

FPL's Response to OPC's First Request for
Production of Documents Nos. 2-5, 10-15, 18,
22, 29, 30, 32-34 (Docket No. 20210178-EI)

(Including Attachments)

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QUESTION:

Isaias and Eta - Travel Log.

Refer to the Confidential travel log Excel files entitled "Isaias Travel Orders" and "Eta Travel Orders" included with the November 12, 2021 petition for Hurricane Isaias and Tropical Storm Eta storm cost recovery which includes details on approximately 60 and 64 different contractor companies, respectively. Provide a copy of all other travel logs maintained, with mileage included, to track the travel of all other FPL personnel, affiliate company personnel, mutual assistance companies, line contractors, and vegetation management contractors during the storm restoration activities. Please provide this information in searchable and unlocked format.

RESPONSE:

Please see Confidential Vendor Flat File(s) provided with the Notice of Filing submitted on November 12, 2021. For the 2020 Hurricane Season, the calculation of mileage is conducted through the Vendor Flat Files.

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QUESTION:

Isaias and Eta - Travel Log.

Provide example copies of correspondence with potential mutual assistance companies which indicate the need or lack of need for their services related to Hurricane Isaias and Tropical Storm Eta.

RESPONSE:

Communication with the mutual assistance companies primarily occurs via phone calls facilitated by the Southeastern Electric Exchange. FPL has conducted a search for follow-up e-mails, if any, but has not identified any such e-mails (if any) that may have been retained.

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QUESTION:

Isaias and Eta - Cost Support Workpapers.

Refer to the summary cost support Excel files included with the Confidential files attached to the November 12, 2021 petition for Hurricane Isaias and Tropical Storm Eta storm cost recovery entitled "DH-1 Isaias Final Costs as of July 2021" and "DH-2 Eta Final Costs as of July 2021." Provide copies of all workpapers used to support calculations in each of the worksheet tabs not already included in these Excel files in electronic format with all formulas in place. (e.g. workpapers detailing the calculation of capitalized costs depicted in worksheet tabs 2(a) and copies of general ledger details related to prior year and 2020 costs utilized in the ICCA calculations.)

RESPONSE:

See the attached "Capital Labor Calc – Eta" as support for the split between Distribution contractor and regular payroll on tab 2(a) of "DH-2 Eta Final Costs as of July 2021". In all other instances the documents which support the calculations in "DH-1 Isaias Final Costs as of July 2021" and "DH-2 Eta Final Costs as of July 2021" that were provided with FPL's initial filing on November 12, 2021.

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QUESTION:

Isaias and Eta - Contracts.

Provide a copy of all contracts between FPL and each contractor (line, line clearing, other), other utilities, and/or other vendors, including applicable rate sheets and vendor statement of work, related to FPL's response to Hurricane Isaias and Tropical Storm Eta and/or the related restoration work in searchable and unlocked format.

RESPONSE:

Please see confidential attachments.

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QUESTION:

Isaias and Eta - Invoice Support.

Provide a copy of all invoices over \$10,000 for each contractor (line, line clearing, and other), other utilities, and/or other vendors (for both capitalized and expensed costs) related to FPL's response to Hurricane Isaias and Tropical Storm Eta and/or the related restoration work for which recovery is requested other than those related to the Excel flat files provided with the filing. Provide the copies separate for each storm in searchable and unlocked format.

RESPONSE:

Please see confidential attachments.

QUESTION:

Isaias and Eta - Mutual Assistance.

Refer to the summary cost support Excel file included with the Confidential files attached to the November 12, 2021 petition for Hurricane Isaias and Tropical Storm Eta storm cost recovery entitled "DH-1 Isaias Final Costs as of July 2021" and "DH-2 Eta Final Costs as of July 2021." Provide a list of all invoices for each mutual assistance company for which storm recovery costs were included separately for each storm. In addition, cite to the worksheet tab(s) included in the Excel file that details this information.

RESPONSE:

List of all invoices for each mutual assistance company utilized for each storm is provided below. Mutual assistance costs are included on the Contractor line item, line 4 of Exhibits DH-1 and DH-2. See tab 1(c) of "DH-1 Isaias Final Costs as of July 2021" and "DH-2 Eta Final Costs as of July 2021" for the details. Note, the below invoices were non-PO invoices and not identifiable by vendor name on tab 1(c). The document reference numbers are included below to facilitate identification of the costs on the GL detail tab of the excel workbooks referenced above.

Eta (FPL)

1. First Energy Document Reference: 1900677351
2. Oncor - Document Reference: 124316367
3. PECO - Document Reference: 1900677442

Isaias (FPL)

1. American Electric Power - Document Reference: 1900675870
2. Oklahoma Gas & Electric - Document Reference: 1900667970

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QUESTION:

Isaias and Eta - Preparedness Plan.

Refer to the Direct Testimony of Mr. Miranda starting at 7 related to FPL's "emergency preparedness plan." Provide copies of all policies and procedures and other "key components of the plan" related to the "emergency preparedness plan."

RESPONSE:

Please refer to FPL's Annual Status Report on Storm Protection Plan Programs and Projects (specifically Section C - Initiative No. 10 and Section D - Storm Season Readiness) which can be accessed on the FPSC website- <http://www.psc.state.fl.us/ElectricNaturalGas/StormProtectionPlans>.

FPL also presents annually at the FPSC Hurricane Preparedness Workshop. These presentations can be accessed on the FPSC website <http://www.psc.state.fl.us/ElectricNaturalGas/HurricanePreparationWorkshops>

Please also see responsive document "Emergency Management Plan Severe Weather Brief" included with the response.

QUESTION:

Isaias and Eta - Preparedness Plan.

Refer to the Direct Testimony of Mr. Spoor starting at 13 related to FPL's utilization of FPL's "storm damage model to forecast system damage and hours of work required to restore service." Provide copies of all policies and procedures related to this model, a detailed description of all key inputs into the model, and a description of how the model changes to account for increases in storm hardening activities.

RESPONSE:

FPL's Storm Damage Model and associated algorithms are propriety trade secrets that are the subject of a pending patent. The model combines wind and in-service asset data to produce damage result information. The wind data is based on the National Hurricane Center (NHC) forecast track and intensity, while the in-service asset data is provided by FPL's Asset Management System (AMS) and includes infrastructure improvements from storm hardening. The model uses multiple Monte Carlo simulation runs to estimate damage based on the all available information about the infrastructure. The model incorporates data regarding vegetation, pole loading, soil conditions, and storm surge. The algorithms used in FPL's Storm Damage Model are tested, updated, and verified twice a year. Please also see responsive document included with the response.

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QUESTION:

Isaias and Eta - Incremental Costs and Capitalized Costs.

Provide a copy of all storm *accounting* policies and procedures, including all specific storm *accounting* communications to employees and/or vendors that address the *accounting* for Hurricane Isaias and Tropical Storm Eta costs and/or the calculation of incremental costs and capitalized costs.

RESPONSE:

See documents attached to this response.

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QUESTION:

Isaias and Eta - Incremental Costs and Capitalized Costs.

Provide a copy of all accounting policies and procedures, including, but not limited to, all specific storm accounting policies and procedures, if any, that address the capitalization of costs to CWIP and/or plant accounts versus expensing of costs.

RESPONSE:

See attachment.

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QUESTION:

Isaias and Eta - Incremental Costs and Capitalized Costs.

Refer to the Direct Testimony of Mr. Hughes at 12. Provide a copy of all accounting policies and procedures, including, but not limited to, all specific storm accounting policies and procedures, if any, that address FPL's use of "a combined simple average of hourly internal Company and embedded contractor rates that are the type normally incurred in the absence of a storm to determine the amount of costs to capitalize to plant, property, and equipment along with the materials and other costs."

RESPONSE:

See the attached Final Order Approving Stipulation and Settlement Agreement, Order No. PSC-2019-0319-S-EI, Docket No. 20180049-EI ("Hurricane Irma Settlement Agreement"). The specific provision requiring the use of the methodology described on page 12 of the Direct Testimony of Mr. Hughes is contained in paragraph 20 of the Hurricane Irma Settlement Agreement.

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QUESTION:

Isaias and Eta - Mobilization/Demobilization.

Provide a copy of all documentation that details each of the service territories into which crews were mobilized and the service territories in which Hurricane Isaias and Tropical Storm Eta damage occurred, including dates of all damages.

RESPONSE:

Please see the attached files showing the outages by County on August 3, 2020 for Isaias, and November 10, 2020 and November 12, 2020 for each Eta's landfall. Further, and simply for clarification, FPL interprets the phrase "FPL's service territories" to mean FPL's management areas throughout its service territory. That said, FPL's response provides information at the more detailed county level, rather than by management area.

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QUESTION:

Isaias and Eta - Standby.

Provide FPL's listing of current service territories served in Florida in August through November 2020 as well as a map of those service territories on a state of Florida map.

RESPONSE:

FPL's map of its service area is included in its tariff book (Sheet No. 3.020), a copy of which is also attached with this response. In August through November of 2020, FPL served the identified areas in peninsular Florida from portions of Nassau County in the north to portions of Miami-Dade County to the south.

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QUESTION:

Isaias and Eta - Materials and Supplies.

For the amount of annual expense associated with materials and supplies that was included in base rates in effect during 2020, provide a copy of the source of this expense amount, e.g., rate filing schedule and/or workpapers.

RESPONSE:

Refer to the Joint Motion for Approval of Settlement Agreement filed in Docket No. 20160021-EI, with attached Stipulation and Settlement, approved by the Commission December 15, 2016, and affirmed by the Florida Supreme Court in *Sierra Club v. Brown, etc. et al*, 243 So. 3d 903 (Fla. 2018).

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QUESTION:

Isaias and Eta - Embedded line Contractors.

Provide a copy of the source of annual expense associated with embedded line contractors providing day-to-day service that was included in base rates in effect during 2020. Include all rate filing schedules and/or workpapers in searchable and unlocked format.

RESPONSE:

Please see FPL's response to OPC's Second Request for Production of Documents No. 29.

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QUESTION:

Isaias and Eta - Contractor Rates.

For any differences in contractor rates (line contractors and/or vegetation management contractors) that depend on whether the contractor is performing embedded and/or day-to-day services or performing storm restoration services and/or that depend on the type of storm restoration services, e.g., the intensity of the storm, provide a copy of those contracts in searchable format.

RESPONSE:

None, there are no differences in contractor rates (line contractors and/or vegetation management contractors) that depend on the type or extent of the storm restoration services, e.g., the intensity of the storm.

Embedded contractor rates are based on unit rates for day to day services. Storm support is based on man hour rates which includes mobilization and demobilization.

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QUESTION:

Isaias and Eta - Payroll.

For the straight time transmission payroll expense and straight time distribution payroll expense included in the base rates that were in effect during 2020 (based on the Company's last base rate proceeding) and the percentage of straight time transmission payroll costs charged to expense in the last base rate proceeding and the percentage of straight time distribution payroll costs charged to expense in the last base rate proceeding, provide a copy

RESPONSE:

Refer to the Joint Motion for Approval of Settlement Agreement filed in Docket No. 20160021-EI, with attached Stipulation and Settlement, approved by the Commission December 15, 2016, and affirmed by the Florida Supreme Court in *Sierra Club v. Brown, etc. et al*, 243 So. 3d 903 (Fla. 2018).

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QUESTION:

Isaias and Eta - Payroll.

For the overtime transmission payroll expense and overtime distribution payroll expense included in the base rates that were in effect during 2020 based on the Company's last base rate proceeding and the percentage of overtime transmission payroll costs charged to expense and the percentage of overtime distribution payroll costs charged to expense in the last base rate proceeding, provide a copy of the source of these expense amounts and the percentages, e.g., rate filing schedule and/or workpapers in unlocked format.

RESPONSE:

Please see FPL's response to OPC's Second Request for Production of Documents No. 33.