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FPL's Response to OPC's Fourth
Production of Documents Nos. 14, 16-
18, 23-27, 29

**(Nos. 14, 16-18, 23-25, 27, and 29
have attachments)**

QUESTION:

Please provide any documents related to the analyses of the DSCADA program and equipment described in the company's response to Interrogatory No. 23.

RESPONSE:

FPL's 2023-2032 Storm Protection Plan filed on April 11, 2022 (Docket No. 20220051-EI) does not contain any spend for DSCADA. Please see the attached responsive document.

QUESTION:

Please provide the outage data referenced in Interrogatory No. 27 (a)(iv) and (v).

RESPONSE:

Please see the responsive document attached.

QUESTION:

Please provide the written protocols for the Undergrounding Pilot Program.

RESPONSE:

Please see the responsive documents attached:

- “UG Lateral Conceptual Guidelines”
- “UG Lateral Design Guidelines”
- “SSUP Conceptual Design Package Deliverables”.

Also, please see FPL’s response to OPC’s 4th set of Production of Documents No. 18.

QUESTION:

Please provide any reports or studies identified in Interrogatory No. 28(c) re: the Undergrounding Pilot Program.

RESPONSE:

Please refer to FPL's responsive documents:

- "Eta Report"
- "Isaias Report"
- "SSUP – OH Construction Considerations"
- "SSUP Pilots of Whole Area at a Time"

QUESTION:

Please provide the documents identified in and used to respond to Interrogatory No. 45.

RESPONSE:

Please see the responsive document attached, which includes a purchase order depicting the approximate hourly equipment rental rate.

QUESTION:

Please provide all files (kmz or equivalent format) showing the location for proposed access road improvements discussed in Interrogatory No. 45(k).

RESPONSE:

FPL does not have a kmz or equivalent format file showing locations of the proposed transmission access road improvements. Please see the attached responsive document showing the images and locations of the proposed access road improvements.

QUESTION:

Please provide maps (kmz or equivalent format) for the following feeders showing the main line as well as laterals to be undergrounded. Include lateral identification number on the maps.

- a. Scottsmoor 105061
- b. Hillsboro 404732
- c. Loxahatchee 407666
- d. Imagination 704264
- e. Cutler 802037

RESPONSE:

Please see the responsive confidential documents attached which depict the requested feeder and associated laterals. However, these maps do not contain lateral identification numbers.

QUESTION:

Please provide any documents referenced in or used to respond to Interrogatory No. 49, including preliminary plans for corrective action (relocation, berms, raising control house, etc.).

RESPONSE:

Please see the responsive documents attached, including 3 confidential and 1 non-confidential attachments.

- “Construction Plans - Gracewood Flood Wall - CONFIDENTIAL”
- “Construction Plans - Lewis Flood Wall - CONFIDENTIAL”
- “Construction Plans - Chambers Substation Floodwall - CONFIDENTIAL
- “2023 Flood Mitigation Scope of Work”

QUESTION:

Please provide maps (kmz or equivalent format) depicting the elevation of each substation referenced in response to Interrogatory No. 50, and FPL's projected elevation of the flood water, as discussed in Interrogatory No. 50(d).

RESPONSE:

Please see the responsive confidential document attached.

QUESTION:

Please provide all documents identified in Interrogatory No. 56.

RESPONSE:

Please see the attached responsive documents which addresses extensive efforts by FPL to manage costs in recent storms.