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FPL's Response to Staff's First Request for Production of
Documents Nos. 1–6.

(including attachments for No. 3.)

QUESTION:
T&D O&M

Please refer to FPL's witness Spoor's direct testimony, page 40, lines 22 through 23. Please provide a summary table of major distribution O&M cost categories in a similar format to the table presented in witness Spoor's direct testimony, page 37, line 17.

RESPONSE:

Please refer to the table for the Major Drivers segmented by Distribution

O&M							
(\$Millions)							
<u>Major Driver</u>	<u>2019</u>	<u>2020</u>	<u>2021</u>	<u>2022</u>	<u>2023</u>	<u>2019-2023</u>	
						(\$)	(%)
FPSC Storm Hardening/SPP	\$73.8	\$65.9	\$70.1	\$69.1	\$69.0	\$348.0	30%
Growth	\$5.1	\$4.4	\$4.3	\$4.4	\$4.7	\$22.9	2%
Reliability/Grid Modernization	\$11.4	\$8.4	\$10.1	\$10.3	\$10.4	\$50.6	4%
Grid Servicing/Support	\$140.7	\$135.4	\$127.1	\$131.5	\$137.3	\$672.1	59%
Regulatory Compliance	\$13.9	\$7.6	\$8.7	\$8.9	\$9.0	\$48.1	4%
Total	\$244.8	\$221.7	\$220.4	\$224.1	\$230.4	\$1,141.6	100%

Note: Totals may not add due to rounding.

QUESTION:
T&D O&M

Please refer to FPL's witness Spoor's direct testimony, page 40, lines 22 through 23. Please provide a summary table of major transmission O&M cost categories in a similar format to the table presented in witness Spoor's direct testimony, page 37, line 17.

RESPONSE:

Please refer to the table below for Major Drivers segmented by Transmission.

O&M							
(\$Millions)							
<u>Major Driver</u>	<u>2019</u>	<u>2020</u>	<u>2021</u>	<u>2022</u>	<u>2023</u>	<u>2019-2023</u>	
						(\$)	(%)
FPSC Storm Hardening/SPP	\$14.9	\$13.4	\$13.9	\$14.1	\$13.9	\$70.1	21%
Growth	\$1.1	\$0.6	\$0.0	\$0.0	\$0.0	\$1.6	0%
Reliability/Grid Modernization	\$19.1	\$18.1	\$17.3	\$17.2	\$17.3	\$89.1	27%
Grid Servicing/Support	\$32.1	\$28.7	\$34.7	\$30.9	\$30.3	\$156.7	47%
Regulatory Compliance	\$1.5	\$1.9	\$3.2	\$3.4	\$3.5	\$13.5	4%
Total	\$68.7	\$62.7	\$69.1	\$65.6	\$65.0	\$331.0	100%

Note: Totals may not add due to rounding.

QUESTION:

Energy Storage

Please refer to FPL's witness Broad's direct testimony, page 23, line 2, and witness Valle's direct testimony, Exhibit MV-7. For each battery storage project FPL is seeking cost recovery of, please provide a summary table including the project's name, location, status, in-service date, nameplate capacity, project goals, project cost, and \$/kW, in a format similar to Exhibit MV-7.

RESPONSE:

Please see responsive document provided.

QUESTION:

Please provide a work paper, in MS Excel format with formulas intact, to support your response to Staff's First Set of Interrogatories, No. 39.(a).

RESPONSE:

See FPL's response to Staff's First Set of Interrogatories No. 39.

QUESTION:

Please provide a work paper, in MS Excel format with formulas intact, to support your response to Staff's First Set of Interrogatories, No. 40.(a).

RESPONSE:

Please see responsive documents provided.