BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchased Power Cost Recovery Clause and Generating Performance Incentive Factor Docket No. 20190001-EI

Filed: October 1, 2019

FLORIDA POWER & LIGHT COMPANY'S PREHEARING STATEMENT

Florida Power & Light Company ("FPL"), pursuant to Order No. PSC-2019-0059-PCO-EI, hereby submits its Prehearing Statement regarding the issues to be addressed at the hearing scheduled for November 5-7, 2019.

1) <u>WITNESSES</u>

WITNESS	SUBJECT MATTER	ISSUES
R. B. Deaton	FPL SolarTogether Credit	2G
R. B. Deaton	Fuel Adjustment True-up and Projections	6-11 and 18-22
R. B. Deaton	Nuclear Cost Recovery Amount	24A
R. B. Deaton	Indiantown Non-Fuel Base Revenue Requirements	24D
R. B. Deaton	Capacity Cost Recovery True-Up and Projections	27-33
R. B. Deaton	2020 FCR/CCR Effective Date	34
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R. B. Deaton	Should this Docket be closed	37
G. J. Yupp	Incentive Mechanism Gains	2C
G. J. Yupp	Incremental Optimization Costs	2D-2F
G. J. Yupp	Fuel Adjustment True-Up and Projections	6-11 and 18
R. Coffey	Fuel Adjustment True-Up and Projections	6-11 and 18
C. R. Rote	2018 GPIF Reward	16
C. R. Rote	2020 GPIF Target/Ranges	17
L. Fuentes	FPL's 2020 solar project ("2020 Project") Revenue Requirements	21
W. F. Brannen	2020 Project Cost Effectiveness	2H
J. E. Enjamio	2020 Project Cost Effectiveness	2H

E. J. Anderson	Revised 2017 SoBRA Factors	2A
E. J. Anderson	2020 Project Base Rate Percentage Increase	2J
E. J. Anderson	Revised tariffs - 2020 Project	2K
E. J. Anderson	Base Rate Percentage Decrease - 2017 SoBRA True- Up	2M
E. J. Anderson	Revised Tariffs - Base Rate Percentage Decrease - 2017 SoBRA True-Up	2N
E. J. Anderson	2017 SoBRA True-Up Adjustment Amount	24B

2) <u>EXHIBITS</u>

Witness	Exhibits	Description	
R. B. Deaton	RBD-1	2018 FCR Final True Up Calculation	
R. B. Deaton	RBD-2	2018 CCR Final True Up Calculation (Confidential)	
R. B. Deaton	RBD-3	2019 FCR Actual/Estimated True Up Calculation	
R. B. Deaton	RBD-4	2019 CCR Actual/Estimated True Up Calculation	
R. B. Deaton	RBD-5	2018 FCR Final True Up Calculation REVISED	
R. B. Deaton	RBD-6	2018 CCR Final True Up Calculation REVISED	
R. B. Deaton	RBD-7	Appendix II 2020 FCR Projection (Jan-Apr)	
R. B. Deaton	RBD-8	Appendix III 2020 FCR Projection (May-Dec)	
R. B. Deaton	RBD-9	Appendix IV 2020 FCR Projection (Jan-Dec)	
R. B. Deaton	RBD-10	Appendix V 2020 CCR Projection (Jan-Dec) (Confidential)	
G. J. Yupp	GJY-1	2018 Incentive Mechanism Results (Confidential)	
G. J. Yupp	GJY-2	Appendix I Fuel Cost Recovery	
C. R. Rote	CRR-1	Generating Performance Incentive Factor Performance Results for January 2018 through December 2018	
C. R. Rote	CRR-2	Generating Performance Incentive Factor Performance Targets for January 2020 through December 2020	
W. F. Brannen	WFB-1	List of FPL Universal PV Solar Energy Centers in Service	
W. F. Brannen	WFB-2	Typical Solar Energy Center Block Diagram	
W. F. Brannen	WFB-3	Renderings of 2020 Solar Energy Centers	
W. F. Brannen	WFB-4	Specifications for 2020 Solar Energy Centers	
W. F. Brannen	WFB-5	Property Delineations, Features and Land Use of 2020 Solar Energy Centers	
W. F. Brannen	WFB-6	Construction Schedule for 2020 Solar Energy Centers	

Witness	Exhibits	Description	
J. Enjamio	JE-1	Load Forecast	
J. Enjamio	JE-2	FPL Fuel Price Forecast	
J. Enjamio	JE-3	FPL Resource Plans	
J. Enjamio	JE-4	CPVRR – Costs and (Benefits)	
L. Fuentes	LF-1	2020 SoBRA Revenue Requirement Calculation	
L. Fuentes	LF-2	2017 SoBRA Final Revenue Requirement Calculation	
E. J. Anderson	EJA-1	2020 SoBRA Factor Calculation	
E. J. Anderson	EJA-2	Projected Retail Base Revenues for May 1, 2020	
E. J. Anderson	EJA-3	Summary of Tariff Changes for May 1, 2020	
E. J. Anderson	EJA-4	Revised 2017 SoBRA Factor	
E. J. Anderson	EJA-5	2017 Project Refund Calculation	
E. J. Anderson	EJA-6	2017 SoBRA Prospective Adjustment for January 1, 2020	
E. J. Anderson	EJA-7	Projected Retail Base Revenues for January 1, 2020	
E. J. Anderson	EJA-8	Summary of Tariff Changes for January 1, 2020	
E. J. Anderson	EJA-9	Typical Bill Projections	

3) STATEMENT OF BASIC POSITION

FPL's 2020 Fuel and Purchased Power Cost Recovery factors and Capacity Cost Recovery factors, including its prior period true-ups, are appropriate and reasonable and should be approved.

FPL's proposed 2020 Solar Project should be approved. The costs of the 2020 Solar Project are reasonable, and the Project is cost effective. The associated revenue requirement of \$50.5 million and solar base rate adjustment ("SoBRA") factor of 0.732% were calculated in accordance with the terms approved in Order No. PSC-16-0560-AS-EI, and should therefore be approved here. The revised tariffs for FPL reflecting the requested base rate percentage increase for the 2020 SoBRA also were calculated in accordance with the terms approved in Order No. PSC-16-0560-AS-EI and should be approved. In addition, FPL's refund, including interest, of \$6.7 million and base rate decrease of 0.049% associated with the true-up of the 2017 SoBRA should be approved.

Finally, the Joint Motion to Modify Order No. PSC-2012-0425-PAA-EU Regarding Weighted Average Cost of Capital Methodology is consistent with Internal Revenue Service requirements and should therefore be approved.

4) STATEMENT OF ISSUES AND POSITIONS

COMPANY-SPECIFIC FUEL ADJUSTMENT ISSUES

- **ISSUE 2A:** What is the appropriate revised SoBRA factor for the 2017 projects to reflect actual construction costs that are less than the projected costs used to develop the initial SoBRA factor?
 - **FPL:** The revised 2017 SoBRA factor is 0.888%. (Anderson)
- **ISSUE 2B:** What is the appropriate revised SoBRA factor for the 2018 projects to reflect actual construction costs that are less than the projected costs used to develop the initial SoBRA factor? (DEFERRED)
- **ISSUE 2C:** What is the appropriate total gain under FPL's Incentive Mechanism approved by Order No. PSC-2016-0560-AS-EI that FPL may recover for the period January 2018 through December 2018, and how should that gain be shared between FPL and customers?
 - **FPL:** FPL's asset optimization activities in 2018 delivered total gains of \$62,404,332. Of these total gains, FPL is allowed to retain \$13,442,599. (Yupp)
- **ISSUE 2D:** What is the appropriate amount of Incremental Optimization Costs under FPL's Incentive Mechanism approved by Order No. PSC-2016-0560-AS-EI that FPL should be allowed to recover through the fuel clause for Personnel, Software, and Hardware costs for the period January 2018 through December 2018?
 - **FPL:** The amount of Incremental Optimization Costs for Personnel, Software, and Hardware Costs that FPL should be allowed to recover through the fuel clause is \$516,451 for the period January 2018 through December 2018. (Yupp)
- **ISSUE 2E:** What is the appropriate amount of Variable Power Plant O&M Attributable to Off-System Sales under FPL's Incentive Mechanism approved by Order No. PSC-2016-0560-AS-EI that FPL should be allowed to recover through the fuel clause for the period January 2018 through December 2018?
 - **FPL:** The amount of Incremental Optimization Costs under the Incentive Mechanism that FPL should be allowed to recover through the fuel clause for variable power plant O&M attributable to off-system sales for the period January 2018 through December 2018 is \$1,611,119. (Yupp)

- **ISSUE 2F:** What is the appropriate amount of Variable Power Plant O&M Avoided due to Economy Purchases under FPL's Incentive Mechanism approved by Order No. PSC-2016-0560-AS-EI that FPL should be allowed to recover through the fuel clause for the period January 2018 through December 2018?
 - **FPL:** FPL has included a credit of \$151,215 as the amount of Incremental Optimization Costs under the Incentive Mechanism for variable power plant O&M avoided due to economy purchases for the period January 2018 through December 2018. The Commission should authorize FPL to flow this credit to customers through the fuel clause. (Yupp)
- **ISSUE 2G:** If the Commission approves the FPL Solar Together Program and Tariff, what is the appropriate total FPL SolarTogether Credit amount to be recovered through the fuel cost recovery clause for the period January 2020 through December 2020?
 - **FPL:** The 2020 Subscription Credit associated with the proposed FPL SolarTogether Program reflected on Schedule E1 is \$31,975,895. The revised Subscription Credit is \$31,623,351, as presented in the rebuttal testimony of Scott Bores in Docket No. 20190061-EI. The change in the Subscription Credit amount does not impact the proposed 2020 fuel factors. Assuming the Commission rules on the FPL SolarTogether Program by the time it rules on the 2020 fuel factors, FPL will submit revised schedules reflecting the Subscription Credit amount ultimately approved by the Commission. (Deaton)
- **ISSUE 2H:** Are the 2020 SoBRA projects (Hibiscus, Okeechobee, Southfork, and Echo River) proposed by FPL cost effective?
 - **FPL:** Yes. The 2020 projects are projected to result in \$26 million (CPVRR) of customer savings. (Enjamio, Brannen)
- **ISSUE 2I:** What are the revenue requirements associated with the 2020 SoBRA projects?
 - **FPL:** \$50,491,000. (Fuentes)
- **ISSUE 2J:** What is the appropriate base rate percentage increase to be effective when all of the 2020 SoBRA projects are in service, currently projected to be May 1, 2020?
 - **FPL:** 0.732%. (Anderson)
- **ISSUE 2K:** Should the Commission approve revised tariffs for FPL, reflecting the base rate percentage increase for the 2020 SoBRA project, determined to be reasonable in this proceeding?
 - **FPL:** Yes. (Anderson)

- **ISSUE 2L:** Has FPL made prudent adjustments, if any are needed, to account for replacement costs associated with the April 2019 forced outage at Saint Lucie Unit 1 generating station? If adjustments are needed and have not been made, what adjustment(s) should be made? (DEFERRED)
 - **FPL:** OPC and FPL have agreed to defer this issue to the 2020 Fuel and Purchased Power Cost Recovery Clause docket.
- **ISSUE 2M:** What is the appropriate base rate percentage decrease associated with the true-up of the 2017 SoBRA Projects approved by Order No. PSC-2018-0028-FOF-EI to be effective January 1, 2020?
 - **FPL:** The appropriate base rate percentage decrease associated with the true-up of the 2017 SoBRA is 0.049%. (Anderson)
- **ISSUE 2N:** Should the Commission approve revised tariffs for FPL to be effective January 1, 2020, reflecting the base rate percentage decrease for the true-up of the 2017 SoBRA projects determined to be reasonable in this proceeding?
 - FPL: Yes. (Anderson)

GENERIC FUEL ADJUSTMENT ISSUES

- **ISSUE 6:** What are the appropriate actual benchmark levels for calendar year 2019 for gains on non-separated wholesale energy sales eligible for a shareholder incentive?
 - **FPL:** FPL's revised Incentive Mechanism approved by the Commission in Order No. PSC-16-0560-AS-EI does not rely upon the three-year average Shareholder Incentive Benchmark specified in Order No. PSC-00-1744-PAA-EI, so it is not applicable to FPL for calendar year 2019. (Deaton)
- **ISSUE 7:** What are the appropriate estimated benchmark levels for calendar year 2020 for gains on non-separated wholesale energy sales eligible for a shareholder incentive?
 - **FPL:** FPL's revised Incentive Mechanism approved by the Commission in Order No. PSC-16-0560-AS-EI does not rely upon the three-year average Shareholder Incentive Benchmark specified in Order No. PSC-00-1744-PAA-EI, so it is not applicable to FPL for calendar year 2020. (Deaton)
- **ISSUE 8:** What are the appropriate final fuel adjustment true-up amounts for the period January 2018 through December 2018?
 - **FPL:** \$70,653,405 under-recovery. (Deaton)

- **ISSUE 9:** What are the appropriate fuel adjustment actual/estimated true-up amounts for the period January 2019 through December 2019?
 - FPL: \$128,735,937 over-recovery. (Deaton)
- **ISSUE 10:** What are the appropriate total fuel adjustment true-up amounts to be collected/refunded from January 2020 through December 2020?
 - **FPL:** \$58,082,532 over-recovery. (Deaton)
- **ISSUE 11:** What are the appropriate projected total fuel and purchased power cost recovery amounts for the period January 2020 through December 2020?
 - **FPL:** \$2,519,447,549 excluding prior period true-ups, revenue taxes, FPL's portion of Incentive Mechanism gains, and the GPIF reward. (Deaton)

COMPANY-SPECIFIC GENERATING PERFORMANCE INCENTIVE FACTOR (GPIF) ISSUES

Florida Power & Light Company

No company-specific GPIF issues for Florida Power and Light Company have been identified at this time. If such issues are identified, they shall be numbered 13A, 13B, 13C, and so forth, as appropriate.

GENERIC GENERATING PERFORMANCE INCENTIVE FACTOR ISSUES

- **ISSUE 16:** What is the appropriate generation performance incentive factor (GPIF) reward or penalty for performance achieved during the period January 2018 through December 2018 for each investor-owned electric utility subject to the GPIF?
 - **FPL:** \$8,577,071 reward. (Rote)

ISSUE 17: What should the GPIF targets/ranges be for the period January 2020 through December 2020 for each investor-owned electric utility subject to the GPIF?

	EAF			ANOHR			
Plant / Unit	Target	Maximum		Target	Maximum		
	EAE (0/-)	EAF (%) EAF (%)	Savings	ANOHR	ANOHR	Savings	
	LAI (70)		(\$000's)	BTU/KWH	BTU/KWH	(\$000's)	
Cape Canaveral 3	83.4	85.9	469	6,615	6,737	2,376	
Ft. Myers 2	90.1	92.6	232	7,342	7,455	2,277	
Manatee 3	91.3	93.8	158	6,880	7,002	1,264	
Port Everglades 5	81.8	84.8	822	6 ,525	6,69 5	3,847	
Riviera 5	84.7	87.2	446	6,567	6,684	2,389	
St. Lucie 1	87.4	90.9	3,728	10,421	10,525	413	
St. Lucie 2	85.7	88.7	2,576	10,262	10,355	278	
Turkey Point 3	85.7	88.7	2,403	11,228	11,418	661	
Turkey Point 4	82.7	85.7	2,250	10,865	11,035	561	
West County 1	68.5	71.0	496	7,060	7,218	2,532	
West County 2	90.2	92.7	614	6,918	7,064	3,126	
West County 3	85.3	88.3	608	6,921	7,084	3,274	

FPL:

(Rote)

FUEL FACTOR CALCULATION ISSUES

- **ISSUE 18:** What are the appropriate projected net fuel and purchased power cost recovery and Generating Performance Incentive amounts to be included in the recovery factor for the period January 2020 through December 2020?
 - **FPL:** \$2,484,500,731 including prior period true-ups, revenue taxes, FPL's portion of Incentive Mechanism gains, and the GPIF reward. (Deaton)
- **ISSUE 19:** What is the appropriate revenue tax factor to be applied in calculating each investorowned electric utility's levelized fuel factor for the projection period January 2020 through December 2020?
 - **FPL:** 1.00072. (Deaton)

- **ISSUE 20:** What are the appropriate levelized fuel cost recovery factors for the period January 2020 through December 2020?
 - **FPL:** FPL proposes that the fuel factors be reduced as of the in-service date of the 2020 Project to reflect the projected jurisdictional fuel savings as of that date. FPL is proposing the following factors:

(a) 2.252 cents/kWh for January 2020 through the day prior to the 2020 Project inservice date (projected to be April 30, 2020);

(b) 2.238 cents/kWh from the 2020 Project in-service date (projected to be May 1, 2020) until the fuel factor is reset by the Commission. (Deaton)

- **ISSUE 21:** What are the appropriate fuel recovery line loss multipliers to be used in calculating the fuel cost recovery factors charged to each rate class/delivery voltage level class?
 - **<u>FPL:</u>** The appropriate fuel cost recovery line loss multipliers are provided in response to Issue No. 22. (Deaton)

[Statement of Issues and Positions Continue on Next Page]

ISSUE 22: What are the appropriate fuel cost recovery factors for each rate class/delivery voltage level class adjusted for line losses?

	ESTIMATED FOR THE PERIOD OF: JAI	NUARY 2020 THROUGH /	APRIL 2020	
			JANUARY - APRIL	
GROUPS	RATE SCHEDULE	Average Factor	Fuel Recovery Loss Multiplier	Fuel Recovery Factor
Α	RS-1 first 1,000 kWh	2.252	1.00212	1.925
Α	RS-1 all additional kWh	2.252	1.00212	2.925
А	GS-1, SL-2, GSCU-1, WIES-1	2.252	1.00212	2.257
A-1	SL-1, OL-1, PL-1 ¹⁴	2.185	1.00212	2.190
в	GSD-1	2.252	1.00207	2.257
С	GSLD-1, CS-1	2.252	1.00157	2.256
D	GSLD-2, CS-2, OS-2, MET	2.252	0.99555	2.242
Е	GSLD-3, CS-3	2.252	0.97529	2.196
Α	GST-1On-Peak	2.588	1.00212	2.593
Α	GST-10ff-Peak	2.108	1.00212	2.112
Α	RTR-10n-Peak			0.336
	RTR-10ff-Peak			(0.145)
в	GSDT-1, CILC-1(G), HLFT-1 (21-499 kW) On-Peak	2.588	1.00207	2.593
в	GSDT-1, CILC-1(G), HLFT-1 (21-499 kW) Off-Peak	2.108	1.00207	2.112
с	GSLDT-1, CST-1, HLFT-2 (500-1,999 kW) On-Peak	2.588	1.00157	2.592
С	GSLDT-1, CST-1, HLFT-2 (500-1,999 k.W) Off-Peak	2.108	1.00157	2.111
D	GSLDT-2, CST-2, HLFT-3 (2,000+ kW) On-Peak	2.588	0.99588	2.577
D	GSLDT-2, CST-2, HLFT-3 (2,000+ kW) Off-Peak	2.108	0.99588	2.099
Е	GSLDT-3, CST-3, CILC-1(T), ISST-1(T) On-Peak	2.588	0.97529	2.524
Е	GSLDT-3, CST-3, CILC-1(T), ISST-1(T) Off-Peak	2.108	0.97529	2.056
F	CILC-1(D), ISST-1(D) On-Peak	2.588	0.99566	2.577
	CILC-1(D), ISST-1(D) Off-Peak	2.108	0.99566	2.099

FPL:

19 VEIGHTED AVERAGE 16% ON-PEAK AND 84% OFF-PEAK

	OFF PEAK: ALL C	EDULE Average Factor Muttinier Fuel Recovery Factor		
			JUNE - SEPTEMBER	
GROUPS	RATE SCHEDULE	Average Factor	Fuel Recovery Loss Multiplier	Fuel Recovery Factor
В	GSD(T)-1 On-Peak	3.090	1.00207	3.096
	GSD(T)-1 Off-Peak	2.142	1.00207	2.146
С	GSLD(T)-1 On-Peak	3.090	1.00157	3.095
	GSLD(T)-1 Off-Peak	2.142	1.00157	2.145
D	GSLD(T)-2 On-Peak	3.090	0.99588	3.077
	GSLD(T)-2 Off-Peak	2.142	0.99588	2.133

ESTIMATED FOR THE PERIOD OF: JANUARY 2020 THROUGH APRIL 2020 OFF PEAK: ALL OTHER HOURS

Note: On-Peak Period is defined as June through September, weekdays 3:00pm to 6:00pm

Off Peak Period is defined as all other hours.

Note: All other months served under the otherwise applicable rate schedule.

See Schedule E-1E, Page 1 of 2.

	ESTIMATED FOR THE PERIOD OF: MAY 2020 THROUGH DECEMBER 2020					
			MAY - DECEMBER			
GROUPS	RATE SCHEDULE	Average Factor	Fuel Recovery Loss Multiplier	Fuel Recovery Factor		
A	RS-1 first 1,000 kWh	2.238	1.00212	1.911		
Α	RS-1 all additional kWh	2.238	1.00212	2.911		
А	GS-1, SL-2, GSCU-1, WIES-1	2.238	1.00212	2.243		
A-1	SL-1, OL-1, PL-1 ¹⁴	2.171	1.00212	2.176		
в	GSD-1	2.238	1.00207	2.243		
С	GSLD-1, CS-1	2.238	1.00157	2.242		
D	GSLD-2, CS-2, OS-2, MET	2.238	0.99555	2.228		
Е	GSLD-3, CS-3	2.238	0.97529	2.183		
Α	GST-1 On-Peak	2.571	1.00212	2.576		
Α	GST-10ff-Peak	2.095	1.00212	2.099		
Α	RTR-10n-Peak			0.333		
	RTR-10ff-Peak			(0.144)		
в	GSDT-1, CILC-1(G), HLFT-1 (21-499 kW) On-Peak	2.571	1.00207	2.576		
в	GSDT-1, CILC-1(G), HLFT-1 (21-499 kW) Off-Peak	2.095	1.00207	2.099		
С	GSLDT-1, CST-1, HLFT-2 (500-1,999 kW) On-Peak	2.571	1.00157	2.575		
С	GSLDT-1, CST-1, HLFT-2 (500-1,999 kW) Off-Peak	2.095	1.00157	2.098		
D	GSLDT-2, CST-2, HLFT-3 (2,000+ kW) On-Peak	2.571	0.99588	2.560		
D	GSLDT-2, CST-2, HLFT-3 (2,000+ kW) Off-Peak	2.095	0.99588	2.086		
Е	GSLDT-3, CST-3, CILC-1(T), ISST-1(T) On-Peak	2.571	0.97529	2.507		
Е	GSLDT-3, CST-3, CILC-1(T), ISST-1(T) Off-Peak	2.095	0.97529	2.043		
F	CILC-1(D), ISST-1(D) On-Peak	2.571	0.99566	2.560		
	CILC-1(D), ISST-1(D) Off-Peak	2.095	0.99566	2.086		

19 VEIGHTED AVERAGE 16% ON-PEAK AND 84% OFF-PEAK

	OFF PEAK: AL	L OTHER HOURS		
			JUNE - SEPTEMBER	
GROUPS	RATE SCHEDULE	Average Factor	Fuel Recovery Loss Multiplier	Fuel Recovery Factor
В	GSD(T)-1 On-Peak	3.071	1.00207	3.077
	GSD(T)-1 Off-Peak	2.128	1.00207	2.132
С	GSLD(T)-1 On-Peak	3.071	1.00157	3.076
	GSLD(T)-1 Off-Peak	2.128	1.00157	2.131
D	GSLD(T)-2 On-Peak	3.071	0.99588	3.058
	GSLD(T)-2 Off-Peak	2.128	0.99588	2.119

ESTIMATED FOR THE PERIOD OF: MAY 2020 THROUGH DECEMBER 2020 OFF PEAK: ALL OTHER HOURS

Note: On-Peak Period is defined as June through September, weekdays 3:00pm to 6:00pm Off Peak Period is defined as all other hours.

Note: All other months served under the otherwise applicable rate schedule. See Schedule E-1E, Page 1 of 2.

(Deaton)

CAPACITY ISSUES

COMPANY-SPECIFIC CAPACITY COST RECOVERY FACTOR ISSUES

- **ISSUE 24A:** What amount has FPL included in the capacity cost recovery clause for nuclear cost recovery?
 - FPL: \$0. (Deaton)
- **ISSUE 24B:** What is the appropriate true-up adjustment amount associated with the 2017 SoBRA projects approved by Order No. PSC-2018-0028-FOF-EI to be refunded through the capacity clause in 2020?
 - **FPL:** \$6,657,982. (Anderson)
- **ISSUE 24C:** What is the appropriate true-up amount associated with the 2018 SoBRA projects approved by Order No. PSC-2018-0028-FOF-EI to be refunded through the capacity clause in 2020? (DEFERRED)
- **ISSUE 24D:** What are the appropriate Indiantown non-fuel base revenue requirements to be recovered through the Capacity Clause pursuant to the Commission's approval of the Indiantown transaction in Docket No. 160154-EI for 2020?
 - **FPL:** The appropriate Indiantown non-fuel base revenue requirements are \$3,687,779 for 2020. (Deaton)

GENERIC CAPACITY COST RECOVERY FACTOR ISSUES

- **ISSUE 27:** What are the appropriate final capacity cost recovery true-up amounts for the period January 2018 through December 2018?
 - FPL: \$7,161,719 over-recovery. (Deaton)
- **ISSUE 28:** What are the appropriate capacity cost recovery actual/estimated true-up amounts for the period January 2019 through December 2019?
 - FPL: \$9,002,615 over-recovery. (Deaton)
- **ISSUE 29:** What are the appropriate total capacity cost recovery true-up amounts to be collected/refunded during the period January 2020 through December 2020?
 - FPL: \$16,164,334 over-recovery. (Deaton)
- **ISSUE 30:** What are the appropriate projected total capacity cost recovery amounts for the period January 2020 through December 2020?
 - **FPL**: \$256,597,002 for the period January 2020 through December 2020, excluding prior period true-ups, revenue taxes, and the Indiantown non-fuel base revenue requirement. (Deaton)
- **ISSUE 31:** What are the appropriate projected net purchased power capacity cost recovery amounts to be included in the recovery factor for the period January 2020 through December 2020?
 - **FPL**: The projected net purchased power capacity cost recovery amount to be recovered over the period January 2020 through December 2020 is \$237,630,783, including prior period true-ups, revenue taxes, the Indiantown non-fuel base revenue requirement, and the 2017 SoBRA true-up credit. (Deaton)

ISSUE 32: What are the appropriate jurisdictional separation factors for capacity revenues and costs to be included in the recovery factor for the period January 2020 through December 2020?

DEMAND	Separation Factors
FPL101 - Transmission	0.899387
FPL102 - Non-Stratified Production	0.957922
FPL103INT - Intermediate Strata Production	0.941569
FPL103PEAK - Peaking Strata Production	0.950455
ENERGY	
FPL201 - Total Sales	0.950640
FPL202 - Non-Stratified Sales	0.958799
FPL203INT - Intermediate Strata Sales	0.942430
FPL203PEAK - Peaking Strata Sales	0.951325
GENERAL PLANT	
1900 - LABOR	0.969124

FPL: The appropriate jurisdictional separation factors are:

- **ISSUE 33:** What are the appropriate capacity cost recovery factors for the period January 2020 through December 2020?
 - **FPL**: The January 2020 through December 2020 capacity cost recovery factors including Indiantown factors are as follows:

	Total Jan 20	20 - Dec 2020 Ca	apacity Recov	very Factor
RA TE SCHEDULE	Capacity Recovery Factor (\$/KW)	Capacity Recovery Factor (\$/kw h)	RDC (\$/KW)	SDD (\$/KW)
RS1/RTR1	-	0.00230	-	-
GS1/GST1	-	0.00225	-	-
GSD1/GSDT1/HLFT1	0.75	-	-	-
OS2	-	0.00095	-	-
GSLD1/GSLDT1/CS1/CST1/HLFT2	0.85	-	-	-
GSLD2/GSLDT2/CS2/CST2/HLFT3	0.81	-	-	-
GSLD3/GSLDT3/CS3/CST3	0.84	-	-	-
SST1T	-	-	0.10	0.05
SST1D1/SST1D2/SST1D3	-	-	0.10	0.05
CILC D/CILC G	0.87	-	-	-
CILC T	0.84	-	-	-
MET	0.75	-	-	-
OL1/SL1/SL1M/PL1	-	0.00018	-	-
SL2/SL2WGSCU1	-	0.00153	-	-
				(]

EFFECTIVE DATE

- **ISSUE 34:** What should be the effective date of the fuel adjustment factors and capacity cost recovery factors for billing purposes?
 - **FPL:** The factors shall be effective for meter readings commencing January 1, 2020. These charges shall continue in effect until modified by subsequent order of this Commission. (Deaton)
- **ISSUE 35:** Should the Commission approve revised tariffs reflecting the fuel adjustment factors and capacity cost recovery factors determined to be reasonable in this proceeding?
 - **FPL:** Yes. The Commission should approve revised tariffs reflecting the fuel adjustment factors and capacity cost recovery factors determined to be reasonable in this proceeding. The Commission should direct staff to verify that the revised tariffs are consistent with the Commission's decision. (Deaton)

MISCELLANEOUS ISSUES

ISSUE 36: Should the Joint Motion to Modify Order No. PSC-2012-0425-PAA-EU Regarding Weighted Average Cost of Capital Methodology be approved?

- Yes. The proposed modifications to the Weighted Average Cost of Capital FPL: calculation methodology approved in Order No. PSC-2012-0425-PAA-EU are necessary in order to comply with the Internal Revenue Code ("IRC") Treasury Regulation Section \$1.167(1)-1(h)(6). This regulation requires public utilities to apply a consistency adjustment and proration formula to compute the depreciationrelated Accumulated Deferred Federal Income Tax ("ADFIT") balance to be included for ratemaking purposes when a forecasted test period is utilized to set rates unless the Limitation Provision is met or exceeded. The Limitation Provision in Treasury Regulation Section \$1.167(1)-1(h)(6)(i) states that as long as the amount of depreciation-related ADFIT used in ratemaking is lower than the amount that would have been used under the Consistency Rule, then there is no violation of Normalization. The proposed modifications are in the public interest because the modified methodology will accurately align current costs with cost recovery while enabling compliance to IRC Treasury Regulation Section §1.167(1)-1(h)(6). (Deaton)
- **ISSUE 37:** Should this docket be closed?
 - **FPL:** No. While a separate docket number is assigned to each year for administrative convenience, this is a continuing docket and should remain open. (Deaton)

5) STIPULATED ISSUES

FPL: None at this time.

6) <u>PENDING MOTIONS</u>

FPL: None at this time.

7) <u>PENDING REQUESTS FOR CONFIDENTIALITY</u>

- Florida Power & Light Company's request for confidential classification of information 423 FORMS for the second quarter of 2019, dated July 31, 2019. [DN 06230-2019]
- Florida Power & Light Company's request for confidential classification of certain information provided in response to OPC's 1st request for PODs (No. 1), dated August 26, 2019. [DN 08424-2019]
- Florida Power & Light Company's request for confidential classification of certain information contained in capacity payments to non-cogenerator identified in Schedule E12 of Appendix V to the direct testimony Renae B. Deaton, dated September 3, 2019. [DN 08578-2019]

4. Florida Power & Light Company's request for confidential classification of certain information provided in response to Staff's 6th set of interrogatories (No. 50), dated September 19, 2019. [DN 08888-2019]

8) OBJECTIONS TO WITNESS QUALIFICATIONS AS AN EXPERT

FPL: None at this time.

9) STATEMENT OF COMPLIANCE WITH ORDER ESTABLISHING PROCEDURE

There are no requirements of the Order Establishing Procedure with which FPL cannot comply.

Respectfully submitted this <u>1st</u> day of October 2019.

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By: <u>s/ Maria Jose Moncada</u>

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CERTIFICATE OF SERVICE Docket No. 20190001-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished

by electronic service on this <u>1st</u> day of October 2019 to the following:

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