

July 14, 2021

FILED 7/14/2021
DOCUMENT NO. 07929-2021
FPSC - COMMISSION CLERK

VIA ELECTRONIC FILING

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

Re: Docket No. 20210015-EI; In re: Petition for rate increase by Florida Power & Light Company

Dear Mr. Teitzman:

Please find enclosed for filing the Prehearing Statement of Walmart Inc. in the above-referenced case.

Please contact me if you have any questions concerning this filing.

Sincerely,

/s/ Stephanie U. Eaton
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SUE:sds
Enclosures
c: Parties of Record

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail to the following parties this 14th day of July, 2021.

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/s/ Stephanie U. Eaton
Stephanie U. Eaton

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for rate increase by Florida Power & Light Company : **DOCKET NO. 20210015-EI**
:
:
: **Filed: July 14, 2021**

**PREHEARING STATEMENT OF
WALMART INC.**

Pursuant to Florida Public Service Commission's ("Commission") Order Nos. PSC-2021-0016-PCO, EI, PSC-2021-0120-PCO-EI, PSC-2021-0120A-PCO-EI, and PSC-2021-0233-PCO-EI, issued March 24, 2021, April 1, 2021, April 8, 2021, and June 28, 2021, respectively, Walmart Inc. ("Walmart") files its Prehearing Statement.

I. APPEARANCES:

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II. WITNESSES

<u>Witness</u>	<u>Subject</u>	<u>Issue No(s).</u>
Steve W. Chriss	Mr. Chriss' testimony addresses Florida Power & Light Company's ("FPL") and Gulf Power Company's ("Gulf Power") (collectively, "Companies") requested revenue increase and return on equity ("ROE"); the Companies' proposed performance adder; FPL Schedule General Service Large Demand – Time of Use ("GSLDT-1") rate design; the Companies' proposed unified rates and transition rider; and FPL's Commercial/Industrial Demand Reduction Rider ("CDR") for use by legacy Gulf customers.	71, 72, 108, 109, 121, 122, 123, and Walmart Issue K

III. EXHIBITS

<u>Exhibit</u>	<u>Description</u>
Exhibit SWC-1	Witness Qualifications Statement
Exhibit SWC-2	2022 Revenue Requirement Impact of the Companies' Proposed Increase in Return on Equity
Exhibit SWC-3	2023 Revenue Requirement Impact of the Companies' Proposed Increase in Return on Equity
Exhibit SWC-4	Reported Authorized Returns on Equity, Electric Utility Rate Cases Completed, 2018 to Present
Exhibit SWC-5	Calculation of 2022 Revenue Requirement Impact of the Companies' Proposed ROE vs National Average ROE, Vertically Integrated Utilities, Proposed Capital Structure
Exhibit SWC-6	2022 Revenue Requirement Impact of the Companies' Proposed Performance Incentive
Exhibit SWC-7	2023 Revenue Requirement Impact of the Companies' Proposed Performance Incentive
Exhibit SWC-8	Revenue Requirement Impact of Gulf Power's Authorized Performance Bonus, Docket 20010949-EI
Exhibit SWC-9	Derivation of Walmart's Proposed GSLDT-1 Rate Design

IV. WALMART'S STATEMENT OF BASIC POSITION

The Commission should authorize an increase in revenue requirement that is minimal and only the amount necessary for the Utilities to provide reliable service, while still having the opportunity to earn a reasonable return. When examining the Companies' proposed revenue requirement and associated ROE increase, Walmart recommends that the Commission consider: (1) the impact of the resulting revenue requirement on customers; (2) the use of a future test year, which reduces the risk due to regulatory lag; (3) the trend of rate case ROEs that have been

approved by state regulatory agencies; (4) recent rate case ROEs approved by this Commission; and (5) the lack of necessity for the Companies' proposed performance adder.

The Commission should reject the Companies' proposed performance adder. If the Commission approves the Companies' proposed performance adder, then the Commission should clearly state the factors driving the determination in its Final Order. Additionally, if the Commission is interested in performance-based ratemaking, a separate docket should be initiated for the Commission to determine the performance factors that are important for every utility regulated in the state and create universal reward/penalty structures that standardize the impacts on customers and the financial implications across utilities.

With respect to the design of the GLSDT-1 rate, the Commission should set the basic charge, maximum demand charge, and transformation credit for GSLDT-1 as proposed by the Companies, increase the on-peak demand charge by 1.2 times the percentage base revenue increase for the schedule, and apply the remainder of the increase to the on-peak and off-peak non-fuel charges in a manner that maintains the proposed 2.3X ratio between the charges.

If the Commission approves unified rates and the proposed transition rider, then the Commission should approve a symmetrical rate design for demand-metered customer classes, where the charge and credit for both legacy utilities are assessed on either a \$/kW or \$/kWh basis. If the Commission does not approve the unified rates for FPL and Gulf, then the Commission should approve FPL's CDR for use by legacy Gulf customers.

V. **ISSUES**

LEGAL

Issue 1: Does the Commission have the statutory authority to grant FPL's requested storm cost recovery mechanism?

Position: Walmart takes no position at this time.

Issue 2: Does the Commission have the statutory authority to approve FPL's requested Reserve Surplus Amortization Mechanism (RSAM)?

Position: Walmart takes no position at this time.

Issue 3: Does the Commission have the statutory authority to approve FPL's requested Solar Base Rate Adjustment mechanism for 2024 and 2025?

Position: Walmart takes no position at this time.

Issue 4: Does the Commission have the statutory authority to adjust FPL's authorized return on equity based on FPL's performance?

Position: Walmart takes no position at this time.

Issue 5: Does the Commission have the statutory authority to include non-electric transactions in an asset optimization incentive mechanism?

Position: Walmart takes no position at this time.

Issue 6: Does the Commission have the statutory authority to grant FPL's requested four year plan?

Position: Walmart takes no position at this time.

Issue 7: Has CLEO Institute, Inc. demonstrated individual and/or associational standing to intervene in this proceeding?

Position: Walmart takes no position at this time.

Issue 8: What impact, if any, does the determination regarding the CLEO Institute Inc.'s associational standing have on its ability to participate in this proceeding?

Position: Walmart takes no position at this time.

Issue 9: Has Floridians Against Increased Rates, Inc. demonstrated individual and/or associational standing to intervene in this proceeding?

Position: Walmart takes no position at this time.

Issue 10: What impact, if any, does the determination regarding Floridians Against Increased Rates, Inc.'s associational standing have on its ability to participate in this proceeding?

Position: Walmart takes no position at this time.

Issue 11: Has Florida Rising, Inc. demonstrated individual and/or associational standing to intervene in this proceeding?

Position: Walmart takes no position at this time.

Issue 12: What impact, if any, does the determination regarding Florida Rising, Inc.'s associational standing have on its ability to participate in this proceeding?

Position: Walmart takes no position at this time.

***Issue 13:** Has Smart Thermostat Coalition demonstrated individual and/or associational standing to intervene in this proceeding?

Position: Walmart takes no position at this time.

Issue 14:¹ What impact, if any, does the determination regarding Smart Thermostat's associational standing have on its ability to participate in this proceeding?

Position: Walmart takes no position at this time.

TEST PERIOD AND FORECASTING

Issue 15: Is FPL's projected test period of the 12 months ending December 31, 2022, appropriate?

Position: Walmart takes no position at this time.

Issue 16: Do the facts of this case support the use of a subsequent test year ending December 31, 2023 to adjust base rates?

Position: Walmart takes no position at this time.

Issue 17: Has FPL proven any financial need for rate relief in any period subsequent to the projected test period ending December 31, 2022?

Position: Walmart takes no position at this time.

¹ *Issues 13 and 14 may be dropped after an order granting/denying Smart Thermostat Coalition's Petition to Intervene is issued but are listed here as place-holders.

Issue 18: Is FPL's projected test period of the 12 months ending December 31, 2023, appropriate?

Position: Walmart takes no position at this time.

Issue 19: Are FPL's forecasts of Customers, KWH, and KW by Rate Schedule and Revenue Class (including but not limited to forecasts of energy efficiency, conservation, demand-side management, distributed solar and electric vehicle adoption), for the 2022 projected test year appropriate?

Position: Walmart takes no position at this time.

Issue 20: Are FPL's forecasts of Customers, KWH, and KW by Rate Schedule and Revenue Class (including but not limited to forecasts of energy efficiency, conservation, demand-side management, distributed solar and electric vehicle adoption), for the 2023 projected test year appropriate, if applicable?

Position: Walmart takes no position at this time.

Issue 21: Are FPL's projected revenues from sales of electricity by rate class at present rates for the 2021 prior year and projected 2022 test year appropriate?

Position: Walmart takes no position at this time.

Issue 22: Are FPL's projected revenues from sales of electricity by rate class at present rates for the projected 2023 test year appropriate, if applicable?

Position: Walmart takes no position at this time.

Issue 23: What are the appropriate inflation, customer growth, and other trend factors for use in forecasting the 2022 test year budget?

Position: Walmart takes no position at this time.

Issue 24: What are the appropriate inflation, customer growth, and other trend factors for use in forecasting the 2023 test year budget, if applicable?

Position: Walmart takes no position at this time.

QUALITY OF SERVICE

Issue 25: Is the quality of the electric service provided by FPL adequate taking into consideration: a) the efficiency, sufficiency and adequacy of FPL's facilities provided and the services rendered; b) the cost of providing such services; c) the value of such service to the public; d) the ability of the utility to improve such service and facilities; e) energy conservation and the efficient use of alternative energy resources; and f) any other factors the Commission deems relevant.

Position: Walmart takes no position at this time.

DEPRECIATION AND DISMANTLEMENT STUDIES

Issue 26: What, if any, are the appropriate capital recovery schedules?

Position: Walmart takes no position at this time.

Issue 27: Based on FPL's 2021 Depreciation Study, what are the appropriate depreciation parameters (e.g., service lives, remaining lives, net salvage percentages, and reserve percentages) and resulting depreciation rates for the accounts and subaccounts related to each production unit?

Position: Walmart takes no position at this time.

Issue 28: Based on FPL's 2021 Depreciation Study, what are the appropriate depreciation parameters (e.g., service lives, remaining lives, net salvage percentages, and reserve percentages) and resulting depreciation rates for each transmission, distribution, and general plant account, and subaccounts, if any?

Position: Walmart takes no position at this time.

Issue 29: If the Commission approves FPL's proposed Reserve Surplus Amortization Mechanism (Issue 130), what are the appropriate depreciation parameters (e.g., service lives, remaining lives, net salvage percentages, and reserve percentages) and depreciation rates?

Position: Walmart takes no position at this time.

Issue 30: Based on the application of the depreciation parameters and resulting depreciation rates that the Commission deems appropriate, and a comparison of the theoretical reserves to the book reserves, what are the resulting imbalances, if any?

Position: Walmart takes no position at this time.

Issue 31: What, if any, corrective reserve measures should be taken with respect to the imbalances identified in Issue 30?

Position: Walmart takes no position at this time.

Issue 32: What should be the implementation date for revised depreciation rates, capital recovery schedules, and amortization schedules?

Position: Walmart takes no position at this time.

Issue 33: Should FPL's currently approved annual dismantlement accrual be revised?

Position: Walmart takes no position at this time.

Issue 34: What, if any, corrective dismantlement reserve measures should be approved?

Position: Walmart takes no position at this time.

Issue 35: What is the appropriate annual accrual and reserve for dismantlement
A. For the 2022 projected test year?
B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

RATE BASE

Issue 36: Has FPL made the appropriate adjustments to remove all non-utility activities from Plant in Service, Accumulated Depreciation and Working Capital
A. For the 2022 projected test year?
B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 37: What is the appropriate amount of Plant in Service for the Dania Beach Clean Energy Center Unit 7
A. For the 2022 projected test year?
B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 38: What is the appropriate amount of Plant in Service for the SolarTogether Centers
A. For the 2022 projected test year?
B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 39: What is the appropriate amount of Plant in Service for FPL's Battery Storage Pilot projects associated with Paragraph 18 of the 2017 Settlement Agreement approved by Order No. PSC-2016-0560-AS-EI?

A. For the 2022 projected test year?

B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 40: Is the North Florida Resiliency Connection reasonable and prudent?

Position: Walmart takes no position at this time.

Issue 41: Are FPL's 2020 through 2023 solar generation additions reasonable and prudent?

Position: Walmart takes no position at this time.

Issue 42: Are FPL's 938 MW Northwest combustion turbine additions in 2022 reasonable and prudent?

Position: Walmart takes no position at this time.

Issue 43: Are FPL's combined cycle generation upgrade projects reasonable and prudent?

Position: Walmart takes no position at this time.

Issue 44: Are FPL's proposed 469 MW of battery storage projects reasonable and prudent?

Position: Walmart takes no position at this time.

Issue 45: Should the Commission approve FPL's proposed hydrogen storage project?

Position: Walmart takes no position at this time.

Issue 46: Is FPL's proposed early retirement of the coal assets at Plant Crist on October 15, 2020, as compared to (Original Retirement Date), reasonable and prudent?

Position: Walmart takes no position at this time.

Issue 47: Is FPL's conversion of Plant Crist Units 4-7 from coal to gas reasonable and prudent?

Position: Walmart takes no position at this time.

Issue 48: Is FPL's proposed early retirement of the Plant Scherer Unit 4 and related transactions reasonable and prudent?

Position: Walmart takes no position at this time.

Issue 49: What is the appropriate ratemaking treatment for Consummation Payments made to JEA?

Position: Walmart takes no position at this time.

Issue 50: What is the appropriate level of Plant in Service (Fallout Issue)

A. For the 2022 projected test year?

B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 51: What is the appropriate level of Accumulated Depreciation (Fallout Issue)

A. For the 2022 projected test year?

B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 52: This issue has been dropped.

Issue 53: This issue has been dropped.

Position: Walmart takes no position at this time.

Issue 54: What is the appropriate level of Construction Work in Progress to be included in rate base

A. For the 2022 projected test year?

B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 55: Are FPL's proposed reserves for Nuclear End of Life Material and Supplies and Last Core Nuclear Fuel appropriate

A. For the 2022 projected test year?

B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 56: What is the appropriate level of Nuclear Fuel (NFIP, Nuclear Fuel Assemblies in Reactor, Spent Nuclear Fuel less Accumulated Provision for Amortization of Nuclear Fuel Assemblies, End of Life Materials and Supplies, Nuclear Fuel Last Core)

A. For the 2022 projected test year?

B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 57: What is the appropriate level of Property Held for Future Use

A. For the 2022 projected test year?

B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 58: What is the appropriate level of fossil fuel inventories

A. For the 2022 projected test year?

B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 59: Should the unamortized balance of Rate Case Expense be included in Working Capital and, if so, what is the appropriate amount to include

A. For the 2022 projected test year?

B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 60: What is the appropriate amount of deferred pension debit in working capital for FPL to include in rate base

A. For the 2022 projected test year?

B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 61: Should the unbilled revenues be included in working capital

A. For the 2022 projected test year?

B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 62: What is the appropriate methodology for calculating FPL's Working Capital

A. For the 2022 projected test year?

B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 63: What is the appropriate level of Working Capital (Fallout Issue)
A. For the 2022 projected test year?
B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 64: What is the appropriate level of rate base (Fallout Issue)
A. For the 2022 projected test year?
B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

COST OF CAPITAL

Issue 65: What is the appropriate amount of accumulated deferred taxes to include in the capital structure and should a proration adjustment to deferred taxes be included in capital structure
A. For the 2022 projected test year?
B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 66: What is the appropriate amount and cost rate of the unamortized investment tax credits to include in the capital structure
A. For the 2022 projected test year?
B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 67: What is the appropriate amount and cost rate for short-term debt to include in the capital structure
A. For the 2022 projected test year?
B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 68: What is the appropriate amount and cost rate for long-term debt to include in the capital structure
A. For the 2022 projected test year?
B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 69: What is the appropriate amount and cost rate for customer deposits to include in the capital structure
A. For the 2022 projected test year?
B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 70: What is the appropriate equity ratio to use in the capital structure for ratemaking purposes
A. For the 2022 projected test year?
B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 71: Should FPL's request for a 50 basis point performance incentive to the authorized return on equity be approved?

Position: The Commission should reject the Companies' proposed performance adder. If the Commission determines that the Companies' performance has influenced its determination of the appropriate ROE within its existing discretion and authority, the factors driving that determination should be clearly delineated in the Commission's Final Order. Walmart's Direct Testimony of Steve W. Chriss, pp. 5, 15-20.

Issue 72: What is the appropriate authorized return on equity (ROE) to use in establishing FPL's revenue requirement
A. For the 2022 projected test year?
B. If applicable, for the 2023 subsequent projected test year?

Position: When considering the appropriate revenue requirement increase for the Companies in the current proceeding, the Commission should consider: (1) the impact of the resulting revenue increase will have on customers; (2) the use of a future test year, which reduces the risk due to regulatory lag; (3) recent rate case ROEs approved by the Commission; (4) the recent rate case ROEs approved by other state regulatory commissions nationwide; and (5) the lack of necessity for the Companies' proposed performance adder. Walmart's Direct Testimony of Steve W. Chriss, pp. 5, 9-15.

Issue 73: What is the appropriate weighted average cost of capital to use in establishing FPL's revenue requirement (Fallout Issue)
A. For the 2022 projected test year?
B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

NET OPERATING INCOME

Issue 74: What are the appropriate projected amounts of Other Operating Revenues
A. For the 2022 projected test year?
B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 75: Has FPL appropriately accounted for SolarTogether Program subscription charges
A. For the 2022 projected test year?
B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 76: What is the appropriate level of Total Operating Revenues
A. For the 2022 projected test year?
B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 77: Has FPL made the appropriate test year adjustments to remove fuel revenues and fuel expenses recoverable through the Fuel Adjustment Clause
A. For the 2022 projected test year?
B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 78: Has FPL made the appropriate test year adjustments to remove capacity revenues and capacity expenses recoverable through the Capacity Cost Recovery Clause
A. For the 2022 projected test year?
B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 79: Has FPL made the appropriate test year adjustments to remove environmental revenues and environmental expenses recoverable through the Environmental Cost Recovery Clause
A. For the 2022 projected test year?
B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 80: Has FPL made the appropriate test year adjustments to remove conservation revenues and conservation expenses recoverable through the Energy Conservation Cost Recovery Clause

A. For the 2022 projected test year?

B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 81: Has FPL made the appropriate adjustments to remove all revenues and expenses recoverable through the Storm Protection Plan Cost Recovery Clause

A. For the 2022 projected test year?

B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 82: Has FPL made the appropriate adjustments to remove all non-utility activities from operating revenues and operating expenses

A. For the 2022 projected test year?

B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 83: What is the appropriate percentage value (or other assignment value or methodology basis) to allocate FPL shared corporate services costs and/or expenses to its affiliates

A. For the 2022 projected test year?

B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 84: What is the appropriate amount of FPL shared corporate services costs and/or expenses (including executive compensation and benefits) to be allocated to affiliates

A. For the 2022 projected test year?

B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 85: Should any adjustments be made to FPL's operating revenues or operating expenses for the effects of transactions with affiliated companies

A. For the 2022 projected test year?

B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 86: What is the appropriate level of generation overhaul expense
A. For the 2022 projected test year?
B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 87: What is the appropriate amount of FPL's production plant O&M expense
A. For the 2022 projected test year?
B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 88: What is the appropriate amount of FPL's transmission O&M expense
A. For the 2022 projected test year?
B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 89: What is the appropriate amount of FPL's distribution O&M expense
A. For the 2022 projected test year?
B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 90: What is the appropriate annual storm damage accrual and storm damage reserve
A. For the 2022 projected test year?
B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 91: What is the appropriate amount of Other Post-Employment Benefits expense
A. For the 2022 projected test year?
B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 92: What is the appropriate amount of Salaries and Employee Benefits expense
A. For the 2022 projected test year
B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 93: What is the appropriate amount of Incentive Compensation Expense to include in O&M expense
A. For the 2022 projected test year?
B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 94: What is the appropriate amount of Pension Expense
A. For the 2022 projected test year?
B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 95: Should an adjustment be made to the amount of the Directors and Officers Liability Insurance expense that FPL included in the 2022 and, if applicable, 2023 projected test year(s)?

Position: Walmart takes no position at this time.

Issue 96: What is the appropriate amount and amortization period for Rate Case Expense
A. For the 2022 projected test year?
B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 97: What is the appropriate amount of uncollectible expense and bad debt rate
A. For the 2022 projected test year?
B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 98: What are the appropriate expense accruals for: (1) end of life materials and supplies and 2) last core nuclear fuel
A. For the 2022 projected test year?
B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 99: What is the appropriate level of O&M Expense (Fallout Issue)
A. For the 2022 projected test year?
B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 100: What is the appropriate amount of depreciation, amortization, and fossil dismantlement expense (Fallout Issue)
A. For the 2022 projected test year?
B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 101: What is the appropriate level of Taxes Other Than Income (Fallout Issue)
A. For the 2022 projected test year?
B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 102: What is the appropriate level of Income Taxes
A. For the 2022 projected test year?
B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 103: What is the appropriate level of (Gain)/Loss on Disposal of utility property
A. For the 2022 projected test year?
B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 104: What is the appropriate level of Total Operating Expenses (Fallout Issue)
A. For the 2022 projected test year?
B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 105: What is the appropriate level of Net Operating Income (Fallout Issue)
A. For the 2022 projected test year?
B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

REVENUE REQUIREMENT

Issue 106: What are the appropriate revenue expansion factor and the appropriate net operating income multiplier, including the appropriate elements and rates for FPL
A. For the 2022 projected test year?
B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 107: What is the appropriate annual operating revenue increase or decrease (Fallout Issue)

A. For the 2022 projected test year?

B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

COST OF SERVICE AND RATE DESIGN ISSUE

Issue 108: Should FPL's proposal for a consolidated cost of service and unified tariffs and rates for FPL and the former Gulf Power Company's customers be approved?

Position: If the Commission approves unified rates and the proposed transition rider, the Commission should approve a symmetrical rate design for demand-metered customer classes, where the charge and credit for both legacy utilities are assessed on either a \$/kW or \$kWh basis. If the Commission determines that it will not approve unified rates for FPL and Gulf, the Commission should approve FPL's CDR for use by legacy Gulf customers. Walmart Direct Testimony of Steve W. Chriss, pp. 6, 29-30.

Issue 109: Should the proposed transition rider charges and transition rider credits for the years 2022 through 2026 be approved?

Position: If the Commission approves unified rates and the proposed transition rider, the Commission should approve a symmetrical rate design for demand-metered customer classes, where the charge and credit for both legacy utilities are assessed on either a \$/kW or \$kWh basis. If the Commission determines that it will not approve unified rates for FPL and Gulf, the Commission should approve FPL's CDR for use by legacy Gulf customers. Walmart Direct Testimony of Steve W. Chriss, pp. 6, 29-30.

Issue 110: Is FPL's proposed separation of costs and revenues between the wholesale and retail jurisdictions appropriate

A. For the 2022 projected test year?

B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 111: What is the appropriate methodology to allocate production, transmission, and distribution costs to the rate classes

A. For the 2022 projected test year?

B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 112: How should the change in revenue requirement be allocated to the customer classes

A. For the 2022 projected test year?

B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 113: What are the appropriate service charges (initial connection, reconnect for nonpayment, connection of existing account, field visit, temporary overhead and underground, late payment charge, meter tampering)

A. For the 2022 projected test year?

B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 114: Should FPL's proposed revisions to the underground electric distribution tariffs for residential subdivisions and commercial customers be approved?

Position: Walmart takes no position at this time.

Issue 115: Should FPL's proposal to eliminate the Governmental Adjustment Factor (GAF) waiver (Tariff Sheet No. 6.300) be approved?

Position: Walmart takes no position at this time.

Issue 116: Should FPL retain the existing Gulf Power Real-Time Pricing (RTP) rate for customers and expand it to be offered for customers in the combined FPL and Gulf Power systems?

Position: Walmart takes no position at this time.

Issue 117: Should FPL's proposed new Economic Development Rider (Original Tariff Sheet Nos. 8.802 – 8.802-1) be approved?

Position: Walmart takes no position at this time.

Issue 118: Should FPL's proposal to increase the cap from 300 to 1,000 megawatts and from 50 to 75 contracts for the Commercial/Industrial Service Rider (CISR) be approved?

Position: Walmart takes no position at this time.

Issue 119: Should FPL's proposal to cancel Gulf's Community Solar (CS) rider be approved?

Position: Walmart takes no position at this time.

Issue 120: What is the appropriate monthly credit for Commercial/Industrial Demand Reduction (CDR) Rider customers effective January 1, 2022?

Position: Walmart takes no position at this time.

Issue 121: Should FPL's proposal to add a maximum demand charge to the commercial/industrial time-of-use rate schedules be approved?

Position: Walmart does not oppose the Companies' proposal to add a maximum demand charge to the time-of-use commercial and industrial base rate schedules. Walmart Direct Testimony of Steve W. Chriss, p. 6.

Issue 122: What are the appropriate base charges (formerly customer charges) (Fallout Issue)

A. For the 2022 projected test year?

B. If applicable, for the 2023 subsequent projected test year?

Position: The Commission should set the basic charge, maximum demand charge, and transformation credit for GSLDT-1 as proposed by the Companies, increase the on-peak demand charge by 1.2 times the percentage base revenue increase for the schedule, and apply the remained of the increase to the on-peak and off-peak non-fuel charges in a manner that maintains the proposed 2.3X ration between the charges. Walmart Direct Testimony of Steve W. Chriss, pp. 6, 21-28.

Issue 123: What are the appropriate demand charges (Fallout Issue)

A. For the 2022 projected test year?

B. If applicable, for the 2023 subsequent projected test year?

Position: The Commission should set the basic charge, maximum demand charge, and transformation credit for GSLDT-1 as proposed by the Companies, increase the on-peak demand charge by 1.2 times the percentage base revenue increase for the schedule, and apply the remained of the increase to the on-peak and off-peak non-fuel charges in a manner that maintains the proposed 2.3X ration between the charges. Walmart Direct Testimony of Steve W. Chriss, pp. 6, 21-28.

Issue 124: What are the appropriate energy charges (Fallout Issue)

A. For the 2022 projected test year?

B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time, except as implied by Walmart's position on Issues 122 and 123.

Issue 125: What are the appropriate charges for the Standby and Supplemental Services (SST-1, ISST-1) rate schedules (Fallout Issue)
A. For the 2022 projected test year?
B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 126: What are the appropriate charges for the Commercial Industrial Load Control (CILC) rate schedule (Fallout Issue)
A. For the 2022 projected test year?
B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

Issue 127: What are the appropriate lighting rate charges? (Fallout Issue)

Position: Walmart takes no position at this time.

Issue 128: Should the Commission give staff administrative authority to approve tariffs reflecting Commission approved rates and charges?

Position: Walmart takes no position at this time.

Issue 129: What are the effective dates of FPL's proposed rates and charges
A. For the 2022 projected test year?
B. If applicable, for the 2023 subsequent projected test year?

Position: Walmart takes no position at this time.

OTHER ISSUES

Issue 130: Should the Commission approve FPL's requested Reserve Surplus Amortization Mechanism (RSAM)?

Position: Walmart takes no position at this time.

Issue 131: Should the Commission approve FPL's request for variable capital recovery for retired assets such that the total amortization over the four year period ended December 31, 2025 is equal to the sum of the amortization expense for 2022-2025?

Position: Walmart takes no position at this time.

Issue 132: Should the Commission approve FPL's requested asset optimization incentive mechanism?

Position: Walmart takes no position at this time.

Issue 133: Should the Commission approve FPL's requested Solar Base Rate Adjustment mechanisms in 2024 and 2025 for a total of 1,788 MW?

Position: Walmart takes no position at this time.

Issue 134: Should the Commission approve FPL's requested Storm Cost Recovery mechanism?

Position: Walmart takes no position at this time.

Issue 135: Should the Commission approve FPL's proposal for addressing a change in tax law, if any, that occurs during or after the pendency of this proceeding?

Position: Walmart takes no position at this time.

Issue 136: Should the Commission authorize FPL to accelerate unprotected accumulated excess deferred income tax amortization in the incremental amounts of \$81 million in 2024 and \$81 million in 2025 or for other amounts in the years 2022 through 2025?

Position: Walmart takes no position at this time.

Issue 137: Should the Commission approve FPL's requested four year plan?

Position: Walmart takes no position at this time.

Issue 138: Should FPL be required to file, within 90 days after the date of the final order in this docket, a description of all entries or adjustments to its annual report, rate of return reports, and books and records which will be required as a result of the Commission's findings in this rate case?

Position: Walmart takes no position at this time.

Issue 139: Should this docket be closed?

Position: Walmart takes no position at this time.

VI. CONTESTED ISSUES

OPC

Issue A: Has FPL proven any financial need for single-issue rate relief in 2024 and 2025, based upon only the additional costs associated with FPL's request for Solar Base Rate Adjustments in 2024 and 2025, and with no offsets for anticipated load and revenue growth forecast to occur in 20214 and 2025?

Position: Walmart takes no position at this time.

CLEO/Vote Solar

Issue B: This issue has been dropped.

Issue C: Do FPL's proposed capital investments in natural gas ensure adequate fuel diversity and fuel supply reliability of the electric grid, per F.S. 366.05?

Position: Walmart takes no position at this time.

Issue D: Are FPL's T&D growth-related capital expenditures of \$5.86 billion between 2019-2023 reasonable and prudent?

Position: Walmart takes no position at this time.

Issue E: Are FPL's reliability/grid modernization-related T&D capital expenditures of \$5.64 billion between 2019-2023 reasonable and prudent?

Position: Walmart takes no position at this time.

Issue F: This issue has been dropped.

Position: Walmart takes no position at this time.

Issue G: This issue has been dropped.

Position: Walmart takes no position at this time.

Issue H: Has FPL established fair, just and reasonable rates and charges, taking into consideration the cost of providing service to the class, as well as the rate history, value of service, and experience of FPL; the consumption and load characteristics of the various classes of customers; and public acceptance of rate structures, in compliance with F.S. 366.05(1)(a), 366.06(1) and (2)?

Position: Walmart takes no position at this time.

FIPUG

Issue I: Are the proposed SOBRA additions in years 2024 and 2025 piecemeal ratemaking?

Position: Walmart takes no position at this time.

Issue J: **If so, how should the proposed SOBRA additions in years 2024 and 2025 be addressed?**

Position: Walmart takes no position at this time.

Walmart

Issue K: **If the Commission determines that it will not approve unified rates for FPL and Gulf, should Gulf's legacy customers be provided access to FPL's Commercial/Industrial Demand Reduction Rider (CDR)?**

Position: If the Commission determines it will not approve the unified rates for FPL and Gulf, the Commission should approve FPL's CDR for use by legacy Gulf customers. Walmart Direct Testimony of Steve W. Chriss, pp. 6, 30-31.

VII. STIPULATED ISSUES

There are currently no stipulated issues.

VIII. PENDING MOTIONS OR OTHER ACTIONABLE MATTERS

Walmart has no pending Motions at this time.

IX. PENDING CONFIDENTIALITY REQUESTS OR CLAIMS

Walmart has no pending confidentiality requests or claims.

X. OBJECTIONS TO WITNESS QUALIFICATIONS AS AN EXPERT

Walmart does not object to any witness's qualifications as an expert.

XI. COMPLIANCE WITH ORDER NOS. PSC-2021-0016-PCO, EI, PSC-2021-0120-PCO-EI, PSC-2021-0120A-PCO-EI, and PSC-2021-0233-PCO-EI

There are no requirements of Order Nos. PSC-2021-0016-PCO, EI, PSC-2021-0120-PCO-EI, PSC-2021-0120A-PCO-EI, and PSC-2021-0233-PCO-EI with which Walmart cannot comply.

Respectfully submitted,

By /s/ Stephanie U. Eaton

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Dated: July 14, 2021