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April 1, 2025

*VIA ELECTRONIC FILING*

Mr. Adam J. Teitzman  
Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

**Re: Docket No. 20250010-EI**  
**In re: Storm Protection Plan Cost Recovery Clause**  
**Florida Power & Light Company 2024 SPPCRC Final True-Up – Petition**

Dear Mr. Teitzman:

Attached for filing in the above-referenced matter, please find the Petition of Florida Power & Light Company requesting approval of the Storm Protection Plan Cost Recovery Clause ("SPPCRC") final true-up for the period January 1, 2024 through December 31, 2024, pursuant to Rule 25-6.031, Florida Administrative Code. Contemporaneously with this Petition, FPL is separately filing the testimonies and exhibits of FPL witnesses Michael Jarro and Richard Hume.

If you or your staff have any question regarding this filing, please contact me at (561) 691-7144.

Respectfully submitted,

/sChristopher T. Wright  
Christopher T. Wright  
Fla. Auth. House Counsel No. 1007055

Enclosures

cc: Ken Hoffman

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copies of the foregoing have been furnished by Electronic Mail to the following parties of record this 1st day of April 2025:

<p>Shaw Stiller Daniel Dose Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399 <a href="mailto:ddose@psc.state.fl.us">ddose@psc.state.fl.us</a> <a href="mailto:ssstiller@psc.state.fl.us">ssstiller@psc.state.fl.us</a> <a href="mailto:discovery-gcl@psc.state.fl.us">discovery-gcl@psc.state.fl.us</a> <b><i>For Commission Staff</i></b></p>	<p>Office of Public Counsel c/o The Florida Legislature 111 West Madison Street, Room 812 Tallahassee, FL 32399-1400 <a href="mailto:christensen.patty@leg.state.fl.us">christensen.patty@leg.state.fl.us</a> <a href="mailto:ponce.octavio@leg.state.fl.us">ponce.octavio@leg.state.fl.us</a> <a href="mailto:rehwinkel.charles@leg.state.fl.us">rehwinkel.charles@leg.state.fl.us</a> <a href="mailto:Trierweiler.walt@leg.state.fl.us">Trierweiler.walt@leg.state.fl.us</a> <a href="mailto:watrous.austin@leg.state.fl.us">watrous.austin@leg.state.fl.us</a> <a href="mailto:wessling.mary@leg.state.fl.us">wessling.mary@leg.state.fl.us</a> <b><i>For Office of Public Counsel</i></b></p>
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*s/ Christopher T. Wright*

Christopher T. Wright

Fla. Auth. House Counsel No. 1007055

*Attorney for Florida Power & Light Company*

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Storm Protection Plan Cost Recovery  
Clause

Docket No. 20250010-EI

Filed: April 1, 2025

**PETITION OF FLORIDA POWER & LIGHT COMPANY  
FOR APPROVAL OF THE 2024 STORM PROTECTION PLAN  
COST RECOVERY CLAUSE FINAL TRUE-UP**

**I. INTRODUCTION**

Florida Power & Light Company (“FPL” or the “Company”) hereby files this Petition and requests the Florida Public Service Commission (“Commission”) approve the FPL Storm Protection Plan Cost Recovery Clause (“SPPCRC”) final true-up for the period January 1, 2024 through December 31, 2024, pursuant to Rule 25-6.031, Florida Administrative Code. In support of this Petition, FPL incorporates the testimonies and exhibits of FPL witnesses Michael Jarro and Richard Hume, and states as follows:

1. FPL is an electric utility, as defined in Sections 366.02(2) and 366.96, Florida Statutes, with its principal office located at:

Florida Power & Light Company  
700 Universe Blvd  
Juno Beach, FL 33408

2. All pleadings, motions, notices, orders, or other documents required to be served upon the Petitioners or filed by any party to this proceeding should be served upon the following individuals:

Kenneth A. Hoffman  
Vice President, Regulatory Affairs  
Florida Power & Light Company  
134 W. Jefferson Street  
Tallahassee, FL 32301  
Phone: 850-521-3919  
Email: [ken.hoffman@fpl.com](mailto:ken.hoffman@fpl.com)

Christopher T. Wright  
Managing Attorney  
Florida Power & Light Company  
700 Universe Boulevard (JB/Law)  
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3. The Commission has jurisdiction pursuant to Section 366.96, Florida Statutes, and Rule 25-6.031, Florida Administrative Code.

4. In Section 366.96(3), Florida Statutes, the Florida Legislature directed each utility to file a ten-year Storm Protection Plan (“SPP”) that explains the storm hardening programs and projects the utility will implement to achieve the legislative objectives of reducing restoration costs and outage times associated with extreme weather events. Each utility is required to file an updated SPP at least every three years that covers the utility’s immediate ten-year planning period. *See* Section 366.96(6), Fla. Stat.

5. On April 11, 2022, FPL filed its 2023-2032 SPP in Docket No. 20220051-EI (the “2023 SPP”). The programs and projects included in FPL’s 2023 SPP were approved, with certain modifications, by Commission Order PSC-2022-0389-FOF-EI issued on November 10, 2022. A true and correct copy of FPL’s final, approved 2023 SPP is available in Docket No. 20220051-EI at: <https://www.floridapsc.com/pscfiles/library/filings/2022/11240-2022/11240-2022.pdf>.

6. The Florida Legislature also directed the Commission to conduct an annual proceeding to determine the utility’s prudently incurred SPP costs and to allow the utility to recover such costs through a charge separate and apart from its base rates, referenced as the

SPPCRC. *See* Section 366.96(7), Fla. Stat. FPL herein seeks Commission approval of the final true-up of the SPP costs for the period January 1, 2024 through December 31, 2024.

7. Rule 25-6.031(2), Florida Administrative Code, provides that the “utility’s petition shall be supported by testimony that provides details on the annual Storm Protection Plan implementation activities and associated costs, and how those activities and costs are consistent with its Storm Protection Plan.”

8. Rule 25-6.031(7)(a), Florida Administrative Code, applies to the final true-up of SPP cost recovery, and provides:

Final True-Up for Previous Year. The final true-up of Storm Protection Plan cost recovery for a prior year shall include revenue requirements based on a comparison of actual costs for the prior year and previously filed costs and revenue requirements for such prior year for each program and project filed in the utility’s cost recovery petition. The final true-up shall also include identification of each of the utility’s Storm Protection Plan programs and projects for which costs were incurred during the prior year, including a description of the work actually performed during such prior year, for each program and project in the utility’s cost recovery petition.

9. Rule 25-6.031(7)(d), Florida Administrative Code, provides that the utility shall report observed variances and changes in scope of work relative to actual-estimated and projected estimates, and provide explanations for variances.

10. Consistent with subparts (2), (7)(a), and (7)(d) of Rule 25-6.031, the direct testimony and exhibits of FPL witness Jarro identify each of the SPP programs and projects for which costs have been incurred during 2024, explain the variances between the final actual 2024 SPP costs and the actual/estimated 2024 SPP costs presented and approved in Docket No. 20240010-EI, and describe how those 2024 SPP projects and costs are consistent with FPL’s Commission-approved 2023 SPP.

11. As to be expected with any major construction project, project schedules and cost estimates may change due to events and circumstances that are largely beyond the utility's control, which may result in variances in the construction schedules, number of projects, and the associated costs of the SPP projects to be undertaken during a calendar year. Exhibit MJ-1 attached to the testimony of FPL witness Jarro provides FPL's actual project level detail and final costs incurred for the SPP projects during calendar year 2024. In addition, Exhibit MJ-1 provides the variances between the previously approved actual/estimated SPP costs and the final actual SPP costs for calendar year 2024, along with explanations for each of the material variances provided therein.

12. As explained by FPL witness Jarro, FPL appropriately responded to each of these variances to ensure cost-effective management of projects, resources, and materials, while still achieving the overall statutory objectives of Section 366.96, Florida Statutes, to reduce restoration costs and outage times associated with extreme weather events. Importantly, although the actual SPP projects and associated costs completed in 2024 experienced variances, FPL effectively managed these variances at the program level to ensure that the actual total number of SPP projects and associated costs were consistent with FPL's Commission-approved 2023 SPP.

13. To calculate the final true-up of the FPL SPP costs for calendar year 2024, FPL compared the 2024 actual/estimated SPP costs approved by Commission Order No. PSC-2024-0459-FOF-EI with the final actual SPP costs for calendar year 2024 identified in Exhibit MJ-1. FPL then applied the methodology and prescribed schedules contained in Commission Forms 1A through 8A, which are provided in Exhibit RLH-1 sponsored by FPL witness Hume.

14. As set forth in the direct testimony and exhibits of FPL witness Hume, FPL's final net true-up of the SPPCRC costs for the period January 2024 through December 2024, including interest, is an over-recovery, including interest, of \$21,904,884.

15. FPL submits that the final true-up of the SPP costs for calendar year 2024 is consistent with the 2024 actual/estimated SPP costs approved by Commission Order No. PSC-2024-0459-FOF-EI in Docket No. 20240010-EI, is consistent with FPL's 2023 SPP approved by Commission Order No. PSC-2022-0389-FOF-EI in Docket No. 20220051-EI, applies the methodology and prescribed schedules contained in Commission Forms 1A through 8A, and meets the requirements of subparts (2), (7)(a), and (7)(d) of Rule 25-6.031, Florida Administrative Code.

16. For these reasons, as more fully explained in the testimony and supporting exhibits of FPL witnesses Jarro and Hume, the final net true-up of the actual 2024 projects and costs is prudent and, therefore, the final 2024 net true-up over-recovery, including interest, of \$21,904,884 should be approved for inclusion in the calculation of the SPPCRC factors for the January 2026 through December 2026 period.

**WHEREFORE**, FPL respectfully requests that the Commission approve FPL's final net true-up over-recovery of \$21,904,884, including interest, for the period January 2024 through December 2024.

Respectfully submitted this 1st day of April 2025,

By: *s/Christopher T. Wright*

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