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FPL's Response to OPC's Eighteenth Interrogatories
Nos. 274-278.

QUESTION:

For purposes of supporting and justifying the cost of the NFRC that are submitted for recovery in this Docket No. 20210015-EI, please state whether the NFRC is being constructed solely to serve the retail (FPSC Jurisdictional) customers of FPL and Gulf. To the extent that a portion of the 850MW capacity of the NFRC is not being constructed to serve the retail load of FPL and Gulf, please also identify the capacity and corresponding costs of the NFRC (separated by capital and expense and by year (2022 -2025) that is related to capacity that will be designated or reserved for non-jurisdictional (wholesale) sales and will not be assigned or otherwise collected from FPL or Gulf retail customers.

RESPONSE:

The NFRC was planned and is being constructed for the purpose of optimizing the generating resources of FPL and Gulf through combined economic dispatch for the benefit of FPL and Gulf retail customers. All of the firm capacity of the line has been reserved by FPL and Gulf for such purposes on a long-term basis. Capacity that is not being used for economic dispatch of the FPL and Gulf systems for the benefit of native load will be released on an as available, non-firm basis for use by wholesale transmission customers, consistent with FERC's open access requirements.

QUESTION:

To the extent that a portion of the NFRC is being designed and constructed, for designation or reservation to serve both existing and future wholesale customers, please indicate whether the capability to serve *future* wholesale customers will require re-designation or reservation of capacity from the portion of the 850MW intended (for purposes of cost recovery in this Docket No.20210015-EI) to serve retail customers. To the extent such capacity would be re-allocated or re-designated from the capacity intended for retail customer service, please identify the expected amount by MW, and also identify the corresponding costs of the NFRC (separated by capital and expense and by year (2022 -2025) of such re-designated or re-allocated capacity and state how these costs are treated for retail cost recovery in this case.

RESPONSE:

The NFRC is not being designed or constructed for the purpose of serving existing or future wholesale customers. Please see response to OPCs Eighteenth Set of Interrogatories, Interrogatory No. 274.

QUESTION:

Please reference the Settlement Agreement between the Southern Companies, Florida Power & Light Company and Gulf Power Company, filed August 25, 2020 ("Settlement Agreement"), and found in the Federal Energy Regulatory Commission (FERC) public documents at Accession Number 20200825-5104 for the following questions:

- A. On page 3 of the Settlement Agreement, in Section 2.2 (defined terms) please state whether the term "**Additional NFRC Transmission Offerings**" encompasses transmission services that are intended primarily to effectuate retail service transactions or intended primarily to effectuate wholesale service transactions.
- B. Section E.2.1.2 states in part that:

FPL intends to perform studies (e.g., critical unit out analysis with projected unit commitments) to establish the range of transfers from the FPL-Gulf Transmission Deliveries that are expected to occur between Gulf and FPL for the various study timeframes (e.g., monthly, daily).

 - i. Please describe how the impacts identified in such "critical unit out analysis" described in the Settlement Agreement were incorporated into the CPVRR analysis supporting the NFRC that was described in the direct testimony of Witness Sim.
 - ii. Please identify all workpapers containing such CPVRR analysis and any documents discussing or describing such critical unit out analysis.
- C. In Section E.2.4.1 the Settlement Agreement provides that FPL/Gulf will make payments to Southern Companies for Improvements identified in Exhibit 1. Beyond the 14 Improvements listed in Exhibit 1 and totaling \$75.715 million (estimated), please identify by entity, project and estimated dollar amount, all other transmission system impacts (on another transmission system entity) that FPL/Gulf knows or has reason to know will be caused by the operation of the NFRC.
 - i. To the extent the requested impacts are not yet known please state with specificity (and by entity, project and estimated dollar amount, if dollar amount is known) the status of each such impact and the expected date of resolution of such impacts and the reason for such uncertainty as to impacts in light of the July 3, 2020 settlement date of the Southern Companies' impacts.
 - ii. Please identify all workpapers containing CPVRR analysis supporting the NFRC that you conducted, related to (and any documents discussing or describing) the impacts (cost of improvements to be paid by FPL/Gulf) that will be imposed on other (non-Southern Companies' transmission system(s)).

D. Section E.2.5.2.3 provides that "Southern Companies may restrict FPL-Gulf transmission Deliveries (or Additional Transmission Offerings) ..." under certain circumstances

- i. Pleases state how FPL/Gulf has accounted for and modeled the possibility of the Southern Companies unilaterally restricting deliveries as such possibility affects the CPVRR analysis supporting the NFRC that was described in the direct testimony of Witness Sim.
- ii. Please identify all workpapers incorporating the impact of such restricted deliveries in the CPVRR analysis supporting the NFRC and any documents discussing or describing the impacts on the NFRC and FPL/Gulf of such delivery restrictions.

E. In Exhibit 2, at page Exhibit 2-1, the Settlement Agreement states that:

[T]his section provides high level information on how FPL intends to perform planning in the Operations horizon and real-time operating for the Gulf Sub-BA, including the treatment of any Additional Transmission Offerings. Additional Transmission Offerings are considered non-firm and would include, for example, transmission service offerings from the Gulf Sub-BA to the rest of the FRCC. The total transfer between the Gulf Sub-BA and FPL Sub-BA from the FPL-Gulf Transmission Deliveries and Additional NFRC Transmission Offerings ("Total FPL-Gulf Transfer") shall not exceed the 850 MW limit of the NFRC in either direction.

- i. With respect to this provision at Exhibit 2-1 and the planning referenced therein, please identify all documents that quantify, forecast, project, or otherwise indicate, discuss, or describe the expected portion of the 850 MW maximum limit of the NFRC that will be available for Additional Transmission Offerings.
- ii. With respect to this provision at Exhibit 2-1 and the planning referenced therein, please identify all documents prepared for or presented to management that quantify, forecast, project, or otherwise indicate, discuss, or describe the capability of the NFRC to effectuate wholesale transactions. The scope of this interrogatory includes the identification of any engineering analyses supporting such quantification, forecast, projection, indication, discussion, or description of the capability of the NFRC to effectuate wholesale transactions.
- iii. With respect to this provision at Exhibit 2-1 and the planning referenced therein, please identify all documents prepared for or presented to management that quantify, forecast, project, or otherwise indicate, discuss, or describe the timeline(or timelines) for execution and completion of all affected system studies triggered or otherwise required by the construction and intended operation of the NFRC.

- iv. Please identify all documents containing status updates to management related to each of the initial presentation(s) made to management as described in (i), (ii) and(iii).
- v. Please state how FPL/Gulf has accounted for and modeled the use of the NFRC to effectuate Additional Transmission Offerings in the CPVRR analysis supporting the NFRC that was described in the direct testimony of Witness Sim.
- vi. Please identify all workpapers showing how FPL/Gulf has accounted for and modeled the use of the NFRC to effectuate Additional Transmission Offerings in the CPVRR analysis supporting the NFRC and any documents discussing or describing the impacts on the NFRC related to effectuating Additional Transmission Offerings.

RESPONSE:

- A. The term “Additional NFRC Transmission Offerings” refers to non-firm transmission capacity made available to third parties under the FPL or Gulf Open Access Transmission Tariffs on an as available basis to the extent such capacity is not being used for combined economic dispatch of the FPL and Gulf transmission systems. Please refer to FPL’s response to OPC’s Eighteenth Set of Interrogatories, No. 274.
- B.
 - i. Section E.2.1.2 is a section in the Settlement Agreement associated with operational protocols and procedures to ensure reliable operations. The “critical unit out analysis” in Section E.2.1.2 is performed as part of an operational reliability analysis to ensure that real time operations reliability is maintained for FPL’s customers not only during normal operations but also in the event of an unexpected generation loss in which additional capability for FPL-Gulf Transmission Deliveries is necessary. The use of “critical unit out analysis” used for real time operations is a different analysis and purpose than the analysis used for CPVRR purposes.
 - ii. There are no documents that are responsive to this request.
- C.
 - i. The only transmission system impacts are to Southern Company and Duke Energy Florida. Furthermore, please refer to FPL’s response to FRF’s First Set of Interrogatories No. 4.
 - ii. There are no documents that are responsive to this request.

D.

- i. Section E.2.5.2.3 is independent of the CPVRR analysis. As part of the agreement, Southern Company will plan and build its system to accommodate in a reliable manner for the full transfers of power used in the CPVRR analysis. However, there may be limited operational circumstances in which one or more facilities (e.g., generators, transmission lines, substation equipment, auto transformers) may be unavailable and could result in the need to limit FPL-Gulf transfers of power. The restriction of FPL-Gulf transmission deliveries in the context of Section E.2.5.2.3. is standard protocol to protect the system reliability and can only be exercised based on strict application of a real time and reliability need. Analyses that compare CPVRR costs of competing transmission-related options, such as the NFRC and wheeling, typically do not address such operational issues that could affect both options.
- ii. There are no documents that are responsive to this request.

E.

- i. There are no documents that are responsive to this request.
- ii. There are no documents that are responsive to this request.
- iii. Please see Attachment No. 1 to this response. Please note, non-responsive pages are not provided.
- iv. Please see response to E., subpart iii.
- v. FPL's CPVRR analysis for NFRC does not account or model Additional Transmission Offerings.
- vi. There are no documents that are responsive to this request.










Gulf Power Projects Update

October 29, 2019

Continued slow progress with Duke, new third party impacts showing up in planning studies

Florida Power & Light Company
Docket No. 20210015-EI
OPC's Eighteenth
Set of Interrogatories
Interrogatory No. 276
Attachment 1
Page 2 of 2

Status of Key Stakeholder Interactions

Entity	Need	Current Status	Status
COT	<ul style="list-style-type: none"> Adherence to Definitive Agreement Outage of Line 31 & 33 during construction 	<ul style="list-style-type: none"> Definitive Agreement formally signed on September 24th 30% design review underway with COT 	
Clay Electric	<ul style="list-style-type: none"> Approval of all four agreements Coordination of line outage during construction 	<ul style="list-style-type: none"> Verbal agreement reached on co-location; surveying in progress All definitive agreements finalized internally and submitted to Clay for review, expect response in early November 	
Duke Energy Florida	<ul style="list-style-type: none"> Approval of MOU Approval of transmission crossings, joint use, and fee-owned land 	<ul style="list-style-type: none"> First monthly meeting scheduled for November 20 Single Point of contact provided by Duke, team will continue outreach 	
Seminole Electric	<ul style="list-style-type: none"> Approval of Letter Agreement for Seminole's proposed transmission line 	<ul style="list-style-type: none"> Preliminary territorial mapping conducted internally and high-detail territorial survey process underway Solar PPA negotiations nearing completion Agreement letter sent for their review pertaining to Seminole's proposed transmission line 	
U.S. Forest Service	<ul style="list-style-type: none"> Publication of NOI 	<ul style="list-style-type: none"> Publication of NOI in Public Register now expected to occur in November due to backlog in Washington, DC office Public Scoping meeting also targeted for November pending NOI publication 	
Florida Forest Service	<ul style="list-style-type: none"> Approval of Wakulla State Forest crossing 	<ul style="list-style-type: none"> Further refinement of crossing exhibits needed following Sept 26 for Wakulla State Forest crossing; Agreed to use of corten poles along Lake Talquin State Forest easement 	
DEF, SoCo, MEAG	<ul style="list-style-type: none"> Confirmation of affected system and related project required to mitigate 	<ul style="list-style-type: none"> Facility Study to be issued on November 18, additional affected system: [Southern - est. \$60 MM, Duke - 17 new projects (TBD \$), MEAG - unknown] 	



QUESTION:

On the website for the Florida Reliability Coordinating Council, Inc. ("FRCC") at FRCC.Com, under "Planning," "Helpful Links," please refer to the document entitled "FRCC Regional Transmission Planning Process FRCC-MS-PL-018 Effective Date: 7/1/2020 Version: 5."

- A. On page 11 of 53 there is a reference to "The Long-Range Transmission Reliability Study ("Study")." Please state whether the impacts of the NFRC have been fully included in this Study performed by the FRCC. If the answer is that the impacts of the NFRC have been included in the Study, please state whether and to what extent the 850MW capacity limit of NFRC was evaluated or modeled in the Study as being dedicated to serve retail customer load.
- B. Please identify all documents supporting your answer to (A).
- C. Please identify all documents in your possession, custody or control containing, evaluating, describing, or discussing FRCC evaluations of the transmission service requests associated with the NFRC.
- D. Please identify all documents in your possession, custody or control containing evaluating, describing, or discussing studies that the FRCC has performed of the impacts of transmission service expected or intended to be carried over the NFRC.

RESPONSE:

- A. The impacts of the NFRC were not included in the 2020 Long-Range Transmission Reliability Study. However, it will be included in the 2021 Study.
- B. No responsive documents.
- C. Please refer to documents provided in FPL's response to OPC's Fifteenth Request for Production of Documents No. 139.
- D. Please refer to documents provided in FPL's response to OPC's Fifteenth Request for Production of Documents No. 139.

QUESTION:

In the June 16, 2021 deposition of Michael Spoor at page 85, the deponent testified that a utility such as FPL/Gulf can "re-dispatch or configure" the (bulk electric) system or "redirect" flows when, for example, a generator is off-line. Accordingly:

- A. Please state whether under re-dispatch scenarios that might occur under the operation of the NFRC, whether FPL/Gulf intends to take steps to mitigate adverse impacts to neighboring systems caused by transmission service over the NFRC.
- B. If the answer to (A) is that FPL/Gulf would take steps to mitigate such impacts in a re-dispatch scenario, please state whether such steps might include re-dispatch of FPL/Gulf generators such that the dispatch of the units would be in a manner *other than least cost*.
- C. If the impacts of such *other than least cost* dispatch as described in (A) and (B) may occur under operation of the NFRC, please state how, if at all, the impacts of such *another than least cost* dispatch scenario(s) was modeled in the CPVRR analysis supporting the NFRC that was described in the direct testimony of Witness Sim.
- D. Please identify workpapers containing such CPVRR analysis(es) described in (C) and any documents discussing or describing the impacts of such *other than least cost* dispatch scenarios that may occur under operation of the NFRC.

RESPONSE:

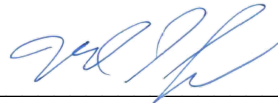
The context of Witness Spoor's response to questions during his deposition on June 16, 2021, pertaining to "re-dispatch or configure" was a general comment regarding the operation of the transmission grid.

- A. If a neighboring system experiences adverse impacts due to transfer of power across the NFRC, FPL would redispatch to maintain reliable operations.
- B. Steps taken to mitigate adverse impacts caused by transmission service over the NFRC under re-dispatch scenarios would be performed in a least cost manner while maintaining reliability.
- C. Not applicable. Please see response to A and B above.
- D. No responsive documents.

DECLARATION

I, Michael Spoor sponsored the answers to Interrogatory Nos. 274-275 and 277 and co-sponsored the answers to Interrogatory Nos. 276 and 278 from the Office of Public Counsel (OPC) Eighteenth 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.




Michael G. Spoor

Date: 07/23/2021

DECLARATION

I, Steven R. Sim co-sponsored the answers to Interrogatory Nos. 276 and 278 from the Office of Public Counsel (OPC) Eighteenth 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.




Steven R. Sim

Date: 7/22/2021

DECLARATION

I, Matthew Valle co-sponsored the answer to Interrogatory No. 276 from the Office of Public Counsel (OPC) Eighteenth 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.



Matthew Valle

Date: 7-22-21