

**FPL's Response to LULAC's Third Request for
Production of Documents Nos. 29-32.**

QUESTION:

Please refer to Mr. Spoor's rebuttal testimony, page 11, lines 2-4, regarding that "continued investments are necessary to maintain the current exceptional level of reliability and to continue to make improvements over time." Please provide all analyses and documents supporting this assertion.

RESPONSE:

The specifics of FPL's T&D reliability program are discussed in detail in Section II, VI, VIII, and X of Mr. Spoor's direct testimony and Section II of Mr. Spoor's rebuttal testimony. Please also see FPL's response to OPC's First Request for Production of Documents No. 36 Supplemental, file name "Rate Case Backup- Spoor Testimony.pdf" in Witness Spoor's folder for breakdown of the future capital investments in Reliability/Grid Modernization.

QUESTION:

Please refer to Mr. Spoor's rebuttal testimony, page 12, lines 10-12, regarding that "it will require continued investment and focus by FPL to just maintain that superior level of service for our customers." Please provide all analyses and documents supporting this assertion.

RESPONSE:

Please refer to FPL's response to LULAC-ECOSWF-FL Rising's Third Request Production of Documents No. 29.

QUESTION:

Please refer to Mr. Spoor's rebuttal testimony, page 12, line 17, that the "overwhelming majority of costs for the work detailed above is to maintain FPL's current reliability apart from any improvements to it." Please provide all analyses and documents supporting this assertion.

RESPONSE:

Please refer to FPL's response to LULAC-ECOSWF-FL Rising's Third Request Production of Documents, No. 29.

QUESTION:

Please refer to Mr. Spoor's rebuttal testimony, page 12, line 20, that "a vast majority of these capital investments will continue to benefit the T&D system and FPL's customers over the life of these investments." Please provide all analyses and documents supporting this assertion.

RESPONSE:

Please refer to FPL's response to LULAC-ECOSWF-FL Rising's Third Request Production of Documents, No. 29.