

66

OPC's Response to FPL's First
Production of Documents Nos. 1-8

(No. 1 has attachments)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of Storm Protection Plan,
pursuant to Rule 25-6.030, F.A.C., Florida
Power & Light Company.

DOCKET NO. 20220051-EI

FILED: June 20, 2022

**CITIZENS' RESPONSE TO FLORIDA POWER & LIGHT FIRST REQUEST FOR
PRODUCTION OF DOCUMENTS (NOS. 1-8)**

The Citizens of the State of Florida, (OPC) by and through Richard Gentry, Public Counsel, by the requirements set forth in the Commission Order No. PSC-2022-0119-PCO-EI, Rule 28-106.206, Florida Administrative Code, and Rule 1.350, Florida Rules of Civil Procedure, submit the following response to the First Request for Production of Documents (Nos. 1-8) propounded by Florida Power & Light on May 31, 2022.

DOCUMENTS REQUESTED

- 1. Please provide the resume or curriculum vitae for all outside witnesses, experts, or consultants retained by OPC for purposes of FPL's SPP docket.**

OPC Response:

Kollen: Refer to Exhibit LK-1 attached to Mr. Kollen's Direct Testimony.
Mara: Please see the attached responsive document, Bates Nos. 000002-000008.

- 2. Please provide the agreements, contracts, or other documents used by OPC to retain each outside witnesses, experts, or consultants for purposes of FPL's SPP docket.**

OPC Response:

Please see the attached responsive documents regarding Docket No. 20220051, Bates Nos. 000015-000022; 000023-000030.

3. **Please provide copies of any analyses, studies, statements, testimonies, exhibits, or other documents related to the review of storm hardening and storm preparedness programs in Florida during the past five (5) years by all outside witnesses, experts, or consultants.**

OPC Response:

Kollen: Refer to Mr. Kollen's Direct Testimonies and the underlying records, including discovery responses, in Docket Nos. 20190038-EI, 20200067-EI, 20200172-EI, 20200241-EI, 20210178-EI, and 20210179-EI. The public versions of these testimonies and the other public records in those proceedings are available on the Commission website.

Mara: Please refer to Mr. Mara's testimony in the 2020 SPP Dockets for FPL and Gulf (Docket Nos. 20200070 and 20200071).

4. **Please provide a copy of any testimonies and exhibits sponsored or submitted by all witnesses retained by OPC for purposes of FPL's SPP docket in each jurisdiction where they analyzed storm hardening and storm preparedness programs during the past five (5) years.**

OPC Response:

Kollen: Please refer to the response to Item No. 3 above.

Mara: Please refer to Mr. Mara's CV for testimony (updated with case numbers). Specific jurisdictions in which Mr. Mara provided testimony regarding storm hardening include Vermont and District of Columbia. The documents are publicly available in the online dockets referenced.

5. **Please provide an electronic copy, in its original format and with all formulas intact and enabled, of all schedules, tables, or exhibits included in or attached to the direct testimonies submitted on behalf of OPC in FPL's SPP docket.**

OPC Response:

Kollen: Refer to the attached responsive Excel workbooks, Bates Nos. 000011-000014.

Mara: Please see the attached responsive three spreadsheets. Bates Nos. 000001; 000009-000010.

6. **Please provide all work papers and other supporting documents, in their original format, for the direct testimonies submitted on behalf of OPC in FPL's SPP docket.**

OPC Response:

Kollen: Refer to the response to Item No. 5 above for Mr. Kollen's workpapers. In addition, Mr. Kollen relied on the documents in the record in this proceeding, both public and confidential, that were filed by FPL, including responses to discovery. Please see the attached documents bearing Bates Nos. 000011 through 000022

Mara: Please refer to the response to Item No. 5 above. Please see the attached documents bearing Bates Nos. 000001 through 000010 and 000023 through 000030.

7. **Please provide copies of any analyses, studies, statements, testimonies, exhibits, or other documents reviewed by OPC's witnesses in connection with their work on FPL's SPP docket.**

OPC Response:

Kollen: Please refer to the response to Item No. 6 above.

Mara: Please see FPL's own PSC docket filings and responses to discovery propounded by PSC Staff and OPC in the instant SPP docket; FPL's 2020 Storm Protection Plan, related docket filings and responses to discovery, and Mr. Mara's testimony in the 2020 FPL SPP docket; also the Storm Protection Plans filed by DEF, FPUC, and TECO in 2020 and 2022.

8. **Please provide copies of any analyses, studies, statements, testimonies, exhibits, or other documents prepared by OPC's witnesses in connection with their work on FPL's SPP docket.**

OPC Response:

Kollen: Please refer to the response to Item No. 6 above.

Mara: Please refer to the response to Item No. 5 above.