

**448**

FPL's Response to CLEO/ Vote Solar's Third  
Interrogatories Nos. 123, 137.

**QUESTION:**

Please describe how FPL is allocating costs of the North Florida Resiliency Connection (NFRC) between Gulf customers and FPL customers, and its basis for this allocation.

**RESPONSE:**

The costs of the North Florida Resiliency Connection (NFRC) are not allocated between Gulf customers and FPL customers in FPL's consolidated cost of service study. FPL's consolidated cost of service study allocates the NFRC to all customers as Transmission plant. As stated in the testimony of witness Dubose, page 27, lines 18-23, "With the exception of transmission pull-offs that are required to connect transmission voltage customers to the grid, transmission costs have been allocated on the basis of 12 CP. All transmission costs classified to demand are allocated to the individual rate classes based on their 12 CP contributions, adjusted for losses. Costs associated with transmission pull-offs are classified as customer-related and allocated only to transmission voltage customers."

QUESTION:

Refer to the Direct Testimony of Witness Sim, page 43, lines 21-22. For the battery storage resources offered to the AURORA model, please provide, for each of the years in which it was offered as a resource option:

- a. Capacity (MW)
- b. Firm capacity (%)
- c. Duration
- d. Overnight capital cost (\$/kW)
- e. Fixed O&M costs

RESPONSE:

- a. For the Step 1 (Gulf stand-alone) and Step 2 (the separate, but connected Gulf utility) analyses, the capacity for Gulf-sited batteries is 20 MW with durations of 2-hour, 3-hour, and 4-hour. For both the Step 2 analyses for the FPL stand-alone system, and Step 3 analyses of the integrated FPL/Gulf system, batteries have a capacity of 100 MW with a duration ranging from 2.5 to 4-hours.
- b. 100% of the nameplate ratings were assumed to be firm capacity.
- c. Please see subpart (a) to this response.
- d. This information has been previously provided in FPL's supplemental, second supplemental, and fourth supplemental response to OPC's First Request for Production of Documents No. 36. Please refer to FPL's responses to those requests.
- e. Please see subpart (d) to this response.

**DECLARATION**

I, Tara B. DuBose sponsored the answer to Interrogatory No. 123 from The CLEO Institute and Vote Solar's Third 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.

*Tara B. DuBose*

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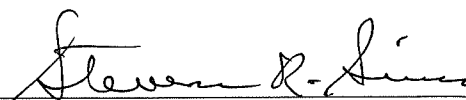
Tara B. DuBose

Date: 06-14-2021

DECLARATION

I, Steven R. Sim sponsored the answers to Interrogatory Nos. 127-137 and co-sponsored the answers to Interrogatory Nos. 124-125 from The CLEO Institute and Vote Solar's Third 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.

  
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Steven R. Sim

Date: 6 / 11 / 2021