

407

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

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 Winter Peak Demand Forecasts					
	Forecast Error Rate (%)				Years 0-2 (%)	
	Years Prior*				Average	Absolute Average
	3 Years	2 Years	1 Year	0 Years		
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 Summer Peak Demand Forecasts					
	Forecast Error Rate (%)				Years 0-2 (%)	
	Years Prior*				Average	Absolute Average
	3 Years	2 Years	1 Year	0 Years		
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	Gulf Standalone - Accuracy of Winter Peak Demand Forecasts					
	Forecast Error Rate (%)				Years 0-2 (%)	
	Years Prior*				Average	Absolute Average
	3 Years	2 Years	1 Year	0 Years		
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 Error Rate (%)				Years 0-2 (%)	
	Years Prior*				Average	Absolute Average
	3 Years	2 Years	1 Year	0 Years		
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 NEL. Similarly, in the column '0 Years', row '2020', enter the percent error in the Company's 2020 forecast of 2020 NEL.

Year	FPL/Gulf Consolidated - Accuracy of Summer Peak Demand Forecasts					
	Forecast Error Rate (%)				Years 0-2 (%)	
	Years Prior*				Average	Absolute Average
	3 Years	2 Years	1 Year	0 Years		
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	FPL/Gulf Consolidated - Accuracy of Winter Peak Demand Forecasts					
	Forecast Error Rate (%)				Years 0-2 (%)	
	Years Prior*				Average	Absolute Average
	3 Years	2 Years	1 Year	0 Years		
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	FPL/Gulf Consolidated - Accuracy of NEL Forecasts					
	Forecast Error Rate (%)				Years 0-2 (%)	
	Years Prior*				Average	Absolute Average
	3 Years	2 Years	1 Year	0 Years		
2015						
2016						
2017						
2018						
2019						
2020						
Average						
<p>*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.</p>						

**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.

Year	FPL Standalone - Accuracy of Winter Peak Demand Forecasts					
	Forecast Error Rate (%)				Years 0-2 (%)	
	Years Prior*				Average	Absolute Average
	3 Years	2 Years	1 Year	0 Years		
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

\*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 Summer Peak Demand Forecasts					
	Forecast Error Rate (%)				Years 0-2 (%)	
	Years Prior*				Average	Absolute Average
	3 Years	2 Years	1 Year	0 Years		
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

\*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	Gulf Standalone - Accuracy of NEL Forecasts					
	Forecast Error Rate (%)				Years 0-2 (%)	
	Years Prior*				Average	Absolute Average
	3 Years	2 Years	1 Year	0 Years		
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

\*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	FPL/Gulf Consolidated - Accuracy of Summer Peak Demand Forecasts					
	Forecast Error Rate (%)				Years 0-2 (%)	
	Years Prior*				Average	Absolute Average
	3 Years	2 Years	1 Year	0 Years		
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	FPL/Gulf Consolidated - Accuracy of Winter Peak Demand Forecasts					
	Forecast Error Rate (%)				Years 0-2 (%)	
	Years Prior*				Average	Absolute Average
	3 Years	2 Years	1 Year	0 Years		
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	FPL/Gulf Consolidated - Accuracy of NEL Forecasts					
	Forecast Error Rate (%)				Years 0-2 (%)	
	Years Prior*				Average	Absolute Average
	3 Years	2 Years	1 Year	0 Years		
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

\*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.

**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 Year
2015			
2016			
2017			
2018			
2019			
2020			
Average			
<p>*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.</p>			

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			
<p>*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.</p>			

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			
<p>*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.</p>			

**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.

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	FPL Standalone - Accuracy of Retail Energy Sales Forecasts					
	Forecast Error Rate (%)				Years 0-2 (%)	
	Years Prior*				Average	Absolute Average
	3 Years	2 Years	1 Year	0 Years		
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.

Year	Gulf Standalone - Accuracy of Total Customers Forecasts					
	Forecast Error Rate (%)				Years 0-2 (%)	
	Years Prior*				Average	Absolute Average
	3 Years	2 Years	1 Year	0 Years		
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	Gulf Standalone - Accuracy of Retail Energy Sales Forecasts					
	Forecast Error Rate (%)				Years 0-2 (%)	
	Years Prior*				Average	Absolute Average
	3 Years	2 Years	1 Year	0 Years		
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.

Year	FPL/Gulf Consolidated - Accuracy of Total Customers Forecasts					
	Forecast Error Rate (%)				Years 0-2 (%)	
	Years Prior*				Average	Absolute Average
	3 Years	2 Years	1 Year	0 Years		
2015						
2016						
2017						
2018						
2019						
2020						
Average						
<p>*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.</p>						

Year	FPL/Gulf Consolidated - Accuracy of Retail Energy Sales Forecasts					
	Forecast Error Rate (%)				Years 0-2 (%)	
	Years Prior*				Average	Absolute Average
	3 Years	2 Years	1 Year	0 Years		
2015						
2016						
2017						
2018						
2019						
2020						
Average						
<p>*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.</p>						

**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.



Year	FPL Standalone - Accuracy of Retail Energy Sales Forecasts					
	Forecast Error Rate (%)				Years 0-2 (%)	
	Years Prior*				Average	Absolute Average
	3 Years	2 Years	1 Year	0 Years		
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

\*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.

Year	Gulf Standalone - Accuracy of Retail Energy Sales Forecasts					
	Forecast Error Rate (%)				Years 0-2 (%)	
	Years Prior*				Average	Absolute Average
	3 Years	2 Years	1 Year	0 Years		
2015	-10.7	-2.4	-0.8	0.1	-1.0	1.1
2016	-4.6	-2.4	-0.9	0.3	-1.0	1.2
2017	-3.3	-2.2	-1.0	0.8	-0.8	1.3
2018	-4.0	-2.9	-0.8	0.9	-0.9	1.5
2019	-4.2	-1.7	0.2	-1.2	-0.9	1.0
2020	-3.7	-1.2	-2.6	-1.2	-1.6	1.6
Average	-5.1	-2.1	-1.0	-0.1	-1.0	1.3

\*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.

Year	FPL/Gulf Consolidated - Accuracy of Retail Energy Sales Forecasts					
	Forecast Error Rate (%)				Years 0-2 (%)	
	Years Prior*				Average	Absolute Average
	3 Years	2 Years	1 Year	0 Years		
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

\*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.

**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*

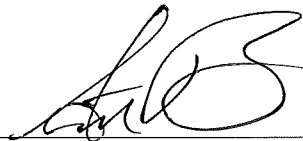
\_\_\_\_\_  
Jun K. Park

Date: 7/28/2021\_\_\_\_\_

**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.

  
\_\_\_\_\_  
Scott R. Bores

Date: 7/29/2021