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FPL's Response to Staff's First Request for Admissions
Nos. 1-5.

QUESTION:

Customers should pay their fair share of costs associated with prudent utility plant investments in service, less accumulated reserve, from which the customers are receiving the associated utility service.

RESPONSE:

Admit, but see FPL's response to Staff Interrogatory 141.

QUESTION:

The matching principle can be defined as matching revenues with expenses for services rendered by a utility.

RESPONSE:

Admit, but see FPL's response to Staff Interrogatory 142.

QUESTION:

Recovery of prudent utility plant investments in service, less accumulated reserve, from customers should match the service lives of those plant investments in service in order not to violate the matching principle.

RESPONSE:

Deny.

QUESTION:

The purpose of the depreciation and dismantlement studies that the Commission requires electric regulated utilities to file periodically is to enable the Commission to gauge whether a utility is on-course with respect to collecting the appropriate amount of capital costs from customers over time and to take remedial action to achieve fairness between generations of customers if an imbalance is identified.

RESPONSE:

Deny.

QUESTION:

Inter generational inequity in utility regulation can be defined as one generation of customers subsidizing another generation of customers.

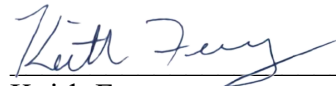
RESPONSE:

Admit, but see FPL's response to Staff's Interrogatory 145.

DECLARATION

I, Keith Ferguson sponsored the answers to question Nos. 1-5 from Staff's First Request for Admissions 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 answer identified above, and that the facts stated therein are true.



Keith Ferguson

Date: July 1, 2021