# 407

FPL's Response to Staff's Seventeenth Interrogatories Nos. 217-219.

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#### **QUESTION**:

Please complete the following tables relating to FPL/Gulf's load forecast accuracy (Summer Peak, Winter Peak, and NEL, for Consolidated and Standalone companies).

Year	FPL Standalone - Accuracy of Summer Peak Demand Forecasts							
		Forecast Er	Years	0-2 (%)				
		Years	Prior*		Average	Absolute		
	3 Years	2 Years	1 Year	0 Years		Average		
2015								
2016								
2017								
2018								
2019								
2020								
Average								

\*Examples: In the column '3 Years,' row '2015', enter the percent error in the Company's 2012 forecast of 2015 Summer Peak Demand. Similarly, in the column '0 Years', row '2020', enter the percent error in the Company's 2020 forecast of 2020 Summer Peak Demand.

Year	FPI	Standalone - A	inter Peak Der	mand Forecasts		
		Forecast Er	Years	0-2 (%)		
		Years	Average	Absolute		
	3 Years	2 Years	1 Year	0 Years		Average
2015						
2016						
2017						
2018						
2019						
2020						
Average						

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Year	FPL Standalone - Accuracy of NEL Forecasts							
		Forecast Er	ror Rate (%)		Years	0-2 (%)		
		Years	Prior*		Average	Absolute		
	3 Years	2 Years	1 Year	0 Years		Average		
2015								
2016								
2017								
2018								
2019								
2020								
Average								
*Examples	: In the colum	nn '3 Years,' ro	ow '2015', ente	er the percent e	rror in the C	ompany's		

2012 forecast of 2015 NEL. Similarly, in the column '0 Years', row '2020', enter the percent error in the Company's 2020 forecast of 2020 NEL.

Year	Gulf	Standalone - A	mmer Peak De	Demand Forecasts		
		Forecast Er	Years	0-2 (%)		
		Years	Prior*		Average	Absolute
	3 Years	2 Years	1 Year	0 Years		Average
2015						
2016						
2017						
2018						
2019						
2020						
Average						

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Year	Gulf Standalone - Accuracy of Winter Peak Demand Forecasts							
		Forecast Er	ror Rate (%)		Years 0-2 (%)			
		Years	Average	Absolute				
	3 Years	2 Years	1 Year	0 Years		Average		
2015								
2016								
2017								
2018								
2019								
2020								
Average								

\*Examples: In the column '3 Years,' row '2015', enter the percent error in the Company's 2012 forecast of 2015 Winter Peak Demand. Similarly, in the column '0 Years', row '2020', enter the percent error in the Company's 2020 forecast of 2020 Winter Peak Demand.

Year	Gulf Standalone - Accuracy of NEL Forecasts							
		Forecast Er	Years	0-2 (%)				
		Years	Prior*		Average	Absolute		
	3 Years	2 Years	1 Year	0 Years		Average		
2015								
2016								
2017								
2018								
2019								
2020								
Average								

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FPL/Gu	lf Consolidated	f Summer Peak	k Demand Forecasts		
	Forecast Er	Years	0-2 (%)		
	Years	Average	Absolute		
3 Years	2 Years	1 Year	0 Years		Average
		Forecast Er Years	Forecast Error Rate (%) Years Prior*	Forecast Error Rate (%) Years Prior*	Years Prior* Average

\*Examples: In the column '3 Years,' row '2015', enter the percent error in the Company's 2012 forecast of 2015 Summer Peak Demand. Similarly, in the column '0 Years', row '2020', enter the percent error in the Company's 2020 forecast of 2020 Summer Peak Demand.

Year	FPL/G	ulf Consolidate	of Winter Peak	k Demand Forecasts		
		Forecast Er		Years	0-2 (%)	
		Years	Average	Absolute		
	3 Years	2 Years	1 Year	0 Years		Average
2015						
2016						
2017						
2018						
2019						
2020						
Average						

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		Forecast Er	ror Rate (%)		Years	urs 0-2 (%)	
		Years	Prior*		Average	Absolute	
	3 Years	2 Years	1 Year	0 Years		Average	
2015							
2016							
2017							
2018							
2019							
2020							
Average							
-		nn '3 Years,' ro EL. Similarly, i		-		- ·	

2012 forecast of 2015 NEL. Similarly, in the column '0 Years', row '2020', enter the percent error in the Company's 2020 forecast of 2020 NEL.

### RESPONSE:

See the tables below for standalone FPL, standalone Gulf, and consolidated FPL. Please note that variances for the consolidated summer and winter peaks cannot be determined because historically FPL and Gulf were operated as separate systems and peak demands are not additive due to system diversity. Consistent with the methodology employed for the response to Staff's Fifth Set of Interrogatories No. 118, a negative variance means that the actuals were less than the forecast, and a positive variance means that the actuals were greater than the forecast. Additionally, all actual NELs are weather normalized.

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Year	FPL Standalone - Accuracy of Summer Peak Demand Forecasts							
		Forecast Er	ror Rate (%)		Years	0-2 (%)		
		Years	Average	Absolute				
	3 Years	2 Years	1 Year	0 Years		Average		
2015	-1.2	0.2	-0.4	-0.4	-0.2	0.3		
2016	1.2	-0.1	-0.3	-2.1	-0.8	0.8		
2017	-4.1	-4.4	-4.9	-3.8	-4.4	4.4		
2018	-2.9	-2.9	-1.9	-0.8	-1.9	1.9		
2019	-6.2	-4.8	-4.8	-4.3	-4.6	4.6		
2020	-0.8	-1.3	-0.7	-1.2	-1.1	1.1		
Average	-2.3	-2.2	-2.2	-2.1	-2.2	2.2		

\*Examples: In the column '3 Years,' row '2015', enter the percent error in the Company's 2012 forecast of 2015 Summer Peak Demand. Similarly, in the column '0 Years', row '2020', enter the percent error in the Company's 2020 forecast of 2020 Summer Peak Demand.

Year	FPL	Standalone - A	Accuracy of W	inter Peak Dem	and Foreca	sts
		Forecast Er	ror Rate (%)		Years	0-2 (%)
		Years		Average	Absolute	
	3 Years	2 Years	1 Year	0 Years		Average
2015	-10.4	-10.0	-5.2	-6.2	-7.1	7.1
2016	-7.1	-3.6	-3.2	2.1	-1.5	3.0
2017	-16.4	-15.5	-14.2	-11.0	-13.6	13.6
2018	-10.2	-9.2	-6.3	-1.3	-5.6	5.6
2019	-12.6	-9.4	-5.7	-3.5	-6.2	6.2
2020	-15.4	-12.1	-10.9	-11.2	-11.4	11.4
Average	-12.0	-10.0	-7.6	-5.2	-7.6	7.8

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Year	FPL Standalone - Accuracy of NEL Forecasts								
		Forecast Er		Years	0-2 (%)				
		Years		Average	Absolute				
	3 Years	2 Years	1 Year	0 Years		Average			
2015	-0.6	-0.7	-1.1	0.4	-0.5	0.7			
2016	-2.2	-2.8	-1.6	0.5	-1.3	1.7			
2017	-5.7	-5.0	-1.0	-1.3	-2.4	2.4			
2018	-2.7	1.9	1.2	3.1	2.0	2.0			
2019	0.9	0.4	1.5	0.3	0.7	0.7			
2020	0.5	2.0	0.4	-0.2	0.7	0.9			
Average	-1.6	-0.7	-0.1	0.5	-0.1	1.4			
*Examples	: In the colum	nn '3 Years,' ro	ow '2015', ente	er the percent er	ror in the C	ompany's			

\*Examples: In the column '3 Years,' row '2015', enter the percent error in the Company's 2012 forecast of 2015 NEL. Similarly, in the column '0 Years', row '2020', enter the percent error in the Company's 2020 forecast of 2020 NEL.

Year	Gulf	Gulf Standalone - Accuracy of Summer Peak Demand Forecasts							
		Forecast Er	ror Rate (%)		Years	0-2 (%)			
		Years	Prior*		Average	Absolute			
	3 Years	2 Years	1 Year	0 Years		Average			
2015	-6.1	-0.6	1.2	3.3	1.3	1.7			
2016	-4.6	-2.4	-0.2	0.7	-0.6	1.1			
2017	-1.1	0.7	1.0	3.4	1.7	1.7			
2018	-2.6	-2.6	0.0	3.0	0.1	1.9			
2019	-5.1	-2.1	0.7	0.6	-0.3	1.1			
2020	-1.5	1.8	4.3	-0.4	1.9	2.2			
Average	-3.5	-0.9	1.2	1.8	0.7	1.6			

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Year	Gulf Standalone - Accuracy of Winter Peak Demand Forecasts							
		Forecast Er	ror Rate (%)		Years	0-2 (%)		
		Years	Prior*		Average	Absolute		
	3 Years	2 Years	1 Year	0 Years		Average		
2015	-11.0	-5.5	-5.6	1.2	-3.3	4.1		
2016	-8.6	-8.0	1.4	0.8	-1.9	3.4		
2017	-4.5	4.2	4.0	4.0	4.1	4.1		
2018	18.7	18.4	18.6	17.0	18.0	18.0		
2019	13.3	14.1	14.0	10.1	12.7	12.7		
2020	11.7	9.1	11.5	9.3	10.0	10.0		
Average	3.3	5.4	7.3	7.1	6.6	8.7		

\*Examples: In the column '3 Years,' row '2015', enter the percent error in the Company's 2012 forecast of 2015 Winter Peak Demand. Similarly, in the column '0 Years', row '2020', enter the percent error in the Company's 2020 forecast of 2020 Winter Peak Demand.

Year	Gulf Standalone - Accuracy of NEL Forecasts							
		Forecast Er	ror Rate (%)		Years	0-2 (%)		
		Years	Prior*		Average	Absolute		
	3 Years	2 Years	1 Year	0 Years		Average		
2015	-11.3	-3.4	-1.8	0.0	-1.8	1.8		
2016	-5.6	-3.5	-1.1	0.1	-1.5	1.5		
2017	-4.5	-2.6	-1.4	0.6	-1.1	1.5		
2018	-3.6	-2.7	-0.3	1.6	-0.5	1.5		
2019	-4.2	-1.4	0.7	-0.6	-0.5	0.9		
2020	-3.6	-0.8	0.6	-0.9	-0.4	0.8		
Average	-5.5	-2.4	-0.5	0.1	-0.9	1.3		

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FPL/Gu	orecasts				
	Forecast Er	ror Rate (%)		Years	0-2 (%)
	Years	Prior*		Average	Absolute
3 Years	2 Years	1 Year	0 Years		Average
		Forecast Er Years	Forecast Error Rate (%) Years Prior*	Forecast Error Rate (%) Years Prior*	Years Prior* Average

\*Examples: In the column '3 Years,' row '2015', enter the percent error in the Company's 2012 forecast of 2015 Summer Peak Demand. Similarly, in the column '0 Years', row '2020', enter the percent error in the Company's 2020 forecast of 2020 Summer Peak Demand.

Year	FPL/Gulf Consolidated - Accuracy of Winter Peak Demand Forecasts						
		Forecast Er	ror Rate (%)		Years	0-2 (%)	
		Years	Prior*		Average	Absolute	
	3 Years	2 Years	1 Year	0 Years		Average	
2015							
2016							
2017							
2018							
2019							
2020							
Average							

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Year	FPL/Gulf Consolidated - Accuracy of NEL Forecasts								
		Forecast Er	ror Rate (%)		Years	0-2 (%)			
		Years	Prior*		Average	Absolute			
	3 Years	2 Years	1 Year	0 Years		Average			
2015	-1.7	-1.0	-1.1	0.4	-0.6	0.8			
2016	-2.5	-2.9	-1.6	0.5	-1.3	1.6			
2017	-5.6	-4.7	-1.1	-1.1	-2.3	2.3			
2018	-2.8	1.5	1.0	2.9	1.8	1.8			
2019	0.5	0.2	1.5	0.2	0.6	0.6			
2020	0.1	1.8	0.4	-0.3	0.6	0.8			
Average	-2.0	-0.9	-0.1	0.4	-0.2	1.3			

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#### **QUESTION**:

Please complete the following table relating to FPL/Gulf's forecasted non-clause expense variances (for Consolidated and Standalone companies).

Year	FPL Standalone Average Variance of Non-Clause Expenses							
	Variance (in millions)							
		Years Prior*						
	3 Years 2 Years 1 Ye							
2015								
2016								
2017								
2018								
2019								
2020								
Average								

\*Examples: In the column '3 Years,' row '2015', enter the forecasted less actual non-clause expenses in the Company's 2012 forecast of 2015 non-clause expenses. Similarly, in the column '1 Year', row '2020', enter the forecasted less actual non-clause expenses in the Company's 2019 forecast of 2020 non-clause expenses.

Year	Gulf Standalone Average Variance of Non-Clause Expenses							
	Variance (in millions)							
		Years Prior*						
	3 Years	2 Years	1 Year					
2015								
2016								
2017								
2018								
2019								
2020								
Average								

\*Examples: In the column '3 Years,' row '2015', enter the forecasted less actual non-clause expenses in the Company's 2012 forecast of 2015 non-clause expenses. Similarly, in the column '1 Year', row '2020', enter the forecasted less actual non-clause expenses in the Company's 2019 forecast of 2020 non-clause expenses.

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Year	FPL/Gulf Consolidated Average Variance of Non-Clause Expenses								
		Variance (in millions)							
		Years Prior*							
	3 Years	2 Years	1 Year						
2015									
2016									
2017									
2018									
2019									
2020									
Average									
non-clause e expenses. S less actual n	Average*Examples: In the column '3 Years,' row '2015', enter the forecasted less actual non-clause expenses in the Company's 2012 forecast of 2015 non-clause expenses. Similarly, in the column '1 Year', row '2020', enter the forecasted less actual non-clause expenses in the Company's 2019 forecast of 2020 non- clause expenses.								

# RESPONSE:

FPL interprets "non-clause expenses" to refer to jurisdictional adjusted operating expenses reflected in the Company's official forecasts (i.e., rate case forecast and forecasted earnings surveillance reports).

Please refer to Attachment No. 1 to this response for FPL Standalone variances and Attachment No. 2 to this response for Gulf Standalone variances. FPL and Gulf Power Company were separate ratemaking entities in 2015-2020, therefore no consolidated data is available.

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#### **QUESTION**:

Please refer to FPL's Response to Staff's 5<sup>th</sup> Set of Interrogatories. No. 118. Please expand on the 2017-2020 data provided in FPL's response to include previous years (2015-2016) along with a Years 0-2 (%) Average/Absolute Average as shown in the tables below.

Year	F	FPL Standalone - Accuracy of Total Customers Forecasts							
		Forecast Er	ror Rate (%)		Years	0-2 (%)			
		Years	Prior*		Average	Absolute			
	3 Years	2 Years	1 Year	0 Years		Average			
2015									
2016									
2017									
2018									
2019									
2020									
Average									

\*Examples: In the column '3 Years,' row '2015', enter the percent error in the Company's 2012 forecast of 2015 customers. Similarly, in the column '0 Years', row '2020', enter the percent error in the Company's 2020 forecast of 2020 customers.

Year	FF	FPL Standalone - Accuracy of Retail Energy Sales Forecasts							
		Forecast Er	ror Rate (%)		Years	0-2 (%)			
		Years	Prior*		Average	Absolute			
	3 Years	2 Years	1 Year	0 Years		Average			
2015									
2016									
2017									
2018									
2019									
2020									
Average									

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Year	(	Gulf Standalone	ers Forecasts	5		
		Forecast Er	ror Rate (%)		Years	0-2 (%)
		Years	Prior*		Average	Absolute
	3 Years	2 Years	1 Year	0 Years		Average
2015						
2016						
2017						
2018						
2019						
2020						
Average						
*Examples	. In the colum	nn '3 Years.' ro	w '2015' ente	er the percent e	error in the C	omnany's

\*Examples: In the column '3 Years,' row '2015', enter the percent error in the Company's 2012 forecast of 2015 customers. Similarly, in the column '0 Years', row '2020', enter the percent error in the Company's 2020 forecast of 2020 customers.

Year	Gulf Standalone - Accuracy of Retail Energy Sales Forecasts					
		Forecast Er	Years	0-2 (%)		
		Years	Prior*		Average	Absolute
	3 Years	2 Years	1 Year	0 Years		Average
2015						
2016						
2017						
2018						
2019						
2020						
Average						

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Year	FPL/Gulf Consolidated - Accuracy of Total Customers Forecasts					asts
		Forecast Er	ror Rate (%)		Years 0-2 (%)	
		Years	Prior*		Average	Absolute
	3 Years	2 Years	1 Year	0 Years		Average
2015						
2016						
2017						
2018						
2019						
2020						
Average						
-		nn '3 Years,' ro	-	er the percent e		1 .

\*Examples: In the column '3 Years,' row '2015', enter the percent error in the Company's 2012 forecast of 2015 customers. Similarly, in the column '0 Years', row '2020', enter the percent error in the Company's 2020 forecast of 2020 customers.

Year	FPL/Gulf Consolidated - Accuracy of Retail Energy Sales Foreca					
		Forecast Er	Years	0-2 (%)		
		Years	Average	Absolute		
	3 Years	2 Years	1 Year	0 Years		Average
2015						
2016						
2017						
2018						
2019						
2020						
Average						

\*Examples: In the column '3 Years,' row '2015', enter the percent error in the Company's 2012 forecast of 2015 retail energy sales. Similarly, in the column '0 Years', row '2020', enter the percent error in the Company's 2020 forecast of 2020 retail energy sales.

# RESPONSE:

See the tables below for standalone FPL, standalone Gulf, and consolidated FPL. Consistent with the methodology employed for the response to Staff's Fifth Set of Interrogatories No. 118, a negative variance means that the actuals were less than the forecast, and a positive variance means that the actuals were greater than the forecast. Additionally, all actual retail energy sales are weather normalized.

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Year	FPL Standalone - Accuracy of Total Customers Forecasts						
		Forecast Er	Years	0-2 (%)			
		Years	Prior*		Average	Absolute	
	3 Years	2 Years	1 Year	0 Years		Average	
2015	0.3	0.1	-0.1	0.0	0.0	0.1	
2016	0.0	-0.3	-0.2	-0.1	-0.2	0.2	
2017	-0.4	-0.4	-0.3	-0.2	-0.3	0.3	
2018	-0.6	-0.6	-0.4	-0.1	-0.4	0.4	
2019	0.0	0.3	0.6	0.2	0.4	0.4	
2020	0.5	0.9	0.5	0.4	0.6	0.6	
Average	0.0	0.0	0.0	0.0	0.0	0.3	

\*Examples: In the column '3 Years,' row '2015', enter the percent error in the Company's 2012 forecast of 2015 customers. Similarly, in the column '0 Years', row '2020', enter the percent error in the Company's 2020 forecast of 2020 customers.

Year	FPL Standalone - Accuracy of Retail Energy Sales Forecasts						
		Years	0-2 (%)				
		Years Prior*					
	3 Years	2 Years	1 Year	0 Years		Average	
2015	-0.3	-0.8	-1.1	0.7	-0.4	0.9	
2016	-2.1	-2.8	-1.1	0.7	-1.1	1.6	
2017	-5.8	-4.6	-1.2	-2.0	-2.6	2.6	
2018	-2.8	1.6	0.3	2.5	1.5	1.5	
2019	0.3	-0.9	0.5	-1.0	-0.4	0.8	
2020	-1.1	0.6	-1.3	-1.3	-0.7	1.1	
Average	-2.0	-1.1	-0.7	-0.1	-0.6	1.4	

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Year	Gulf Standalone - Accuracy of Total Customers Forecasts						
		Forecast Er	ror Rate (%)		Years	0-2 (%)	
		Years	Prior*		Average	Absolute	
	3 Years	2 Years	1 Year	0 Years		Average	
2015	-1.6	-0.7	0.4	0.2	0.0	0.5	
2016	-1.4	0.2	0.2	0.2	0.2	0.2	
2017	-0.3	0.0	0.1	0.2	0.1	0.1	
2018	-0.3	-0.2	0.2	-0.2	-0.1	0.2	
2019	-1.4	-0.9	-1.5	-1.5	-1.3	1.3	
2020	-0.7	-1.4	-1.8	-0.3	-1.2	1.2	
Average	-0.9	-0.5	-0.4	-0.2	-0.4	0.6	

\*Examples: In the column '3 Years,' row '2015', enter the percent error in the Company's 2012 forecast of 2015 customers. Similarly, in the column '0 Years', row '2020', enter the percent error in the Company's 2020 forecast of 2020 customers.

Gulf Standalone - Accuracy of Retail Energy Sales Forecasts					
	Years	0-2 (%)			
	Years	Average	Absolute		
3 Years	2 Years	1 Year	0 Years		Average
-10.7	-2.4	-0.8	0.1	-1.0	1.1
-4.6	-2.4	-0.9	0.3	-1.0	1.2
-3.3	-2.2	-1.0	0.8	-0.8	1.3
-4.0	-2.9	-0.8	0.9	-0.9	1.5
-4.2	-1.7	0.2	-1.2	-0.9	1.0
-3.7	-1.2	-2.6	-1.2	-1.6	1.6
-5.1	-2.1	-1.0	-0.1	-1.0	1.3
	3 Years -10.7 -4.6 -3.3 -4.0 -4.2 -3.7	Forecast Er   Years 2 Years   3 Years 2 Years   -10.7 -2.4   -4.6 -2.4   -3.3 -2.2   -4.0 -2.9   -4.2 -1.7   -3.7 -1.2	Forecast Error Rate (%)   Years Prior*   3 Years 2 Years 1 Year   -10.7 -2.4 -0.8   -4.6 -2.4 -0.9   -3.3 -2.2 -1.0   -4.0 -2.9 -0.8   -4.2 -1.7 0.2   -3.7 -1.2 -2.6	$\begin{array}{c c c c c c c c c c c c c c c c c c c $	$\begin{array}{c c c c c c c c c c c c c c c c c c c $

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Year	FPL/Gulf Consolidated - Accuracy of Total Customers Forecasts						
		Forecast Er	ror Rate (%)		Years	0-2 (%)	
		Years	Prior*		Average	Absolute	
	3 Years	2 Years	1 Year	0 Years		Average	
2015	0.1	0.0	-0.1	0.0	0.0	0.0	
2016	-0.1	-0.2	-0.1	-0.1	-0.1	0.1	
2017	-0.4	-0.3	-0.3	-0.1	-0.2	0.2	
2018	-0.5	-0.5	-0.3	-0.1	-0.3	0.3	
2019	-0.1	0.2	0.4	0.0	0.2	0.2	
2020	0.4	0.7	0.3	0.3	0.5	0.5	
Average	-0.1	0.0	0.0	0.0	0.0	0.2	
*	T .1 1				. 1 0		

\*Examples: In the column '3 Years,' row '2015', enter the percent error in the Company's 2012 forecast of 2015 customers. Similarly, in the column '0 Years', row '2020', enter the percent error in the Company's 2020 forecast of 2020 customers.

Year	FPL/C	FPL/Gulf Consolidated - Accuracy of Retail Energy Sales Forecasts						
		Forecast Er	ror Rate (%)		Years	0-2 (%)		
		Years	Prior*		Average	Absolute		
	3 Years	2 Years	1 Year	0 Years		Average		
2015	-1.3	-1.0	-1.1	0.7	-0.5	0.9		
2016	-2.4	-2.8	-1.1	0.7	-1.1	1.5		
2017	-5.6	-4.4	-1.2	-1.7	-2.5	2.5		
2018	-2.9	1.2	0.2	2.3	1.2	1.2		
2019	-0.2	-0.9	0.5	-1.0	-0.5	0.8		
2020	-1.3	0.5	-1.4	-1.3	-0.7	1.1		
Average	-2.3	-1.2	-0.7	-0.1	-0.7	1.3		

# DECLARATION

I, Jun K. Park, sponsored the answers to Interrogatory Nos. 214-215, 217, and 219 from Staff's Seventeenth Set of Interrogatories to Florida Power & Light Company in Docket No. 20210015-EI, and the responses are true and correct based on my personal knowledge.

Under penalty of perjury, I declare that I have read the foregoing declaration and the interrogatory answers identified above, and that the facts stated therein are true.

Jun Park

Jun K. Park

Date: <u>7/28/2021</u>

#### **DECLARATION**

I, Scott R. Bores, sponsored the answers to Interrogatory Nos. 216 and 218 from Staff's Seventeenth Set of Interrogatories to Florida Power & Light Company in Docket No. 20210015-EI, and the responses are true and correct based on my personal knowledge.

Under penalty of perjury, I declare that I have read the foregoing declaration and the interrogatory answer identified above, and that the facts stated therein are true.

1 K

Scott R. Bores 12021 Date: \_\_\_\_\_