

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for evaluation of Hurricane
Dorian storm costs, by Florida Power & Light
Company.

DOCKET NO. 20200172-EI

DATED: SEPTEMBER 11, 2020

STAFF'S FIRST SET OF INTERROGATORIES TO
FLORIDA POWER & LIGHT COMPANY (NOS. 1 - 9)

The Staff of the Florida Public Service Commission, by and through its undersigned attorney, propounds the following interrogatories, pursuant to Rule 1.340, Florida Rules of Civil Procedure, to Florida Power & Light Company (FPL). These interrogatories shall be answered under oath by you or your agent, who is qualified and who will be identified, with the answers being served as provided by the Rules of Civil Procedure, **and within 30 days from date of service**. As provided by Rule 1.340(a), Florida Rules of Civil Procedure, each interrogatory shall be answered separately and fully in writing under oath unless it is objected to. Each answer shall be signed by the person making it.

Give the name, address, and relationship to FPL of those persons providing the answers to each of the following interrogatories.

If an interrogatory contained herein asks for information that has already been provided or is in the process of being provided to the Commission through a Commission audit, please so state, indicating the date provided and the audit document/record request number.

DEFINITIONS

“You”, “your”, “Company” or “FPL” refers to Florida Power & Light Company, its employees and authorized agents.

“Document” refers to written matter of any kind, regardless of its form, and to information recorded on any storage medium, whether in electrical, optical or electromagnetic form, and capable of reduction to writing by the use of computer hardware and software.

“Identify” means:

- (a) With respect to a person, to state the person’s name, address and business relationship (e.g., “employee”) to the Company;
- (b) With respect to a document, to state the nature of the document in sufficient detail for identification in a request for production, its date, its author, and to identify its custodian. If the information or document identified is recorded in electrical, optical or electromagnetic form, identification includes a description of the computer hardware or software required to reduce it to readable form.

INTERROGATORIES

Please refer to the direct testimony of witness Miranda for the following questions.

1. Please refer to page 8, lines 19 through 20. Please indicate whether or not a “dry run” exercise was conducted prior to Hurricane Dorian. If so, please provide the date it was conducted.

2. Please refer to page 9, line 22, through page 10, line 23, and Exhibit No. MBM-4. Please provide a summary of costs Florida Power & Light Company (FPL) incurred prior to the projected impact of Hurricane Dorian to FPL’s system in a manner similar to Exhibit No. MBM-4.

3. Please refer to page 10, lines 1 through 16. Please explain how FPL determines when it is safe to begin restoration processes.

Please refer to the direct testimony of witness Gerard for the following questions.

7. Please refer to page 8, lines 11 through 13. Please explain how FPL determined when to release crews to demobilize.
 - a. Please indicate when FPL began to release crews to demobilize.

8. Please refer to page 17, lines 12 through 21. Please indicate whether or not there was a formal process for approving exceptions. If so, please describe this process in detail. If not, please explain why not.

9. Please refer to page 19, lines 14 through 16. Please indicate when FPL projects that the iStormed app will be ready for use.

/s/ Suzanne S. Brownless

SUZANNE S. BROWNLESS

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FLORIDA PUBLIC SERVICE COMMISSION

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AFFIDAVIT

STATE OF FLORIDA)

COUNTY OF _____)

I hereby certify that on this _____ day of _____, 2020, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared _____, who is personally known to me, and he/she acknowledged before me that he/she provided the answers to interrogatory number(s) _____ from STAFF'S FIRST SET OF INTERROGATORIES TO FLORIDA POWER & LIGHT COMPANY (Nos. 1 - 9) in Docket No. 20200172-EI, and that the responses are true and correct based on his/her personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this _____ day of _____, 2020.

Notary Public
State of Florida, at Large

My Commission Expires:

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of STAFF'S FIRST SET OF INTERROGATORIES TO FLORIDA POWER & LIGHT COMPANY (NOS. 1 - 9) has been served by electronic mail to the following this 11th day of September, 2020:

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/s/ Suzanne S. Brownless

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