

STATE OF FLORIDA

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OFFICE OF THE GENERAL COUNSEL  
KEITH C. HETRICK  
GENERAL COUNSEL  
(850) 413-6199

# Public Service Commission

August 24, 2021

Ms. Maria Moncada  
700 University Boulevard  
Juno Beach, Florida 33408-0420  
[Maria.moncada@fpl.com](mailto:Maria.moncada@fpl.com)

**STAFF'S EIGHTH DATA REQUEST**  
*via email*

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

Dear Ms. Moncada:

By this letter, the Commission staff requests that Florida Power & Light Company provide responses to the following data requests:

## DSM Credits

1. Please refer to paragraph 4(e) of the Settlement Agreement.
  - a. Can the Commission consider the CDR and CILC credits outside of a base rate proceeding (e.g., during a FEECA goals proceeding or DSM plan approval)? If not, please explain why not.
  - b. Could the Commission close enrollment to new participants of the CDR and CILC programs if they are not cost effective? If not, please explain why not.
2. Please refer to paragraph 4(e) of the Settlement Agreement and Exhibit B, Tariff Sheet No. 8.680.
  - a. Verify that the CDR Credit included in the Settlement Agreement is \$8.70/kW. If not, please provide the correct value.
  - b. Provide an updated RIM and TRC cost-effectiveness analysis of the CDR Credit included in the Settlement Agreement. As part of your response, identify assumptions used in developing the cost-effectiveness result.
  - c. What would be the highest cost-effective CDR Credit using the RIM Test and TRC Tests, respectively? As part of your response, please provide the cost-effectiveness analyses used in this determination.

SoBRA Mechanism

3. Please refer to paragraph 12(d) of the Settlement Agreement.
  - a. Explain how cost-effectiveness will be determined. As part of this response, specify whether other solar project(s) outside of the SoBRA and SolarTogether extension would be considered in this analysis as part of the base case, and if not, explain why not.
  - b. Explain whether the cost-effectiveness requirement means that FPL must select the most cost-effective resource plan. If not, explain why not.
  - c. Explain what is meant by “is cost effective compared to solar alone.”
  - d. Does the cost-effectiveness analysis have to take into account other solar projects FPL is planning during the planning horizon, such as the SolarTogether extension? If not, explain why not.
4. Please refer to paragraph 12(f) of the Settlement Agreement. Clarify if there is a limit to the amount of surplus solar capacity that FPL could request in 2025.

SolarTogether Extension

5. Please refer to paragraph 20 of the Settlement Agreement and Exhibit B, Tariff Sheet Nos. 7.030 and 8.932. Please identify which former Gulf territories are eligible for the SolarTogether Rider given the multiple excluded counties listed on Tariff Sheet No. 7.030.
6. Please refer to paragraph 20 of the Settlement Agreement.
  - a. Identify the status of the original 20 solar energy centers for the original 1,490 MW capacity approved by Order No. PSC-2020-0084-S-EI.
  - b. Explain how the inclusion of the 1,788 MW of additional solar capacity in Phase 1 is consistent with Order No. PSC-2020-0084-S-EI. As part of your explanation, identify whether each component survives intact, is modified, or is no longer relevant.
  - c. Explain why the incremental 1,788 MW SolarTogether extension is not treated as a separate phase, which would have subscription costs and credit rates that would reflect the costs and system benefits specific to that phase, as suggested by Witness Valle on page 10 of his direct testimony in Docket No. 20190061-EI.
  - d. Provide the CPVRR benefit analysis of the incremental 1,788 MW SolarTogether extension. As part of this response, explain how the projected benefits were calculated, identifying whether the original 1,490 MW SolarTogether is included

- in the "No ST Extension Plan" base case, and provide the calculations in electronic (excel) format.
- e. Explain how the projected benefits from the SolarTogether project change with the change in Subscription Charge shown in Exhibit B, Second Revised Tariff Sheet No. 8.934. As part of your response, provide the calculations in electronic (excel) format.
  - f. Would existing SolarTogether Phase 1 subscribers get retroactive credits or deductions for prior months of service? If not, explain why and whether FPL would seek cost recovery for those credits in excess of the amounts identified in the Revised Tariff.
  - g. Provide a detailed installed cost estimate for the incremental 1,788 MW SolarTogether extension. As part of your response, please provide an electronic copy in excel format.
  - h. Provide the amount of annual revenue requirement for the incremental 1,788 MW SolarTogether extension, with categories of capital and O&M separated. As part of this response, provide the annual amount that is covered by the new participant subscription charges and provide the calculations in electronic (Excel) format with the results should be shown in both dollars and percentages.
  - i. Detail the amount subscription credits and subscription charges would be for the 1,788 MW incremental solar plants associated with the SolarTogether extension if it were independently evaluated. As a part of this response, provide the supporting calculations and the difference between these values and those proposed for SolarTogether Phase 1.

#### Asset Optimization Program

7. Please refer to paragraph 21 of the Settlement Agreement.
  - a. Please indicate whether FPL intends to participate in the Generation Performance Incentive Factor and/or the wholesale power sales incentives, as originally authorized by Order No. 9558 and PSC-2000-1744-PAA-EI respectively, if continuation of the Asset Optimization Program is approved as part of the Settlement Agreement. Please explain why or why not.
  - b. Does implementing the Asset Optimization Program as a permanent program preclude FPL from participating in any other incentive programs during the settlement term or thereafter? Explain why or why not.
8. Please refer to paragraph 21 of the Settlement Agreement, Order No. PSC-13-0023-S-EI, page 24, paragraph 12(c), and Order No. PSC-2016-0560-AS-EI, paragraph 15. Is it still FPL's contention that if the Asset Optimization Program is no longer deemed to be in the public interest, now or in a future setting, the Commission may terminate the program?

9. Please refer to paragraph 21(ii) of the Settlement Agreement. Please detail if FPL has plans to monetize renewable energy credits associated with the SolarTogether program.
10. Please refer to paragraph 21(v) of the Settlement Agreement. How frequently, and under what circumstances, if any, could the Commission review the “adjustable parameters” or other parameters of the Asset Optimization Program outside of FPL’s request every four years? As part of your response, explain whether the Commission could initiate its own review of the parameters, outside of FPL’s request, and if not, why not.

EV Programs – Residential EV Charging Services Pilot

11. Please refer to paragraph 22(iii) of the Settlement Agreement.
  - a. Provide the number of chargers FPL estimates will be installed through the pilot.
  - b. Will any customers or locations be excluded from service under the pilot?
  - c. Explain why FPL believes it is appropriate for a regulated entity to engage in activities in a competitive market.

EV Programs – Commercial EV Charging Services

12. Please refer to paragraph 22(iv) of the Settlement Agreement.
  - a. Provide the number of chargers FPL estimates will be installed through the pilot.
  - b. Will any customers or locations be excluded from service under the pilot?
  - c. Explain why FPL believes it is appropriate for a regulated entity to engage in activities in a competitive market.

Residential Smart Panel Pilot Program

13. Please refer to paragraph 25 of the Settlement Agreement and to Exhibit B, Tariff Sheet No. 9.806, Section 3. Please explain how FPL intends to recover the costs associated with the \$100 bill credit.

Staff's Eighth Data Request

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Please file all responses electronically no later than Tuesday, August 31, 2021, from the Commission's website at [www.floridapsc.com](http://www.floridapsc.com), by selecting the Clerk's Office tab and Electronic Filing Web Form. Please feel free to call me at (850) 413-6218 if you have any questions.

Sincerely,

*/s/ Suzanne S. Brownless*

Suzanne S. Brownless  
Special Counsel

SBr/csc

cc: Office of Commission Clerk  
All parties of record