

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for approval of FPL
SolarTogether program and tariff, by Florida
Power & Light Company.

DOCKET NO. 20190061-EI

DATED: November 15, 2019

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the supplemental testimony of Cayce Hinton on behalf of the staff of the Florida Public Service Commission was electronically filed with the Office of Commission Clerk, Florida Public Service Commission, and copies were furnished by electronic mail to the following on this 15th day of November, 2019.

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 20190061-EI - Petition for approval of FPL SolarTogether program and tariff, by
Florida Power & Light Company

WITNESS: Supplemental Testimony of Cayce Hinton, Florida Public Service Commission;
Appearing on behalf of the Staff of the Florida Public Service Commission

DATE FILED: November 15, 2019

1 **SUPPLEMENTAL TESTIMONY OF CAYCE HINTON**

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

3 **A.** My name is Cayce Hinton. My business address is the Florida Public Service
4 Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399.

5 **Q. Did you previously submit direct testimony in this proceeding?**

6 **A.** Yes.

7 **Q. What is the purpose of your supplemental testimony?**

8 **A.** My testimony will briefly respond to the rebuttal testimony of Florida Power & Light
9 Company (FPL), filed September 23, 2019.

10 **Q. In your previous testimony, you posed questions that you felt expressed policy**
11 **considerations raised by the SolarTogether program. Did FPL witnesses address your**
12 **questions?**

13 **A.** Yes. FPL witnesses Valle and Deason both testified regarding the policy observations I
14 made in my testimony and witness Deason provided responses to my specific questions.

15 **Q. Do you believe the questions you raised are still appropriate for the Commission**
16 **to consider?**

17 **A.** Yes. I believe the questions are still relevant and should still be considered by the
18 Commission. I raised the questions in my direct testimony in order to prompt discussion of the
19 underlying regulatory policy that may be impacted by SolarTogether. Witnesses Valle and
20 Deason provided FPL's answers to the questions I posed and responded to other observations I
21 expressed in my testimony. Consistent with my direct testimony, however, I am not going to
22 opine on whether FPL's responses alleviate the concerns I raised regarding the SolarTogether
23 program. I will leave that determination to the Commissioners.

24 **Q. Did FPL update the SolarTogether program in rebuttal testimony, and did that**
25 **update address the policy considerations you raised about the structure of the program?**

1 A. FPL updated its economic analysis by changing some of the assumptions used to
2 calculate the cost-effectiveness of the program, resulting in a new allocation of costs and
3 benefits of the program. However, the program does not appear to have been structurally
4 changed. Certain costs of the program will still be included in rate base and potentially
5 included in base rates in the future, and the credits provided to participants will be recovered
6 from the general body of ratepayers through FPL's fuel cost recovery clause. In addition,
7 future additions of utility-scale solar will still be determined based upon interest in a voluntary
8 program rather than on an analysis of need for additional capacity. So, although FPL has
9 testified that the SolarTogether program is more cost-effective than originally proposed,
10 structurally it still represents a departure from historical regulatory practices that are in place
11 to protect the general body of ratepayers, as explained in my previous testimony.

12 **Q. Does this conclude your supplemental testimony?**

13 A. Yes.
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