

455

**FPL's Response to FIT's Second Interrogatories
Nos. 26-31.**

QUESTION:

For each year from 2006 to and through 2021 as of June 30, 2021, identify the number of utility distribution poles FPL and Gulf Power replaced as a result of the implementation of Grade B construction standards for utility poles.

RESPONSE:

Please see FPL's specific objection to this request served on July 19, 2021 and general objections served contemporaneously with this response.

To promote the strengthening of Florida's electric infrastructure and to improve resiliency following the severe 2004 and 2005 hurricane seasons, the Florida Public Service Commission adopted extensive storm hardening initiatives. As a result, all distribution pole installations and replacements for FPL and Gulf since 2007 meet the National Electrical Safety Code's (NESC) Grade B construction standard. These programs were approved by the Commission in 2007 and subsequent Storm Hardening Plan filings and the 2020 Storm Protection Plan.

QUESTION:

For each year from 2006 to and through 2021 as of June 30, 2021, identify how many utility distribution poles FPL and Gulf Power installed that met Grade B construction standards, excluding the poles identified in response to FIT's Interrogatory 26, above.

RESPONSE:

Please see FPL's specific objection to this request served on July 19, 2021 and general objections served contemporaneously with this response.

Notwithstanding objection, please refer to FPL's response to FIT's Second Set of Interrogatories, No. 26.

QUESTION:

Identify the height of each Grade B construction standard pole installed by FPL and Gulf Power since January 1, 2006.

RESPONSE:

See FPL's response to FITs First Request for Production of Documents No. 13 for years 2018 through 2021. Additionally, see Attachments 1 and 2 to this response for year 2017.

QUESTION:

For Gulf Power prior to the merger with FPL, please identify for test year 2020:

- a. total pole attachment revenues;
- b. total electric service revenues;
- c. average monthly electric service customer bill;
- d. total number of electric service customers;
- e. total kilowatt hours;
- f. average monthly kilowatt hours per customer

RESPONSE:

Please refer to FPL's response to FIT's First Set of Interrogatories, No. 4 and Gulf's 2020 FERC Form 1 found here: <http://www.psc.state.fl.us/UtilityRegulation/AnnualReport>

QUESTION:

Referring to MFR, 2022 test year, Vol. 3 of 8, Section C, referring to Account No. 454 Rent from Electric Property – Pole Attachments for test year 2022. Please identify each of the following attributable to Gulf Power disaggregated from the totals for the consolidated FPL and Gulf Power:

- a. total pole attachment revenues;
- b. total electric service revenues;
- c. average monthly electric service customer bill;
- d. total number of electric service customers;
- e. total kilowatt hours;
- f. average monthly kilowatt hours per customer.

RESPONSE:

- a. Please refer to MFR C-04 for Gulf Power Standalone for the 2022 Test Year.
- b. Please refer to response to subpart (a) above.
- c. Subpart (b) / Subpart (d) / 12
- d. There are projected to be an average of 478,941 retail customers for test year 2022. Refer to FPL's supplemental response to OPC's First Request for Production of Documents No. 35, in the load forecasting subfolder: \Customers\energy_build\ file named "gulf_energy_build_v8".
- e. There are projected to be a total of 10,843,036,589 retail kWh for test year 2022. Refer to FPL's supplemental response to OPC's First Request for Production of Documents No. 35, in the load forecasting subfolder: \Customers\energy_build\ file named "gulf_energy_build_v8".
- f. Subpart (e) / Subpart (d) / 12

QUESTION:

Referring to MFR, 2023 test year, Vol. 3 of 8, Section C, referring to Account No. 454 Rent from Electric Property – Pole Attachments for test year 2023. Please identify each of the following attributable to Gulf Power disaggregated from the totals for the consolidated FPL and Gulf Power:

- a. total pole attachment revenues;
- b. total electric service revenues;
- c. average monthly electric service customer bill;
- d. total number of electric service customers;
- e. total kilowatt hours;
- f. average monthly kilowatt hours per customer.

RESPONSE:

- a. Please refer to MFR C-04 for Gulf Power Standalone for the 2023 Subsequent Year.
- b. Please refer to response to subpart (a) above.
- c. Subpart (b) / Subpart (d) / 12
- d. There are projected to be an average of 483,762 retail customers for test year 2023. Refer to FPL's supplemental response to OPC's First Request for Production of Documents No. 35, in the load forecasting subfolder: \Customers\energy_build\ file named "gulf_energy_build_v8".
- e. There are projected to be a total of 10,831,818,047 retail kWh for test year 2023. Refer to FPL's supplemental response to OPC's First Request for Production of Documents No. 35, in the load forecasting subfolder: \Customers\energy_build\ file named "gulf_energy_build_v8".
- f. Subpart (e) / Subpart (d) / 12