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Public Service Commission

July 21, 2017

Kevin I.C. Donaldson
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Florida Power & Light Company
700 Universe Boulevard
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STAFF'S FIRST DATA REQUEST

Re: Docket No. 20170148-EI: Petition for determination under Rule 25-6.115, F.A.C., and approval of associated revised tariff sheet 6.300, by Florida Power & Light Company.

Dear Mr. Donaldson:

By this letter and pursuant to subsection 366.04(2), Florida Statutes, Commission staff respectfully requests the following information from Florida Power and Light Company (FPL).

1. Page 4 of the petition states that FPL currently estimates it will complete the hardening of all of its remaining overhead distribution feeders over the next five to six years. Please state the remaining overhead distribution feeders that will be replaced with hardened overhead facilities in miles and as a percentage of the total number of miles of overhead distribution feeder lines in FPL's system.

	Remaining overhead distribution feeders (miles)	Percent of total overhead distribution feeders
2017		
2018		
2019		
2020		
2021		
2022		
2023		

2. Page 4 of the petition states that FPL currently estimates it will complete the hardening of all of its remaining overhead distribution feeders over the next five to six years. Please complete the table below summarizing FPL’s estimated cost to remove existing overhead facilities and estimated residential rate impact. For this question, please assume that no costs are recovered through CIAC as no customer conversions are requested. Column (1) represents element 2 of the CIAC formula, column (2) represents element 3 of the CIAC formula, and column (3) represents element 5 of the CIAC formula as shown on Tariff Sheet No. 6.300.

	(1) Cost to Remove Existing Overhead Facilities (\$)	(2) Net Book Value of the Existing Overhead Facilities (\$)	(3) The Salvage Value of the Existing Overhead Facilities to be Removed (\$)	Total (1)+(2)-(3)	Residential Rate Impact (\$/1,000 kWh)
2017					
2018					
2019					
2020					
2021					
2022					
2023					

3. Page 5 of the petition states that FPL is currently aware of several municipalities that are considering or moving forward with plans to convert existing non-hardened feeders to underground facilities.
- a) Please list all the municipalities FPL refers to.
- b) Based on the municipalities that are the subject of the above statement and listed in the response above, please complete the table below summarizing the amount of CIAC FPL estimates it will receive.

	Total CIAC under current Tariff Sheet No. 6.300 (\$)	Total CIAC under proposed Tariff Sheet No. 6.300 (e.g., excluding Existing Facilities Cost) (\$)
2017		
2018		
2019		
2020		
2021		
2022		
2023		

4. Pages 4 and 6 of the petition cite Rule 25-6.0432, F.A.C. Please confirm that FPL is referring to Rule 25-6.0342, F.A.C.
5. Page 6 of the petition states that FPL's experience is that underground tends to be more storm resilient than hardened overhead facilities. Please provide a discussion and supporting documentation for this statement.
6. Page 6 of the petition states that underground facilities have historically provided better overall day to day reliability. Please provide a discussion and supporting documentation for this statement.
7. Please list all the municipalities that to date have completed the conversion from overhead to underground facilities, state the date of completed conversion, and provide a discussion and any available supporting documentation on reliability improvements since the conversion has been completed.
8. For the municipalities that have completed conversion projects in the past five years, please provide the following information:

	Total Amount of CIAC paid to FPL (\$)	Amount of CIAC associated with the Existing Facilities Cost (\$)
2010		
2011		
2012		
2013		
2014		
2015		
2016		

9. In general, what is the average cost to convert one mile of overhead distribution feeder lines to equivalent underground distribution feeder facilities?
10. Page 7 of the petition states that excluding the Existing Facilities Cost from the CIAC for the conversion of existing non-hardened overhead feeder facilities to underground will reduce the cost of conversion thereby incentivizing more conversions. Please provide a discussion and any available documentation that supports this statement.
11. Assuming the proposed tariff revision is approved, will FPL notify customers that may be considering overhead to underground conversion of the tariff change? If yes, please explain how.
12. Rule 25-6.115(4) through (6), F.A.C., provides the steps for applicants requesting conversion projects (non-binding cost estimate; applicant request - payment of deposit –

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binding cost estimate; contract with utility). Please clarify the following language in the proposed tariff: “from an applicant who submits an application providing a binding notification”. Would an applicant that has requested a binding cost estimate under Subsection (5), but has not yet entered into a contract with FPL pursuant to subsection (6), qualify to receive a lower CIAC calculation under the revised tariff?

13. Were costs for the removal of existing overhead facilities for purposes of storm hardening included in FPL’s most recent rate case filing?
14. Please discuss the differences in the accounting treatment of the Existing Facilities Cost for non-hardened overhead feeder X under the following three scenarios:
 - a. FPL removes and replaces feeder X per its Storm Hardening Plan.
 - b. FPL does a conversion project for feeder X and receives CIAC under current tariff 6.300.
 - c. FPL does a conversion project for feeder X and receives CIAC under proposed tariff 6.300.

Please file all responses electronically no later than Friday, August 4, 2017 via the Commission’s website at www.floridapsc.com by selecting the Clerk’s Office tab and Electronic Filing Web Form. Please feel free to call me at 850.413.6204 if you have any questions.

Thank you.

/s/Sevini Guffey

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cc: Office of Commission Clerk