

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

**DOCKET NO. 170009-EI  
FLORIDA POWER & LIGHT COMPANY**

**MAY 1, 2017**

**IN RE: NUCLEAR POWER PLANT COST RECOVERY  
FOR THE YEAR ENDING  
DECEMBER 2018**

**TESTIMONY & EXHIBITS OF:  
STEVEN D. SCROGGS**

1                   **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

2                   **FLORIDA POWER & LIGHT COMPANY**

3                   **DIRECT TESTIMONY OF STEVEN D. SCROGGS**

4                   **DOCKET NO. 170009-EI**

5                   **May 1, 2017**

6

7   **Q.    Please state your name and business address.**

8    A.    My name is Steven D. Scroggs. My business address is 700 Universe  
9           Boulevard, Juno Beach, Florida 33408.

10 **Q.    By whom are you employed and what is your position?**

11 A.    I am employed by Florida Power & Light Company (“FPL” or the  
12           “Company”) as Senior Director, Project Development. In this position I have  
13           responsibility for the development of power generation projects to meet the  
14           needs of FPL’s customers.

15 **Q.    Have you previously provided testimony in this docket?**

16 A.    Yes.

17 **Q.    Are you sponsoring or co-sponsoring any exhibits in this case?**

18 A.    Yes. I am sponsoring or co-sponsoring the following exhibits:

- 19           •       Exhibit SDS-9, Turkey Point 6 & 7 Site Selection and Preconstruction  
20                   Nuclear Filing Requirement (NFR) Schedules. The NFR Schedules  
21                   contain a table of contents listing the schedules sponsored and co-  
22                   sponsored by FPL Witness Grant-Keene and me, respectively.
- 23           •       Exhibit SDS-10, Steps in Turkey Point 6 & 7 Licensing

1 **Q. What is the purpose of your testimony?**

2 A. The purpose of my testimony is to provide a description of how the Turkey  
3 Point 6 & 7 project is being managed and controlled in a stepwise manner,  
4 particularly as the project nears the end of the Licensing phase. My testimony  
5 also provides insight into factors that influence FPL's decisions on the pace of  
6 the project and how recent developments in first wave AP1000 projects  
7 (Georgia Power's Vogtle project and SCANA Corporation's Summer project)  
8 may impact the project in the future. Additionally, my testimony discusses  
9 FPL's 2017 project activities, its decision to complete final licensing steps,  
10 and plans for the project in the years that follow 2017.

11 **Q. Please summarize your testimony.**

12 A. FPL continues to carefully and methodically create the opportunity for  
13 additional reliable, cost-effective and fuel diverse nuclear generation to  
14 benefit FPL's customers. The approach applied to the management of the  
15 Turkey Point 6 & 7 project provides control of cost risks by being responsive  
16 to project-specific and industry-wide developments while maintaining  
17 progress through the intensive licensing period. In 2017 FPL will continue its  
18 progress on the project primarily by supporting the final stages of the Nuclear  
19 Regulatory Commission's (NRC) Combined Operating License Application  
20 (COLA) review process, development of the West Consensus Corridor, and  
21 completion of the United States Army Corps of Engineers (ACOE) 404(b)  
22 wetland permits and Section 408 reviews. FPL currently expects to receive  
23 the COL, the ACOE Section 404(b) wetland permit, and Section 408 reviews

1 in late 2017 or early 2018. FPL will also address the Third District Court of  
2 Appeal's (3<sup>rd</sup> DCA) ruling, which reversed and remanded three aspects of the  
3 Site Certification received by the project in 2014. As licenses and approvals  
4 are received, the project activities will focus on maintaining the compliance of  
5 the approved licenses, permits, and certifications.

6  
7 The first wave AP1000 projects have experienced significant challenges in the  
8 past two years, reducing the certainty of prior cost estimates and schedules for  
9 those projects. This reduced certainty reinforces FPL's cautious stepwise  
10 approach overall, and as discussed in my March 1 testimony, its decision to  
11 "pause" after completing licensing. The pause period will allow FPL to better  
12 observe and understand the challenges faced by those projects as they  
13 approach completion, and to continue to monitor broader changes to the  
14 nuclear power plant construction industry. While there is a lack of clarity  
15 regarding the immediate direction of the first wave projects, it remains clear  
16 that FPL should preserve the potential for customer benefits offered by  
17 completing the final Licensing steps that remain without making any decisions  
18 about entering into the preconstruction phase at this time. Obtaining the COL  
19 will create a valuable option to add new nuclear generation to FPL's system in  
20 the future, when it is most advantageous to do so. In the interim, FPL has  
21 decided not to request contemporaneous cost recovery for obtaining, and then  
22 maintaining, the necessary Turkey Point 6 & 7 approvals beginning with the  
23 year 2017.

1

2 FPL will continue to monitor the new nuclear construction projects underway  
3 in the U.S. and will continue to be actively involved in organizations such as  
4 the AP1000 Owners Group (APOG) in order to gather lessons learned and  
5 improve the basis upon which a decision to begin preconstruction work  
6 ultimately will be made. FPL will also conduct activities that will maintain  
7 all received permits, approvals, certifications and licenses in a state of  
8 compliance that will support a timely transition to preconstruction and  
9 construction, once such a determination is made and appropriate approvals are  
10 obtained.

11

12 FPL's stepwise approach continues to provide customers with the best  
13 opportunity to complete a critical milestone in the project and to be ready to  
14 move into the pre-construction work phase when it is advantageous to do so.  
15 My testimony provides the Florida Public Service Commission (FPSC) with  
16 the information necessary to conclude that it is reasonable for FPL to take the  
17 final steps necessary to obtain the COL and related federal and state  
18 approvals, and for FPL to maintain compliance with those approvals once  
19 received.

20 **Q. Please describe how the remainder of your testimony is organized.**

21 A. My testimony includes the following sections:

- 22 1. Policy Considerations
- 23 2. Project Approach



1 generation as one tool to help improve fuel diversity and has been successful  
2 for FPL customers, as more than 520 MW of new nuclear capacity was  
3 successfully added to the system in 2013.

4 **Q. How did Florida's reliance on natural gas develop?**

5 A. Throughout the last several decades, significant political, economic and  
6 technology changes occurred to reshape the state's generation portfolio away  
7 from a dependence on foreign oil in the 1970s as existing plants were replaced  
8 by plants operating on other fuel sources. During this period the nuclear  
9 industry was dealing with significant regulatory, cost and schedule challenges  
10 in deploying new nuclear units – essentially keeping new nuclear capacity  
11 from being an option in the late 1980s and 1990s. The other traditional  
12 baseload alternative, coal, had only been developed in limited amounts in  
13 Florida because of the significant logistical challenges and expense in  
14 delivering large quantities of coal from supply regions located in the country's  
15 interior and concerns related to emissions. These factors opened the door for  
16 a new baseload technology. Deregulation of natural gas as a fuel for electric  
17 generation and the introduction and continued improvement of large scale  
18 combined cycle gas turbine technology evolved to provide a cost-effective,  
19 efficient and low emissions alternative. As a result, combined cycle gas  
20 turbine plants have been the technology of choice for most generation  
21 additions in the state from the 1990s to today. While customers have  
22 benefited from these choices, particularly the affordability and lower  
23 emissions of domestic natural gas, recurrence of high and volatile fossil fuel

1 prices or supply reliability issues have impacted customers and the Florida  
2 economy in the past and, if unaddressed, could impact the state again in the  
3 future.

4 **Q. What developments occurred to enable new nuclear generation to be  
5 viewed as a deployable alternative?**

6 A. In the late 1990s, the NRC instituted a refined regulatory framework for the  
7 licensing of new nuclear generating units. This revised process places a high  
8 focus on the rigor and detail applied during the licensing process, reducing the  
9 opportunity for regulatory delays during construction or prior to operation;  
10 complications that severely impacted the prior generation of nuclear power  
11 plants. In this way, if regulatory delays occur they do so prior to significant  
12 investment reducing the financial risk in the process. Also during the 1980s  
13 and 1990s, a new generation of nuclear power plants were developed and  
14 poised for U.S. and international deployment. The federal Energy Policy Act  
15 of 2005 provided incentives and assurances that further motivated renewed  
16 interest in nuclear generation. Consortiums were formed between potential  
17 owners and manufacturers that furthered several key projects validating that  
18 the new designs and licensing processes would be successful. By 2006, a host  
19 of new nuclear projects had been proposed in the U.S. With the passage of  
20 the Florida Energy Act of 2006 and the FPSC's adoption of the Nuclear Cost  
21 Recovery rule, deployment of new nuclear capacity in Florida to address fuel  
22 diversity concerns became a realistic option.

1 **Q. What specific considerations are included in the Nuclear Cost Recovery**  
2 **rule as implemented by the FPSC?**

3 A. A core principle of the Nuclear Cost Recovery rule is that of transparency. In  
4 order to satisfy that principle, applicants for cost recovery must satisfy a  
5 number of extensive reviews. In order to enter the annual cost recovery  
6 process, an applicant must first obtain an affirmative need determination  
7 verifying that the proposed generation is required to provide cost-effective and  
8 reliable electric generation. Annually, within the cost recovery process, the  
9 applicant must provide a full accounting for all project activities and costs for  
10 which a utility is seeking recovery. This transparency allows the FPSC to  
11 conduct in-depth oversight of the utility's actions in real time – as the project  
12 proceeds, rather than in hindsight decades after decisions are made and money  
13 is spent. The FPSC then makes a “reasonableness” determination as to costs  
14 projected for the project (prior to any recovery of those costs), and reviews  
15 historical costs for “prudence.” Amendments to the Nuclear Cost Recovery  
16 statute in 2013 provide for additional interim review steps as a project  
17 proceeds from licensing to construction.

18 **Q. How does the existence of the Nuclear Cost Recovery process assist FPL**  
19 **in bringing forward nuclear generation projects?**

20 A. The statute and associated rule provide the requisite regulatory certainty  
21 necessary for FPL to undertake the complex and challenging task of adding  
22 new nuclear capacity to its system. The process allows FPL to take the long-  
23 lead steps of licensing and pre-construction and pays off interest costs during

1 construction, reducing costs to FPL's customers. Additionally, it enables FPL  
2 to go to the financial markets and obtain competitive financing rates for the  
3 large amount of capital required to fund the construction of the project.

4 **Q. What developments have occurred since the Nuclear Cost Recovery Rule**  
5 **was instituted that influence the decision to proceed with a new nuclear**  
6 **project?**

7 A. Natural gas supply has increased with the advent of new resources and  
8 extraction technologies, reducing the natural gas price to approximately  
9 \$3/MMBtu – nearly 75% below the peak prices experienced in 2005.  
10 Additionally, increased natural gas pipeline infrastructure and supply diversity  
11 options have been developed. As we look forward, we can see that the price  
12 of solar photovoltaic generation has decreased to a point supporting large  
13 scale installations throughout Florida, satisfying a portion of the growing  
14 demand with a non-traditional, fuel-diverse generation source. We have also  
15 observed the lengthy timelines associated with the licensing of new nuclear  
16 plants, and challenges experienced by the first wave of AP1000 projects in the  
17 U.S. It is the combination of these factors that influence FPL's decision to  
18 “pause” before proceeding to preconstruction.

19 **Q. Is it possible that factors influencing the decision to proceed with a new**  
20 **nuclear project could change?**

21 A. Yes. We have seen favorable and significant shifts in generation technology,  
22 fuel supply, fuel infrastructure and fuel prices in the past ten years. However,  
23 history tells us that unforeseen events can influence fuel supplies, technology,

1 regulatory or economic policies and markets. The result of these influences  
2 could increase the need for, and value offered by, new nuclear generation.  
3 Likewise, technological improvements in materials and construction, or  
4 impacts to labor markets, could influence construction cost and schedule. In  
5 short, the economics of a new nuclear construction project five to ten years  
6 from now could support proceeding forward. Possession of a complete set of  
7 licenses and approvals would enable timely action to capitalize on such an  
8 opportunity.

9

## 10 **PROJECT APPROACH**

11

12 **Q. What is FPL's overall approach to developing Turkey Point 6 & 7?**

13 A. FPL continues to develop Turkey Point 6 & 7 through a deliberate and careful  
14 process navigating through the four phases of project development:  
15 Exploratory, Licensing, Preparation, and Construction. The project is  
16 currently focused on the Licensing phase which allows FPL to make progress  
17 on obtaining licenses and approvals without taking on the risks and  
18 expenditures that would result from committing to a specific construction  
19 schedule. For example, through 2016, FPL estimates it will have spent  
20 approximately 1.5% of the high end of the estimated project cost range  
21 (\$21.87 billion).

22

1 A project of this complexity, particularly in the early stages, is subject to  
2 external factors that are not under FPL's control. Therefore, FPL's approach  
3 has been developed as a step-wise process. Routine monitoring of a wide  
4 range of factors and events is accomplished to help increase certainty and  
5 predictability, informing each subsequent step.

6 **Q. Please expand on the concept of the step-wise process and how the risks**  
7 **related to the Turkey Point 6 & 7 project are controlled by key decisions.**

8 A. The project team monitors issues at local, state, and federal levels and across  
9 technical, commercial, economic, and regulatory areas of interest. The  
10 certainty of cost, schedule, and quality are routinely assessed through tools  
11 and reviews. If review indicates the potential for a considerable cost or  
12 schedule impact, mitigation actions are identified and are designed to  
13 eliminate, reduce, or otherwise manage the potential for impact. If the  
14 magnitude of the impact materially affects overall project cost or schedule, a  
15 decision is made as to whether such impact is acceptable in light of all current  
16 information. Alternative courses of action include continuing with a modified  
17 budget and schedule along with available mitigation actions, or halting a  
18 portion of the project temporarily while the issue is further assessed or  
19 resolved. The alternative of slowing or halting a portion of the project in  
20 response to significant events or uncertainties offers a high level of risk  
21 control for FPL and its customers.

22 **Q. Is the plan to pause between the Licensing phase and the Preparation**  
23 **phase an example of this step-wise process?**

1 A. Yes. An important part of the FPL approach to new nuclear generation was  
2 to leverage the experience of first wave U.S. construction projects to better  
3 inform what FPL should expect for cost, schedule, contracting and  
4 procurement challenges in its Turkey Point Units 6 & 7 project. As those  
5 projects have experienced delays, FPL recognized that proceeding without this  
6 information would reduce certainty in several key areas. In 2016 FPL made  
7 the determination to pause after receipt of the COL before proceeding to the  
8 Preparation phase.

9 **Q. What activities are undertaken by the project to address industry issues**  
10 **affecting the long term success and execution of the project?**

11 A. FPL is involved in a number of areas to address issues relevant to new nuclear  
12 deployment. FPL participates in three specific groups comprised of new  
13 nuclear industry owners and design vendor(s). These include the Design  
14 Centered Working Group (DCWG), APOG, and the Advanced Nuclear  
15 Technology group. The collective purpose of these groups is to identify and  
16 resolve issues potentially affecting the licensing, design, construction,  
17 operation, and maintenance of the AP1000 design. Individually, each group  
18 provides a collaborative forum for owners to work with each other, the design  
19 vendor and the NRC to achieve standardized solutions to the issues facing all  
20 owners. This enables the industry to maintain a high level of standardization  
21 from the earliest stages of new nuclear deployment. Standardization of  
22 designs and processes provides benefits to FPL customers in terms of  
23 efficiency and cost control.

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**FACTORS INFLUENCING THE PROJECT**

**Q. What are the issues being monitored for their effect on the Turkey Point 6 & 7 project?**

A. FPL monitors issues that can affect the overall timeline or feasibility of the project. Several of these factors, directly or indirectly, influence the scope and pace of regulatory reviews. For example, industry events and administrative decisions can impact the NRC resources available to conduct the review of FPL’s COLA. Other developments can impact the information that must be incorporated into FPL’s decision making process, such as the lessons being gathered at the two U.S. AP1000 construction sites and current economic factors.

*Project-Specific Factors*

**Q. What factors in the federal license and permit review processes may affect the overall timeline of the project?**

A. The federal processes include the safety and environmental reviews that inform the NRC COLA process, as well as additional reviews conducted by the ACOE in support of the Section 404(b) wetland permit applications and Section 408 reviews.

The safety and environmental reviews are complete. The FSER and FEIS were both issued in 2016. Next, the NRC process will conclude through a set

1 of administrative hearings. A single remaining contention in the Turkey Point  
2 Units 6 & 7 COLA process focuses on certain constituents in the reclaimed  
3 water to be used for cooling. This contention will be addressed through a  
4 contested hearing. The NRC will also conduct a “mandatory hearing” to  
5 formally approve the FSER and FEIS and approve the COL. Finally, the  
6 NRC will meet in final session to vote on issuance of the COL. These  
7 proceedings could be completed in 2017, or extend into 2018.

8

9 The ACOE conducts a related review that has been performed in parallel to  
10 the NRC Environmental Review and uses the FEIS in development of its  
11 Record of Decision. The review informs the issuance of Section 404(b)  
12 permits related to wetland impacts and Section 408 reviews regarding  
13 structural integrity of certain flood control structures impacted by  
14 transmission lines associated with the project.

15 **Q. What factors at the state and local levels may affect the pace of the state**  
16 **Site Certification process?**

17 A. Following the Siting Board Final Order in May 2014, four parties filed  
18 appeals in the Third District Court of Appeal. On April 20, 2016 the 3<sup>rd</sup> DCA  
19 reversed and remanded the Site Certification. The 3<sup>rd</sup> DCA found the Site  
20 Certification deficient in three areas: the application of local land development  
21 regulations, the Siting Board’s conclusion that it could not require  
22 underground installation of transmission lines, and the Siting Board’s  
23 interpretation of the nature and applicability of a County regulation. In early



1 previously provided by CB&I Stone & Webster. The prior organization  
2 provided a combined Engineering, Procurement and Construction (EPC) style  
3 arrangement under a consortium of Westinghouse as the EP contractor, and  
4 CB&I Stone & Webster as the Construction contractor. The objective of the  
5 reorganized project was to put in place a more streamlined organization to  
6 finish the projects, effectively an EPC organization wholly under  
7 Westinghouse. As a result of the dispute resolution, a new project schedule  
8 was developed that estimated Vogtle Units 3 and 4 completion in 2019 and  
9 2020, respectively. This meant that the first projects of the first wave of  
10 AP1000 construction in the U.S. would not be completed for several more  
11 years.

12 **Q. How did this revised schedule for first wave AP1000 project completion**  
13 **impact the timing of the Turkey Point Units 6 & 7 project?**

14 A. As discussed in my March 1, 2017 testimony, the Turkey Point Unit 6 & 7  
15 project was conceived and developed to be the first project in the second wave  
16 of AP1000 projects. This allows FPL to obtain the benefits of lessons learned  
17 regarding construction schedule, logistical support, contract terms and  
18 conditions, and the market for contractors and suppliers from the first wave  
19 projects. As a result of the delays in the first wave projects, there is  
20 incomplete information to support the decision to proceed to post licensure  
21 activities, namely a more certain construction execution schedule and capital  
22 cost. This was a key factor in FPL's 2016 decision to pause prior to

1 requesting approval to conduct pre-construction work directly following  
2 receipt of all licenses and permits.

3 **Q. What impact, if any, do the recent announcements regarding**  
4 **Westinghouse's future participation in nuclear construction have on the**  
5 **Turkey Point 6 & 7 project?**

6 A. The future impacts of the financial issues facing Westinghouse, and parent  
7 company Toshiba, are unknown because they are still unfolding. The  
8 principal issue appears to be that the first wave projects will require more  
9 capital and time to complete than estimated when Westinghouse consolidated  
10 Engineering, Procurement and Construction in late 2015 with the purchase of  
11 CB&I Stone & Webster. The overall impact is reduced certainty with respect  
12 to the timing, cost, and manner in which the first wave construction projects  
13 will be completed.

14  
15 However, it is FPL's expectation that any decision that would prevent  
16 Westinghouse from participating in future projects as the Construction  
17 contractor would not preclude them from maintaining the more traditional role  
18 of Engineering and Procurement contractor, a position reactor design  
19 companies have historically taken in nuclear construction projects. In fact,  
20 throughout the recent issues, Westinghouse has continued to support the  
21 design and licensing activities associated with existing and pending licenses,  
22 unchanged from its position in prior years. Taking the recent reports at face  
23 value, FPL would expect that a "turnkey" EPC contract with Westinghouse is

1 no longer a contracting option. A future project could proceed with a  
2 contracting option that would have Westinghouse, or its successor, provide EP  
3 services and another qualified company, or consortium of companies,  
4 providing Construction services. Alternatively, a reorganization or buyout of  
5 Westinghouse by a sufficiently funded entity may place the EPC structure  
6 back on the table. So while the Westinghouse events have reduced certainty  
7 regarding the schedule and costs of first wave AP1000 projects, they do not  
8 have the effect of rendering a future nuclear construction project, such as  
9 Turkey Point 6 & 7, infeasible.

10 **Q. What do recent developments related to national and regional energy**  
11 **policy indicate with respect to the continued pursuit of the Turkey Point**  
12 **6 & 7 project?**

13 A. National energy policy remains supportive of nuclear energy in general, and  
14 new nuclear energy development in specific as evidenced by the closing of  
15 loan guarantees for Vogtle and acknowledgements of nuclear power's  
16 contribution to achieving emission reduction goals. In general, while  
17 cautious, policymakers continue to recognize the long term benefits of and  
18 need for existing and new nuclear generation capacity.

19 *Economic Factors*

20 **Q. What do recent economic developments indicate with respect to the**  
21 **continued pursuit of the Turkey Point 6 & 7 project?**

22 A. The shift in the supply and demand balance in the natural gas industry has  
23 created a near term reduction in natural gas prices and has maintained long

1 range price forecasts at historically low levels. As I mentioned in my March  
2 1, 2017 testimony, the historically low trend in natural gas price forecasts  
3 places continued pressure on economic benefits to be delivered by the project.

4 **Q. What do recent developments related to national and regional**  
5 **environmental regulations indicate with respect to the continued pursuit**  
6 **of the Turkey Point 6 & 7 project?**

7 A. It remains reasonable to assume that CO<sub>2</sub> compliance costs will be realized at  
8 some point in the future during the projected 60 year operating lives of Turkey  
9 Point Units 6 and 7. However, there is continuing uncertainty regarding the  
10 level of those compliance costs and exactly when they may take effect.

11

## 12 **2017 PROJECT ACTIVITIES**

13

14 **Q. What is the focus of the project in 2017?**

15 A. The focus will remain on completing the federal licenses and permits  
16 necessary to construct and operate the Turkey Point 6 & 7 project,  
17 establishing the necessary staff and resources to maintain compliance with all  
18 requirements for licenses and certifications received, and resolving the three  
19 outstanding issues associated with the Site Certification. The licensing phase  
20 milestones are discussed below and summarized in Exhibit SDS-10.

21 **Q. What specific milestones are expected in relation to completing the NRC**  
22 **licensing process in 2017?**

1 A. A contested hearing will be held May 2, 2017 in Homestead, FL to address the  
2 single remaining contention. The contention addresses certain constituents  
3 contained in reclaimed water to be used at the plant and the injection of that  
4 water into Underground Injection Control wells. An administrative hearing,  
5 referred to as the Mandatory hearing, will be held at NRC headquarters in  
6 August 2017 where the NRC Commissioners are expected to approve the  
7 COL. Upon completion of the administrative and legal processes, the NRC  
8 Commissioners will meet later in 2017 or early 2018 to issue the COL.

9 **Q. What specific milestones are expected related to the ACOE Section 404(b)**  
10 **and Section 408 processes in 2017?**

11 A. As described in prior sections, the ACOE will utilize the NRC EIS to support  
12 its Record of Decision (ROD) for the Section 404(b) permits. Thus, the  
13 completion of the Final EIS in 2016 was a prerequisite for the remaining  
14 ACOE reviews. The ACOE will complete a review under the Clean Water  
15 Act in 2017 to determine the Least Environmentally Damaging Practicable  
16 Alternative (LEDPA). This will include a wildlife consultation with the U.S.  
17 Fish & Wildlife Service. The Section 408 reviews will be conducted in  
18 parallel to assure that the placement of transmission infrastructure poses no  
19 impacts to the structural integrity of flood control structures under the  
20 ACOE's authority.

21 **Q. What specific milestones are expected related to the state Site**  
22 **Certification process in 2017?**

1 A. As discussed earlier, the remand of the Site Certification will result in several  
2 specific activities FPL will undertake to appropriately address the issues  
3 identified in the 3<sup>rd</sup> DCA's Order, while retaining the value that has been  
4 created for our customers. Also, FPL will take necessary actions required by  
5 Conditions of Certification (CoC) to maintain compliance, including  
6 continued development of the West Consensus Corridor.

7 **Q. What actions does the Land Exchange Agreement require of FPL in**  
8 **2017?**

9 A. The Land Exchange Agreement requires FPL to pursue development of the  
10 West Consensus Corridor, approved in the Site Certification Process and  
11 consistent with the COC governing its development. The goal is to maximize  
12 the use of the Western Consensus Corridor, and reconvey to Everglades  
13 National Park (ENP) any portion of the Exchange Property (formerly ENP  
14 lands) not required to complete a contiguous corridor. Therefore, FPL is  
15 moving forward with the necessary design, surveys and legal reviews to  
16 determine if the Western Consensus Corridor can be successfully developed in  
17 a timely and cost-effective manner. These actions will be conducted in  
18 compliance with the Site Certification COC, in order to maintain compliance  
19 with that authorization.

20 **Q. What are the next steps in the Turkey Point Units 6 & 7 project,**  
21 **following receipt of the COL?**

22 A. Receipt of the necessary licenses, permits, certifications and other approvals  
23 to construct and operate the Turkey Point Units 6 & 7 project will mark a

1 milestone in creating the option for new nuclear generation in Florida.  
2 Additional activities will be required to maintain the validity of those  
3 approvals. These activities include a reorganization of the New Nuclear  
4 Project team (staffing and resources) to enable the processing of numerous  
5 license amendments generated with the first wave of AP1000 construction, the  
6 development and maintenance of a Quality Assurance/Quality Control  
7 program to manage the license in compliance with NRC requirements, and  
8 activities to maintain compliance with the conditions associated with these  
9 approvals.

10

11 Activities apart from the COL process include executing all phases of the  
12 Land Exchange Agreement between NPS and FPL, including the attempted  
13 development of the West Consensus Corridor that would minimize use of  
14 lands currently in Everglades National Park, and other actions associated with  
15 resolving the three issues remanded to the Siting Board by the 3<sup>rd</sup> DCA. The  
16 West Consensus Corridor activity is in compliance with a specific COC in the  
17 State Power Plant Siting Act process.

18 **Q. Will FPL immediately pursue pre-construction planning activities**  
19 **following receipt of the licenses, permits, certifications and approvals**  
20 **needed for construction?**

21 A. No. As discussed earlier, further observations are yet to be made as the first  
22 wave projects move through the latter stages of construction. Additionally,  
23 the project came about in a period of increased natural gas price forecasts and

1 expectations for earlier and increasing emissions compliance costs. While  
2 generally beneficial for FPL's customers, the combination of historically low  
3 natural gas price forecasts for the near term, combined with delays in emission  
4 compliance cost implementation, reduce the economic benefits that could be  
5 expected from the project. Finally, the Nuclear Cost Recovery statute  
6 envisions a utility must first petition the FPSC for approval before proceeding  
7 with preconstruction work after receipt of the Combined License.

8 **Q. What non-economic factors affect the project's long term feasibility?**

9 A. Non-economic factors include the feasibility of obtaining all necessary  
10 approvals (permits, licenses, etc.), the feasibility of an EPC contractor or EP  
11 and C contractors to construct the project, the ability to obtain financing for  
12 the project at a reasonable cost, and supportive state and federal energy policy.

13

14 Review of permits and approvals continues to show progress. While the  
15 review process has taken longer than originally anticipated, the process is  
16 proceeding substantively as expected.

17

18 The challenges experienced by Westinghouse in the first wave of AP1000  
19 construction projects highlight the importance of the contracting scheme and  
20 organization of the implementing team in these large and complex  
21 construction projects. As discussed earlier in this testimony, structures other  
22 than that implemented in the first wave of projects have historically been

1 feasible for nuclear construction, and qualified companies are available to  
2 provide the roles of Engineering, Procurement Lead and Constructor.

3

4 Financing will be determined as the project proceeds through approvals to  
5 construction. The lead projects, Vogtle and Summer, have successfully  
6 obtained financing, and Vogtle has closed on a significant federal loan  
7 guarantee. FPL will continue its dialogue with the financial community to  
8 help maintain FPL's capability to obtain financing with reasonable terms.

9

10 Finally, as discussed earlier in this testimony, state and federal energy policy  
11 continues to be generally supportive of new nuclear generation.

12

### 13 **PROJECT NEXT STEPS**

14

15 **Q. Does FPL intend to pursue completion of licensing for the Turkey Point 6**  
16 **& 7 project so that FPL is in a position to timely move to preconstruction**  
17 **when conditions warrant?**

18 **A.** Yes. The ability to deliver the potential benefits of the Project to FPL  
19 customers is an opportunity available only if FPL completes and maintains the  
20 licenses and approvals necessary to construct and operate the facility. Future  
21 market conditions will determine the appropriate timing.

1 **Q. In light of the reduced certainty surrounding the first wave of new**  
2 **nuclear construction projects, why is FPL continuing to pursue licensing**  
3 **for the Turkey Point 6 & 7 project?**

4 A. Possession of a valid COL and associated approvals will be a valuable option  
5 for FPL's customers to enable FPL to move forward in a timely manner with  
6 preconstruction at the right time. The license may be acted upon for a period  
7 of at least 20 years once issued, providing a significant window of time during  
8 which factors influencing a decision to move to construction may change.  
9 Through 2016, FPL has spent \$260 million (excluding carrying costs)  
10 pursuing the COL and other approvals. In FPL's view, it would be short-  
11 sighted if FPL did not complete the Licensing phase to secure the potential  
12 benefits of new nuclear generation for customers. While FPL is not seeking a  
13 reasonableness determination from the Commission regarding the costs it is  
14 spending in 2017, FPL is seeking a Commission determination that FPL's  
15 decision to complete these licensing steps (and maintain compliance with  
16 approvals received) is reasonable.

17 **Q. Does FPL have sufficient, meaningful, and available resources dedicated**  
18 **to the Turkey Point 6 & 7 project?**

19 A. Yes. FPL has in place an appropriate project management structure that relies  
20 on both dedicated and matrixed employees, the necessary contractors for  
21 specialized expertise, and a robust system of project controls. These resources  
22 enable the project to progress through the current licensing phase.

1 **Q. What activities are being taken to prepare for the obligations of being an**  
2 **NRC Licensee upon issuance of the COL?**

3 A. As a Licensee, FPL must comply with NRC standards and conditions related  
4 to maintaining the configuration control of the issued license, which is both  
5 authorization to construct and operate two AP 1000 units. These requirements  
6 include standards for Quality Control and Quality Assurance programs and  
7 specific administrative and substantive requirements to maintain the License  
8 current. Therefore, FPL has begun the process of establishing the required  
9 programs, personnel and resources to maintain the License in compliance with  
10 all NRC standards and requirements. This includes the purchase of specialty  
11 software, hiring and training of staff to ensure proper conduct of the necessary  
12 activities.

13 **Q. What activities are expected to maintain the configuration control of the**  
14 **COL?**

15 A. As the first wave projects proceed through construction, they have generated  
16 small changes to the lead License documents through the NRC License  
17 Amendment Request (LAR) process. Approximately 30 LARs have been  
18 processed for the Vogtle and Summer COLs, or will be processed by the time  
19 FPL is expected to receive its COL. FPL license engineers will develop and  
20 submit LARs for the Turkey Point Units 6 & 7 COL to bring it up to a  
21 consistent configuration with the Vogtle and Summer COLs. As the first  
22 wave units complete construction, they will likely develop further LARs,  
23 decreasing in number to completion. FPL will need to incorporate these

1 LARs into its COL to maintain it in a condition that is current and actionable.  
2 FPL's participation in APOG significantly reduces the cost and time  
3 associated with processing and obtaining approval for LARs.

4 **Q. What is the value to FPL's customer of maintaining the configuration**  
5 **control of the COL current, once received?**

6 A. By maintaining the COL current, FPL customers will retain the option of the  
7 issued COL with a minimal time to be able to move forward with  
8 preconstruction and construction. By making the LARs to our COL now, we  
9 are maintaining regulatory consistency with the NRC staff who have issued  
10 the LARs for first wave units and obtaining these approvals at significantly  
11 reduced costs.

12 **Q. How will this activity change over time?**

13 A. As indicated, the LARs will be generated in reducing number as the  
14 construction concludes. Once first wave units are complete, FPL anticipates a  
15 modest annual cost to maintain configuration control.

16 **Q. What are FPL's estimated costs for the Turkey Point 6 & 7 project**  
17 **during this pause?**

18 A. In 2017, FPL expects to incur about \$25 million for the Project, including  
19 carrying costs. FPL expects costs to decrease to about \$10 million to \$15  
20 million annually, including carrying costs, during the initial years of the  
21 maintenance period, and continue to decline as LARs are completed.

22 **Q. Does FPL intend to seek contemporaneous cost recovery for costs**  
23 **incurred in 2017 or during the "pause" period prior to pre-construction?**

1 A. No. FPL will not seek contemporaneous cost recovery for costs incurred on  
2 the project while we monitor the first wave AP1000 construction experience  
3 leading to future decisions on project next steps; instead, FPL is seeking to  
4 defer recovery of these costs.

5 **Q. What factors will FPL monitor to determine when it would be**  
6 **appropriate to request approval for pre-construction work?**

7 A. FPL will be intimately involved in the details of the LARs. FPL will also  
8 maintain an awareness of important cost, schedule and implementation  
9 information from the first wave projects through our monitoring and  
10 participation in industry groups such as APOG and the Designed Centered  
11 Working Group. This information will assist in developing a comprehensive  
12 review that will provide FPL and the Commission with the necessary  
13 information to determine when pre-construction work is warranted to further  
14 develop the contractual pricing, terms, conditions and schedule that would  
15 form the basis of the construction decision.

16 **Q. Does this conclude your direct testimony?**

17 A. Yes.

**Turkey Point 6 & 7 Site Selection and Pre-Construction Costs**  
**Nuclear Filing Requirements (NFRs)**  
**TOR-Schedules (True-up to Original)**  
**2017 P-Schedule (Projection)**  
**January 2017 - December 2018**

# **Site Selection & Pre-Construction**

**Turkey Point 6 & 7 Site Selection & Pre-Construction  
Nuclear Filing Requirements (NFRs)  
2017 P-Schedule (Projection)  
TOR-Schedules (True-up to Original)  
January 2017 - December 2018**

**Site Selection Table of Contents**

<b><u>Page (s)</u></b>	<b><u>Schedule</u></b>	<b><u>Year</u></b>	<b><u>Description</u></b>	<b><u>Sponsor</u></b>
4	TOR-1	2018	NCRC Summary	J. Grant-Keene
5	TOR-3	2018	Summary of Annual Clause Recovery Amounts	J. Grant-Keene & S. Scroggs
6	TOR-6	2018	Capital Additions/Expenditures	J. Grant-Keene & S. Scroggs

**Pre-Construction Table of Contents**

<b><u>Page (s)</u></b>	<b><u>Schedule</u></b>	<b><u>Year</u></b>	<b><u>Description</u></b>	<b><u>Sponsor</u></b>
8-9	P-8	2018	Estimated Rate Impact	J. Grant-Keene
11	TOR-1	2018	NCRC Summary	J. Grant-Keene
12	TOR-2	2018	Budgeted and Actual Power Plant In-Service Costs	J. Grant-Keene & S. Scroggs
13	TOR-3	2018	Summary of Annual Clause Recovery Amounts	J. Grant-Keene & S. Scroggs
14	TOR-6	2018	Capital Additions/ Expenditures	J. Grant-Keene & S. Scroggs
15	TOR-7	2018	Power Plant Milestones	S. Scroggs

# **Site Selection True-Up To Original 2018**

**FLORIDA POWER & LIGHT COMPANY**  
**Turkey Point Units 6&7 - Site Selection Costs**  
**NCRC Summary - Docket No. 170009**

Schedule TOR-1 (True-Up to Original)

FLORIDA PUBLIC SERVICE COMMISSION

EXPLANATION: Show the jurisdictional amounts used to calculate the final true-up, estimated true-up, projection, deferrals, and recovery of deferrals for each project included in the NCRC. The sum of the amounts should be the total amount requested for recovery in the projected period.

For the Period Ended 12/31/2018

COMPANY: FLORIDA POWER LIGHT & COMPANY

Witness: Jennifer Grant-Keene

DOCKET NO. 170009-EI

Line No.	Costs by Project	2015			2016			2017	2018	Subtotals	Deferred Recovery			Net Amounts	
		A (a)	B	C (B)-(A)	D (a)	E	F (E)-(D)	G (c)	H (c)	I (C)+(F)	J	K	L	M	
		Approved Actual & Estimated Amounts in Docket No. 150009-EI	Final Actual Amounts in Docket No. 170009-EI	Final True-up for 2015	Approved Projected Amounts in Docket No. 150009-EI	Actual & Amounts in Docket No. 170009-EI	True-up for 2016	Actual & Estimated Amounts for 2017 in Docket No. 170009-EI	Initial Projected Amounts for 2018 in Docket No. 170009-EI	Amounts for 2017 to be Recovered in Docket No. 170009-EI	Increase in Deferred Balance	Decrease in Deferred Balance	2018 Deferred Balance	Net Amount Requested for Recovery in 2017 in Docket No. 180009-EI	
Site Selection Costs															
Jurisdictional Dollars															
1	Additions	\$0	\$0	\$0	\$0	\$0	\$0	N/A	N/A	\$0				\$0	
2	Carrying Costs - Construction	\$158	\$158	\$0	\$27	(\$183)	(\$210)	N/A	N/A	(\$210)				(\$210)	
3	Carrying Costs - DTA/(DTL)	\$159,586	\$159,930	\$344	\$159,561	\$159,578	\$17	N/A	N/A	\$361				\$361	
4	O&M	\$0	\$0	\$0	\$0	\$0	\$0	N/A	N/A	\$0				\$0	
5	Base Rate Revenue Requirements	\$0	\$0	\$0	\$0	\$0	\$0	N/A	N/A	\$0				\$0	
6	Subtotal (Sum 1-5)	\$159,744	\$160,088	\$345	\$159,588	\$159,395	(\$193)	N/A	N/A	\$151	\$0	\$0	\$0	\$151	
7															
8	Pre-Construction Costs (b)														
9	Additions														
10	Carrying Costs - Construction														
11	Carrying Costs - DTA/(DTL)														
12	O&M														
13	Base Rate Revenue Requirements														
14	Subtotal (Sum 10-14)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
15															
16															
17	Construction Costs														
18	CWIP Balance														
19	Carrying Costs - Construction														
20	Carrying Costs - DTA/(DTL)														
21	O&M														
22	Base Rate Revenue Requirements														
23	Subtotal (Sum 20-23)	\$0	\$0	\$0	\$0	\$0	\$0	N/A	N/A	\$0	\$0	\$0	\$0	\$0	
24															
25															
26	Total (Sum 6,15,24)	\$159,744	\$160,088	\$345	\$159,588	\$159,395	(\$193)	N/A	N/A	\$151	\$0	\$0	\$0	\$151	

Notes:  
29 (a) The amounts referenced were approved by the Commission in Docket No. 150009-EI (see Order No. PSC-15-0521-FOF-EI).  
30 (b) Please refer to Pre-Construction TORs for further detail.  
31 (c) FPL is not seeking FPSC review or recovery of 2017 and 2018 project costs at this time.  
32 \* Totals may not add due to rounding

**Turkey Point Units 6&7**  
**Site Selection Costs and Carrying Costs on Site Selection Cost Balance**  
**Summary of Annual Clause Recovery Amounts**

Schedule TOR-3 (True-up to Original)

FLORIDA PUBLIC SERVICE COMMISSION

EXPLANATION: Provide a summary of the actual to date and projected total amounts for the project.

COMPANY: FLORIDA POWER LIGHT & COMPANY

For the Period Ended 12/31/2018

DOCKET NO.170009-EI

Witness: Jennifer Grant-Keene and Steven D. Scroggs

Line No.	Description	(A) Actual 2006	(B) Actual 2007 (a)	(C) Actual 2008	(D) Actual 2009	(E) Actual 2010	(F) Actual 2011	(G) Actual 2012	(H) Actual 2013	(I) Actual 2014	(J) Actual 2015	(K) Actual 2016	(L) Total Actual PTD	(M) Actual/Estimated 2017	(N) Projected 2018	(O) To-Date Total Through 12/31/2018
Jurisdictional Dollars																
<b>1</b>	<b>Site Selection Category</b>															
a.	Additions		\$6,092,571	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$6,092,571	N/A	N/A	\$6,092,571
b.	O&M		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	N/A	N/A	\$0
c.	Carrying Costs on Additions		\$134,731	\$689,750	\$343,600	(\$31,207)	(\$9,831)	\$0	\$0	(\$742)	\$158	(\$183)	\$1,126,276	N/A	N/A	\$1,126,276
d.	Carrying Costs on DTA/(DTL)		(\$90)	(\$3,023)	\$29,562	\$177,172	\$180,883	\$180,883	\$170,485	\$159,224	\$159,930	\$159,578	\$1,214,604	N/A	N/A	\$1,214,604
e.	<b>Total Site Selection Amounts (Lines 1.a through 1.d)</b>	\$0	\$6,227,213	\$686,727	\$373,162	\$145,965	\$171,052	\$180,883	\$170,485	\$158,482	\$160,088	\$159,395	\$8,433,452	N/A	N/A	\$8,433,452
<b>2</b>	<b>Pre-Construction Category (b)</b>															
a.	Additions															
b.	O&M															
c.	Carrying Costs on Additions															
d.	Carrying Costs on DTA/(DTL)															
e.	<b>Total Pre-Construction Amounts (Lines 2.a through 2.d)</b>	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	N/A	N/A	\$0
<b>3</b>	<b>Construction Category</b>															
	Additions															
	CWIP Base Eligible for a return															
a.	O&M															
b.	Carrying Costs on Additions															
c.	Carrying Costs on DTA/(DTL)															
d.	<b>Total Construction Amounts (Lines 3.a through 3.c)</b>	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	N/A	N/A	\$0
<b>4</b>	<b>Other Adjustments</b>	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	N/A	N/A	\$0
<b>5</b>	<b>Total Actual Annual Amounts (Lines 1.e + 2.e + 3.d + 4)</b>	\$0	\$6,227,213	\$686,727	\$373,162	\$145,965	\$171,052	\$180,883	\$170,485	\$158,482	\$160,088	\$159,395	\$8,433,452	N/A	N/A	\$8,433,452
<b>6</b>	<b>Original Projected Total Annual Amounts</b>		\$6,539,167	\$723,484	\$509,050	\$233,136	\$171,052	\$180,883	\$180,883	\$158,402	\$159,744	\$159,588	\$8,855,801	N/A	N/A	\$8,855,801
<b>7</b>	<b>Difference (Line 5 - Line 6)</b>	\$0	(\$311,953)	(\$36,758)	(\$135,888)	(\$87,171)	(\$0)	\$0	(\$10,398)	\$79	\$345	(\$193)	(\$422,349)	N/A	N/A	(\$422,349)
<b>8</b>	<b>Percent Difference [(7 ÷ 6) x 100%]</b>	0%	-5%	-5%	-27%	-37%	0%	0%	-6%	0%	0%	0%	-5%	N/A	N/A	N/A

Notes:

- 9 (a) Effective with the filing of FPL's need petition on October 16, 2007, all costs were transferred to Construction Work in Progress, Account 107, and site selection costs ceased.
- 10 (b) Please refer to Pre-Construction TORs for further detail.
- 11 (c) FPL is not seeking FPSC review or recovery of 2017 and 2018 project costs at this time.

\* Totals may not add due to rounding

**Turkey Point Units 6&7**  
**Site Selection Costs and Carrying Costs on Site Selection Cost Balance**  
**True-up to Original: Site Selection Category - Capital Additions/Expenditures**

Schedule TOR-6 (True-up to Original)

FLORIDA PUBLIC SERVICE COMMISSION

COMPANY: FLORIDA POWER LIGHT & COMPANY

DOCKET NO. 170009-EI

EXPLANATION: Provide the actual to date and projected annual expenditures by major tasks performed within the site selection category for the project.

For the Period Ended 12/31/2018

Witness: Jennifer Grant-Keene and Steven D. Scroggs

Line No.	Description	(A)	(B)	(C)
		Actual 2006 (a)	Actual 2007 (a) (b)	Total Actual
1	<b>Site Selection:</b>			
2				
3	<b>Activities (c)</b>			
4	Project Staffing	\$442,676	\$320,164	\$762,840
5	Engineering	\$2,077,555	\$1,274,189	\$3,351,744
6	Environmental Services	\$113,473	\$1,106,817	\$1,220,290
7	Legal Services	\$22,482	\$760,749	\$783,231
8	Total Site Selection Costs:	<u>\$2,656,186</u>	<u>\$3,461,919</u>	<u>\$6,118,105</u>
9	Jurisdictional Factor	0.9958099	0.9958265	0.9958265
10	Total Jurisdictionalized Site Selection Costs:	<u>\$2,645,056</u>	<u>\$3,447,471</u>	<u>\$6,092,571</u>
11	<b>Adjustments (d)</b>			
12	Other Adjustments		(\$20,516)	(\$20,516)
13	Jurisdictional Factor	0.9958099	0.9958265	0.9958265
14	Total Jurisdictionalized Adjustments:	<u>\$0</u>	<u>(\$20,430)</u>	<u>(\$20,430)</u>
15				
16	Total Jurisdictionalized Site Selection net of adjustments	<u>\$2,645,056</u>	<u>\$3,467,901</u>	<u>\$6,113,001</u>

Notes:

- 17 (a) As filed in Docket No. 090009-EI for 2006-2007.  
18 (b) Effective with the filing of FPL's need petition on October 16, 2007, all costs were transferred to Construction Work in Progress, Account 107, and site  
19 selection costs ceased.  
20 (c) See March 2, 2009 WP-2 Page 1 of 2 in Docket No. 090009-EI.  
21 (d) See revised March 2, 2009 T-6, Line 10 in Docket No. 090009-EI.

\*Totals may not add to rounding

# **Pre-Construction Projection**

**2018**



**Turkey Point Units 6 & 7**  
**Pre-Construction Costs and Carrying Costs on Construction Cost Balance**  
**Projection Filing: Estimated Rate Impact**

Schedule P-8

FLORIDA PUBLIC SERVICE COMMISSION  
 COMPANY: FLORIDA POWER & LIGHT COMPANY  
 DOCKET NO.: 170009-EI

EXPLANATION: Using the most recent billing determinants and allocation factors available, provide an estimate of the rate impact by class of the costs requested for recovery.

For the Year Ended 12/31/2018  
 Witness: Jennifer Grant-Keene

**CALCULATION OF CAPACITY PAYMENT RECOVERY FACTOR**  
**ESTIMATED FOR THE PERIOD OF: JANUARY 2018 THROUGH DECEMBER 2018**

Line No.	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)
	RATE SCHEDULE	Percentage of Sales at Generation (%) (a)	Percentage of Demand at Generation (%) (b)	Energy Related Cost (\$) (c)	Demand Related Cost (\$) (d)	Total Capacity Costs (\$) (e)	Projected Sales at Meter (kwh) (f)	Billing KW Load Factor (%) (g)	Projected Billed KW at Meter (KW) (h)	Capacity Recovery Factor (\$/KW) (i)	Capacity Recovery Factor (\$/kwh) (j)	RDC (\$/KW) (k)	SDD (\$/KW) (l)
4	RS1/RTR1	53.25397%	58.79541%	(\$299,470)	(\$3,967,584)	(\$4,267,054)	57,483,949,536	-	-	-	(0.00007)	-	-
5	GS1/GST1	5.56609%	5.77208%	(\$31,301)	(\$389,507)	(\$420,807)	6,008,203,182	-	-	-	(0.00007)	-	-
6	GSD1/GSDT1/HLFT1	24.06472%	21.79607%	(\$135,326)	(\$1,470,825)	(\$1,606,151)	25,977,598,105	49.84229%	71,396,701	(0.02)	-	-	-
7	OS2	0.00985%	0.00501%	(\$55)	(\$338)	(\$394)	10,819,466	-	-	-	(0.00004)	-	-
8	GSLD1/GSLDT1/CS1/CST1/HL	9.78836%	8.63791%	(\$55,044)	(\$582,896)	(\$637,941)	10,572,732,222	58.50168%	24,756,887	(0.03)	-	-	-
9	GSLD2/GSLDT2/CS2/CST2/HL	2.31528%	1.72512%	(\$13,020)	(\$116,413)	(\$129,433)	2,513,919,140	66.18315%	5,203,326	(0.02)	-	-	-
10	GSLD3/GSLDT3/CS3/CST3	0.15861%	0.11752%	(\$892)	(\$7,930)	(\$8,822)	175,793,917	64.49420%	373,388	(0.02)	-	-	-
11	SST1T	0.08090%	0.05258%	(\$455)	(\$3,548)	(\$4,003)	89,667,754	12.32043%	996,983	-	-	(\$0.00)	(\$0.00)
12	SST1D1/SST1D2/SST1D3	0.01080%	0.00887%	(\$61)	(\$598)	(\$659)	11,856,926	29.33276%	55,373	-	-	(\$0.00)	(\$0.00)
13	CILC D/CILC G	2.56956%	1.93699%	(\$14,450)	(\$130,710)	(\$145,160)	2,790,632,003	73.96625%	5,168,281	(0.03)	-	-	-
14	CILC T	1.38272%	0.98645%	(\$7,776)	(\$66,567)	(\$74,343)	1,532,560,735	76.16413%	2,756,413	(0.03)	-	-	-
15	MET	0.08309%	0.07358%	(\$467)	(\$4,965)	(\$5,432)	91,241,144	64.16476%	194,792	(0.03)	-	-	-
16	OL1/SL1/SL1M/PL1/LT1	0.61921%	0.02559%	(\$3,482)	(\$1,727)	(\$5,209)	668,389,683	-	-	-	(0.00001)	-	-
17	SL2/SL2M/GSCU1	0.09685%	0.06683%	(\$545)	(\$4,510)	(\$5,054)	104,537,486	-	-	-	(0.00005)	-	-
18													
19	TOTAL			(\$562,343)	(\$6,748,119)	(\$7,310,462)	108,031,901,299		110,902,144				

21 (a) Obtained from Page 1, Col(9)  
 22 (b) Obtained from Page 1, Col(10)  
 23 (c) (Total Capacity Costs/13) \* Col(2)  
 24 (d) (Total Capacity Costs/13 \* 12) \* Col(3)  
 25 (e) Col(4) + Col(5)  
 26 (f) Projected kwh sales for the period January 2018 through December 2018.  
 27 (g) (kWh sales / 8760 hours)/((avg customer NCP)/(8760 hours))  
 28 (h) Col(7) / (Col(8) \*730)  
 29 (i) Col(6) / Col(9)  
 30 (j) Col(6) / Col(7)  
 31 (k) RDC = Reservation Demand Charge - (Total Col 6)/(Page 1 Total Col 8)/(Page 1 Col 5)/12 Months  
 32 (l) SDD = Sum of Daily Demand Charge - (Total Col 6)/(Page 1 Total Col 8)/(21 onpeak days)/(Page 1 Col 5)/12 Months  
 33  
 34 Note: There are currently no customers taking service on Schedules ISST1(D) and ISST1(T). Should any customer begin  
 35 taking service on these schedules during the period, they will be billed using the applicable SST1 factor.

Totals may not add due to rounding.

# **Pre-Construction True-Up To Original**

## **2018**

**FLORIDA POWER & LIGHT COMPANY**  
**Turkey Point Units 6&7 - Pre-Construction Costs**  
**NCRC Summary - Dkt. 170009**

Schedule TOR-1 (True-up to Original)

FLORIDA PUBLIC SERVICE COMMISSION

EXPLANATION: Show the jurisdictional amounts used to calculate the final true-up, estimated true-up, projection, deferrals, and recovery of deferrals for each project included in the NCRC. The sum of the amounts should be the total amount requested for recovery in the projected period.

For the Period Ended 12/31/2018

COMPANY: FLORIDA POWER LIGHT & COMPANY

Witness: Jennifer Grant-Keene

DOCKET NO.170009-EI

Line No.	Costs by Project	2015			2016			2017	2018	Subtotals	Deferred Recovery			Net Amounts
		A (b)	B	C (B)-(A)	D (b)	E	F (E)-(D)	G	H	I (C)+(F)	J	K	L	M
		Approved Actual & Estimated Amounts in Docket No. 150009-EI	Final Actual Amounts in Docket No. 170009-EI	Final True-up for 2015	Approved Projected Amounts in Docket No. 150009-EI	Final Actual Amounts in Docket No. 170009-EI (d)	Final True-up for 2016	Actual & Estimated Amounts for 2017 in Docket No. 170009-EI (e)	Initial Projected Amounts for 2018 in Docket No. 170009-EI (e)	Amounts to be Recovered in Docket No. 170009-EI (d)	Increase in Deferred Balance	Decrease in Deferred Balance	2018 Deferred Balance	Net Amount Requested for Recovery in 2018 in Docket No. 170009-EI

Site Selection Costs (c)

Jurisdictional Dollars

1	Additions													
2	Carrying Costs - Construction													
3	Carrying Costs - DTA/(DTL)													
4	O&M													
5	Base Rate Revenue Requirements													
6	Subtotal (Sum 1-5)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0

Pre-Construction Costs

10	Additions (a)	\$18,638,220	\$17,309,494	(\$1,328,727)	\$21,057,310	\$15,673,982	(\$5,383,328)	N/A	N/A	(\$6,712,054)	-	-	-	(\$6,712,054)
11	Carrying Costs - Construction	(\$62,774)	(\$57,109)	\$5,665	\$246,400	\$26,460	(\$219,940)	N/A	N/A	(\$214,274)	-	-	-	(\$214,274)
12	Carrying Costs - DTA/(DTL)	\$6,709,332	\$6,725,838	\$16,505	\$7,376,121	\$6,980,591	(\$395,530)	N/A	N/A	(\$379,024)	-	-	-	(\$379,024)
13	O&M	\$0	\$0	\$0	\$0	\$0	\$0	N/A	N/A	\$0	-	-	-	\$0
14	Base Rate Revenue Requirements	\$0	\$0	\$0	\$0	\$0	\$0	N/A	N/A	\$0	-	-	-	\$0
15	Subtotal (Sum 10-14)	\$25,284,779	\$23,978,223	(\$1,306,556)	\$28,679,830	\$22,681,033	(\$5,998,797)	N/A	N/A	(\$7,305,353)	\$0	\$0	\$0	(\$7,305,353)

Construction Costs

19	CWIP Balance													
20	Carrying Costs - Construction													
21	Carrying Costs - DTA/(DTL)													
22	O&M													
23	Base Rate Revenue Requirements													
24	Subtotal (Sum 20-23)	\$0	\$0	\$0	\$0	\$0	\$0	N/A	N/A	\$0	\$0	\$0	\$0	\$0
26	Total (Sum 6,15,24)	\$25,284,779	\$23,978,223	(\$1,306,556)	\$28,679,830	\$22,681,033	(\$5,998,797)	N/A	N/A	(\$7,305,353)	\$0	\$0	\$0	(\$7,305,353)

(a) Additions are pre-construction costs that, absent Section 366.93, F.S., would be recorded as CWIP.

(b) The amounts referenced were approved by the Commission in Docket No. 150009-EI (see Order No. PSC-15-0521-FOF-EI).

(c) Refer to Site Selection TORs for further details.

(d) Initial assessment costs reflected on TOR-6 are not included in additions for 2016 Final True Up. FPL is not seeking to recover these costs at this time.

(e) FPL is not seeking FPSC review or recovery of 2017 and 2018 costs at this time.

\* Totals may not add due to rounding

**Turkey Point Units 6&7**  
**Site Selection, Pre-Construction Costs, and Carrying Costs on Construction Cost Balance**  
**True-up to Original: Budgeted and Actual Power Plant In-Service Costs**

Schedule TOR-2 (True-Up to Original)

[Section (8)(f)]

FLORIDA PUBLIC SERVICE COMMISSION  
 COMPANY: Florida Power & Light Company  
 DOCKET NO.170009-EI

EXPLANATION: Report the budgeted and actual costs as compared to the estimated in-service costs of the proposed power plant as provided in the petition for need determination or revised estimate as necessary.

For the Period Ended 12/31/2018

Witness: Jennifer Grant-Keene and Steven D. Scroggs

Line No.		Actual Costs as of December 31, 2016	Remaining Budget Costs to Complete Plant		Total Estimated In-Service Cost		Estimated Cost Provided in the Petition for Need determination	
			Low Range	High Range	Low Range	High Range	Low Range	High Range
1	Site Selection	\$6,118,105	\$0	\$0	\$6,118,105	\$6,118,105	\$8,000,000	\$8,000,000
2	Pre-Construction	\$253,680,617	\$93,125,585	\$128,958,195	\$346,806,203	\$382,638,812	\$465,000,000	\$465,000,000
3	Construction	\$0	\$11,155,665,197	\$16,406,703,271	\$11,155,665,197	\$16,406,703,271	\$8,149,000,000	\$12,124,000,000
4	Carrying Charges & AFUDC	\$48,281,188	\$3,405,359,711	\$5,031,009,079	\$3,453,640,899	\$5,079,290,267	\$3,461,000,000	\$5,160,000,000
5	Total	<u>\$308,079,911</u>	<u>\$14,654,150,493</u>	<u>\$21,566,670,544</u>	<u>\$14,962,230,404</u>	<u>\$21,874,750,455</u>	<u>\$12,083,000,000</u>	<u>\$17,757,000,000</u>

- 6 (a) Actual Sunk Costs represent costs incurred on the project as of December 31, 2016. This amount does not include any termination or other  
 7 cancellation costs that could be incurred in the event of project cancellation or deferral.  
 8 (b) Carrying Costs on (over)/under recoveries are not included as part of Sunk Costs.  
 9 (c) AFUDC is calculated on the non-incremental costs total company and includes carrying costs.  
 10 (d) Actual AFUDC through December 31, 2016 represents the retail jurisdictional portion.

11 \*Totals may not add due to rounding.  
 12

**Turkey Point Units 6&7**  
**Pre-Construction Costs and Carrying Costs on Construction Cost Balance**  
**Summary of Annual Clause Recovery Amounts**

Schedule TOR-3 (True-up to Original)

FLORIDA PUBLIC SERVICE COMMISSION

EXPLANATION: Provide a summary of the actual to date and projected total amounts for the project.

COMPANY: FLORIDA POWER LIGHT & COMPANY

For the Period Ended 12/31/2018

DOCKET NO. 170009-EI

Witness: Jennifer Grant-Keene and Steven D. Scroggs

Line No.	Description	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(L)	(K)	(M)	(N)	(O)
		Actual 2006	Actual 2007	Actual 2008	Actual 2009	Actual 2010	Actual 2011	Actual 2012	Actual 2013	Actual 2014	Actual 2015	Actual 2016 (b)	Total Actual	Actual/Estimated 2017 (c)	Projected 2018 (c)	To-Date Total Through 12/31/2018
Jurisdictional Dollars																
1	<b>Site Selection Category (a)</b>															
	a. Additions															
	b. O&M															
	c. Carrying Costs on (over)/under recoveries															
	d. Carrying Costs on DTA/(DTL)															
	e. Total Site Selection Amounts (Lines 1.a through 1.d)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2	<b>Pre-Construction Category</b>															
	a. Additions	\$0	\$2,522,692	\$47,049,854	\$37,599,045	\$25,287,720	\$22,877,377	\$29,034,114	\$28,209,654	\$18,448,666	\$17,309,494	\$15,673,982	\$244,012,597	N/A	N/A	\$244,012,597
	b. O&M	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	N/A	N/A	\$0
	c. Carrying Costs on (over)/under recoveries	\$0	\$20,555	\$2,204,114	(\$691,521)	(\$9,331,680)	(\$5,974,180)	(\$2,666,490)	(\$1,525,282)	(\$1,179,841)	(\$57,109)	\$26,460	(\$19,174,974)	N/A	N/A	(\$19,174,974)
	d. Carrying Costs on DTA/(DTL)	\$0	(\$8)	(\$4,359)	\$1,549,215	\$3,481,362	\$4,418,565	\$5,406,452	\$6,190,204	\$6,149,897	\$6,725,838	\$6,980,591	\$40,897,755	N/A	N/A	\$40,897,755
	e. Total Pre-Construction Amounts (Lines 2.a through 2.d)	\$0	\$2,543,239	\$49,249,608	\$38,456,738	\$19,437,402	\$21,321,762	\$31,774,076	\$32,874,575	\$23,418,721	\$23,978,223	\$22,681,033	\$265,735,378	N/A	N/A	\$265,735,378
3	<b>Construction Category</b>															
	Additions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	CWIP Base Eligible for a return	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	a. O&M	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	b. Carrying Costs on Additions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	c. Carrying Costs on DTA/(DTL)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	d. Total Construction Amounts (Lines 3.a through 3.c)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	N/A	N/A	\$0
4	<b>Other Adjustments</b>	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	N/A	N/A	\$0
5	<b>Total Actual Annual Amounts (Lines 1.e + 2.e + 3.d + 4)</b>	\$0	\$2,543,239	\$49,249,608	\$38,456,738	\$19,437,402	\$21,321,762	\$31,774,076	\$32,874,575	\$23,418,721	\$23,978,223	\$22,681,033	\$265,735,378	N/A	N/A	\$265,735,378
6	<b>Original Projected Total Annual Amounts</b>	\$0	\$2,543,239	\$73,042,554	\$116,885,727	\$91,627,859	\$31,310,395	\$36,642,378	\$34,813,272	\$23,970,235	\$19,183,748	\$21,057,310	\$451,076,717	N/A	N/A	\$451,076,717
7	<b>Difference (Line 5 - Line 6)</b>	\$0	\$0	(\$23,792,946)	(\$78,428,989)	(\$72,190,457)	(\$9,988,634)	(\$4,868,302)	(\$1,938,697)	(\$551,513)	\$4,794,475	\$1,623,724	(\$185,341,339)	N/A	N/A	(\$185,341,339)
8	<b>Percent Difference [(7 ÷ 6) x 100%]</b>	N/A	N/A	-33%	-67%	-79%	-32%	-13%	-6%	-2%	25%	8%	-41%	N/A	N/A	N/A

9 (a) Refer to Site Selection TORs for further details.

10 (b) Initial Assessment costs reflected on TOR-6 are not included in additions for 2016 Actual costs. FPL is not seeking to recover these costs at this time.

11 (c) FPL is not seeking FPSC review or recovery of 2017 and 2018 project costs at this time.

12 \* Totals may not add due to rounding

**Turkey Point Units 6&7**  
**Pre-Construction Costs and Carrying Costs on Construction Cost Balance**  
**True-up to Original: Pre-Construction Capital Additions/Expenditures**

Schedule TOR-6 (True-up to Original)

FLORIDA PUBLIC SERVICE COMMISSION

EXPLANATION: Provide the actual to date and projected annual expenditures by major tasks performed within pre-construction for the project.

For the Period Ended 12/31/2018

COMPANY: FLORIDA POWER LIGHT & COMPANY

All pre-construction category costs also included in site selection costs or construction costs must be identified.

Witness: Jennifer Grant-Keene and Steven D. Scroggs

DOCKET NO. 170009-EI

Line No.	Description	(A) Actual 2007	(B) Actual 2008	(C) Actual 2009	(D) Actual 2010	(E) Actual 2011	(F) Actual 2012	(G) Actual 2013	(H) Actual 2014	(I) Actual 2015	(J) Actual 2016	(K) Total Actual	(L) Actual/Estimated 2017 (c)	(M) Projections 2018 (c)
1	<b>Pre-Construction:</b>													
2														
3	<b>Generation:</b>													
4	Licensing	\$2,017,181	\$31,085,381	\$30,271,612	\$23,181,548	\$19,339,344	\$22,569,507	\$25,637,988	\$16,072,491	\$14,778,172	\$14,056,556	\$199,009,779	N/A	N/A
5	Permitting	\$516,084	\$1,694,555	\$991,090	\$1,223,203	\$679,397	\$1,004,333	\$1,231,174	\$414,704	\$187,118	\$221,004	\$8,162,662	N/A	N/A
6	Engineering and Design	\$0	\$3,542,947	\$6,445,161	\$1,185,396	\$3,132,238	\$5,991,791	\$1,859,326	\$2,916,303	\$3,326,281	\$3,105,727	\$31,505,170	N/A	N/A
7	Long lead procurement advanced payments	\$0	\$10,860,960	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$10,860,960	N/A	N/A
8	Power Block Engineering and Procurement	\$0	\$31,789	\$23,662	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$55,451	N/A	N/A
9	Initial Assessment (a)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$1,480,242	\$809,801	\$2,290,043	N/A	N/A
10	Total Generation Costs	\$2,533,265	\$47,215,633	\$37,731,525	\$25,590,147	\$23,150,978	\$29,565,631	\$28,728,488	\$19,403,498	\$19,771,813	\$18,193,088	\$251,884,066	N/A	N/A
11	<b>Adjustments</b>													
12	Non-Cash Accruals	\$587,128	\$6,678,052	(\$4,978,314)	\$931,345	\$1,204,389	\$0	\$0	\$0	\$0	\$0	\$4,422,600	N/A	N/A
13	Other Adjustments (b)	(\$14,344)	(\$176,256)	(\$187,874)	(\$110,607)	(\$137,153)	\$0	\$0	\$0	\$1,480,242	\$1,618,052	\$2,472,059	N/A	N/A
14	Total Adjustments	\$572,783	\$6,501,796	(\$5,166,188)	\$820,738	\$1,067,236	\$0	\$0	\$0	\$1,480,242	\$1,618,052	\$6,894,659	N/A	N/A
15														
16	Total Generation Costs Net of Adjustments (Line 10 - Line 14)	\$1,960,482	\$40,713,837	\$42,897,713	\$24,769,409	\$22,083,742	\$29,565,631	\$28,728,488	\$19,403,498	\$18,291,571	\$16,575,036	\$244,989,407	N/A	N/A
17	Jurisdictional Factor	0.9958265	0.99648888	0.99648888	0.98818187	0.98818187	0.98202247	0.98194011	0.95079073	0.94630981	0.94563790		N/A	N/A
18	Total Jurisdictional Generation Costs Net of Adjustments	\$1,952,300	\$40,570,886	\$42,747,094	\$24,476,681	\$21,822,754	\$29,034,114	\$28,209,654	\$18,448,666	\$17,309,494	\$15,673,982	\$240,245,624	N/A	N/A
19														
20	<b>Transmission:</b>													
21	Line Engineering	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	N/A	N/A
22	Substation Engineering	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	N/A	N/A
23	Clearing	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	N/A	N/A
24	Other	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	N/A	N/A
25	Total Transmission Costs	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	N/A	N/A
26	Jurisdictional Factor	0.99412116	0.99412116	0.99412116	0.88696801	0.88696801	0.90431145	0.89472420	0.88498196	0.88498196	0.88718019		N/A	N/A
27	Total Jurisdictional Transmission Costs	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	N/A	N/A
28	<b>Adjustments</b>													
29	Non-Cash Accruals	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	N/A	N/A
30	Other Adjustments	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	N/A	N/A
31	Total Adjustments	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	N/A	N/A
32	Jurisdictional Factor	0.99412116	0.99412116	0.99412116	0.88696801	0.88696801	0.90431145	0.89472420	0.88498196	0.88498196	0.88718019		N/A	N/A
33	Total Jurisdictional Adjustments	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	N/A	N/A
34														
35	Total Jurisdictional Transmission Costs Net of Adjustments	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	N/A	N/A
36														
37	Total Jurisdictional Pre-Construction Costs	\$1,952,300	\$40,570,886	\$42,747,094	\$24,476,681	\$21,822,754	\$29,034,114	\$28,209,654	\$18,448,666	\$17,309,494	\$15,673,982	\$240,245,624	N/A	N/A
38														
39	<b>Construction:</b>													
40														
41	N/A- At this stage, construction has not commenced.													
42														
43														
44	(a) Reflected on line 9 are initial assessment costs which FPL is not seeking to recover at this time, and therefore these costs are adjusted out on line 13. Instead, FPL will capitalize these costs as incurred and accrue allowance for funds used during construction (AFUDC).													
45	(b) Reflects adjustments for Initial Assessment costs and Property Held for Future Use.													
46	(c) FPL is not seeking FPSC review or recovery of 2017 and 2018 project costs at this time.													
47														
48														
49	* Totals may not add due to rounding													

**Turkey Point Units 6&7**  
**Pre-Construction Costs and Carrying Costs on Construction Cost Balance**  
**Power Plant Milestones**

Schedule TOR-7 (True-up to Original)

[Section (6)(c)1.c.]

FLORIDA PUBLIC SERVICE COMMISSION

EXPLANATION: Provide initial project milestones in terms of costs, budget levels, initiation dates and completion dates.

For the Period Ended 12/31/2018

COMPANY: FLORIDA POWER & LIGHT COMPANY

Provide all revised milestones and reasons for each revision.

Witness: Steven D. Scroggs

DOCKET NO.: 170009-EI

Line  
No.

Line No.		Initial Milestones	Revised Milestones	Reasons for Variance(s)
1				
2				
3	Licensing/Permits/Authorizations/Legal	Initiate 2007	no change	N/A
4		Complete 2012	2017	Current expectation for COL issuance
5	Site/Site Preparation	Initiate 2010	Under Review	Construction will await license approvals
6		Complete 2012	Under Review	Initial date has changed
7	Related Facilities <sup>1</sup>	Initiate 2010	Under Review	Construction will await license approvals
8		Complete 2018/2020	Under Review	Initial date has changed
9	Generation Plant	Initiate 2013/2015	Under Review	Construction will await license approvals
10		Complete 2018/2020	Under Review	Initial date has changed
11	Transmission Facilities	Initiate 2010	Under Review	Construction will await license approvals
12		Complete 2020	Under Review	Initial date has changed

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Estimated Cost Provided in the Petition for Need Determination (in millions)			
Year	Case A	Case B	Case C
2006	\$4	\$4	\$4
2007	\$8	\$8	\$8
2008	\$113	\$113	\$113
2009	\$223	\$223	\$223
2010	\$373	\$373	\$373
2011	\$523	\$523	\$523
2012	\$1,293	\$1,183	\$1,506
2013	\$2,483	\$2,201	\$3,025
2014	\$4,023	\$3,521	\$4,993
2015	\$6,091	\$5,291	\$7,632
2016	\$8,522	\$7,373	\$10,736
2017	\$10,610	\$9,161	\$13,402
2018	\$12,705	\$10,956	\$16,077
2019	\$13,431	\$11,578	\$17,005
2020	\$14,020	\$12,082	\$17,757
2021			
2022			
2023			
2024			
2025			
2026			
2027			
2028			
2029			
2030			
2031			
2032			

Total Current Estimated in Service Costs (in millions)		
	Low Range	High Range
	\$11	\$11
	\$73	\$73
	\$122	\$122
	\$155	\$155
	\$185	\$185
	\$223	\$224
	\$261	\$261
	\$286	\$287
	\$312	\$312
	\$335	\$336
	\$360	\$361
	\$371	\$377
	\$376	\$384
	\$381	\$391
	\$383	\$395
	\$459	\$506
	\$523	\$601
	\$1,080	\$1,421
	\$2,301	\$3,220
	\$4,109	\$5,885
	\$6,310	\$9,127
	\$8,655	\$12,582
	\$10,814	\$15,763
	\$12,792	\$18,677
	\$14,552	\$21,271
	\$14,962	\$21,875

(1) Turkey Point Unit 6 targeted for 2031, Unit 7 targeted for 2032.  
 Values include Site Selection, Pre-Construction and Construction Costs.



**CERTIFICATE OF SERVICE  
DOCKET NO. 170009-EI**

I HEREBY CERTIFY that a true and correct copy of FPL's Testimony and Exhibits of Steven Scroggs was served electronically this 1st day of May, 2017, to the following:

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