

FPL's Response to OPC's Second Request for
Production of Documents Nos. 35, 41, 43
(Docket No. 20210178-EI)

(Including Attachments)

QUESTION:

Isaias and Eta - Preparedness Plan.

Please refer to the Company's response to OPC's First Request for Production of Documents Request No. 12, which addresses FPL's storm damage model. Please provide the following with regards to the storm damage model:

- a. Provide a copy of the user manual, if there is one.
- b. Provide a copy of all model documentation regarding the process (scope and timing) of updates, especially to incorporate the effects of the Company's SPP programs and projects, including, but not limited to, hardening activities, such as undergrounding and pole replacements, and vegetation management.
- c. Provide a copy of all model documentation regarding the inputs that could affect the potential damage determined by the model.
- d. Provide a copy of the documentation filed with the US Patent Office.
- e. Provide a copy of all model documentation regarding the outputs that address the magnitude and types of resources required to repair damage and restore service.

RESPONSE:

- a. No responsive documents.
- b. Please see FPL's response to OPC's First Request for Production to Documents No. 12. FPL's in-service asset data which includes the completed storm hardening activities, undergrounding, and pole replacement is uploaded to the Storm Damage Model at the beginning of every storm season. The model also considers the Vegetation Management performed by FPL as well as the vegetation density data for the FPL service area.
- c. Please see FPL's response to OPC's First Request for Production to Documents No. 12 and subpart (d) of this response.
- d. Please see responsive documents included with this response.
- e. Please see FPL's response to OPC's First Request for Production to Documents No. 12 and subpart (d) of this response.

Florida Power & Light Company
Docket No. 20210178-EI
OPC's Second Request For Production of Documents
Request No. 41
Page 1 of 1

QUESTION:

Isaias and Eta -Contractor Rates.

Please provide a list of all Product IDs utilized to invoice all storm restoration activities that includes a description of each.

RESPONSE:

Please see attachments titled "OPC's 2nd POD No. 41 - ETA PRODUCT IDs AND DESCRIPTIONS" and "OPC's 2nd POD No. 41 - ISAIS PRODUCT IDs AND DESCRIPTIONS".

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Florida Power & Light Company
Docket No. 20210178-EI
OPC's Second Request For Production of Documents
Request No. 43
Page 1 of 1

QUESTION:

Isaias and Eta -Mobilization/Demobilization.

Please refer to the attachments provided in OPC's First Request for POD No. 18, which depicted the Hurricane Isaias and Tropical Storm Eta outages by county on August 3, 2020 for the "7AM EDT Release" and November 10, 2020 for the "5PM EDT Release", respectively. Provide copies of all other available summaries of outages in similar format by county for all release times for Hurricane Isaias on each day August 1, 2020 through August 4, 2020 and for Tropical Storm Eta on each day November 9, 2020 through November 11, 2020. If none, so state.

RESPONSE:

The State Emergency Operations Center/Florida Department of Emergency Management requires all electric utilities to report outages by county during a declared state of emergency. The reports are required at 6 am, 9 am, 12 noon, 3 pm, 6 pm and 9 pm. These reports are available on the PSC website at: <http://www.psc.state.fl.us/Home/HurricaneReport>