

435

FPL's Response to OPC's First Request for
Production of Documents Nos. 13, 15, 19, 35-
36, 38-43, 48, 50.

(including supplemental responses for Nos. 13,
40-43, 35, and 36)

(including amended response to No. 36)

(including attachments for Nos. 40-43)

**Confidential Document Nos. 13, 15, 35, 36,
48, 50**

(Highly Sensitive 35, 36, 48)

Bates No. 00703-00735

QUESTION:

Please provide copies of all known reports, in searchable format, by investment firms on NextEra Energy and/or Florida Power & Light Company between January 1, 2020 and the present.

RESPONSE:

Objection filed, including FPL's general objections and specifically including but not limited to the objection to premature and unauthorized pre-Petition discovery, and considering the fact that the petition initiating the case has not yet been filed.

QUESTION:

Please provide copies of all known reports, in searchable format, by investment firms on NextEra Energy and/or Florida Power & Light Company between January 1, 2020 and the present.

RESPONSE:

Please see attached confidential reports. Note that reports included with this response are third-party material and are not owned or verified by FPL or NextEra Energy. Several investment firms declined to consent to the sharing of their reports, and reports from those firms have been excluded.

All documents responsive to OPC's 1st Request for Production of Documents No. 13, Second Supplemental, Bates Nos. 027773-028203, are confidential in their entirety.

QUESTION:

Please provide copies of credit reports for NextEra Energy and/or Florida Power & Light Company from the major credit rating agencies published since January 1, 2019.

RESPONSE:

Objection filed, including FPL's general objections and specifically including but not limited to the objection to premature and unauthorized pre-Petition discovery, and considering the fact that the petition initiating the case has not yet been filed.

QUESTION:

Please provide copies of the following FERC Form 1:

- a. Please provide a copy of the FPL's FERC Form 1 for Florida separately for each of the years 2015, 2016, 2017, 2018, and 2019.
- b. Please provide a copy of the Gulf's FERC Form 1 for Florida separately for each of the years 2015, 2016, 2017, 2018, and 2019.
- c. Please provide a copy of any consolidated FPL and Gulf FERC Form 1.

RESPONSE:

Objection filed, including FPL's general objections and specifically including but not limited to the objection to premature and unauthorized pre-Petition discovery, and considering the fact that the petition initiating the case has not yet been filed.

QUESTION:

MFR Workpapers. Within two weeks after filing the Minimum Filing Requirements (MFR) with the PSC, please provide any and all workpapers used to produce the schedules in the Company's MFR filing and please provide such workpapers electronically in Excel, with all formulas and calculations intact, or as a PDF in searchable format.

RESPONSE:

Objection filed, including FPL's general objections and specifically including but not limited to the objection to premature and unauthorized pre-Petition discovery, and considering the fact that the petition initiating the case has not yet been filed.

Florida Power & Light Company

Docket No. 20210015-EI

OPC's First Request for Production of Documents

PRIVILEGE LOG

<u>R/P or Interrog.</u>	<u>Date of</u>				<u>Subject Matter/Description of</u>	
<u>No.</u>	<u>Communication</u>	<u>Sender</u>	<u>Recipient</u>	<u>Recipient of Copies</u>	<u>Communication</u>	<u>Basis for Claim of Privilege</u>
R/P 63	12/18/2020	Office of the Corporate Secretary	NextEra Energy Board of Directors	Directors	Presentation to NextEra Energy Board of Directors regarding FPL's proposed 2021 Rate Case filing; pages 52-72	Attorney-Client Privilege; Work Product
R/P 63	2/11/2021	Office of the Corporate Secretary	NextEra Energy Board of Directors	Directors	Presentation to NextEra Energy Board of Directors regarding FPL's proposed 2021 Rate Case filing; pages 73-79	Attorney-Client Privilege; Work Product
R/P 63	3/12/2021	Office of the Corporate Secretary	NextEra Energy Board of Directors	Directors	Presentation to NextEra Energy Board of Directors regarding FPL's proposed 2021 Rate Case filing and other IOU 2021 Rate Case filings; pages 129-131	Attorney-Client Privilege; Work Product
R/P 35	6/4/2020	Tariff Alignment Team (legal and various business units)	FPL Management; M.Santos as Executive Sponsor of Tariff Alignment Project; Rate Case Planning Committee	Tariff Alignment Team and Management	"Recommendations ALL (Final-Updated)" - legal and tariff team recommendations on alignment of FPL and Gulf tariffs	Attorney-Client Privilege; Work Product
R/P 35	10/2/2020	Tariff Alignment Team (legal and various business units)	FPL Management; M.Santos as Executive Sponsor of Tariff Alignment Project; Rate Case Planning Committee	Tariff Alignment Team and Management	"Tariff Alignment Project Grandfathering Oct_2020" - legal and tariff team recommendations on grandfathering contracts and rates	Attorney-Client Privilege; Work Product
R/P 35	Sep-20	Tariff Alignment Team (legal and various business units)	FPL Management; M.Santos as Executive Sponsor of Tariff Alignment Project; Rate Case Planning Committee	Tariff Alignment Team and Management	"Tariff Definitions Abbreviations Rules and Regulations_Recommendation Matrix" - legal and various business units recommendations on revised tariff language	Attorney-Client Privilege; Work Product

Florida Power & Light Company

Docket No. 20210015-EI

OPC's First Request for Production of Documents

PRIVILEGE LOG

<u>R/P or Interrog. No.</u>	<u>Date of Communication</u>	<u>Sender</u>	<u>Recipient</u>	<u>Recipient of Copies</u>	<u>Subject Matter/Description of Communication</u>	<u>Basis for Claim of Privilege</u>
R/P 63	2/14/2019	Office of the Corporate Secretary	NextEra Energy Board of Directors	Directors	Presentation to NextEra Energy Board of Directors regarding FPL's legal strategy with respect to OPC's Petition for Rate Reduction; page 49	Attorney-Client Privilege; Work Product
R/P 63	2/14/2019	Office of the Corporate Secretary	NextEra Energy Board of Directors	Directors	Presentation to NextEra Energy Board of Directors regarding FPL's legal strategy with respect to the pending Ballot Initiative; pages 55-56	Attorney-Client Privilege; Work Product
R/P 63	5/23/2019	Office of the Corporate Secretary	NextEra Energy Board of Directors	Directors	Presentation to NextEra Energy Board of Directors regarding FPL's legal strategy with respect to OPC's Petition for Rate Reduction; pages 85-87	Attorney-Client Privilege; Work Product

QUESTION:

Testimony and Exhibits. Within two weeks after filing all testimony and exhibits attached to testimony, please provide any and all workpapers used to develop all testimony and exhibits attached to testimony. For any workpapers created electronically in Excel, please provide those spreadsheets with all formulas and calculations intact. For any workpapers created electronically in a PDF file, please provide that in searchable format.

RESPONSE:

Objection filed, including FPL's general objections and specifically including but not limited to the objection to premature and unauthorized pre-Petition discovery, and considering the fact that the petition initiating the case has not yet been filed.

QUESTION:

Testimony and Exhibits. Within two weeks after filing all testimony and exhibits attached to testimony, please provide any and all workpapers used to develop all testimony and exhibits attached to testimony. For any workpapers created electronically in Excel, please provide those spreadsheets with all formulas and calculations intact. For any workpapers created electronically in a PDF file, please provide that in searchable format.

RESPONSE:

Attached is FPL's amended file titled, "Support for 5 Percent Non-Solar Install Actual vs Budget" provided previously in the folder for witness Valle. The changes result in a variance of actual vs. budgeted non-solar install costs from 5.04% to 4.82%. Below is a summary of the changes (note: calculations based on the changes below are also reflected in the amended spreadsheet):

Martin Unit 8

- 1,107 MW changed to 787 MW based on the incremental new capacity additions to the two existing combustion turbine units. 1,107 MW is the total for the combined cycle power plant.
- Approved Plan of \$462.7 million changed to \$439 million to reflect the capital cost estimate included in Order number PSC-02-1743-FOF-E, issued December 10, 2002.

Manatee Unit 3

- Approved Plan \$552.8 million changed to \$551 million to reflect the capital cost estimate included in Order number PSC-02-1743-FOF-E, issued December 10, 2002.

Port Everglades Energy Center

- Actual \$1,142.2 million changed to \$1,139.5 million to reflect the value included in the final annual cost update letter provided to the Commission in May 2017.

Okeechobee Clean Energy Center

- 1,622 MW changed to 1,778 MW to reflect capacity improvements as detailed in FPL's 2018 Ten Year Site Plan.
- Actual \$1,219.4 million changed to \$1,223.3 million to reflect the value included in the final annual cost update letter provided to the Commission in Jan 2021.
- Added approved and actual schedule performance dates.

To provide more precise figures, the following changes were made:

- Cape Canaveral: approved Plan \$1,114.7 million changed to \$1,115.0 million and actual \$963.0 million changed to \$962.8 million.
- Riviera Beach: approved Plan \$1,275.6 million changed to \$1,276.0 million and actual \$1,271.4 million changed to \$1,272.0 million.
- Port Everglades Energy Center: approved Plan \$1,185.2 million changed to \$1,185.0 million.

QUESTION:

Testimony and Exhibits. Within two weeks after filing all testimony and exhibits attached to testimony, please provide any and all workpapers used to develop all testimony and exhibits attached to testimony. For any workpapers created electronically in Excel, please provide those spreadsheets with all formulas and calculations intact. For any workpapers created electronically in a PDF file, please provide that in searchable format.

RESPONSE:

Please see responsive documents provided for FPL witness Sim that address the analyses that determined that FPL's planned 2024 and 2025 solar projects are projected to be cost-effective. Please note, one of the files responsive to this request is confidential.

The document responsive to OPC's First Request for Production of Documents No. 36, Second Supplemental, Bates No. 042976, is confidential in its entirety

QUESTION:

Testimony and Exhibits. Within two weeks after filing all testimony and exhibits attached to testimony, please provide any and all workpapers used to develop all testimony and exhibits attached to testimony. For any workpapers created electronically in Excel, please provide those spreadsheets with all formulas and calculations intact. For any workpapers created electronically in a PDF file, please provide that in searchable format.

RESPONSE:

See responsive documents.

FPSC Report - April 2020

Average Number of Customers

Average Number of Customers for Investor-Owned Utilities
By Class of Service
2019

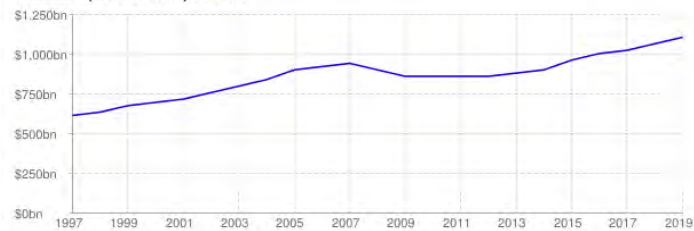
Utility	Residential	Commercial	Industrial	Other	Total
Duke Energy Florida	1,691,570	180,351	2,074	27,136	1,901,131
Florida Power & Light Co.	4,391,832	553,562	11,601	4,318	4,961,313
Florida Public Utilities Company	23,921	4,216	2	2,870	31,009
Gulf Power Company	405,462	56,678	251	592	462,983
Tampa Electric Company	670,517	74,895	1,588	9,254	756,254
Total	7,183,302	869,702	15,516	44,170	8,112,690

2019 \$1,106.50
Per day (365.25) \$3.03

FPL total sales 4,691,313
Gulf total Sales 462,983
FPL + Gulf 5,154,296
Total Investor-Owned 8,112,690
FPL Share based on Number of Customers 64%

\$1.92

Real GDP (2019 Dollars): Florida



Historical Real GDP (2019 Dollars) data for Florida

Date	Florida (Billions)
2019	\$1,106.500
2018	\$1,069.048
2017	\$1,031.967
2016	\$999.833
2015	\$963.320
2014	\$910.342
2013	\$883.607
2012	\$863.007
2011	\$854.173
2010	\$862.323
2009	\$857.501

FFPL SPP Programs												(\$ in millions)	
	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	Total SPP Costs	Annual Average Cost	
Distribution - Pole Inspections													
Operating Expenses	\$ 3.8	\$ 3.8	\$ 3.8	\$ 3.8	\$ 3.8	\$ 3.9	\$ 3.9	\$ 4.0	\$ 4.1	\$ 4.2	\$ 39.1	\$ 3.9	
Capital Expenditures	\$ 50.7	\$ 54.1	\$ 54.1	\$ 55.3	\$ 55.3	\$ 56.4	\$ 57.8	\$ 59.3	\$ 60.8	\$ 62.3	\$ 566.1	\$ 56.6	
Total	\$ 54.5	\$ 57.9	\$ 57.9	\$ 59.0	\$ 59.1	\$ 60.3	\$ 61.8	\$ 63.3	\$ 64.9	\$ 66.5	\$ 605.2	\$ 60.5	
# of Pole Inspections	150,000	150,000	154,000	154,000	154,000	154,000	154,000	154,000	154,000	154,000			
Transmission - Inspections													
Operating Expenses	\$ 1.3	\$ 1.0	\$ 1.0	\$ 1.0	\$ 1.0	\$ 1.0	\$ 1.0	\$ 1.0	\$ 1.0	\$ 1.0	\$ 10.5	\$ 1.0	
Capital Expenditures	\$ 34.5	\$ 31.2	\$ 27.9	\$ 67.5	\$ 54.6	\$ 52.0	\$ 53.3	\$ 54.6	\$ 56.0	\$ 57.4	\$ 489.0	\$ 48.9	
Total	\$ 35.8	\$ 32.2	\$ 28.9	\$ 68.5	\$ 55.6	\$ 53.0	\$ 54.3	\$ 55.7	\$ 57.0	\$ 58.4	\$ 499.5	\$ 50.0	
# of Structure Inspections	68,000	68,000	68,000	68,000	68,000	68,000	68,000	68,000	68,000	68,000			
Distribution - Feeder Hardening (1) (2)													
Operating Expenses	\$ 628.1	\$ 664.9	\$ 664.9	\$ 573.3	\$ 474.5	\$ 200.0	\$ -	\$ -	\$ -	\$ -	\$ 3,205.8	\$ 534.3	
Capital Expenditures	\$ 628.1	\$ 664.9	\$ 664.9	\$ 573.3	\$ 474.5	\$ 200.0	\$ -	\$ -	\$ -	\$ -	\$ 3,205.8	\$ 534.3	
Total	\$ 1,256.2	\$ 1,329.8	\$ 1,329.8	\$ 1,146.6	\$ 949.0	\$ 400.0	\$ -	\$ -	\$ -	\$ -	\$ 6,411.6	\$ 1,068.6	
# of Feeders (3)	300-350	300-350	300-350	300-350	250-350								
Distribution Lateral Hardening (1) (2)													
Operating Expenses	\$ 120.4	\$ 212.5	\$ 342.8	\$ 475.6	\$ 631.4	\$ 631.4	\$ 647.2	\$ 663.4	\$ 679.9	\$ 696.9	\$ 5,101.4	\$ 510.1	
Capital Expenditures	\$ 120.4	\$ 212.5	\$ 342.8	\$ 475.6	\$ 631.4	\$ 631.4	\$ 647.2	\$ 663.4	\$ 679.9	\$ 696.9	\$ 5,101.4	\$ 510.1	
Total	\$ 240.8	\$ 425.0	\$ 685.6	\$ 951.2	\$ 1,262.8	\$ 1,262.8	\$ 1,294.4	\$ 1,326.8	\$ 1,359.8	\$ 1,393.8	\$ 10,202.8	\$ 1,020.2	
# of Laterals (3)	220-230	300-350	400-500	600-700	800-900	800-900	800-900	800-900	800-900	800-900			
Transmission - Replacing Wood Structures													
Operating Expenses	\$ 0.2	\$ 0.2	\$ 0.2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 0.6	\$ 0.2	
Capital Expenditures	\$ 52.7	\$ 42.7	\$ 21.9	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 117.3	\$ 39.1	
Total	\$ 52.9	\$ 42.9	\$ 22.1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 117.9	\$ 39.3	
# of Structures to be Replaced	1,400-1,600	900-1,100	300-600										
Distribution - Vegetation Management													
Labor - Contractor	\$ 47.7	\$ 47.8	\$ 46.9	\$ 46.9	\$ 47.1	\$ 47.1	\$ 46.3	\$ 45.5	\$ 44.6	\$ 43.8	\$ 463.7	\$ 46.4	
Labor - FPL	\$ 1.3	\$ 1.4	\$ 1.4	\$ 1.5	\$ 1.5	\$ 1.6	\$ 1.5	\$ 1.5	\$ 1.5	\$ 1.5	\$ 14.7	\$ 1.5	
Equipment - Contractor	\$ 11.9	\$ 12.0	\$ 11.7	\$ 11.7	\$ 11.8	\$ 11.8	\$ 11.6	\$ 11.4	\$ 11.2	\$ 11.0	\$ 115.9	\$ 11.6	
Equipment - FPL	\$ 0.1	\$ 0.1	\$ 0.1	\$ 0.1	\$ 0.1	\$ 0.1	\$ 0.1	\$ 0.1	\$ 0.1	\$ 0.1	\$ 1.4	\$ 0.1	
Total	\$ 61.1	\$ 61.3	\$ 60.2	\$ 60.2	\$ 60.6	\$ 60.6	\$ 59.5	\$ 58.5	\$ 57.4	\$ 56.4	\$ 595.7	\$ 59.6	
# of Miles Maintained	15,200	15,200	15,200	15,200	15,200	15,200	15,200	15,200	15,200	15,200			
Transmission - Vegetation Management													
Labor - Contractor	\$ 6.7	\$ 6.7	\$ 6.6	\$ 6.7	\$ 7.2	\$ 7.2	\$ 7.4	\$ 7.6	\$ 7.8	\$ 7.9	\$ 71.7	\$ 7.2	
Labor - FPL	\$ 0.5	\$ 0.5	\$ 0.5	\$ 0.5	\$ 0.5	\$ 0.6	\$ 0.6	\$ 0.6	\$ 0.6	\$ 0.6	\$ 5.3	\$ 0.5	
Equipment - Contractor	\$ 1.7	\$ 1.7	\$ 1.7	\$ 1.7	\$ 1.8	\$ 1.8	\$ 1.8	\$ 1.9	\$ 1.9	\$ 2.0	\$ 17.9	\$ 1.8	
Equipment - FPL	\$ 0.1	\$ 0.1	\$ 0.1	\$ 0.1	\$ 0.1	\$ 0.1	\$ 0.1	\$ 0.1	\$ 0.1	\$ 0.2	\$ 1.4	\$ 0.1	
Total	\$ 9.0	\$ 8.9	\$ 8.9	\$ 9.0	\$ 9.7	\$ 9.7	\$ 9.9	\$ 10.2	\$ 10.4	\$ 10.7	\$ 96.4	\$ 9.6	
# of Miles Maintained	7,000	7,000	7,000	7,000	7,000	7,000	7,000	7,000	7,000	7,000			
Substation Storm surge/Flood Mitigation													
Operating Expenses	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
Capital Expenditures	\$ 3.0	\$ 10.0	\$ 10.0	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 23.0	\$ 7.7	
Total	\$ 3.0	\$ 10.0	\$ 10.0	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 23.0	\$ 7.7	
# of Substations	1	2	5 to 7										
Total SPP Costs	\$ 964.7	\$ 1,090.7	\$ 1,195.8	\$ 1,245.6	\$ 1,290.9	\$ 1,014.9	\$ 832.7	\$ 851.0	\$ 869.7	\$ 889.0	\$ 10,245.0	\$ 1,271.1	

(1) Project level detail for 2020 in Appendix
(2) Costs include previous year(s) projects carried over to current year's project costs and future year's preliminary project costs (e.g., engineering)
(3) # of feeders or lateral to be initiated in the current year

FPL CO2 rate (lbs/MWh)

1,029 2001 rate

627 2020 rate

402 difference in rate

39% % difference 2001 to 2020

Electric Power Sector Emissions & Generation 2020**Annual Energy Outlook 2021**

ref2021

d113020a

released

January 2021

Reference case

8. Electricity Supply, Disposition, Prices, and Emissions

(billion kilowatthours, unless otherwise noted)

Supply, Disposition, Prices, and Emissions**2020****Net Generation by Fuel Type****Electric Power Sector 1/****Power Only 2/**

Coal	756
Petroleum	14
Natural Gas 3/	1,390
Nuclear Power	785
Pumped Storage/Other 4/	1
Renewable Sources 5/	751
Distributed Generation	
(Natural Gas)	0
Total	3,697
Combined Heat and Power 6/	
Coal	10
Petroleum	1
Natural Gas	132
Renewable Sources	4
Other	0
Total	147
Total Net Electric Power Sector	
Generation	3,844
Less Direct Use	15

Net Available to the Grid **3,829****Electric Power Sector Emissions****1/**

Sulfur Dioxide (million short tons)	0.61
Nitrogen Oxide (million short tons)	0.77
Mercury (short tons)	3.38

18. Energy-Related Carbon Dioxide Emissions by Sector and Source

(million metric tons carbon dioxide, unless otherwise noted)

Sector and Source	2020
Electric Power 6/	
Petroleum	12
Natural Gas	643
Coal	767
Other 7/	10 million short tons
Total Electric Power	1,432 1578.461766

Electric Power Sector Average Rates		
SO ₂	0.32	lbs/MWh
NO _x	0.40	lbs/MWh
CO ₂	824.39	lbs/MWh

Rates: Percent Below Electric Power Sector Avg		
	FPL	
SO ₂		97.8%
NO _x		77.1%
CO ₂		23.9%
*Negative numbers mean above avg		

QUESTION:

Testimony and Exhibits. Within two weeks after filing all testimony and exhibits attached to testimony, please provide any and all workpapers used to develop all testimony and exhibits attached to testimony. For any workpapers created electronically in Excel, please provide those spreadsheets with all formulas and calculations intact. For any workpapers created electronically in a PDF file, please provide that in searchable format.

RESPONSE:

Please see responsive documents that further address the analyses of solar additions planned from 2022-2025 as shown in the current Step 3 analysis, as well as documents used to determine the duration needed for storage firm capacity in both the initial and current Steps 1 and 2 analyses. Please note, all the responsive documents are confidential.

The documents responsive to OPC's First Request for Production of Documents No. 36, Fourth Supplemental, Bates Nos. 064571-064611, 064617-064620, 064780-064781 & 064827 are confidential in their entirety

QUESTION:

Chart of Accounts. Please provide the detailed chart of accounts used by FPL during the test year, and how the accounts used by the Company relate to and correspond with the FERC Uniform System of Accounts for Electric Utilities. If this is in a PDF document, please provide that document in searchable format.

RESPONSE:

Objection filed, including FPL's general objections and specifically including but not limited to the objection to premature and unauthorized pre-Petition discovery, and considering the fact that the petition initiating the case has not yet been filed.

QUESTION:

Chart of Accounts. Please provide the detailed chart of accounts used by Gulf Power during the test year, and how the accounts used by the Company relate to and correspond with the FERC Uniform System of Accounts for Electric Utilities. If this is in a PDF document, please provide that document in searchable format.

RESPONSE:

Objection filed, including FPL's general objections and specifically including but not limited to the objection to premature and unauthorized pre-Petition discovery, and considering the fact that the petition initiating the case has not yet been filed.

QUESTION:

Books and Records. Please provide a complete copy of FPL's detailed general ledger for 2019, 2020 and 2021 to date in unlocked and searchable format.

RESPONSE:

Objection filed, including FPL's general objections and specifically including but not limited to the objection to premature and unauthorized pre-Petition discovery, and considering the fact that the petition initiating the case has not yet been filed.

QUESTION:

Books and Records. Please provide a complete copy of FPL's detailed general ledger for 2019, 2020 and 2021 to date in unlocked and searchable format.

RESPONSE:

FPL's supplemental response served on April 6, 2021 indicated it would file a second supplemental response once it had publicly released information for 2021 actuals, which occurred on April 23, 2021.

Please see responsive documents provided for the period of January through March 2021.

QUESTION:

Books and Records. Please provide a complete copy of Gulf Power's detailed general ledger for 2019, 2020 and 2021 to date in unlocked and searchable format.

RESPONSE:

Objection filed, including FPL's general objections and specifically including but not limited to the objection to premature and unauthorized pre-Petition discovery, and considering the fact that the petition initiating the case has not yet been filed.

QUESTION:

Books and Records. Please provide a complete copy of Gulf Power's detailed general ledger for 2019, 2020 and 2021 to date in unlocked and searchable format.

RESPONSE:

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Please see responsive documents provided for the period of January through March 2021.

QUESTION:

Books and Records. Please provide a copy of FPL's trial balances for December 31, 2020 including closing and adjusting entries and monthly for 2021 to date, in unlocked and searchable format.

RESPONSE:

Objection filed, including FPL's general objections and specifically including but not limited to the objection to premature and unauthorized pre-Petition discovery, and considering the fact that the petition initiating the case has not yet been filed.

QUESTION:

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QUESTION:

Books and Records. Please provide a copy of Gulf Power's trial balances for December 31, 2020 including closing and adjusting entries and monthly for 2021 to date, in unlocked and searchable format.

RESPONSE:

FPL's supplemental response served on April 6, 2021 indicated it would file a second supplemental response once it had publicly released information for 2021 actuals, which occurred on April 23, 2021.

Please see responsive documents provided for the period of January through March 2021.

QUESTION:

Incentive Compensation. Please provide a copy of each of FPL's incentive compensation/bonus plans for 2019, 2020, and 2021 in searchable format.

RESPONSE:

Objection filed, including FPL's general objections and specifically including but not limited to the objection to premature and unauthorized pre-Petition discovery, and considering the fact that the petition initiating the case has not yet been filed.

QUESTION:

Pensions. Please provide a copy of FPL's most recent pension plan and post-retirement benefits actuarial studies in unlocked and searchable format.

RESPONSE:

Objection filed, including FPL's general objections and specifically including but not limited to the objection to premature and unauthorized pre-Petition discovery, and considering the fact that the petition initiating the case has not yet been filed.