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**FPL's Response to LULAC's Third Interrogatories  
Nos. 36-37.**

QUESTION:

Please refer to Mr. Chapel's rebuttal testimony, page 6, line 15, referencing "an existing voluntary policy . . . to suspend disconnections during extreme cold and heat events." Please describe this policy.

RESPONSE:

FPL/Gulf have a voluntary policy that suspends disconnection for non-payment due to extreme cold and heat conditions.

- Extreme heat: FPL/Gulf suspends disconnection for non-payment in an FPL geographic operating area if a Heat Advisory is issued and/or two or more consecutive days are forecasted to reach 97 degrees Fahrenheit or greater.
- Extreme cold: Disconnection for non-payment is suspended in an FPL geographic operating area if the temperature is expected to reach 34 degrees Fahrenheit or below for FPL and 32 degrees Fahrenheit or below for Gulf Power.

QUESTION:

Please refer to Mr. Chapel's rebuttal testimony, page 6, lines 12-14, referencing how FPL "already suspends disconnections in geographic areas that are forecasted to be impacted and that are impacted by severe weather events such as hurricanes." Please describe the criteria FPL uses to make the decisions regarding suspension of disconnections for severe weather events. Please provide a list of all such suspensions, along with the dates of such suspensions, and the geographic areas impacted by such suspensions.

RESPONSE:

Subject to and without waiving FPL's specific objections filed on July 19, 2021 and general objections filed contemporaneously with this response, FPL responds as follows:

FPL considers the well-being of our employees and the impact to our customers as we make decisions regarding suspensions of disconnections for severe weather events. In the case of severe weather events such as hurricanes, FPL suspends disconnections based on the Florida State of Emergency declaration for impacted geographic regions. In addition, FPL considers other factors that may accelerate or expand the suspension of disconnects beyond the State of Emergency, such as:

- Ability to receive and process payments
- Availability of resources to reconnect power
- Ability for our Care Center to take regular inbound calls from our customers

The policy for extreme heat/cold events is addressed in FPL's response to LULAC, ECOSWF, and Florida Rising's Third Set of Interrogatories No. 36.

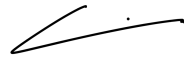
The disconnect suspension data is included in Attachment No. 1 to this response. Extreme weather and storm disconnect suspension data for Gulf Power prior to January 2020, while Gulf Power's billing systems were under Southern Company, is not available.

Please note that these suspension periods are in addition to the COVID-19 pandemic suspension for FPL and Gulf Power.

**DECLARATION**

I, Christopher Chapel, sponsored the answers to Interrogatory Nos. 36-37 from the Florida Rising, League of United Latin American Citizens, and Environmental Confederation of Southwest Florida 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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Christopher Chapel

Date: 7.21.21