

July 24, 2020

VIA ELECTRONIC FILING

Mr. Adam Teitzman Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Re: Docket No. 20200182-EI; Joint Petition of Florida Power & Light Company and Gulf Power Company for Declaratory Statement or, in the Alternative, Petition for Variance

Dear Mr. Teitzman:

Enclosed for filing please find the response of Florida Power & Light Company and Gulf Power Company to Staff's First Data Request, dated July 17, 2020.

Please contact me at (561) 691-7100 if you or your staff have any questions regarding this filing.

Sincerely,

/s/ John T. Butler
John T. Butler
Counsel for Florida Power & Light Company and
Gulf Power Company

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QUESTION:

Please consider the following MFR Schedule F-7 "Explanation":

"For each forecasting model used to estimate test year projections for customers, demand, and energy, provide the historical and projected values for the input variables and the output variables used in estimating and/or validating the model. Also, provide a description of each variable, specifying the unit of measurement and the time span or cross sectional range of the data."

For purposes of the instant FPL/Gulf Joint Petition, please specify whether FPL/Gulf intends for each portion of its submission of MFR Schedule F-7 (as part of its 2021 rate filing) to be provided in accordance with Exhibit 1 or Exhibit 2 of the Joint Petition. If neither of these exhibit designations is FPL's / Gulf's intention, please explain.

RESPONSE:

FPL and Gulf intend to provide MFR F-7 in a manner similar to the MFRs in Exhibit 1 of the Joint Petition. Data for all time periods, including the 2022 test year, would be provided separately for Pre-Consolidation FPL ("legacy FPL") and Pre-Consolidation Gulf ("legacy Gulf"). The test year forecasts for Consolidated FPL would then be developed by adding together the test year data from the separate legacy FPL and legacy Gulf models.

FPL and Gulf note that the preparation of MFR F-6 also would be affected by the fact that sales forecasting models would be prepared separately for legacy FPL and legacy Gulf. Thus, MFR F-6 would have separate tables showing the relationship between changes to inputs and outputs for legacy FPL and for legacy Gulf.