 13	\$ 539
15		
16 Charging Station Revenue Requirements	Line 9 + Line 14	\$ 1,283
17		
18 Income Tax Credits ⁽⁵⁾		\$ -
19		
20 Net Charging Station Revenue Requirements	Line 16 + Line 18	\$ 1,283
21		
22 <u>Revenue Requirements for Electricity Sold from Charging Stations</u>		
23 Base Revenue Requirements ⁽⁶⁾		\$ 498
24 Clause Revenue Requirements ⁽⁷⁾		135
25 Total Rev Req for Electricity Sold from Charging Stations	Line 23 + Line 24	\$ 633
26		
27 Total Revenue Requirements	Line 20 + Line 25	\$ 1,916
28		
29 Revenues Collected		\$ 527
30		
31 Net (Revenues)/Costs for December 2023	Line 27 - Line 29	\$ 1,388

Notes:

- (1) Represents reporting requirements for FPL's utility owned fast charging stations placed in-service through December 2023 under the UEV Tariff as required by Order No. PSC-2020-0512-TRF-EI, Docket No. 20200170-EI.
- (2) Represents total capital expenditures incurred for all utility fast charging stations through December 2023 to be recovered under the UEV tariff rate.
- (3) Represents the December 2023 13-month average of net plant in-service of utility-fast charging stations recovered under the UEV tariff rate.
- (4) Based on FPL's 2023 Forecasted ESR using a ROE of 10.8% as approved in Docket No. 20210015-EI, Order No. PSC-2022-0358-FOF-EI approving FPL's Notice of Triggering Revised Authorized Return on Equity.
- (5) UEVs do not qualify for income tax credits at this time.
- (6) Revenue requirements were calculated using FPSC approved 2023 base rates for the GSD rate schedule and actual kWh billed to UEV customers from Jan 2023 to Dec 2023.
- (7) Revenue requirements were calculated using FPSC approved 2023 clause factors for the GSD rate schedule and actual kWh billed to UEV customers from Jan 2023 to Dec 2023.

ANNUAL REPORT ⁽¹⁾		
UTILITY OWNED FAST CHARGING STATIONS - UEV PILOT TARIFF		
FOR THE PERIOD: JANUARY THROUGH DECEMBER 2024		
(\$000)		
		Actual 2024
1 Energy Sales (kWh)		11,162,344
2 Capital Expenditures ⁽²⁾	\$	49,367
3		
4 <u>Charging Station Revenue Requirements</u>		
5 <u>Operating Costs</u>		
6 Depreciation Expense	\$	1,739
7 Operating and Maintenance Expenses		480
8 Taxes Other Than Income Taxes (Property and Payroll Taxes)		210
9 Total Operating Costs	\$	2,430
10		
11 <u>Capital Costs</u>		
12 Rate Base ⁽³⁾	\$	26,205
13 Pre Tax Rate of Return ⁽⁴⁾		8.85%
14 Return on Rate Base	Line 12 x Line 13	\$ 2,318
15		
16 Charging Station Revenue Requirements	Line 9 + Line 14	\$ 4,748
17		
18 Income Tax Credits ⁽⁵⁾		\$ (668)
19		
20 Net Charging Station Revenue Requirements	Line 16 + Line 18	\$ 4,080
21		
22 <u>Revenue Requirements for Electricity Sold from Charging Stations</u>		
23 Base Revenue Requirements ⁽⁶⁾	\$	2,505
24 Clause Revenue Requirements ⁽⁷⁾		770
25 Total Rev Req for Electricity Sold from Charging Stations	Line 23 + Line 24	\$ 3,276
26		
27 Total Revenue Requirements	Line 20 + Line 25	\$ 7,355
28		
29 Revenues Collected	\$	3,354
30		
31 Net (Revenues)/Costs for December 2024	Line 27 - Line 29	\$ 4,001

Notes:

- (1) Represents reporting requirements for FPL's utility owned fast charging stations placed in-service through December 2024 under the UEV Tariff as required by Order No. PSC-2020-0512-TRF-EI, Docket No. 20200170-EI.
- (2) Represents total capital expenditures incurred for all utility fast charging stations through December 2024 to be recovered under the UEV tariff rate.
- (3) Represents the December 2024 13-month average of net plant in-service of utility-fast charging stations recovered under the UEV tariff rate.
- (4) Based on FPL's 2024 Forecasted ESR using a ROE of 10.8% as approved in Docket No. 20210015-EI, Order No. PSC-2022-0358-FOF-EI approving FPL's Notice of Triggering Revised Authorized Return on Equity.
- (5) Includes income tax credits allowed for 30% of the costs of any qualified alternative fuel vehicle refueling property placed in-service after 2022 and started construction before January 29, 2023. For qualified locations placed in-service in 2024, the income tax credits were reduced to 6% of the costs. This income tax credit is limited to \$100,000 per qualified location. Note this amount includes credits for assets in 2023 and 2024.
- (6) Revenue requirements were calculated using FPSC approved base rates for the GSD rate schedule and actual kWh billed to UEV customers from Jan 2024 to Dec 2024.
- (7) Revenue requirements were calculated using FPSC approved clause factors for the GSD rate schedule and actual kWh billed to UEV customers from Jan 2024 to Dec 2024.