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FPL's Response to Staff's Nineteenth Interrogatories
No. 221.

QUESTION:

Please refer to Witness Reed's Rebuttal Testimony, page 19, lines 5 through 8. Is it FPL's position that if the Commission doesn't approve its requested RSAM and Four Year Rate Plan FPL will not be able to access capital at favorable rates? If the answer is yes, please explain why not, and provide a detailed analysis of how it would affect FPL's credit ratings.

RESPONSE:

The question is not a proper inference to be drawn from FPL Witness Reed's testimony. Mr. Reed asserts that among the benefits to FPL and its customers of prior RSAM and multi-year rate plans is FPL's ability to access capital at favorable rates. FPL's prior multi-year plans were much more comprehensive than merely the inclusion of an RSAM. These comprehensive multi-year agreements, and the Company's successful strategy, supported by a constructive regulatory environment, have together provided an opportunity for FPL to access capital at favorable rates.

FPL's proposed Four Year Rate Plan as discussed by FPL witness Barrett in direct testimony page 65, line 22 through page 67, line 5, contains core components in addition to the RSAM which include: "necessary financial support, consistent with FPL's requested revenue increases for 2022 and 2023", the requested capital structure, and the requested ROE of 11.5% including the one-half percent performance incentive. FPL's prior multi-year rate plans similarly were comprehensive. Mr. Reed's testimony in the following two paragraphs beginning at line 10 of page 19, through line 2 of page 20, and referencing FPL witness Barrett's testimony, discusses additional benefits of the proposed Four Year Rate Plan enabled in part by the RSAM.

DECLARATION

I, Robert E. Barrett, sponsored the answer to Interrogatory No. 221 from Staff's Nineteenth Set of Interrogatories to Florida Power & Light Company in Docket No. 20210015-EI, and the response is 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.

A handwritten signature in cursive script that reads "Robert Barrett".

Robert E. Barrett

Date: 7/27/21