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FPUC's Response to OPC's Third
Production of Documents Nos. 4-9

(No. 6 has attachments)

DOCUMENT REQUESTS

4. Please refer Interrogatory No. 13 and to the Cost/Benefit Comparison subsections for each program in Section 3.0 of the FPUC Storm Protection Plan and respond to the following:

(a) If the Company has performed a dollar cost/benefit analysis whereby it compares the forecast dollar costs to the forecast dollar benefits of each proposed storm protection program, please provide a copy of all such dollar cost/benefit analyses, including all supporting documentation and electronic spreadsheets in live format with all formulas intact.

Response: Please see Company's response to Interrogatory 13(a).

(b) If the Company interprets Rule 25-6.030(3)(d), F.A.C. "costs" to mean dollars and "benefits" to mean narrative descriptions and not dollars, please provide all authoritative support and documentation that the Company's believes supports this interpretation of the requirements of Rule (3)(d)1, F.A.C."

Response: Please see Company's response to Interrogatory 13c of OPC's 3rd Set of Interrogatories (Nos. 13-20).

5. Please refer to Interrogatory No. 14 and Rule 25-6.030(3)(d)5., F.A.C., please provide a copy, of any, of all dollar cost/benefit analyses, ratios, and/or thresholds that were used as decision criteria, including all supporting documentation and electronic spreadsheets in live format with all formulas intact.

Response: Please reference Sections 2 & 6 of FPUC's SPP detailing the criteria utilized to risk rank and prioritize FPUC's system and the selection of specific projects along with the previously provided "FPUC Model & Targets" worksheet from OPC's Requests for Production Nos. 1-2.

6. Please refer to Interrogatory No. 15, if the Company confirms that it uses a construction authorization initiation and approval process to budget and authorize capital expenditures, including capital expenditures for SPP programs and projects, provide a copy of the related procedures and guidelines, all forms and required justification, and all economic analyses. If there are differences between the initiation and approval process to budget and authorize capital expenditures for non-SPP programs and projects compared to SPP programs and projects, provide a copy of all documentation that addresses the differences.

Response: Attached are the “FIN-027 Capitalization Policy” and FIN-015 Capital Project Request Approval Policy Final 04-14-21 Signed Certificate” that guides the capital expenditures for all construction projects.

7. Please refer to Interrogatory No. 18 and for each SPP program and/or project, please provide a copy of all written documentation and/or models that address the specific quantitative decision criteria used.

Response: There are no additional responsive documents.

8. Please refer to Interrogatory No. 19 and the Estimated Rev Req – bs tab in the Estimated Storm Protection Cost Recovery Rate Impact - revised 4_5_2022_FPUC-SPP (0773-0792)(15065474.1) Excel workbook. If the Company agrees that there will be non-SPP expense savings, then please provide the Company's forecast of these expense savings, including all assumptions, data, calculations, and electronic spreadsheets in live format with all formulas intact.

Response: FPUC objects to this request to the extent that it would necessitate that the Company create an Excel file that does not currently exist, which exceeds the discovery requirements.

9. Please refer to Interrogatory No. 20 and Paragraph No. 9 of the Company's Application wherein it states "[T]he SPP contains eight programs, three of which reflect the continuation of legacy Storm Hardening Distribution Wood Pole Inspection and Replacement, Transmission Structure Inspection and Hardening, and Vegetation Management Initiatives."

(a) For the amounts included in rate base by component and the amounts included in expense by O&M expense account and each other operating expense account for each of the three legacy programs that are presently recovered in base rates, provide a copy of the source documents relied on to provide these amounts.

Response: The Company continues to review its records for responsive documents and will, in good faith, provide such documentation once it has been gathered and BATES labelled. The Company notes that this information can be gleaned, in part, from the documentation available in the docket for the Company's last rate case, Docket No. 20140025-EI.

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(b) For the amounts included in rate base by component and the amounts included in expense by O&M expense account and each other operating expense account for each of the three legacy programs that are presently recovered in storm hardening surcharge rates, provide a copy of the source documents relied on to provide these amounts.

Response: There are no responsive documents, given the Company does not have a storm hardening surcharge.