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September 6, 2017

-VIA ELECTRONIC FILING-

Ms. Carlotta S. Stauffer
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

**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 Ms. Stauffer:

Please find enclosed for electronic filing a copy of Florida Power & Light Company's responses to Staff's Second Data Request (Nos. 1-8) in the above mentioned docket.

If there are any questions regarding this transmittal, please contact me at (561) 304-5170.

Sincerely,

/s/ Kevin I.C. Donaldson
Kevin I.C. Donaldson
Fla. Bar No. 0833401

Enclosure

QUESTION:

Please discuss whether the proposed new tariff provision on Sheet No. 6.300 should be removed once FPL completes its hardening (since at that point FPL will have no more non-hardened overhead feeder facilities on its system for customers to convert to underground).

RESPONSE:

While FPL believes the proposed tariff language revision restricts its applicability to the remaining non-hardened feeders in FPL's system and therefore would be deemed moot if it was not removed, FPL is not opposed to subsequently petitioning the Commission for approval to remove the proposed tariff language once all existing non-hardened feeders have been hardened.

QUESTION:

Please provide a discussion how the exclusion of the Existing Facilities Cost from the CIAC calculation affects FPL's earnings and the general body of ratepayers:

- a) for the period 2017-2020 (term of 2016 rate case settlement and base rate freeze)
- b) in the MFRs of FPL's next rate case.

RESPONSE:

FPL interprets this request as asking FPL to provide a conceptual discussion as to how the exclusion of the Existing Facilities Costs from the CIAC calculation would affect FPL's earnings and the general body of ratepayers.

- a) For the period 2017-2020, there is no impact to FPL's general body of ratepayers as a result of the exclusion of the Existing Facilities Cost from the CIAC calculation because of the base rate freeze during the term of the settlement agreement. Assuming FPL has enough reserve amortization to cover any increase in revenue requirements associated with the exclusion, then FPL would not expect an impact to earnings during the term of the settlement agreement.
- b) The exclusion of the Existing Facilities Cost from the CIAC calculation impacts FPL's depreciation reserve as shown below:
 - a. Cost to Remove Existing Facilities – The cost to remove existing facilities would be reflected as a reduction in FPL's depreciation reserve.
 - b. Net Book Value of Existing Overhead Facilities – The remaining net book value of replaced facilities would be reflected as a reduction in FPL's depreciation reserve.
 - c. Salvage Value of Existing Facilities – Any amounts received for salvage would be reflected as an increase in FPL's depreciation reserve.

Any amounts incurred for these items, which are not recovered through the CIAC calculation, and the use of reserve amortization to cover any associated increase in revenue requirements as described in subpart (a) would impact the balance of FPL's depreciation reserve that is used to determine rate base in FPL's MFRs for its next base rate case.

Note that accruals for each of these items are embedded in FPL's current depreciation rates. Exclusion of the Existing Facilities Cost from the CIAC calculation also would need to be taken into account when FPL prepares its next depreciation study and reflected in the proposed depreciation rates in that filing. Assuming FPL files its next depreciation study along with its next base rate case, any adjustments to FPL's depreciation expense and depreciation reserve resulting from the depreciation rates proposed in the depreciation study would be presented as a company adjustment in that base rate case.

QUESTION:

Please refer to Order No. PSC-07-0442-TRF-EI, in Docket No. 060150-E1, Attachment C, CIAC and GAF Waiver Example. Keeping the same illustrative amounts, please add a column showing the CIAC and GAF waiver calculation under proposed Sheet No. 6.300 (i.e., excluding Existing Facilities Cost).

RESPONSE:

Please see Attachment No. 1 for an updated Attachment C.

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ATTACHMENT C

CIAC & GAF WAIVER EXAMPLES (\$000's)
UPDATED FOR PROPOSED REVISION TO FPL'S SHEET NO. 6.300
(Amounts Are Illustrative Only)

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Contribution-In-Aid-of-Construction (CIAC):

The estimated cost to install the requested underground facilities	10,000	10,000
The estimated cost to remove the existing overhead facilities	1,000	---
+ The net book value of the existing overhead facilities	3,000	---
+ The net present value of the estimated operational costs of underground facilities over 30 years (new per rule)	1,800	1,800
+ The net present value of the estimated average storm restoration costs of underground facilities over 30 years (new per rule)	700	700
- The estimated cost that would be incurred to install new overhead facilities, in lieu of underground, to replace the existing overhead facilities (the "Hypothetical Overhead Facilities")	(7,000)	(7,000)
- The estimated salvage value of the existing overhead facilities to be removed	(1,000)	---
- The net present value of the estimated operational costs of overhead facilities over 30 years (new per rule)	(2,000)	(2,000)
- The net present value of the estimated average storm restoration costs of overhead facilities over 30 years (new per rule)	<u>(1,000)</u>	<u>(1,000)</u>
CIAC	<u>5,500</u>	<u>2,500</u> sum of lines 2-10

GAF Waiver:

CIAC * 25%	1,375	625 line 11 * 25%
+ (The net present value of the estimated average storm restoration costs of underground facilities over 30 years	700	700 line 6
- The net present value of the estimated average storm restoration costs of overhead facilities over 30 years);	<u>(1,000)</u>	<u>(1,000)</u> line 10
Subtotal - Estimated average storm restoration costs differential	(300)	(300) line 14 + line 15
* 75%	<u>(225)</u>	<u>(225)</u> line 16 * 75%
GAF Waiver	<u>1,150</u>	<u>400</u> line 13 + line 17

QUESTION:

Referring to the response to Staff's First Data Request No. 3, please state whether any of the municipalities listed also qualify for the GAF Waiver. If yes, please state whether the 25 percent GAF Waiver reduction is reflected in the CIAC amounts shown in the table (response to question 3b).

RESPONSE:

Yes, based on preliminary discussions that have occurred to date, the potential overhead to underground projects associated with the municipalities provided in FPL's response to Staff's First Data Request No. 3 all qualify for the GAF Waiver and the 25% GAF Waiver amounts have been reflected in the provided estimated "ball park" CIAC amounts.

QUESTION:

Referring to the response to Staff's First Data Request No. 3b, please show the assumptions and steps of the calculation of the residential rate impact (\$14.2 million reduction in CIAC = \$0.01).

RESPONSE:

Calculation: $(\$14.2 \text{ million} * 0.091884813 * 1.001381305 * \$0.8878) / 100,000,000 = \0.01

Details:

\$14.2 million: Difference in CIAC collected – current vs. proposed tariff;

0.091884813: Weighted average cost of capital from FPL's May 2017 Earnings Surveillance Report at the mid-point of FPL's authorized return on equity range (10.55%) on a pre-tax basis;

1.001382305: Multiplier for bad debt and regulatory assessment fee, from FPL's most recent rate case – Docket No. 20160021-EI; and

\$0.8878: Cents per kWh per FPL's 2016 sales forecast for 2023

QUESTION:

In response to Staff's First Data Request Nos. 5 and No. 6, FPL described the reliability benefits of underground facilities. Please describe, and quantify if possible, any economic benefits associated with underground facilities.

RESPONSE:

As noted in FPL's responses to Staff's First Data Request Nos. 5 and 6, underground facilities have demonstrated that they are more storm resilient and provide improved day-to-day reliability results when compared to overhead facilities. Since there are fewer outages with underground facilities, restoration costs are reduced, which results in lower base rate revenue requirements and reduced storm charges for FPL's customers. FPL's approved tariffs for Underground Distribution Facilities for Residential Subdivisions and Developments and for Installation of Underground Electric Distribution Facilities for the Conversion of Overhead Electric Distribution Facilities recognize the reduction in FPL's storm restoration costs when facilities are undergrounded, as both tariffs similarly provide for up to a 25% reduction in contributions in aid of construction ("CIAC"). Beyond the reduction in FPL's storm restoration costs, FPL's customers also enjoy other economic benefits. For instance, for residential customers, overall food spoilage costs should be lower or eliminated if service interruptions and/or restoration times are reduced. Also, FPL knows from discussions with its commercial and industrial customers that continuity in their operations helps to reduce or avoid additional and unexpected expenses, lost revenues and reduced profits. However, these customer-side economic benefits are both difficult to quantify and highly dependent upon the customer mix that would be affected by a particular undergrounding project. Therefore, FPL has not yet been able to quantify those benefits.

FPL notes as a result of its plans to harden the remaining feeder system, the Existing Facilities Costs would have been incurred and borne by the general body of customers anyway. Therefore, there will be no additional costs borne by the general body of customers as a result of municipalities opting to pursue underground conversions.

QUESTION:

In response to Staff's First Data Request No. 6, FPL reported that its 2016 reliability report showed that the reliability indices for underground facilities have been performing better than the overhead facilities. However, on page 91 of the reliability report, it shows the L-bar for underground facilities is worse than the L-bar for the overhead facilities. Please explain why this is.

RESPONSE:

L-bar is a reliability performance metric that considers the length of an outage based upon the time it takes to restore the last affected customer. Said another way, L-bar measures the time it takes to get customers "all on" for each outage. This is different than other reliability performance metrics (e.g., SAIDI and CAIDI), which consider "part on" customers, i.e., customers that are restored more quickly than others (e.g., customers restored as a result of automated/manual switching). Since much of FPL's underground system is designed to take advantage of loop configuration, there are increased opportunities for switching that will accelerate restoration for "part on" customers. While this provides for improved underground SAIDI and CAIDI performance, it does not necessarily improve the performance of underground L-bar. The primary reasons for the better overhead vs. underground L-bar or "all on" performance are locating the cause/failure mode of an overhead outage and/or the repair/replacement of overhead facilities is generally less difficult and time consuming than it is for underground.

QUESTION:

In response to Staff's First Data Request No. 7, FPL provided the municipalities that have completed the conversion from overhead to underground facilities. Please provide the reporting regions for those municipalities and the reliability indices for those regions. Please include the reliability data for 2007 through the present.

RESPONSE:

In preparing its response to this question, FPL realized that it had inadvertently only provided conversion projects that were completed in the last five years (as was requested in Staff's First Data Request No. 8), instead of all completed conversion projects. Below is a listing of all completed conversion projects (since late 2006), with the applicable management regions. Additionally, for management area reliability data, please see Attachment No.1 which contains pages 96-98 of FPL's March 2012 Annual Reliability Report that includes reliability data for 2007-2011, and Attachment No. 2 which contains pages 88-90 of FPL's March 2017 Annual Reliability Report that includes reliability data for 2012-2016. FPL notes that for all the conversion projects identified below, the total miles of overhead facilities converted to underground amounts to less than 55 miles.

Municipality / Project	Completion Date	Management Area
Town of Jupiter Island - Pilot Phase	Nov-06	Treasure Coast
Town of Jupiter Island - Phase A	Sep-08	Treasure Coast
City of Coconut Creek	Dec-08	Pompano
Town of Jupiter Island - Phase B	Mar-09	Treasure Coast
City of Palm Coast	May-09	Central Florida
Sarasota County - Siesta Village	May-09	Manasota
Town of Jupiter Island - Phase E	Sep-09	Treasure Coast
Town of Jupiter Island - Phase C	Oct-09	Treasure Coast
City of Sarasota - Golden Gate Point	Nov-09	Manasota
City of Sunny Isles Bch - Phase 2	Jan-10	North Dade

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Canaveral Port Authority	Jan-10	Brevard
Broward County - PT E - Terminal 18	Feb-10	Gulfstream
Broward County - PT E Eisenhower & 28th Street	Jun-10	Gulfstream
City of Stuart - Stypmann Blvd	Jun-10	Treasure Coast
City of Hollywood - Grant - Cleveland - Phase 1	Jun-10	Gulfstream
City of Daytona Beach Shores - Section "D"	Jul-10	Central Florida
City of Flagler Beach - 2nd St to 5th St; Shore	Oct-10	Central Florida
Town of Palm Beach - Worth Ave	Nov-10	West Palm Beach
City of Daytona Beach Shores - Section "B"	Mar-11	Central Florida
City of Daytona Beach Shores - Section "C"	Mar-11	Central Florida
City of Daytona Beach Shores - Section "A"	Mar-11	Central Florida
City of Daytona Beach Shores - Section "F"	Mar-11	Central Florida
City of Sunny Isles Bch - Phase 3	Jul-11	North Dade
City of Ft Lauderdale - Seabreeze #2	Sep-11	Wingate
Town of Golden Beach	Apr-12	North Dade
Town of Palm Beach - S. Ocean - Seagrape	May-12	West Palm Beach
City of Daytona Beach Shores	Jul-12	Central Florida
City of Ft Lauderdale - Sistrunk	Aug-12	Wingate
City of Coconut Creek	Sep-12	Pompano
Martin County - C.R. 707	Sep-12	Treasure Coast

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City of Daytona Beach Shores - Section "E"	Nov-12	Central Florida
City of Daytona Beach Shores - Section "E-2"	Nov-12	Central Florida
City of Deerfield Beach	Apr-13	Pompano
City of Hollywood - Minnesota to Tyler - Phase 3	May-13	Gulfstream
City of Pompano Beach - N Pompano Bch Blv	May-13	Pompano
Town of Golden Beach	May-13	North Dade
City of Pompano Beach - E. Atlantic & N Pompano	Jun-13	Pompano
City of Palm Coast	Jul-13	Central Florida
Town of Jupiter Inlet Colony	Aug-13	West Palm Beach
Town of Golden Beach	Aug-13	North Dade
Town of Golden Beach	Aug-13	North Dade
Town of Palm Beach - Everglades Island	Aug-13	West Palm Beach
Town of Sewall's Point - A1A Evans Crary	Sep-13	Treasure Coast
Collier Cty - Vandy - Phase 1	Nov-13	Naples
City of Ormond Beach	May-14	Central Florida
City of Coconut Creek	Jun-14	Pompano
City of Ft Lauderdale - SE 15th St	Sep-14	Wingate
Town of Jupiter Island - Phase F	Aug-15	Treasure Coast
City of Pompano Beach - Old Pompano	Sep-16	Pompano
City of Daytona - Orange Ave. - Phs. #3	Apr-17	Central Florida

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Town of Gulf Stream - Phs 1	May-17	Boca Raton
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REGIONAL RELIABILITY INDICES

20. Five-Year patterns/trends in each region's reliability for each index and on any overall basis.

(* Note for all indices tables: Ft. Myers (FM) was split into Naples (NA) and Toledo Blade (TB) in 2011)

Annual SAIDI performance for the Distribution unit and its regions

Data	Region	2007	2008	2009	2010	2011
SAIDI	Boca Raton (BR)	68.3	53.8	66.9	73.1	58.1
	Brevard (BV)	69.8	75.7	75.4	71.2	115.0
	Central Dade (CE)	63.9	50.4	74.9	69.4	48.8
	Central Florida (CF)	84.2	79.6	70.9	69.3	149.1
	Fort Myers (FM)	75.3	78.9	72.8	79.0	*
	Gulfstream (GS)	55.1	53.9	76.4	77.0	54.8
	Manasota (MS)	67.9	72.5	82.6	77.6	66.8
	Naples (NA)	59.4	64.5	72.7	91.7	85.5
	North Dade (ND)	72.3	62.3	84.3	84.4	66.8
	North Florida (NF)	94.3	129.3	103.2	81.7	130.9
	Pompano (PM)	61.4	48.9	57.3	70.8	60.9
	South Dade (SD)	95.7	88.8	122.2	87.6	92.5
	Toledo Blade (TB)	74.3	60.0	79.2	77.6	98.0
	Treasure Coast (TC)	94.5	67.1	70.0	79.2	77.8
	West Palm (WB)	70.5	55.5	62.4	66.7	63.1
	West Dade (WD)	77.8	66.4	85.8	88.6	69.5
Wingate (WG)	76.3	71.0	88.0	80.6	78.0	
All FPL		73.2	67.2	78.0	77.3	79.7

Annual SAIFI performance for the Distribution unit and its regions

Data	Region	2007	2008	2009	2010	2011
SAIFI	BR	1.23	1.04	1.29	0.93	0.92
	BV	1.16	1.07	1.18	1.01	1.15
	CE	1.20	0.94	1.16	0.78	0.68
	CF	1.49	1.24	1.05	0.91	1.19
	FM	1.26	1.24	1.11	1.09	*
	GS	1.13	1.03	1.03	0.82	0.81
	MS	0.87	1.01	0.94	0.91	0.84
	NA	1.12	0.93	0.98	0.86	0.90
	ND	1.13	0.83	0.89	0.82	0.78
	NF	1.38	1.58	1.30	1.02	1.34
	PM	1.03	0.91	0.82	0.79	0.92
	SD	1.42	1.35	1.52	1.04	1.14
	TB	0.96	0.77	1.02	0.96	1.28
	TC	1.31	1.05	1.10	1.01	0.98
	WB	1.21	0.88	0.98	0.78	0.87
	WD	1.40	1.17	1.19	1.15	0.96
WG	1.50	1.35	1.42	0.97	1.10	
All FPL		1.21	1.07	1.11	0.92	0.97

Annual CAIDI performance for the Distribution unit and its regions

Data	Region	2007	2008	2009	2010	2011
CAIDI	BR	55.7	51.8	52.0	78.6	63.4
	BV	60.0	70.7	63.9	70.5	99.9
	CE	53.4	53.8	64.5	89.4	71.5
	CF	56.4	64.2	67.8	76.3	125.5
	FM	60.0	63.4	65.8	72.7	*
	GS	48.7	52.1	74.4	94.2	67.5
	MS	77.8	71.7	87.8	85.5	79.5
	NA	53.2	69.3	74.1	107.1	95.5
	ND	63.8	75.2	94.8	103.2	86.2
	NF	68.5	81.6	79.4	80.0	97.7
	PM	59.3	53.8	69.7	89.7	66.4
	SD	67.2	65.7	80.4	84.1	81.0
	TB	77.1	77.6	77.6	80.5	76.4
	TC	72.0	63.7	63.4	78.6	79.7
	WB	58.4	62.9	63.6	85.3	72.6
	WD	55.6	56.7	71.9	77.3	72.7
	WG	51.0	52.6	62.2	82.8	71.1
All FPL	60.3	62.9	70.2	83.9	82.1	

Annual MAIFle performance for the Distribution unit and its regions

Data	Region	2007	2008	2009	2010	2011
MAIFle	BR	9.6	8.9	10.6	7.0	8.3
	BV	16.6	14.1	13.6	11.1	15.1
	CE	10.3	8.5	9.5	7.1	6.7
	CF	14.1	13.3	12.3	10.7	13.9
	FM	11.2	9.4	8.5	8.1	*
	GS	9.0	8.5	9.3	7.7	7.7
	MS	9.5	9.2	8.5	8.1	8.8
	NA	8.3	7.5	7.7	7.2	7.3
	ND	10.0	7.8	8.8	7.2	7.0
	NF	12.9	15.9	15.3	13.0	16.4
	PM	7.6	7.2	7.3	5.7	6.9
	SD	10.2	8.9	11.0	8.2	8.9
	TB	17.1	16.5	18.2	16.4	15.4
	TC	17.6	17.5	15.2	13.4	15.1
	WB	10.8	10.0	10.9	9.0	10.2
	WD	10.0	9.0	9.7	9.1	8.7
	WG	13.1	11.0	14.0	10.2	10.9
All FPL	11.4	10.5	10.9	9.1	10.1	

Annual Cust >5 performance for the Distribution unit and its regions

Data	Region	2007	2008	2009	2010	2011
# Cust >5	BR	2.3%	0.7%	1.6%	0.4%	0.4%
	BV	0.9%	0.8%	1.1%	0.9%	0.7%
	CE	1.1%	1.2%	1.3%	0.4%	0.2%
	CF	1.8%	2.6%	1.2%	1.0%	0.9%
	FM	1.1%	2.3%	0.8%	0.8%	*
	GS	1.0%	0.5%	1.7%	1.0%	0.4%
	MS	1.1%	1.1%	0.6%	0.7%	0.5%
	NA	4.3%	1.2%	1.0%	0.5%	0.5%
	ND	2.8%	1.2%	1.1%	0.7%	0.9%
	NF	2.4%	5.5%	2.8%	1.8%	1.7%
	PM	1.6%	0.9%	0.5%	0.2%	0.5%
	SD	3.3%	2.3%	3.9%	0.7%	1.6%
	TB	3.0%	0.7%	1.1%	0.6%	1.3%
	TC	3.2%	2.2%	1.1%	1.5%	1.3%
	WB	1.9%	0.7%	0.8%	0.8%	0.5%
	WD	2.9%	1.4%	1.3%	0.8%	0.5%
	WG	3.0%	2.0%	1.1%	0.5%	0.7%
	All FPL		2.1%	1.4%	1.3%	0.7%

21. The process used to identify and select actions to improve the regional reliability trends.

See FPL's response to Distribution Reliability Item No. 3.

22. Discuss any 2012 projected activities and budget levels directed at improving regional reliability performance.

See FPL's response to Distribution Reliability Item No. 16. Each activity listed addresses equipment and devices at the management area level.

Annual SAIDI performance for the Distribution unit and its regions

Data	Region	2012	2013	2014	2015	2016
SAIDI	Boca Raton (BR)	63.0	60.5	63.1	53.6	51.0
	Brevard (BV)	60.6	55.7	69.0	52.7	52.8
	Central Dade (CE)	61.8	50.7	54.2	46.6	41.3
	Central Florida (CF)	61.2	66.7	60.8	49.5	49.1
	Gulfstream (GS)	60.2	59.2	57.8	52.0	42.7
	Manasota (MS)	55.4	57.8	56.6	55.4	52.4
	Naples (NA)	56.8	53.5	57.5	56.8	55.5
	North Dade (ND)	63.6	60.0	76.9	71.1	59.1
	North Florida (NF)	81.2	83.7	76.8	67.6	64.0
	Pompano (PM)	61.6	48.9	52.0	56.9	48.1
	South Dade (SD)	81.4	76.6	72.9	76.2	68.1
	Toledo Blade (TB)	61.7	71.9	72.6	64.8	74.8
	Treasure Coast (TC)	60.6	71.9	74.5	72.4	80.7
	West Palm (WB)	54.5	54.5	49.5	55.2	50.8
	West Dade (WD)	79.1	59.1	72.4	67.8	56.2
	Wingate (WG)	70.5	70.1	74.5	64.3	57.7
All FPL	63.5	61.4	63.8	59.4	55.8	

Annual SAIFI performance for the Distribution unit and its regions

Data	Region	2012	2013	2014	2015	2016
SAIFI	BR	1.14	1.10	1.21	1.08	1.08
	BV	0.87	0.89	1.14	0.96	0.87
	CE	0.72	0.67	0.80	0.78	0.66
	CF	0.82	0.93	0.95	0.90	0.80
	GS	0.86	0.93	0.96	0.88	0.83
	MS	0.77	0.83	0.83	1.00	0.91
	NA	0.86	0.68	0.88	0.91	0.97
	ND	0.70	0.68	0.83	0.87	0.72
	NF	1.03	1.10	1.06	1.08	1.00
	PM	0.84	0.69	0.86	1.03	0.80
	SD	0.96	0.99	0.90	1.08	0.99
	TB	0.91	1.04	1.16	0.98	1.14
	TC	0.95	1.08	1.07	1.05	1.19
	WB	0.82	0.95	0.85	1.01	0.88
	WD	1.20	0.85	1.20	1.24	0.99
	WG	0.99	0.99	1.25	1.14	0.86
All FPL	0.90	0.89	0.99	1.00	0.92	

Annual CAIDI performance for the Distribution unit and its regions

Data	Region	2012	2013	2014	2015	2016
CAIDI	BR	55.4	55.0	52.0	49.7	47.1
	BV	70.0	62.7	60.7	54.8	60.4
	CE	86.0	75.2	67.8	59.6	63.1
	CF	74.6	71.4	64.1	55.3	61.0
	GS	70.3	63.3	60.5	58.9	51.3
	MS	72.0	69.5	68.1	55.2	57.4
	NA	66.2	79.0	65.6	62.2	57.0
	ND	90.9	88.4	92.1	81.9	82.2
	NF	79.0	76.2	72.5	62.8	64.0
	PM	73.2	70.7	60.6	55.4	60.5
	SD	84.9	77.4	80.6	70.8	68.9
	TB	68.0	69.5	62.6	65.8	65.8
	TC	63.8	66.8	69.4	69.2	67.5
	WB	66.3	57.3	57.9	54.8	58.0
	WD	66.1	69.3	60.3	54.7	56.6
	WG	71.4	71.1	59.5	56.6	67.0
AII FPL	70.8	68.7	64.5	59.6	60.7	

Annual MAIFe performance for the Distribution unit and its regions

Data	Region	2012	2013	2014	2015	2016
MAIFe	BR	8.1	8.0	8.3	7.1	5.4
	BV	10.7	10.1	9.7	7.9	5.2
	CE	6.2	6.5	7.6	7.3	4.9
	CF	9.7	9.9	8.9	6.5	5.1
	GS	8.0	9.0	9.1	6.9	5.3
	MS	7.4	7.4	6.7	5.9	5.2
	NA	6.5	7.2	7.3	7.4	7.1
	ND	7.2	7.3	9.0	8.2	5.6
	NF	11.6	10.8	10.3	8.7	5.8
	PM	7.1	7.7	7.1	6.3	4.6
	SD	7.9	8.0	8.0	7.1	5.8
	TB	10.9	12.8	9.6	8.1	7.7
	TC	12.1	14.2	11.1	8.1	6.4
	WB	9.4	10.2	8.8	7.8	5.6
	WD	7.5	7.0	7.9	7.5	6.2
	WG	10.7	10.9	12.1	9.9	7.4
AII FPL	8.7	9.1	8.7	7.5	5.8	

Annual Cust >5 performance for the Distribution unit and its regions

Data	Region	2012	2013	2014	2015	2016
# Cust >5	BR	1.0%	1.3%	0.9%	0.8%	1.4%
	BV	0.2%	0.6%	0.3%	0.3%	0.2%
	CE	0.3%	0.1%	0.7%	0.3%	0.5%
	CF	1.0%	0.5%	0.5%	0.3%	0.1%
	GS	0.4%	0.5%	0.7%	0.8%	0.1%
	MS	0.2%	0.2%	0.3%	0.9%	0.2%
	NA	0.2%	0.4%	0.7%	0.6%	0.4%
	ND	0.4%	0.5%	0.9%	1.0%	0.3%
	NF	0.5%	0.5%	0.6%	0.7%	0.4%
	PM	0.2%	0.1%	0.5%	1.0%	1.2%
	SD	0.3%	0.7%	0.6%	0.9%	0.2%
	TB	0.5%	1.2%	1.3%	0.6%	1.6%
	TC	0.6%	0.9%	1.0%	1.0%	2.9%
	WB	0.2%	0.7%	1.4%	1.0%	0.5%
	WD	2.0%	0.3%	0.6%	1.5%	0.6%
	WG	0.2%	0.2%	0.8%	0.6%	0.5%
All FPL		0.5%	0.5%	0.7%	0.8%	0.7%

21. The process used to identify and select actions to improve the regional reliability trends.

See FPL's response to Distribution Reliability Item No. 3.

22. Discuss any 2017 projected activities and budget levels directed at improving regional reliability performance.

See FPL's response to Distribution Reliability Item No. 16. Each program listed addresses equipment and devices at the management area level.

OVERHEAD – UNDERGROUND RELIABILITY

23. Describe the five year patterns/trends in reliability performance of underground systems vs. overhead systems.

The majority of FPL's customers are fed from circuits that are a hybrid of both overhead and underground systems. The methodology used to classify a customer as overhead (OH) is defined as those customers served by a feeder with combined feeder and lateral overhead miles greater than or equal to 95% of the total primary miles. Then, to classify a customer as underground (UG), customers must be served by a feeder with combined feeder and lateral underground miles greater than or equal to 95% of the total primary miles. The balance of customers is classified as Hybrid. According to this methodology, FPL has 142 OH feeders, 498 UG feeders, with the remaining 2616 feeders classified as hybrid. This methodology was applied for FPL's responses to Distribution Reliability Question Nos. 23 & 26.