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Gerald Yupp October 20, 2021, Deposition and  
errata sheet.

In re: Fuel and Purchased Power Cost Recovery Clause

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Deposition of:

Gerard Yupp

October 06, 2021

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Vol .01

**PHIPPS REPORTING**  
*Raising the Bar!*

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 20210001-EI  
FILED OCTOBER 6, 2021

IN RE: FUEL AND PURCHASED POWER COST  
RECOVERY CLAUSE WITH GENERATING  
PERFORMANCE INCENTIVE FACTOR,

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WEB CONFERENCE DEPOSITION OF

GERARD J. YUPP  
(Noticed as Gerald J. Yupp)

Wednesday, October 20, 2021  
10:01 a.m. - 11:13 a.m.

Via Web Conference

Stenographically Reported Via Web By:  
Lillian Rivera, Stenographer

Job No.: 212348

1 APPEARANCES: (All appearing via web conferencing.)

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20

Also Present via web conferencing:

21 Interested Parties:

22 Damaris Rodriguez  
23 Molly Cardi  
24 Rich Hume  
25 Diane Triplett  
Chris Menendez  
Ken Hoffman, appearing via telephone  
Charles Rehwinkel, appearing via telephone  
Bobby Pickles  
Jackie Grady

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17	(Stenographer's note: No exhibits were marked for	
18	identification.)	
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1     Thereupon,  
2     the following proceedings began at 10:01 a.m.:

3             STENOGRAPHER:   Raise your right hand,  
4             please.

5             Do you solemnly swear or affirm the  
6             testimony you are about to give in this  
7             matter will be the truth, the whole truth  
8             and nothing but the truth so help you God?

9             THE WITNESS:   Yes, I do.

10    Thereupon,

11                     GERARD J. YUPP,  
12    having been first duly sworn or affirmed, was examined  
13    and testified as follows:

14                     DIRECT EXAMINATION

15    BY MS. MORSE:

16             **Q.    This is Stephanie Morse with the Office of**  
17             **Public Counsel.**

18                     **Good morning, Mr. Yupp.**

19             A.    Good morning.

20             **Q.    And this is Ms. Oakley.**

21                     MS. MONCADA:   Maria Moncada with  
22             Florida Power & Light.

23                     In the room with me is David Lee, Molly  
24             Cardi and Damaris Rodriguez.

25                     MR. REHWINKEL:   Also on the phone is

1 Charles Rehwinkel with the Office of Public  
2 Counsel. I am just observing.

3 MS. CHRISTENSEN: This is Pattie  
4 Christensen. I am also observing today.

5 MR. HOFFMAN: Ken Hoffman. I am with  
6 Florida Power & Light. I am also on the call  
7 observing.

8 MS. MONCADA: I'd like to have an  
9 understanding of who else is on the call. I  
10 notice that the notice went out, and the Webex  
11 information went out to a lot of people.

12 MR. HUME: Rich Hume with Florida Power &  
13 Light.

14 MR. PICKLES: Bobby Pickles with Duke  
15 Energy.

16 MS. MONCADA: We have a number that starts  
17 with 8133.

18 MS. TRIPLETT: This is Diane Triplett with  
19 Duke Energy.

20 MS. MONCADA: And then we have an 8504.

21 Is that the Public Service Commission?

22 Is it Jackie Grady?

23 MR. REHWINKEL: Perhaps it's Douglas  
24 Higgins for the Public Service Commission.

25 MS. MONCADA: 727 area code?

1 MR. MENENDEZ: This is Chris Menendez with  
2 Duke Energy.

3 MS. MONCADA: Good morning, Chris.

4 I do see Jackie Grady's name, and she is  
5 with Gulf and FP&L.

6 MS. MORSE: Thank you for indulging us.

7 I wanted to make sure who was on the line.

8 Ms. Moncada and just to counsel, can we  
9 agree that all objections, except as to the form  
10 of the question, are reserved for hearing?

11 MS. MONCADA: Yes, Ms. Morse, I agree.

12 BY MS. MORSE:

13 Q. This deposition is being taken for the  
14 purposes of discovery and pursuant to notice.

15 Mr. Yupp, it's possible some of the  
16 information could be confidential, but it's not my goal  
17 to put confidential information on the record.

18 So I am going to ask that if I ask you a  
19 question that you think the answer needs to involve  
20 confidential information, if you could avoid vocalizing  
21 it. We can work on either me re-asking the question or  
22 amend the answer.

23 First of all, Mr. Yupp, could you please  
24 state your full name, your employer, your title for the  
25 record, please?



1           A. Yes. My name is Gerard Yupp. I am employed  
2 by Florida Power & Light Company as senior director of  
3 wholesale operations.

4           **Q. Did you review the notice with the list of**  
5 **documents that we asked you to bring?**

6           A. I did.

7           **Q. Did you bring those documents with you?**

8           A. Yes, I did.

9           **Q. Thank you. FP&L, who do you report to?**

10          A. I report to the vice president of energy,  
11 marketing and trading.

12          **Q. Who is that?**

13          A. That is Sam Forest.

14          **Q. Do you report to anyone at NextEra?**

15               **N-E-X-T, capital E-R-A.**

16          A. I do not report to anybody at NextEra.

17          **Q. Along those lines, do you have any dotted**  
18 **line responsibilities within NextEra?**

19          A. No, I do not.

20          **Q. Mr. Yupp, do you have any corrections to your**  
21 **September 3rd, 2021, testimony?**

22          A. I did file an errata, just changing one of  
23 the first questions in the testimony. Instead of have I  
24 previously testified in the docket, it was changed to my  
25 educational background. That was the only change that I

1 have had to my testimony.

2 Q. Well, just to clarify, I thought that was to  
3 your -- was that a correction to your April testimony  
4 instead, maybe?

5 A. Is it April? Yes, I am sorry. Yes, April.  
6 There are no changes to my September 3rd testimony.

7 Q. I understand.

8 Please turn to page 3 of your September 3rd  
9 testimony.

10 A. Okay. I am there.

11 Q. Okay. At line 9, your testimony refers to  
12 Gulf exiting the Southern pool in 2021.

13 STENOGRAPHER: Ms. Morse, I didn't hear  
14 your question. Can you repeat it?

15 BY MS. MORSE:

16 Q. Mr. Yupp, on page 3 of your testimony, your  
17 testimony refers to Gulf exiting the Southern pool in  
18 2021. Do you see that?

19 A. I do.

20 Q. My question was: Was it a typo? Did you  
21 mean that Gulf will exit on July 2021 or 2022?

22 A. I am sorry. That should be July 1st of 2022.

23 Q. Next, Mr. Yupp, I am going to ask you to go  
24 to page 2 of your testimony at line 4. This is where  
25 you state the purposes of your testimony.

1                   Down to line 5 of page 2, when you use the  
2   word "dispatch" there, what do you mean?

3           A. The dispatch -- the dispatch costs are  
4   reflective of right now what we would use in our system  
5   EMS, which controls all of our units to dispatch the  
6   units on a daily basis.

7           These fuel prices are -- as opposed to -- I  
8   guess maybe the best way to describe it, as opposed  
9   to -- let's say, for coal, where coal is charged out  
10   based on the weighted average cost of it. The dispatch  
11   cost would be the price that is used to dispatch the  
12   unit on a day-in, day-out basis, which really reflects  
13   the replacement value of fuel.

14          Q. Could you tell me why you testify about  
15   dispatch?

16                I understand your reference to replacement  
17   value of fuel. But could you elaborate on exactly why  
18   you testified about dispatch?

19                MS. MONCADA: I object to the form.

20                Ms. Morse, it says the dispatch costs. I  
21   just want to make that clear.

22   BY MS. MORSE:

23          Q. That's fine.

24                You can answer, please, Mr. Yupp.

25          A. I was going to say that I am testifying to

1 dispatch costs of fuel.

2 Q. Is your testimony that the way previous  
3 dispatch in your testimony -- I'll rephrase that.

4 Does dispatch relate to both the use of the  
5 cost of fuel and to the energy transfers themselves?

6 A. I am sorry. Can you clarify what you mean by  
7 energy transfers?

8 Q. I think earlier, you were explaining that the  
9 definition of dispatch related also in terms of  
10 dispatching due to -- does that relate to power?

11 A. Yes, it does. I guess maybe to clarify, from  
12 a broader level, the projections for fuel costs for --  
13 in this case, let's say, 2022, are run in a model that I  
14 reference in my testimony.

15 The dispatch costs of fuel is an input to  
16 that model, as well as many other parameters, such as  
17 unit outage, schedules, and generation unit parameters,  
18 load.

19 So that is the model that is run within my  
20 department, fuel being an input to the model to  
21 ultimately determine what our -- project what our fuel  
22 requirement will be for whatever time period we are  
23 looking at.

24 Q. As you stated on page 2, line 5, you said one  
25 purpose of your testimony is to explain the projections

1 for the dispatch costs, light fuel coal and natural gas.

2 But on line 6, you also say another purpose  
3 is to explain projections for generating heat rates and  
4 availability. Am I reading that correctly?

5 A. Yes.

6 Q. Could you explain what you mean by that in  
7 your testimony, the generating heat rates and  
8 availability?

9 A. Yes. Those are, again, inputs to the overall  
10 model that is run to develop what our fuel requirements  
11 and costs will be for the time period we are looking at.

12 So part of the input to that model would  
13 be -- and these would come under generation  
14 parameters -- would be e-grade curves, as well as --  
15 from an availability standpoint, we would also model in  
16 that time period whether a unit was going to be on a  
17 planned outage or not. So that is what is meant by  
18 generation unit heat rates and availabilities. Those  
19 are inputs to the model as well.

20 Q. So understanding those are inputs, are you  
21 saying that that data, those inputs are not -- didn't  
22 come from you or your office? You get that from another  
23 office? Or are you saying that you're the office that  
24 prepares those inputs?

25 A. The generating unit heat rates and

1 availability, both as an input and then subsequently as  
2 an output from the model, the input piece of anything  
3 related to generation parameters, whether it be outage  
4 schedules, unit ramp rates, minimum up and down times,  
5 heat rates, whatever it may be, those inputs are  
6 supplied by our power generation division.

7 **Q. Who is in charge of that power generation**  
8 **division?**

9 A. Mike Arechabala is the executive vice  
10 president of power generation.

11 **Q. Could you spell his last name, please?**

12 A. It's A-R-E-C-H-A-B-A-L-A.

13 **Q. Thank you.**

14 **Mr. Yupp, what does a unit availability have**  
15 **to do with the dispatch costs --**

16 STENOGRAPHER: I'm sorry, Ms. Morse. I  
17 couldn't hear your question.

18 BY MS. MORSE:

19 **Q. What does a unit availability have to do with**  
20 **dispatch as discussed in your testimony?**

21 A. Whether or not a unit is available certainly  
22 has an impact on what ultimately our fuel cost  
23 projections are going to be for the period of time that  
24 we're evaluating.

25 In other words, just to give an example, if

1 hypothetically one of our nuclear units was in a  
2 refueling outage, which I do cover in my testimony as  
3 well, then that needs to be modeled that that unit would  
4 be off for whatever duration of time within the period  
5 we're looking at, so we can correctly capture or at  
6 least project what our fuel costs would be during that  
7 period of time.

8           So all unit outages have an impact on our  
9 fuel requirements, when they occur, what units they are,  
10 and for the duration of each individual outage.

11           **Q. Thank you. So, Mr. Yupp, do you have a**  
12 **working definition of the term "dispatch" as it relates**  
13 **to determining dispatch costs?**

14           A. I guess from a general sense, dispatch  
15 really -- in the manner in which I am using it really  
16 covers the output of the model -- given all of the  
17 inputs that go into the model, from fuel prices to load  
18 forecast to generation availability, the dispatch of the  
19 system, meaning given all of those inputs, how is the  
20 system projected to run for the period of time that we  
21 are evaluating it. That is the system dispatch.

22           **Q. Forgive me. Did you just say how the system**  
23 **is projected to run?**

24           A. Yes, given the inputs to the model.

25           **Q. So along the same lines, in terms of your**

1 cost projection testimony, do you have a working  
2 definition of the term "re-dispatch"?

3 A. No, I don't cover re-dispatch in my  
4 testimony.

5 Q. Do you have an understanding of the term  
6 generally, though?

7 A. Re-dispatch, I guess, from a very high level,  
8 yes.

9 Q. Okay. What is that?

10 A. I would say re-dispatch, in my definition,  
11 would be ultimately how you may -- or how a utility may  
12 change which units are loaded or on-line at any given  
13 point in time, maybe to handle some contingency on the  
14 system, if there are transmission issues or reliability  
15 issues.

16 I have always associated the word re-dispatch  
17 with a reliability or a transmission issue.

18 Q. As to the model that you referenced working  
19 with that you used in your department, does that model  
20 project system dispatch in the most efficient and  
21 economic manner?

22 A. Yes, it does.

23 Q. So back to the system which forms the basis  
24 of your projections, do you know if FP&L's generating  
25 units is currently part of an integrated system?



1           A. I am not sure what you mean by FP&L units  
2 part of an integrated system.

3           **Q. Or like a transmission, a grid?**

4           A. Yes. FP&L's units are ultimately putting  
5 power out onto a transmission grid.

6           **Q. Is Gulf still on track to exit the Southern  
7 pool on July 1, 2022?**

8           A. That is my understanding.

9           **Q. So on page 3 of your testimony, you explained  
10 the two distinct parts or finalizing the forecast, the  
11 date ranges for January -- June 2022, and the range from  
12 July 1 to December of '22.**

13                   So is your testimony -- is the point of that,  
14 the time period beginning July 1 is meant to coincide  
15 with the in-service date of the North Florida Resiliency  
16 Connection?

17           A. Yes. With the projected in-service date,  
18 yes.

19           **Q. Can you explain your understanding of the  
20 NFRC? That's the North Florida Resiliency Connection.**

21           A. Yes. My understanding is that is a  
22 transmission line that will connect the Gulf and FP&L  
23 systems and allow for the joint dispatch of the two  
24 systems together.

25           **Q. I am going to go to -- please turn to page 13**

1 of your testimony.

2 A. Okay. I am there.

3 Q. Starting at line 5, you testified that,  
4 quote, "Associated interchange represents energy  
5 transfers that occur between the Southern pool members  
6 as a result of a centralized integrated system, economic  
7 dispatch." End quote.

8 That appears to be your reference to the time  
9 for July 1, 2022. I think you previously testified -- I  
10 just want to confirm. So after July 1, if the projected  
11 NFRC is in service, and the joint dispatch with Gulf and  
12 FP&L system occurs, Gulf will be leaving the Southern  
13 pool.

14 So my question was: What integrated system,  
15 if any, will Gulf belong to after July 1, 2022?

16 A. After July 1 of 2022, Gulf will be  
17 dispatching as -- I shouldn't say Gulf. Gulf will be  
18 with Florida Power & Light dispatching as an integrated  
19 system.

20 Q. Please turn to page 20 of your testimony.

21 A. Okay. I am there.

22 Q. I apologize, Mr. Yupp. I read my notes  
23 wrong. I meant page 2.

24 A. Okay.

25 Q. This time, I am going to line 20.

1                   So there, it says that the cost included in  
2   your projection reflected consolidation of FP&L and Gulf  
3   systems.

4                   Does that mean that your projections for 2022  
5   include the results of your assumed dispatch of units of  
6   both FP&L and the Legacy Gulf system?

7                   A. Yes. From July through December of '22, our  
8   fuel cost projections assume that Legacy Gulf and FP&L  
9   will be dispatching its systems together.

10                  Q. So your projections for the second half of  
11   '22 is based on the assumption that Gulf and FP&L will  
12   be fully integrated, and that Gulf will not rely on the  
13   Southern company -- inner company interchange, the  
14   Southern pool at all in the Southern half of 2022 -- the  
15   second half of 2022?

16                  A. That is correct.

17                  Q. Are you projecting that any units will be  
18   dispatched differently based on whether the Gulf system  
19   operates as part of the Southern pool or is jointly  
20   dispatch within the integrated FP&L system connected  
21   through the NFRC?

22                  A. Can you clarify? When you say if any Gulf  
23   units will be dispatched differently, what is the  
24   comparison? What's the baseline? Differently from  
25   what?

1           Q. If I said Gulf units, I didn't mean to. I  
2 simply said units. But I was looking for the difference  
3 between -- the difference between before July 1 and  
4 after July 1, you projecting any difference in dispatch.

5           A. Well, I think there certainly has to be a  
6 difference in dispatch. It's probably an apples to  
7 oranges comparison just because -- being dispatched with  
8 Gulf assets dispatched as part of a pool or the Southern  
9 pool, that is a much different scenario than the units  
10 dispatched together with Florida Power & Light.

11                 So to make a comparison is difficult. We  
12 would not -- I, at least, would not know the reasons for  
13 the way Gulf units dispatch in the pool today or for the  
14 first six months of the period. I don't know that  
15 information. I don't know how they fit into that pool.

16                 I would say after Gulf exits the pool, then  
17 certainly, their units could dispatch differently than  
18 they have in the past, as with not being a member of the  
19 pool, and, you know, dispatching economically together  
20 with Florida Power & Light's units.

21                 So a comparison to how they were running in  
22 the past in the pool to how they will run after is a  
23 difficult comparison. I am certain they will run  
24 differently. I do know, though, after Gulf exits the  
25 pool, that the system will be dispatched as economically

1 and efficiently as possible, given the combination of  
2 both systems.

3 Q. Okay. Thank you.

4 So going to page 3 of your testimony,  
5 starting at line 20, you state, "For the July through  
6 December 2022 period, the projections represent  
7 estimated fuel and power costs for a consolidated system  
8 that is jointly dispatched after the NFRC goes into  
9 service." End quote.

10 Did I read that correctly?

11 A. Yes.

12 Q. Can you describe, then, how the July through  
13 December period affected the fuel cost relative to a  
14 scenario where the NFRC is not in service during the  
15 second half?

16 A. No, I do not have any -- I guess I would ask  
17 to clarify. Are you saying a comparison between if the  
18 NFRC was not in service beginning July 1 and Gulf  
19 remained a member of the pool dispatching as a member of  
20 the pool, versus how they would dispatch exiting the  
21 pool on July 1 with FP&L?

22 Q. Yes.

23 A. Again, I do not know what Gulf's dispatch  
24 would look like as a member of the pool or why Gulf's  
25 dispatch looks as it does as a member of the Southern

1 pool.

2 I am not privy to that information, to those  
3 inputs, to their models, to any of the other operating  
4 company's units, data, the load of the system. I am not  
5 privy to any of that information. So how Gulf  
6 dispatches as part of the pool is all done by Southern  
7 Company.

8 What I can reiterate is, again, with the NFRC  
9 projected to be in service on July 1, our model to both  
10 systems integrated them together, and dispatched them as  
11 economically and efficiently as possible for the last  
12 six months of the year.

13 **Q. So it's your testimony that FP&L did not**  
14 **perform any alternate runs for projections in a scenario**  
15 **where the NFRC is not in service during the second half**  
16 **of '22?**

17 A. FP&L did not perform any runs. I believe  
18 that Southern Company -- as I reference in my testimony,  
19 Southern Company ran the first six months of the year in  
20 their model, similar to what we talked about with our  
21 model. I believe they did run the entire year as a  
22 precautionary measure in case we -- or we may have asked  
23 them just to run the entire year, which made more sense.

24 I did not look -- I did not focus on anything  
25 past June of '22. The focus at that point was on

1 putting our projections together for a consolidated  
2 system.

3 Q. Okay. So is it your testimony, then, that if  
4 you asked Southern to do those runs for an entire year,  
5 then that data was provided to you?

6 A. I believe it was, subject to check. I would  
7 have to check, but I believe it was, yes.

8 Q. Okay. Can you produce that as a late file  
9 exhibit if it exists?

10 MS. MONCADA: Stephanie, discovery is  
11 closed. I will consider it, and we will let you  
12 know. We will get back to you.

13 MS. MORSE: I appreciate that, Maria. I  
14 understand it's closed. It's why we are here,  
15 by agreement.

16 BY MS. MORSE:

17 Q. Mr. Yupp, please turn to page 9.

18 A. Okay. I am there.

19 Q. At the very beginning there, you have a Q and

20 A. And in your answer, you reference the system average  
21 dispatch cost.

22 Mr. Yupp, will you please define that term,  
23 "system average dispatch cost," as you are using it in  
24 the testimony?

25 A. Yes. Again, that's just a terminology that

1 would be used to represent what the forward market for  
2 gas looks like. As I mentioned in my testimony, it's by  
3 pipeline and by month.

4 So just looking at one particular month, when  
5 we develop our fuel forecast, the underlying -- the  
6 underlying commodity price for natural gas would be  
7 NYMEX. And then we build up onto a variable dispatch  
8 cost.

9 So what that means is based on the forward  
10 curve for natural gas, and then subsequently building up  
11 those curves into what we believe a delivered cost would  
12 be to our system on a variable basis, excluding firm  
13 transport, that would represent -- or the system average  
14 dispatch would be a terminology used to describe that.  
15 That's what I am using it as here.

16 Q. Okay. Thank you.

17 Next, I am going to ask you to please turn to  
18 appendix 1 of your testimony at page 3.

19 A. Okay. I am there.

20 Q. Would you please walk through how the  
21 dispatch cost is calculated in this document?

22 A. Sure. So beginning at the top of that  
23 exhibit or table, light fuel oil -- again, the base of  
24 light fuel oil would be a forward market. And then that  
25 forward market is developed into what we believe a



1 delivered cost would be. So there is variable transport  
2 associated by location for us. So that's how the light  
3 oil would be done.

4 Coal, our underlying commodity forecast for  
5 coal is done by an outside vendor, and where the  
6 commodity cost is developed into a delivered cost of  
7 coal, projected delivered cost of coal. That's what  
8 that represents there.

9 Natural gas dispatch price, again, the  
10 underlying commodity component of that is the NYMEX  
11 forward curve, as I described in my testimony. That is  
12 modified or developed into a -- what we believe a  
13 delivered cost of natural gas to our facilities would  
14 be.

15 In the natural gas dispatch price, you can  
16 see that it's broken down between firm, and there is  
17 also a non-firm component. So non-firm would -- firm  
18 represents what we believe the delivered cost of natural  
19 gas would be on a monthly basis, utilizing our firm  
20 transport positions. The non-firm is just simply a  
21 higher price based on having to procure interruptible  
22 transport for non-firm.

23 And then the lower half of that chart -- or  
24 lower third is all of the delivery transportation that  
25 we have in our portfolio that we utilize on a day-in,

1 day-out basis by pipeline.

2 Q. Okay. Looking at the data in this table, the  
3 dispatch cost prices for the second half of the year are  
4 generally lower than those for the first half of the  
5 year.

6 Will you explain why that is?

7 A. Yes. The forward curve for natural gas has a  
8 very odd shape to it right now. And as we all know,  
9 there has been some extreme volatility recently in the  
10 curve. But based on the uncertainty around winter  
11 weather and natural gas inventories and high demand in  
12 Europe and Asia, a lot of factors are going into what is  
13 driving the natural gas market right now.

14 The curve is very, very highly  
15 backward-dated. So, in other words, November, December,  
16 January, February and March are I would say subject to  
17 check right now. I don't have the market in front of  
18 me. But it would be above, let's say, \$5 in MMBtu from  
19 a commodity perspective.

20 In April, that price, the forward price drops  
21 down probably sub \$4. So within from March of '22 to  
22 April of '22, the forward market drops over \$1 for  
23 MMBtu, and then remains relatively flat for the balance  
24 of the year.

25 So that's what you are seeing in this table

1 here. Because the NYMEX forward curve is the underlying  
2 curve that we use to develop our fuel forecast. You  
3 would see the same type of shape of delivery prices that  
4 we're forecasting that you're seeing in the market from  
5 just a commodity perspective.

6 Q. Earlier in your answer there, you might have  
7 mentioned some variables like weather, other impacts on  
8 demand.

9 Any other causes that would make those  
10 dispatch prices change since the time you have projected  
11 them that they're showing --

12 A. No. The dispatch price -- maybe I should  
13 clarify. The dispatch price is not an output of the  
14 model. It's an input to the model. The dispatch prices  
15 represent really delivered cost curves or price curves  
16 that we are developing as an input to the model, for  
17 then the model to dispatch the system and the units as  
18 economically as possible. It's not an output.

19 So, yes, these prices change all the time.  
20 On the day that we utilize the forward curve, which was  
21 August 2nd in my testimony, the dispatch prices will be  
22 different the following day and the day after, as they  
23 are today.

24 They're different than they were on August  
25 2nd, yes. That will change what this delivered curve

1 looks like. But it would only be due to a change in the  
2 forward or NYMEX curve, which is driven by many market  
3 factors that would create a change in this delivered  
4 price curve.

5 MS. MONCADA: Stephanie, whenever you can  
6 take a break, I am going to need just five  
7 minutes.

8 MS. MORSE: We can take it now, Maria.  
9 That's fine.

10 (A brief recess was taken from 10:52 a.m.  
11 until 11:00 a.m.)

12 BY MS. MORSE:

13 Q. Mr. Yupp, I am going to ask you to turn to  
14 page 10 of your testimony, starting at line 22 and  
15 continuing over to the next page.

16 There, you testified that, quote, "The heat  
17 rate equation or efficiency factors are updated as  
18 appropriate based on historical unit performance and  
19 projected changes due to plant upgrades, fuel grade  
20 changes and" --

21 STENOGRAPHER: I hate to interrupt, but I  
22 hear background noise that is overriding your  
23 questions.

24 BY MS. MORSE:

25 Q. Mr. Yupp, I was just asking you about the

1 testimony on page -- starting on the bottom of page 10,  
2 going over to 11.

3 Is it fair to say the available transmission  
4 pathways do not factor into these heat rate equations  
5 and efficiency factors?

6 A. Yes, yes, but the two are totally unrelated.  
7 A transmission path and a heat rate equation, I am  
8 struggling with the connection. So I guess, yes,  
9 they're unrelated.

10 Q. Mr. Yupp, do you interact with Michael Score  
11 or his team in preparing your testimony and the  
12 information that you present to the Commission?

13 A. No, I do not.

14 Q. Do your projected costs for the 2022 dispatch  
15 costs referenced in your testimony, do those costs  
16 contemplate any degree of re-dispatch that would not  
17 occur, absent the need to avoid imposing costs on any  
18 other transmission system other than FP&L's?

19 A. I am sorry. The audio was cutting in and  
20 out.

21 Can you repeat that question, please?

22 Q. Sure. Do your projected costs for 2022  
23 contemplate any degree of re-dispatch that would not  
24 occur absent the need to avoid imposing costs on another  
25 transmission system other than the NFRC?

1           A. I am sorry. The audio is really cutting in  
2     and out.

3           Q. Can you tell me what, if anything, you heard  
4     from that question?

5           A. Something related to costs in 2022,  
6     projections and power flowing on other systems?

7           Q. Okay. So the question was about your  
8     projected costs for 2022, correct?

9           A. Yes.

10          Q. All right. Did your projection contemplate  
11     any degree of re-dispatch that would not occur absent  
12     the need to avoid imposing costs on another transmission  
13     system other than FP&L's transmission system?

14           MS. MONCADA: Object to the form.

15           And, Stephanie, I think we are going to  
16     try calling in to see if the audio from the  
17     phone helps us here.

18           MS. MORSE: Okay. If he can just answer  
19     first.

20           MS. MONCADA: Sure, if he heard the  
21     question. I don't know if he did.

22           A. Yeah. The answer to your question is, no,  
23     our model does not incorporate a projected re-dispatch  
24     of our system, under any conditions. Our model is based  
25     on projecting fuel costs on normal conditions on the

1 system, not for contingencies that may or may not occur.

2 MS. MORSE: Well, thank you.

3 Maria, if you guys want to call in, we can  
4 break to do that now.

5 (A brief recess was taken from 11:07 a.m.  
6 until 11:10 a.m.)

7 BY MS. MORSE:

8 Q. Mr. Yupp, finally, just generally as to your  
9 fuel cost projections referenced in your testimony, are  
10 those based on dispatching economically?

11 A. Yes, I would say economically, within  
12 whatever constraints that we may have. And maybe  
13 constraints is the wrong word. But within -- let's say  
14 one caveat could be firm transportation limits on our  
15 system.

16 So we do model what we have available on a  
17 firm transportation basis. So the program will dispatch  
18 as economically as it can, under whatever parameters we  
19 put in the program.

20 So for the most part, it is just economic --  
21 you know, as economic as possible. But there are fuel,  
22 natural gas areas where we have to abide by our  
23 contractual limits. So those are part of the model as  
24 well.

25 MS. MORSE: Well, thank you, Mr. Yupp.

1           Those are all of my questions on direct. I may  
2           have redirect. But I will turn it over for  
3           other questions now.

4                   MS. MONCADA: I only have one.

5                                   CROSS-EXAMINATION

6 BY MS. MONCADA:

7           Q. A real quick clarification. You mentioned  
8           that the generation information comes from Mr.  
9           Arechabala. He is the executive vice president.

10                   Is there a vice president of FP&L that the  
11           organization chart comes before?

12           A. Yeah, Tom Brod is the vice president of power  
13           generation for Florida Power & Light.

14                   MS. MONCADA: That's the only question I  
15           have, Ms. Morse.

16                   MS. MORSE: Okay. Well, thank you. I  
17           don't have any redirect, Mr. Yupp.

18                   Thank you very much for attending. I  
19           think the court reporter might want to know if  
20           you want to read or waive.

21                   MS. MONCADA: We will read.

22                   STENOGRAPHER: Ms. Morse, did you need to  
23           order this?

24                   MS. MORSE: Yes.

25                   STENOGRAPHER: Ms. Moncada, did you want



1 to order a copy?

2 MS. MONCADA: Yes, please.

3 (The deposition was concluded at 11:13

4 a.m.)

5 (Reading and signing were not waived.)

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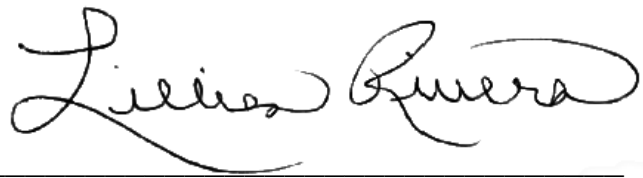
CERTIFICATE OF OATH

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THE STATE OF FLORIDA )  
COUNTY OF MIAMI-DADE )

I, the undersigned authority,  
certify that GERARD J. YUPP remotely appeared before me  
and was duly sworn on the 20th day of October, 2021.

Signed this 28th day of October,  
2021.



LILLIAN RIVERA, STENOGRAPHER  
Notary Public - State of Florida  
My Commission No. GG 978935  
My Commission Expires: June 13, 2024

## CERTIFICATE OF REPORTER

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THE STATE OF FLORIDA )  
COUNTY OF MIAMI-DADE )

I, LILLIAN RIVERA, certify that I was authorized to and did stenographically report the deposition via web conference of GERARD J. YUPP, pages 1 through 31; that a review of the transcript was requested; and that the transcript is a true and complete record of my stenographic notes.

I further certify that I am not a relative, employee, attorney, or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorney or counsel connected with the action, nor am I financially interested in the action.

DATED this 28th of October, 2021.



LILLIAN RIVERA, STENOGRAPHER

1     October 28, 2021

2     MARIA MONCADA, ESQUIRE  
3     maria.moncada@fpl.com  
4     700 Universive Blvd.  
5     Juno Beach, Florida 33408

6     Re:   In Re: Fuel and Purchase Power Cost Recovery Clause  
7     Docket No.:   20210001-EI

8     Please take notice that on the 20th of October, 2021,  
9     you gave your deposition in the above cause.  At that  
10    time you did not waive your signature.  The transcript  
11    is now available for your review.

12    Please call (888)811-3408 or e-mail  
13    production@phippsreporting.com between the hours of 9:00  
14    a.m. and 4:00 p.m., Monday through Friday, for access to  
15    a read-only PDF transcript via computer.

16    Please execute the PDF-fillable Errata Sheet which will  
17    be forwarded to you by Phipps Reporting.  The Errata  
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19    www.phippsreporting.com.  Once completed, please print,  
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21    If you do not read and sign the deposition within a  
22    reasonable amount of time, the original, which has  
23    already been forwarded to the ordering attorney, may be  
24    filed with the Clerk of the Court.

25    If you wish to waive your signature now, please sign  
26    your name in the blank at the bottom of this letter and  
27    e-mail to the address listed below.

28    Very truly yours,  
29    LILLIAN RIVERA, STENOGRAPHER  
30    Phipps Reporting, Inc.  
31    production@phippsreporting.com

32    I do hereby waive my signature.

33    \_\_\_\_\_  
34    GERARD J. YUPP

35    Job No.:   212348

1 ERRATA SHEET AND OATH  
2 DO NOT WRITE ON TRANSCRIPT  
3 ENTER CHANGES ON THIS SHEET

3 October 28, 2021

Deponent: Gerard J. Yupp

4 Date of Deposition: October 20, 2021

Docket No: 20210001-EI

5 In Re: Fuel and Purchased Power Cost Recovery Clause

6 PAGE LINE REMARKS

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17 Under penalties of perjury, I declare that I have read  
18 the foregoing transcript of my deposition and I hereby  
19 swear that my testimony therein was true at the time it  
20 was given and is now true and correct, including any  
21 corrections and/or amendments listed above.

22 Signature of witness \_\_\_\_\_

23 Dated this \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.

24 Job No.: 212348

25

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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Fuel and Purchase Power Cost Recovery  
Clause and Generating Performance Incentive  
Factor

Docket No. 20210001-EI

**ERRATA SHEET**

October 29, 2021

Deponent: Gerard J. Yupp

Date of Deposition: October 20, 2021 Docket No: 20210001-EI

In Re: Fuel and Purchased Power Cost Recovery Clause

<b><u>PAGE #</u></b>	<b><u>LINE #</u></b>	<b><u>REMARKS</u></b>
Page 2	Line 16	Strike "Cardi" and replace with "Carty"
Page 4	Line 24	Strike "Cardi" and replace with "Carty"
Page 7	Line 2	Strike "senior director" and replace with "Senior Director"
Page 7	Line 3	Strike "wholesale operations" and replace with "Wholesale Operations"
Page 7	Line 10	Strike "vice president of energy" and replace with "Vice President of Energy"
Page 7	Line 11	Strike "marketing and trading" and replace with "Marketing and Trading"
Page 7	Line 13	Strike "Forest" and replace with "Forrest"
Page 9	Line 12	Strike "unit" and replace with "units"
Page 10	Line 17	Strike "outage, schedules" and replace with "outage schedules"
Page 10	Line 17	Strike "and"
Page 10	Line 18	Insert "and" before "load"
Page 11	Line 14	Strike "e-grade" and replace with "heat rate"
Page 12	Line 9	Strike "executive vice" and replace with "Executive Vice"
Page 12	Line 10	Strike "president of power generation" and replace with "President of Power Generation"
Page 22	Line 7	Strike "build up onto" and replace with "build that up into"
Page 23	Line 5	Strike "and"
Page 23	Line 7	Insert "a" before "projected"
Page 24	Line 14	Strike "is very, very highly" and replace with "is very highly"
Page 24	Line 15	Strike "backward-dated" and replace with "in backwardation"
Page 24	Line 18	Strike "\$5 in" and replace with "\$5 per"
Page 24	Line 21	Insert "to" after "down"
Page 24	Line 21	Insert "per MMBtu" after "\$4"
Page 24	Line 21	Strike "within"
Page 24	Line 22	Strike "for" and replace with "per"

<u>PAGE #</u>	<u>LINE #</u>	<u>REMARKS</u>
Page 25	Line 15	Insert "the" before "delivered"
Page 25	Line 17	Strike "then"
Page 27	Line 10	Strike "Score" and replace with "Spoor"
Page 30	Line 9	Strike "executive vice president" and replace with "Executive Vice President"
Page 30	Line 12	Strike "Brod is the vice president of power" and replace with "Broad is the Vice President of Power"
Page 30	Line 13	Strike "generation" and replace with "Generation"

Under penalties of perjury, I declare that I have read my deposition and that it is true and correct, subject to any changes in form or substance entered here.

10/29/21

DATE

Gerard J. Yupp

Gerard J. Yupp