

FPL's Response to CLEO/Vote Solar's First Request for
Production of Documents Nos. 38, 40, 47.

(including attachments for Nos. 38, 47)

QUESTION:

Please refer to Witness Spoor's testimony, p. 16, lines 3-4. Please provide all data, analyses, assumptions, and spreadsheets supporting the statement that "during Tropical Storm Eta's 'double' Florida landfall in 2020, FPL's smart grid technology investments helped avoid more than 140,000 outages".

RESPONSE:

FPL maintains a list of customer interruptions avoided by circuit number for those circuits that experienced an outage associated with the event, where smart grid technology helped avoid approximately 140,000 outages.

Please see responsive documents provided.



December 4, 2020

Adam Teitzman
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Subject: FPL Storm Event Notification for Tropical Storm Eta, Per Rule 25-6.0143(1)(d), F.A.C. – Amount to Exceed \$10 million

Dear Mr. Teitzman,

Pursuant to Rule 25-6.0143(1)(d), F.A.C., Florida Power & Light Company ("FPL") is notifying the Commission that its storm restoration costs associated with Tropical Storm Eta will exceed the \$10 million threshold contained within the Rule.

Eta's double landfall resulted in impacts to customers throughout FPL's service territory. In each case, FPL followed its well developed and systematic plan to respond to such a weather event, which includes obtaining and pre-staging resources in advance of the storm. FPL mobilized a workforce of approximately 12,000 personnel (i.e., FPL employees and external utilities and contractor personnel from multiple states, including Florida) dedicated to the restoration effort.

In total, FPL restored service to approximately 420,000 customers. Preliminary estimates show the company's smart grid technology helped avoid approximately 140,000 outages and helped speed restoration. The leading cause of outages was vegetation blowing into power lines. More than 80 drones were deployed to help crews visualize damage in hard to access areas.

If you have any questions, please do not hesitate to contact me at (561) 691-7554.

Regards,

A handwritten signature in black ink, appearing to read 'David Hughes', is written over a horizontal line.

David Hughes
Assistant Controller, FPL

cc: Andrew Maurey, Director of Accounting & Finance, Florida Public Service Commission
Judy Harlow, Director of Economics, Florida Public Service Commission
J.R. Kelly, Public Counsel, Office of Public Counsel

QUESTION:

Please refer to Witness Spoor's testimony, p. 16, lines 18-20. Please provide all data, analyses, assumptions, and spreadsheets demonstrating how FPL targets "interruptions' causes that, if remedied/repared, will result in the largest benefits for customers".

RESPONSE:

Please refer to FPL and Gulf's Annual Reliability Filings to the Florida Public Service Commission available at:

<http://www.psc.state.fl.us/ElectricNaturalGas/ElectricDistributionReliability>

QUESTION:

Please refer to Witness Spoor's testimony, Exhibit MS-6. Please provide all data, analyses, assumptions, and spreadsheets supporting the calculation of 1,613,329 avoided customer interruptions from AFS.

RESPONSE:

Please see responsive document provided.