FILED 6/9/2025
DOCUMENT NO. 04333-2025
FPSC - COMMISSION CLERK

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June 9, 2025

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

Re: Docket No. 20250011-EI- Petition for rate increase by Florida Power & Light Company

Dear Mr. Teitzman:

Please find enclosed for filing in the above referenced docket the Direct Testimony and Exhibits of Roger D. Colton. This filing is being made via the Florida Public Service Commission's web-based electronic filing portal.

If you have any questions or concerns, please do not hesitate to contact me. Thank you for your assistance in this matter.

Sincerely,

Walt Trierweiler
Public Counsel

/s/ Mary A. Wessling
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CERTIFICATE OF SERVICE
DOCKET NO. 20250011-EI

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re.: Petition for rate increase by Florida Power & Light Company.
_____/

Docket No. 20250011-EI

Filed: June 9, 2025

DIRECT TESTIMONY
OF
ROGER D. COLTON
ON BEHALF
OF
THE CITIZENS OF THE STATE OF FLORIDA

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FPL Districts by Zip Code	RDC-2
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DIRECT TESTIMONY

OF

ROGER D. COLTON

On Behalf of the Office of Public Counsel

Before the

Florida Public Service Commission

DOCKET NO. 20250011-EI

I. Introduction

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Roger Colton. My business address is 34 Warwick Road, Belmont, Massachusetts.

Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT POSITION?

A. I am owner of the firm of Fisher Sheehan & Colton, Public Finance and General Economics of Belmont, Massachusetts. In that capacity, I provide technical assistance to a variety of federal and state agencies, consumer organizations, and public utilities on rate and customer service issues involving water/sewer, natural gas, and electric utilities.

Q. ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS PROCEEDING?

A. I have been retained by the Florida Office of Public Counsel ("OPC") to provide technical assistance and expert testimony regarding Florida Power & Light Company's

("FPL" or "Company") petition for a rate increase. Accordingly, I am appearing on behalf of the Citizens of the State of Florida.

Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND.

A. After receiving my undergraduate degree in 1975 (Iowa State University), I obtained further training in both law and economics. I received my law degree in 1981 (University of Florida). I received my Master's Degree (Regulatory Economics) from the MacGregor School (Antioch University) in 1993.

Q. PLEASE DESCRIBE YOUR PROFESSIONAL BACKGROUND.

A. I work primarily on low-income utility customer issues. This involves regulatory work on rate and customer service issues, as well as research into low-income customer usage, payment patterns, and affordability programs. At present, I am working on various projects in the states of New Hampshire, Massachusetts Connecticut, New Jersey, Pennsylvania, Ohio, Michigan, Wisconsin, Illinois, Missouri, and Montana. My clients include state agencies (e.g., Pennsylvania Office of Consumer Advocate, Maryland Office of People's Counsel, Massachusetts Attorney General's Office), federal agencies (e.g., the U.S. Department of Health and Human Services), community-based organizations (e.g., Cleveland Legal Aid Society, Legal Action of Chicago, Consumers Council of Missouri), and private utilities (e.g., Toledo Water, Entergy Services). Examples of my work include my current projects to assist the Connecticut Office of Consumers Counsel in the annual review of the low-income affordability initiatives of that state's utilities by the Public Utilities Regulatory

Authority. I am also assisting the Massachusetts Attorney General's Office (AGO) in the generic investigation by the Department of Public Utilities into the design of low-income affordability programs, as well as the New Jersey Office of Rate Counsel in the New Jersey Board of Public Utilities (BPU) generic review of the design of affordability programs. In Canada, I recently developed a universal service plan for Nova Scotia and prepared an income-based tiered discount program for BC Hydro.

In addition to state-specific and utility-specific work, I engage in national work throughout the United States. For example, I have recently completed a project with the Natural Resources Defense Council to develop a tool by which to assess the financial impact of differing types of low-income customer bill assistance. A brief description of my professional background is provided in Exhibit RDC-1.

Q. HAVE YOU EVER PUBLISHED ON PUBLIC UTILITY REGULATORY ISSUES?

A. Yes. I have published three books and more than 80 articles in scholarly and trade journals, primarily on low-income utility and housing issues. I have published an equal number of technical reports for various clients on energy, water, telecommunications, and other associated low-income utility issues. A summary of my publications is included in Exhibit RDC-1.

Q. HAVE YOU EVER TESTIFIED BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION OR OTHER UTILITY COMMISSIONS?

A. I have not previously testified before the Florida Public Service Commission ("FPSC" or "Commission"). However, I have previously testified as an expert witness before regulatory commissions in more than 350 regulatory proceedings in 43 states and five Canadian provinces on a wide range of utility issues. A list of the jurisdictions in which I have testified is listed in Exhibit RDC-1.

Q. PLEASE EXPLAIN THE PURPOSE OF YOUR DIRECT TESTIMONY.

A. The purpose of my Direct Testimony is to review the impact of FPL rates on the bill affordability to low- and moderate-income households. More specifically, my testimony below will:

- Examine the history of FPL rate increases relative to changes in incomes in the FPL service territory;
- Examine the affordability impacts of existing and proposed FPL rates on low-income households;
- Examine the ability-to-pay of moderate income customers in the FPL service territory;
- Examine the impacts of cost-of-living on ability-to-pay in the FPL service territory;
- Examine the disproportionate impacts which recent high inflation rates have had on low- and moderate-income households in particular;
- Examine the impacts that rate unaffordability has on the ability of FPL to collect its bills; and

- Examine the adverse impacts which residential rate unaffordability has on non-residential customers.

II. Rate History

Q. PLEASE EXPLAIN THE PURPOSE OF THIS SECTION OF YOUR TESTIMONY.

A. In this section of my testimony, I examine the movement in FPL prices relative to the movement in incomes for FPL customers. In examining affordability, I do not look at incomes at higher income levels. Affordability concerns instead are assessed by looking at FPL households at lower to moderate income levels. My first inquiry includes looking at recent movements in FPL rates relative to income levels at the First and Second Quintiles of income in the FPL service territory.[1] For purposes of this discussion, I define "moderate" income households to include those falling in the Second Quintile.

The first step in my analysis is to develop an index for FPL prices over time. In my analysis, I set 2016 as the Base Year (Index equals 100). The change in FPL prices over time results in the FPL Price Index being more or less than 100. An FPL Price Index of more than 100 means that rates have increased. An FPL Price Index of less than 100 means that rates have declined. Using an index such as this is a common way to measure data over time. For example, it is the way that the U.S. Bureau of Labor

[1] The Census Bureau rank orders households from lowest income to highest income for each geographic area for which it publishes data. It then divides that rank ordering into five equal parts, each part of which is called a "quintile." The First Quintile (Q1) is sometimes also referred to as the "bottom Quintile" or "lowest Quintile" (households at the 0 to 20th percentile of income). The Second Quintile (Q2) represents households at the 21st to 40th percentiles of income.

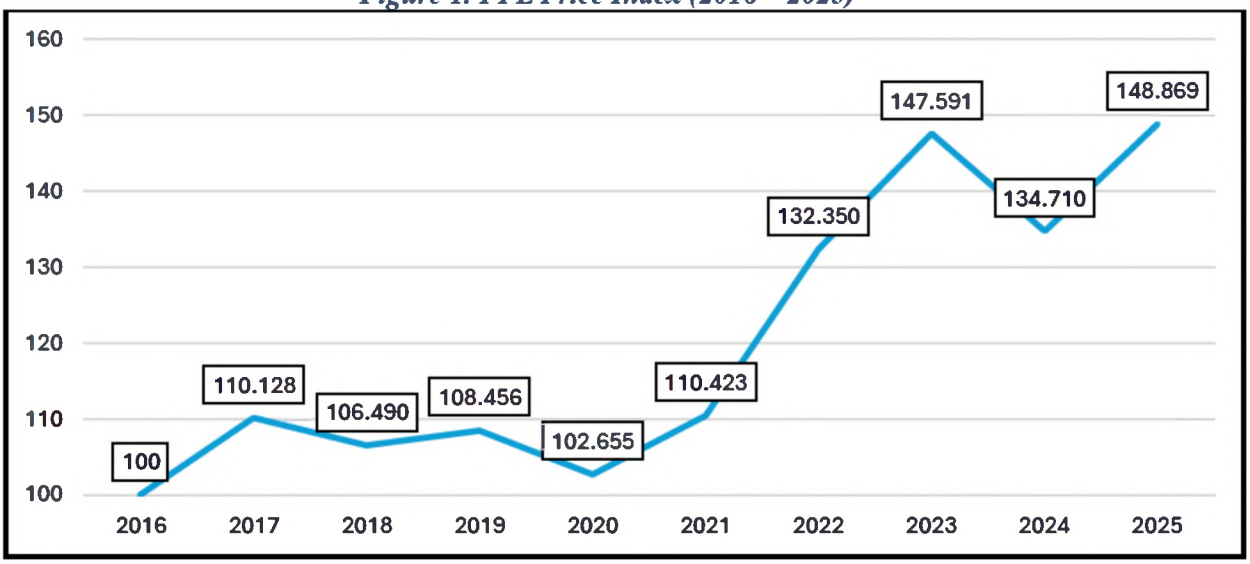
1 Statistics measures inflation (with the Consumer Price Index showing the extent of
2 increase or decrease relative to a base year).

3 Figure 1 below shows the FPL Price Index for the years 2016 through 2025.
4 The prices are based on data reported by FPL in its Energy Information Administration
5 ("EIA") Form 861 each year.[2] The data shows that FPL prices[3] were relatively stable
6 from 2016 through 2020. Since 2020, however, FPL prices have seen a dramatic
7 increase. The 2025 FPL Price Index reaches 148.869, indicating that FPL rates are
8 roughly 50% higher in 2025 than they were in 2016.

[2] 2024 and 2025 is based on a compilation of monthly Form EIA 861M filings. EIA Form 861 annual data is available at https://www.eia.gov/electricity/data/eia861/. EIA Form 861M monthly data is available at https://www.eia.gov/electricity/data/eia861m/.

[3] While I use the term "price," the actual data I examine is average revenue per customer. I divide the total residential revenue reported by FPL by the total residential usage reported by FPL.

Figure 1. FPL Price Index (2016 – 2025)



I have "checked" this data reported to EIA against the history of FPL bills (1,000 kWh) as reported each year by the Florida PSC.[4] While the numbers are not identical, they are very close. Using the PSC numbers, the FPL PSC Price Index for 2022 is 131.702 (compared to 132.350 using EIA data). The FPL PSC Price Index for 2023 is 148.426 (compared to 147.591 using EIA data). The Florida PSC, as of the time I write this testimony, has not reported 2024 data.

Q. HOW DOES THE FPL PRICE INDEX INFORM AN AFFORDABILITY ANALYSIS FOR FPL?

A. The FPL Price Index informs an affordability analysis when it is compared to an index for incomes over the same time period. Again using 2016 as the base (Index = 100), The Schedules present the following data: (1) Figure 2 presents a comparison of the Q1 Index for 2023 to the FPL Price Index; (2) Figure 3 presents a comparison of the Q1

[4] Florida PSC, Facts and Figures of the Florida Utility Industry, available at https://www.floridapsc.com/pscfiles/website-files/PDF/Publications/Reports/General/FactsAndFigures/.

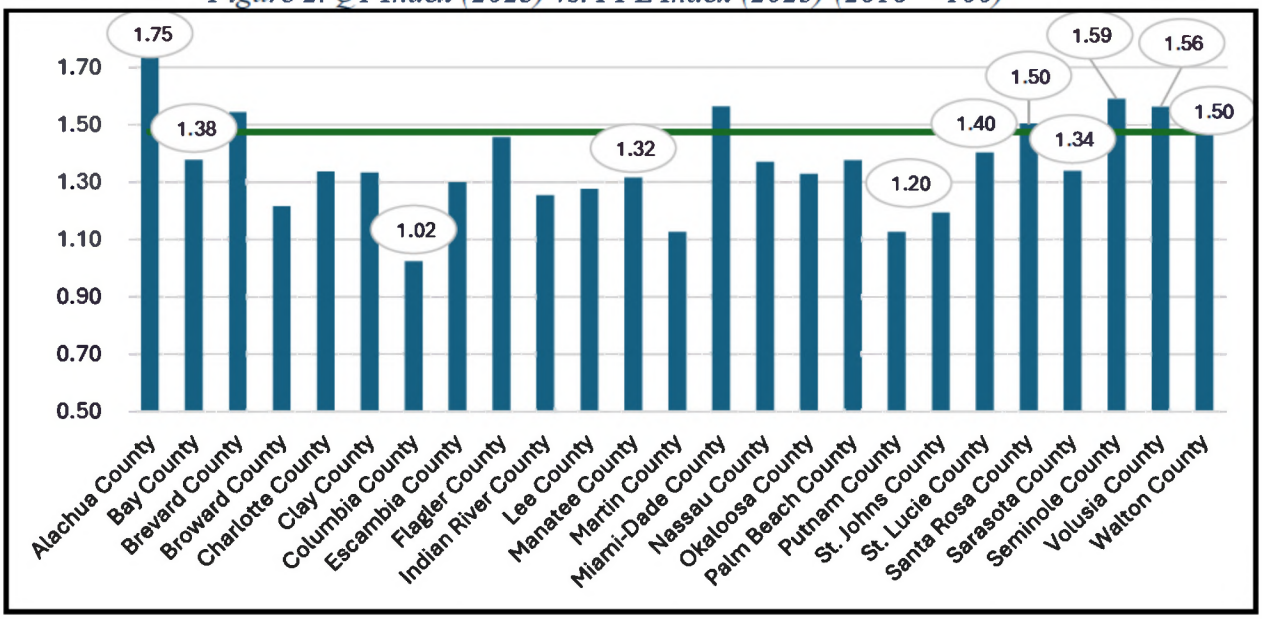
1 Index for 2022 to the FPL Price Index; and (3) Figure 4 presents a comparison of the
2 Q2 Index for 2023 to the FPL Price Index. In each Schedule, the FPL Price Index is
3 represented by the line. The Q1 and Q2 Indexes for each FPL county for which the
4 Census reports data are represented by the bars.[5] The Census Bureau reports mean
5 income by quintile for 20 of the 29 FPL counties which I use.[6]

6 Figure 2 shows that of the 20 Peninsular FPL counties, in only five instances
7 did the growth in Q1 income exceed the growth in FPL rates, with one other county
8 showing a growth rate in Q1 income nearly equal to the FPL Price Index. What that
9 means, however, is that in 15 of FPL's 20 Peninsular counties for which data is
10 available, FPL customers in the bottom quintile (Q1) were worse off relative in 2023
11 FPL than they were in 2016.

[5] I made two adjustments to the list of counties reported by FPL. First, some counties are not sufficiently large for the Census Bureau to report annual data. Second, I excluded the current FPL Northwest counties of Bay, Escambia, Okaloosa, Santa Rosa, and Walton. Prior to the acquisition of Gulf Power by FPL in 2019, residents of these counties were not FPL customers. Finally, I note that the Census Bureau did not publish 2020 one-year data due to data collection problems associated with COVID.

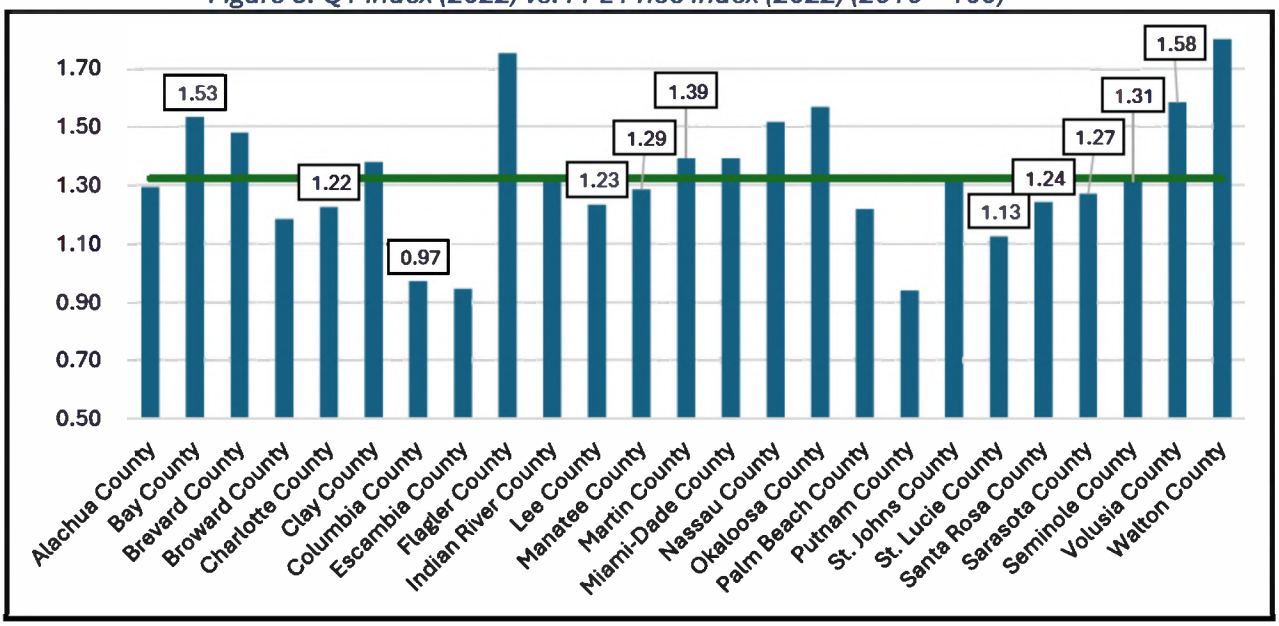
[6] 2024 Census data has not yet been publicly released.

Figure 2. Q1 Index (2023) vs. FPL Index (2023) (2016 = 100)



The deterioration of affordability for FPL's Q1 households is not simply attributable to this rate case or to recent increases in FPL prices. Figure 3 shows a comparison of the Q1 Index for 2022 relative to the FPL Price Index in 2022. Even in 2022, of the 20 counties for which data is available, only seven had experienced a growth in income greater than the growth in the FPL Price Index.

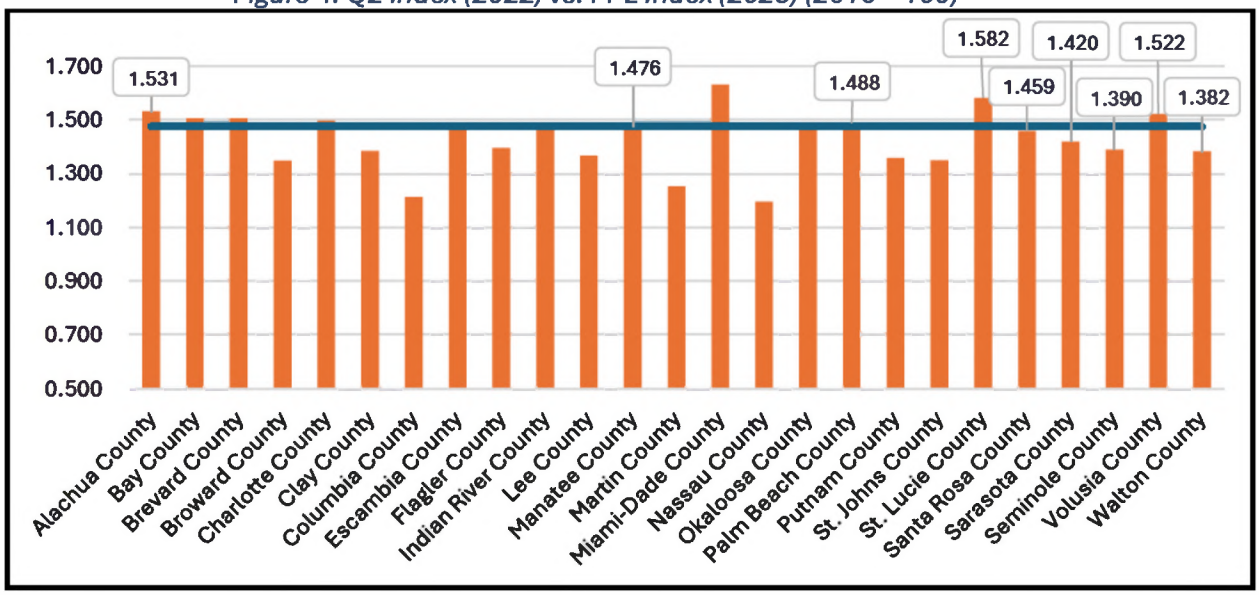
Figure 3. Q1 Index (2022) vs. FPL Price Index (2022) (2016 = 100)



Q. IS THIS DETERIORATION IN AFFORDABILITY EXCLUSIVELY THE PROVINCE OF THE VERY POOR?

A. Defining the "very poor" as being households in the bottom one-fifth of income (Q1), the deterioration in FPL affordability is not limited exclusively to the very poor. Figure 4 compares the Q2 (Second Income Quintile) Index for 2023 to the 2023 FPL Price Index. Of the 20 FPL counties, in only four did the mean Q2 income grow more from 2016 through 2023 than did FPL prices. In an additional five counties, the growth in Q2 incomes was nearly identical to the growth in FPL prices. The significance of this is that in more than half of the 20 counties for which data is available, FPL prices grew faster than Q2 incomes grew during this time period. The bottom-line observation is that the 40% of FPL customers with the lowest incomes throughout its service territory were worse off in 2023 than they were in 2016 when comparing incomes to FPL prices.

Figure 4. Q2 Index (2022) vs. FPL Index (2023) (2016 = 100)

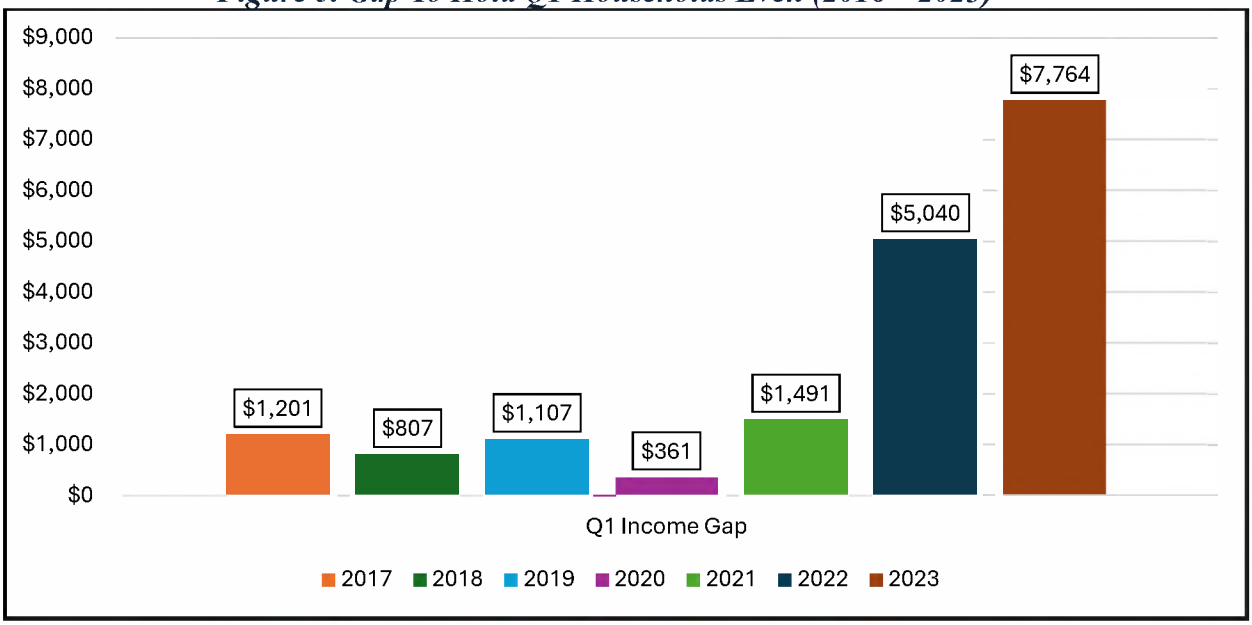


Q. PLEASE EXPLAIN THE IMPACT ON HOUSEHOLDS OF THIS MISMATCH BETWEEN THE GROWTH IN Q1 INCOMES AND THE GROWTH IN FPL BILLS.

A. The mismatch between the growth in Q1 incomes and the growth in FPL prices means that FPL bills are taking up a higher and higher proportion of total household income. The way to measure that increase is by assessing what increase in household income would be required to hold Q1 households constant in their FPL bill affordability. In setting forth this data, I emphasize that this is *not* the growth in income that would be needed to make FPL bills affordable. The income growth I identify below is simply that which is needed to have FPL customers being in no better or worse situation in 2023 than there were in 2016. If a household had an FPL burden of 15% in 2016, for example, this income would be required to keep that burden at 15%. Figure 5 shows that by 2022, a household falling in the First Quintile (Q1) of income would need to have experienced an income growth of $5,040 more than its income actually grew in

2022 just to have their FPL Bill-to-Income Ratio stay even to that what it was in 2016. In 2023, a Q1 household would need to have experienced an income growth of $7,764 more than its income actually grew in 2023 just to have their Bill-to-Income Ratio stay even. The "gaps" identified below are *not* the *total* growth in income that would have been needed to have Bill-to-Income ratios for Q1 households to remain constant. The gaps instead represent what *additional* income growth would have been required above and beyond that which actually occurred in order for those Bill-to-Income ratio for Q1 households to remain the same in 2023 as they had been in 2016.

Figure 5. Gap To Hold Q1 Households Even (2016 – 2023)



To provide some context, the average Q1 income in 2022 for the State of Florida was $15,579, while the average Q1 income in 2023 for the State of Florida was $16,315. The additional income growth needed in 2023, in other words, just to remain even with FPL price increases, would have represented nearly half of the actual total income for Q1 households. The growing unaffordability of FPL bills to these households is thus evident.

1 **Q. HAVE YOU EXAMINED THE AFFORDABILITY OF FPL BILL BURDENS**
2 **EXPERIENCED BY Q1 HOUSEHOLDS FROM 2016 THROUGH 2023?**
3 A. Yes. The final step I undertook in this part of my inquiry was to determine what
4 incomes would have been needed each year 2016 through 2025 to achieve an affordable
5 Bill-to-Income Ratio.
6
7 **Q. HOW DO YOU DEFINE "AFFORDABILITY"?**
8 A. As can be expected, there is not perfect uniformity in the burdens which various states
9 have adopted to define an affordable energy burden. However, a 6% burden has been
10 the standard most frequently relied upon by policymakers with respect to affordable
11 home energy across the country.[7] The 6% burden has been frequently adopted,[8]
12 including in the states of Washington,[9] Oregon,[10] New Hampshire,[11] New York,[12] and

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[7] Throughout my testimony, unless I explicitly note to the contrary, the terms "Bill-to-Income Ratio" (BTI Ratio), "home energy burdens," and "energy bill burdens" are intended to be used interchangeably.

[8] Six percent is based on the recognition that total shelter costs are generally deemed to be unaffordable to the extent that they exceed 30% of income. Moreover, utility costs tend to equal 20% of total shelter costs. A multiplication of those two data points (20% times 30%) yields the 6% figure.

[9] WASH ADMIN. CODE § 194-40-030 (2021) ("'Energy assistance need' means the amount of assistance necessary to achieve an energy burden equal to six percent for utility customers").

[10] Oregon Department of Energy, 2024 Biennial Energy Report, at 45 (Nov. 2024), *available at* https://www.oregon.gov/energy/Data-and-Reports/Documents/2024-Biennial-Energy-Report.pdf.

[11] New Hampshire Public Utilities Commission, Docket No. DE 06-079, Order No. 24,664, 3–4 (Sept. 1, 2006). ("[T]he current [Electric Assistance Program] was designed with the goal of making electricity affordable at 4 % of gross household income for non-electric heat customers (and at 6% of income for households with electric heat).").

[12] New York Public Service Commission, Case 14-M-0565, *Order Adopting Low Income Program Modifications and Directing Utility Filings*, 7–48 (effective May 20, 2016) (favoring a 6% energy burden level because it appears to be a widely accepted limit for utility payments, including in New Jersey and Ohio; and also reflected by EIA data).

New Jersey.[13] In addition, the Pennsylvania PUC has capped home energy burdens for households with annual income at or below 50% of the Federal Poverty Level at 6% of income.[14] Most recently, the Connecticut Public Utilities Regulatory Authority (PURA) held that a 6% burden for total home energy costs was the appropriate definition of affordability.[15]

Throughout my testimony below, unless I note explicitly to the contrary, I define an "affordable" Bill-to-Income Ratio as being a bill burden of no more than four percent of income. This definition begins with an affordable Bill-to-Income Ratio of six percent for total energy. It then assigns two-thirds of that affordable burden (4%) to electricity.

Q. WHAT DID YOU FIND WITH RESPECT TO THE AFFORDABILITY OF FPL BILL BURDENS?

A. My first finding is that Bill-to-Income Ratios for Q1 income are unaffordable throughout the FPL service territory. The Q1 income I used in Figure 6 is the statewide average Q1 income.[16] As can be seen, in order for an FPL bill to be affordable to the Q1 population, beginning in 2023, that income would need to have exceeded $40,000 (in contrast to the actual mean Q1 income of $16,315 as I observe above). In 2022, the

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[13] New Jersey Department of Community Affairs, *Universal Service Fund (USF)*, https://www.state.nj.us/dca/divisions/dhcr/faq/usf.html#q1 (last visited Mar. 24, 2023). (Requiring USF customers who use natural gas for heating and electricity to pay 2% for their natural gas service and 2% for their electricity service. If, however, the customer uses electricity for heating, the entire 4% is devoted to the electricity service. The discount provided to customers is based on the difference between their annual utility bill (after LIHEAP is applied) and the required percentage of household income.).

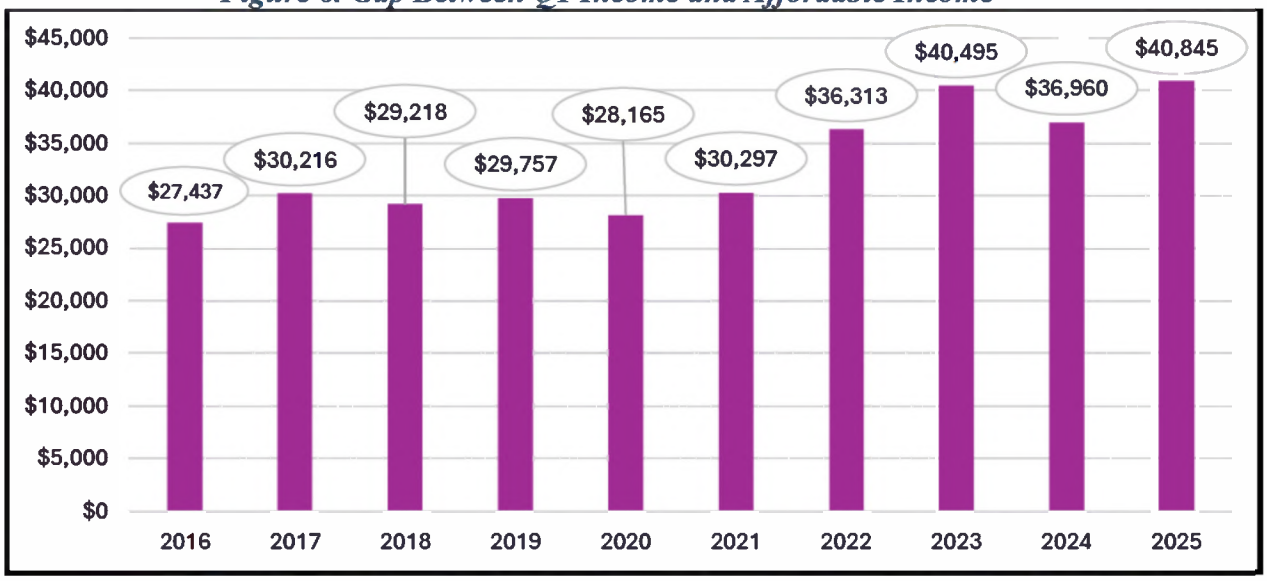
[14] Pennsylvania Public Utility Commission, Docket M-2019-3012599, Final Policy Statement and Order, 29–31 (Sept. 19, 2019).

[15] Connecticut Pub. Util. Reg. Auth., Docket No. 17-12-03RE11, Decision, 2 (Oct. 19, 2022).

[16] A county-by-county disaggregation of Q1 and Q2 incomes is set forth in Exhibit RDC-2.

Q1 income would need to have exceeded $36,000, while the 2021 Q1 would need to have exceeded $30,000.

Figure 6. Gap Between Q1 Income and Affordable Income



The growth in income that would have been needed to keep FPL bills affordable during the time period 2016 through 2025 is seen in Figure 6.

III. Affordability Impacts on Low-Income Customers

Q. PLEASE EXPLAIN THE PURPOSE OF THIS SECTION OF YOUR TESTIMONY.

A. In the section above, while I examined how the situation of lower income households has declined in recent years, I did not present data on either the breadth or depth of bill unaffordability in general. When I reference the "breadth" of unaffordability, I am referring to how wide-spread unaffordability is. A population of 100,000 with unaffordable bills represents a "broader" unaffordability issue than a population of 50,000 with unaffordable bills. In contrast, the "depth" of unaffordability measures how unaffordable a bill is. A household with a Bill-to-Income Ratio ("BTI") of 15%

has a "deeper" level of unaffordability than a household with a Bill-to-Income Ratio of 8% of income.

Q. HAVE YOU UNDERTAKEN A DISAGGREGATED ANALYSIS OF THE AFFORDABILITY OF FPL RATES?

A. Yes. In my discussion below, I consider the affordability of FPL bills not by quintiles of income, but rather by absolute dollars of income. I examine FPL burdens associated with each income level. I then examine the distribution of households by those income levels throughout the FPL service territory. In my analysis, I engage in four different inquiries. I examine the mean[17] and median[18] bills combined with existing and proposed rates.

Figure 7. Affordability Matrix by Income

Mean Bill / Existing Rates	Mean Bill / Proposed Rates
Median Bill / Existing Rates	Median Bill / Proposed Rates

The results of this inquiry are set forth in Table 1. The distribution of households by income range is the sum of households in Zip Codes identified by FPL as being served by the Company.[19]

[17] FPL Response to OPC's Seventh Set of Interrogatories, No. 167.
[18] FPL Response to OPC's Seventh Set of Interrogatories, No. 167.
[19] FPL Response to OPC's Seventh Set of Interrogatories, No. 160.

1

Table 1. Bill-to-Income Ratios at Mean and Median Usage by Income Range At Existing and Proposed Rates ($0 - $49,999)

	Households at Income Range[20]	Median Bill / Existing Rates	Median Bill / Proposed Rates	BTI Ratio / Existing Rates	BTI Ratio / Proposed Rates
<$10,000	232,111	$1,531	$1,617	30.6%	32.3%
$10,000 - $14,999	164,956	$1,531	$1,617	12.2%	12.9%
$15,000 - $19,999	151,408	$1,531	$1,617	8.7%	9.2%
$20,000 - $24,999	176,928	$1,531	$1,617	6.8%	7.2%
$25,000 - $29,999	177,290	$1,531	$1,617	5.6%	5.9%
$30,000 - $34,999	176,333	$1,531	$1,617	4.7%	5.0%
$35,000 - $39,999	181,274	$1,531	$1,617	4.1%	4.3%
$40,000 - $44,999	181,532	$1,531	$1,617	3.6%	3.8%
$45,000 - $49,999	175,309	$1,531	$1,617	3.2%	3.4%

	Mean Bill / Existing Rates	Mean Bill / Proposed Rates	BTI Ratio / Existing Rates	BTI Ratio / Proposed Rates
<$10,000	$1,804	$1,901	36.1%	38.0%
$10,000 - $14,999	$1,804	$1,901	14.4%	15.2%
$15,000 - $19,999	$1,804	$1,901	10.3%	10.9%
$20,000 - $24,999	$1,804	$1,901	8.0%	8.4%
$25,000 - $29,999	$1,804	$1,901	6.6%	6.9%
$30,000 - $34,999	$1,804	$1,901	5.6%	5.8%
$35,000 - $39,999	$1,804	$1,901	4.8%	5.1%
$40,000 - $44,999	$1,804	$1,901	4.2%	4.5%
$45,000 - $49,999	$1,804	$1,901	3.8%	4.0%

2 As can be seen in this Table, the unaffordability of FPL bills is now beginning to reach
3 well into more moderate incomes. The BTI Ratio at mean usage and proposed rates is
4 4.5% for households with income between $40,000 and $44,999, while remaining at

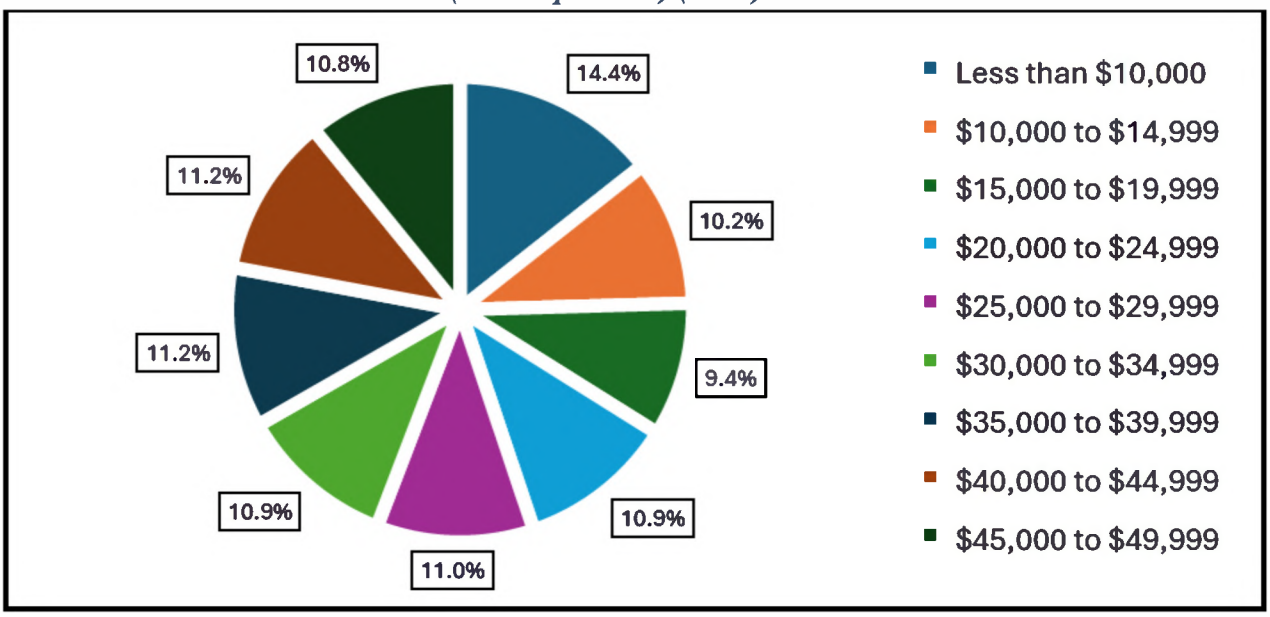
[20] The Census Bureau reports the number of households by annual household income in its American Community Survey, Table B19001.

4.0% even for households with income between $45,000 and $49,999. Even at the somewhat lower bills at median (rather than mean) usage, BTI Ratios push the limits of affordability for households with income between $40,000 and $44,999.

The number of households at these income levels is substantial. FPL's service territory, in other words, does not present the situation where households with lower incomes have high burdens, but few of those households exist. Of the 1.62 million households in the FPL service territory with income less than $50,000, a substantial number in fact have incomes in the bottom ranges of that population. Figure 8 below shows, for example, that nearly one-third of the households in the FPL service territory with income less than $50,000 in fact have income less than $20,000 (14.9% + 10.2% + 9.4%). More than one-quarter of those with income less than $50,000 in fact have income less than $15,000. The import of this is that households with income less than $10,000 experience, at median usage and proposed rates, an FPL burden of nearly 40% of their income. Even households with income in the range of $45,000 to $49,999, at median usage and proposed rates, would experience an FPL burden of 4.0% of income.[21]

[21] A county-by-county disaggregation of households by income range by county is set forth in Exhibit RDC-3.

Figure 8. Percent of Households with Income <$50,000 by Income Range (FPL Zip Codes) (2023)



It is clear from the data above that while low-income households would bear a particular harm from high FPL burdens, the unaffordability of FPL burdens is not the exclusive province of low-income households. The needs of more moderate income households are discussed in more detail below.

Q. IS THERE ANY ADDITIONAL ASPECT OF LOW-INCOME UNAFFORDABILITY THAT YOU HAVE EXAMINED?

A. Yes. I have examined both the depth and the breadth of the unaffordability of FPL bills to low-income customers, as measured by ranges of Federal Poverty Level (hereafter "Poverty Level" or "Fed.PL"), throughout the Company's service territory at existing and proposed rates. The depth of unaffordability considers the degree to which bills are unaffordable. For example, a Bill-to-Income Ratio of 18% of income represents a deeper level of unaffordability than a Bill-to-Income Ratio of 8% of income. The breadth of unaffordability considers how many households experience an unaffordable

bill. For example, having 100,000 customers with an unaffordable Bill-to-Income Ratio represents a broader unaffordability than having 10,000 customers experiencing an unaffordable bill.

I examine the depth and breadth of unaffordability based on the Company's demarcation of districts. The Company has stated that "FPL's primary method of tracking data is based on these regional districts."[22] Accordingly, to the extent possible, I follow that same tracking methodology using the Company's 33 named districts.[23] The names of each Company district by District number are set forth in Exhibit RDC-2. A summary of the systemwide average BTI Ratios at existing and proposed rates, using mean and median usage, is presented in Table 2 below. For example, the Table shows that, systemwide, households with income at or below 50% of the Fed.PL would have an FPL bill burden of 19.0% at mean usage and existing rates. That bill burden would increase to 20.1% at mean usage and proposed rates. In contrast, households with income at 125% to 150% of the Fed.PL would have an FPL bill burden of 4.7% at median usage and existing rates. That burden would increase to 5.0% at median usage and proposed rates.

Table 2. BTI Ratios at Proposed and Existing Rates (using mean and median usage)

	Income <50% Fed.PL	Income 50-74% Fed.PL	Income 75-99% Fed.PL	Income 100-124% Fed.PL	Income 125-150% Fed.PL
Mean existing	19.0%	12.2%	8.7%	6.8%	5.5%
Mean proposed	20.1%	12.8%	9.2%	7.1%	5.8%
Median existing	16.2%	10.3%	7.4%	5.7%	4.7%
Median proposed	17.1%	10.9%	7.8%	6.1%	5.0%

[22] FPL Response to OPC's Seventh Set of Interrogatories, No. 160.

[23] For my use of Census data, I begin with zip code level data. I assign each zip code to an FPL District based on the Company's designation of zip codes to Districts. (FPL Response to OPC Interrogatory No. 160).

The issue of unaffordability is not one that should be viewed solely on an aggregated system-wide basis. While FPL does not track information by zip code, it is possible to consider the breadth and depth of unaffordability on a geographically-disaggregated basis by looking at the impacts by FPL District. The District-specific results are set forth in Exhibit RDC-3 and RDC-4. The District data shows the depth of unaffordability. For the lowest range of incomes, the BTI Ratios are four or more times higher than an affordable burden. Even for the highest range of incomes, the BTI Ratios exceed an affordable burden. The same results are seen whether I use median usage (Exhibit RDC-3) or mean usage (Exhibit RDC-4), and whether I use existing or proposed rates. In sum, this District-specific data shows that while the unaffordability of FPL rates may differ in different geographic locations within the FPL service territory, FPL bills nonetheless remain unaffordable in all parts of the FPL service territory.

IV. Considering More Moderate Income Customers

Q. PLEASE EXPLAIN THE PURPOSE OF THIS SECTION OF YOUR TESTIMONY.

A. In this section of my testimony, I examine the ability-to-pay of more moderate income households using the ALICE Threshold. "ALICE" is the acronym used to describe Asset-Limited, Income-Constrained, Employed ("ALICE") households with income above the Federal Poverty Level but below the cost of basics included in the ALICE Household Survival Budget described below.

1 **Q. PLEASE DESCRIBE THE TERMINOLOGY YOU USE IN USING THE ALICE**
2 **DATA.**
3 A. There are three basic terms that are used in presenting and assessing ALICE data for a
4 particular geographic area:
5 • **<u>The ALICE Survival Budget</u>**. The ALICE Budget tracks the cost of household
6 necessities that matter most to ALICE households: housing, child care, food,
7 transportation, health care, and basic technology. According to United for ALICE,
8 the United Way research arm which addresses the economic issues facing ALICE
9 households, the ALICE Budget differs from the budget used by the U.S. Bureau of
10 Labor Statistics (BLS) to calculate the Consumer Price Index (the traditional
11 measure of inflation). The budget which BLS uses tracks over 200 goods and
12 services. These include items that financially insecure households cannot afford on
13 a regular basis (e.g., full-service meals at restaurants, wine, major appliances,
14 flights, and jewelry). In contrast, the ALICE Budget is limited to household
15 essentials.[24]
16 • **<u>The ALICE Essentials Index</u>:** The ALICE Essentials Index is the rate of price
17 increase for the limited market basket of household essentials: housing, child care,
18 food, transportation, health care, and a smartphone plan. According to the 2025
19 ALICE report for Florida, the ALICE Essentials Index has consistently outpaced
20 the broader CPI nationwide.[25] Costs for both measures increased at a faster rate
21 following the COVID-19 pandemic, peaking between 2021 and 2023. During this

[24] ALICE Essentials Index, available at https://www.unitedforalice.org/essentials-index.
[25]The State of ALICE in Florida: Costs Over Time: The ALICE Essential Index, https://unitedforalice.org/costs-over-time/Florida.

period, the ALICE Essentials Index in Florida increased at an annual rate of 9.4% compared to an average annual increase in the CPI of 6.1%.[26] The Florida ALICE Report found that even in occupations where wages have grown faster than costs in recent years, wages started from such a low level that many workers are still not able to cover household essentials.[27]

- **The ALICE Wage:** The ALICE Wage is expressed on a monthly, annual and hourly basis. It represents the dollar amount needed to be earned that would exactly equal the household's ALICE Survival Budget. A wage lower than the ALICE Wage means the wage-earner can *not* meet the ALICE Survival Budget. A wage higher than the ALICE Wage means the wage-earner is meeting the ALICE Survival Budget with some additional earning capacity left over. The ALICE Wage differs by household size and composition, as well as by the number of wage earners in the household.

Q. HAVE YOU EXAMINED THE WAGES NEEDED TO MEET THE ALICE SURVIVAL BUDGET IN THE FPL SERVICE TERRITORY?

A. Yes. As I described above, the dollars needed for a household to meet the ALICE Survival Budget is known as the ALICE Wage. I have examined this ALICE Wage data for selected counties throughout the FPL service territory. I selected counties to represent each FPL District and each area of the State which FPL serves. The ALICE Wage (i.e., the income needed on a monthly, annual, and hourly basis by household

[26] Id.
[27] Id.

1 composition needed to meet the ALICE Survival Budget) for these counties is set forth

2 in the Table below.

3

Table 3. Hourly Wage Needed to Meet ALICE Budget (Selected FPL Counties) (2022)

	Single Adult	One Adult One Child	One Adult One Childcare	Two Adults	Two Adults Two Children	Two Adults Two Childcare
Bradford	$16.62	$24.94	$26.95	$24.74	$38.18	$45.45
Brevard	$15.00	$24.17	$27.07	$23.51	$37.57	$44.15
Broward	$17.57	$26.32	$29.10	$25.71	$40.63	$47.15
Charlotte	$15.00	$23.26	$25.76	$22.84	$36.25	$42.54
Columbia	$12.92	$19.99	$21.33	$20.15	$31.87	$35.83
Desoto	$13.27	$20.05	$21.29	$20.23	$31.04	$36.25
Flagler	$15.04	$23.74	$26.20	$23.35	$37.55	$43.40
Indian River	$14.72	$23.94	$26.39	$23.56	$37.23	$42.75
Lee	$16.27	$23.63	$25.56	$23.48	$36.85	$41.63
Martin	$16.70	$24.82	$27.55	$24.28	$39.31	$45.71
Miami-Dade	$17.92	$26.83	$28.94	$26.57	$41.09	$46.43
Okaloosa	$16.26	$23.83	$26.21	$23.47	$36.66	$42.20
Putnam	$12.74	$19.53	$20.86	$19.70	$31.34	$34.77
Sarasota	$16.71	$26.14	$28.99	$25.51	$40.92	$46.88
Seminole	$18.74	$27.13	$29.57	$26.72	$40.36	$46.71
St. Lucie	$16.35	$23.77	$26.19	$23.38	$37.24	$42.85
Walton	$15.22	$23.74	$25.78	$23.56	$36.65	$41.18

4 Table 3 demonstrates how the cost-of-living varies across the State of Florida. For

5 example, Broward, Miami-Dade and Seminole counties all have noticeably higher

6 ALICE wages than do other FPL counties. In contrast, Columbia, Desoto and Putnam

7 counties have lower ALICE wages.

1 **Q. HOW DO THESE ALICE WAGES COMPARE TO WAGES THAT ARE**
2 **COMMONLY AVAILABLE IN THE FPL SERVICE TERRITORY?**
3 A. ALICE research reports that "a key contributor to the number of ALICE households in
4 Florida is the fundamental mismatch between the cost of living and what jobs pay."[28]
5 Common occupations throughout Florida provide insufficient wages to allow a
6 household to cover the ALICE Survival Budget. Included among those "common
7 occupations" are, for example, retail salespersons, cashiers, customer service
8 representatives, janitors and cleaners, waiters and waitresses, administrative assistants,
9 and cooks (restaurants), amongst others. Data on common occupations throughout
10 Florida is set forth in the Table below. The median hourly wage for these occupations
11 do not come close to covering the hourly wage needed to meet the ALICE Survival
12 Budget. Indeed, of the 14 occupations listed, representing a total employment of more
13 than 2.639 million workers, six had a median hourly wage (shaded in light grey) of less
14 than $16.

[28] The State of ALICE in Florida, ALICE in the Labor Force, https://www.unitedforalice.org/ALICE-in-the-labor-force/florida.

1

Table 4. Selected Occupations, Employment, Wages, and Percentage Below ALICE Threshold, Florida, 2023			
Occupation	Total Employment	Median Hourly Wage	% Below ALICE Threshold
Bookkeeping, Accounting, And Auditing Clerks	107,950	$22.20	27%
Other Healthcare Support Workers	110,920	$18.67	28%
Maintenance And Repair Workers, General	102,700	$19.13	31%
Office Clerks, General	192,850	$18.91	35%
Customer Service Representatives	239,440	$18.31	36%
Retail Salespersons	312,260	$14.89	39%
Driver/Sales Workers And Truck Drivers	205,310	$19.18	41%
Fast Food And Counter Workers	220,150	$13.21	44%
Waiters And Waitresses	198,440	$14.39	45%
Stockers And Order Fillers	217,000	$16.97	47%
Laborers And Freight, Stock, And Material Movers	140,850	$17.05	48%
Cashiers	211,570	$14.40	50%
Janitors And Building Cleaners	192,950	$15.04	56%
Cooks	186,640	$15.79	57%
Total	2,639,030		

2

3 **Q. HAVE YOU EXAMINED ANY SUBSET OF ALICE HOUSEHOLDS IN**

4 **PARTICULAR?**

5 A. Yes. Table 5 below documents what hourly wage would be required to meet the ALICE

6 Survival Budget for *senior* households based on data up to 2022. Again, Broward,

7 Miami-Dade and Seminole counties have higher ALICE Wages.

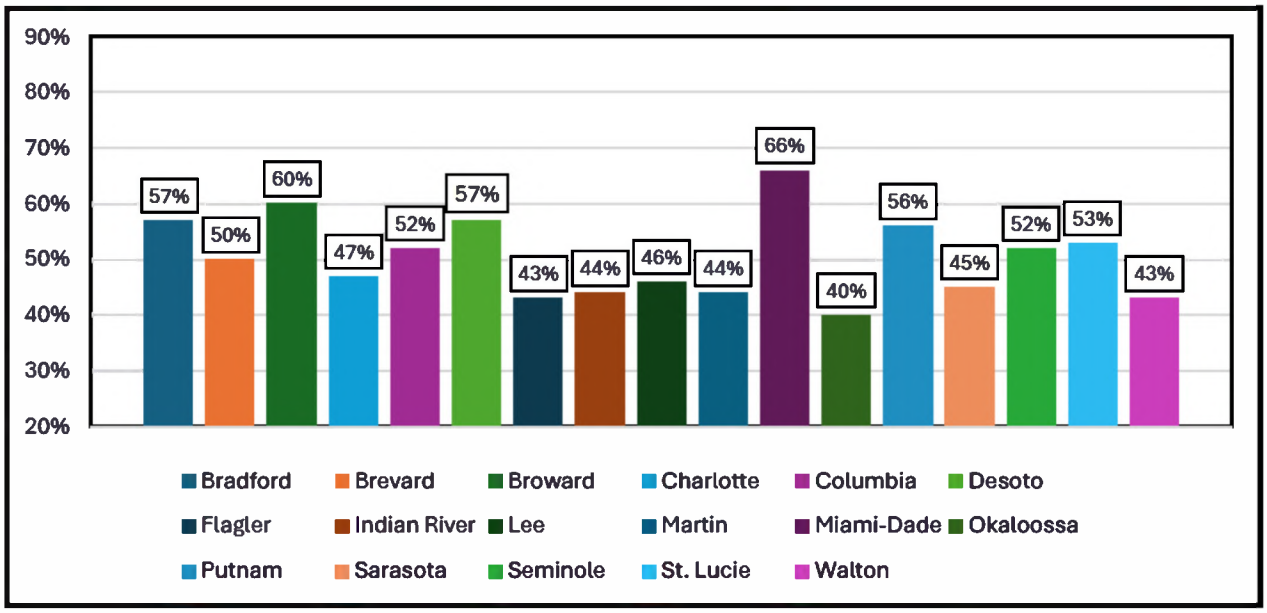
1

Table 5. Hourly Wage Needed to Meet ALICE Budget (seniors) For Selected FPL Counties (2022)		
	Single Senior	Two Seniors
Bradford	$18.71	$28.64
Brevard	$17.09	$27.43
Broward	$20.03	$30.37
Charlotte	$17.09	$26.72
Columbia	$15.09	$24.13
Desoto	$15.68	$24.71
Flagler	$17.08	$27.12
Indian River	$16.77	$27.37
Lee	$18.34	$27.32
Martin	$18.89	$28.38
Miami-Dade	$20.41	$31.32
Okaloosa	$18.47	$27.59
Putnam	$15.01	$23.88
Sarasota	$18.76	$29.38
Seminole	$21.14	$31.30
St. Lucie	$18.64	$27.67
Walton	$17.17	$27.18

2 As can be seen in this data, in FPL's counties, the ALICE Wage for single seniors is
3 higher than it is for single adult households overall (comparing Table 3 to Table 5).
4 Otherwise, the ALICE Wage for a two-person senior household is roughly comparable
5 to a two-person household (one adult/one child), but higher than for a household with
6 two adults (and no children). This cost-of-living leaves many, if not most, seniors in
7 the FPL service territory with inadequate income to meet their basic living expenses.
8 In nine of the 17 selected counties, half or more seniors had incomes falling below the

ALICE Threshold. In none of the 17 counties did the percentage of seniors falling below the ALICE Threshold fall below 40%.

Figure 9. Percent Population Age 65 and Older Falling Below ALICE Threshold (2022)
(Selected FPL Counties)

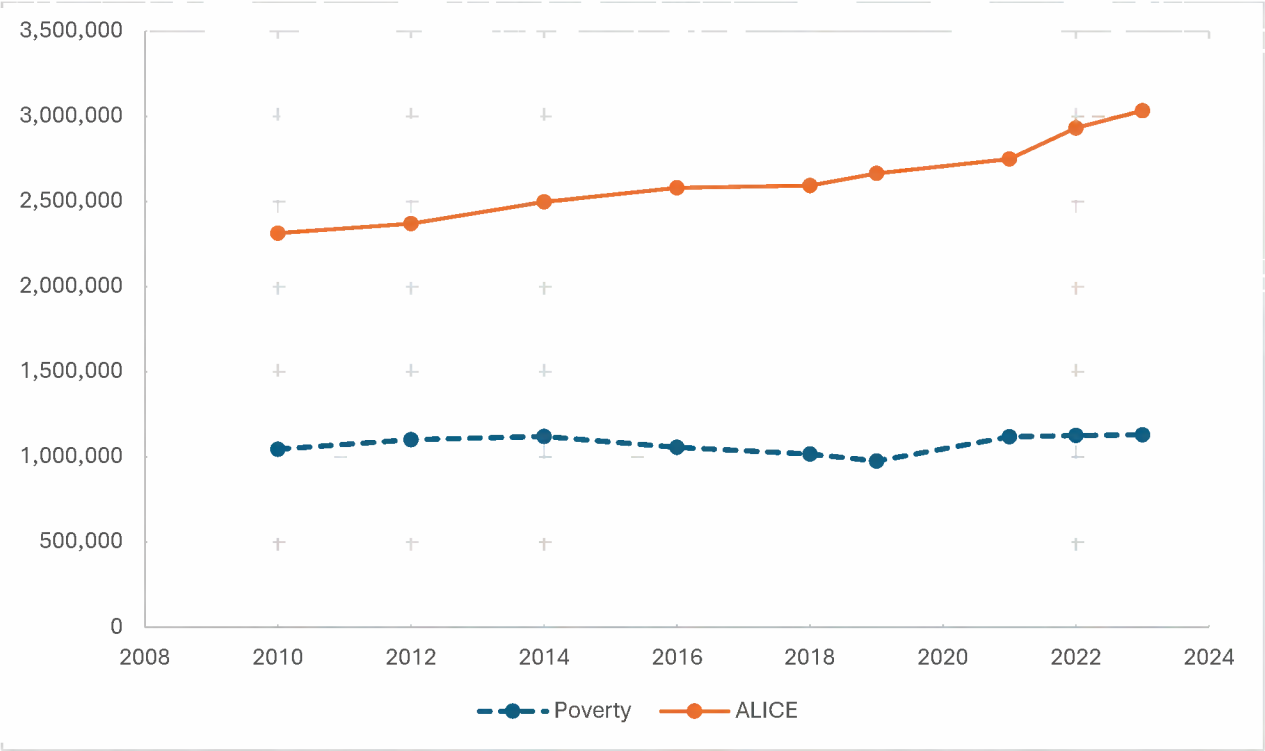


Q. DO YOU HAVE ANY FINAL OBSERVATIONS ABOUT THE ALICE DATA YOU HAVE REVIEWED FOR FPL?

A. While the number of persons in Florida with income falling below the Fed.PL has remained relatively steady from 2008 through 2024, the number of persons with income falling below the ALICE Threshold has seen a steady increase. As Figure 10 documents, the number of Florida residents with income below the ALICE Threshold has grown from fewer than 2.5 million in 2008 to more than 3.0 million in 2024.[29]

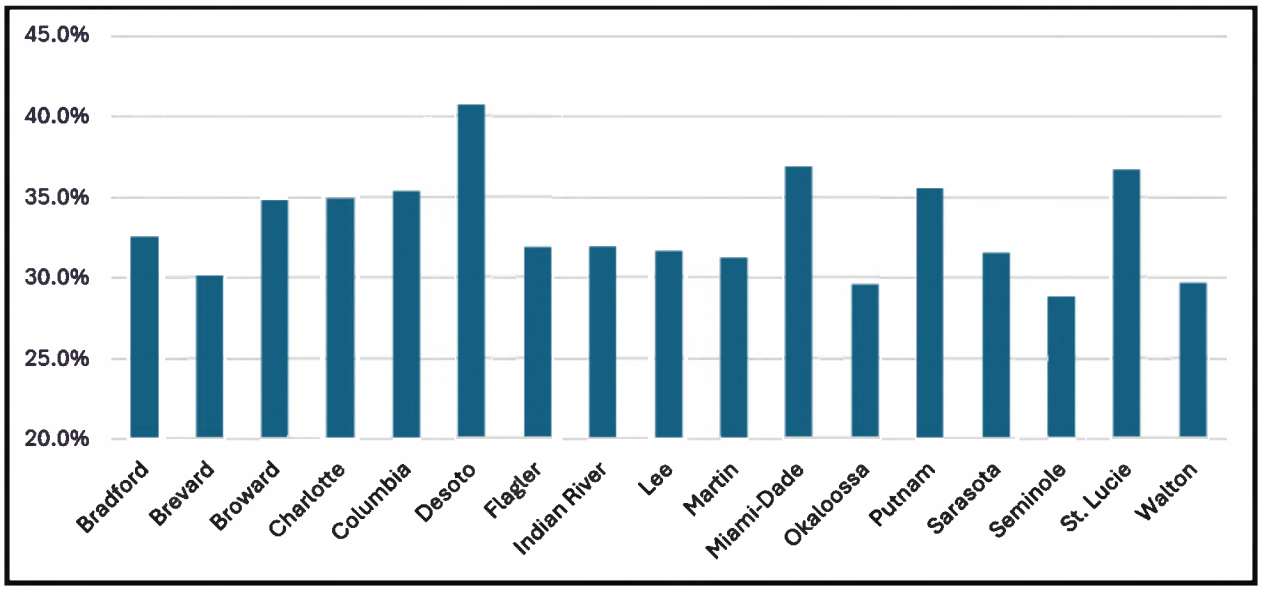
[29] The State of ALICE in Florida: Trends in Financial Hardship, https://www.unitedforalice.org/trends-in-hardship/florida.

Figure 10. No. of Persons Falling Below the Fed.PL and Below ALICE Threshold (2008 - 2024)



My final observation is simply that while the magnitude of the problem may differ from one part of the FPL service territory to another, there is no county served by FPL that escapes these identified hardships. Figure 11 below shows, for the selected FPL counties I have been reviewing, the percentage of households with incomes falling below the ALICE Threshold in 2022. In only three counties does the percentage fall below 30%, while in no county does the percentage fall below 25%.

Figure 11. Pct Households Falling Below ALICE Threshold (2022)



The ALICE data presented above provides some insights into the cost-of-living in different parts of the FPL service territory. It is possible, however, to more directly consider FPL rate increases in light of local cost-of-living through an examination of the Self-Sufficiency Standard for Florida's counties. I turn to that Self-Sufficiency Standard in the next section.

V. The Affordability of Electric Bills and the Local Cost-of-Living

Q. PLEASE DESCRIBE THE PURPOSE OF THIS SECTION OF YOUR TESTIMONY.

A. In this section of my testimony, I assess the affordability of electricity in the FPL service territory within the context of the cost-of-living in different regions. Throughout the FPL service territory, there are regions that have a significantly higher cost-of-living. The fact that the cost-of-living can vary dramatically even within a single utility service territory is important in assessing a utility's affordability. If income does not vary

1 sufficiently to cover the increased cost-of-living, customers living in those high cost
2 areas may face affordability problems not otherwise faced by other customers with
3 equal bills and equal incomes. In other words, the same "energy burden" caused by
4 utility bills may have different impacts on real life affordability when other necessities
5 require a greater share of income.
6
7 **Q. HOW DO YOU MEASURE THE "COST OF LIVING" IN DIFFERENT PARTS**
8 **OF THE FPL SERVICE TERRITORY?**
9 A. The way I assess the cost-of-living in different regions of the FPL service territory is to
10 examine the "self-sufficiency income" periodically calculated by the University of
11 Washington's School of Social Work. The Self-Sufficiency Standard measures how
12 much income a family of a certain composition in a given place needs to adequately
13 meet their basic needs—without public or private assistance.[30]
14 The Self-Sufficiency Standard derives the cost-of-living by combining data for
15 housing, child care, food, transportation, health care, taxes and "miscellaneous."[31]
16 Given that it assumes all adults work, it allocates the Earned Income Tax Credit to all
17 eligible households, and the Child Care Tax Credit to each eligible family with children.
18 The Self-Sufficiency Standard considers 719 different household compositions,

[30] The Self-sufficiency Standard defines the income working families need to meet a minimum yet adequate standard of living, taking into account family composition, ages of children, and geographic differences in costs. See, Self-Sufficiency Standard: Florida, available at https://selfsufficiencystandard.org/florida/.

[31] "Miscellaneous items include all other essentials: clothing, shoes, paper products, diapers, nonprescription medicines, cleaning products, household items, personal hygiene items, and telephone. It does not allow for recreation, entertainment, savings, or debt repayment. Miscellaneous expenses are calculated by taking 10% of all other costs. This percentage is a conservative estimate in comparison to estimates in other basic needs budgets, which commonly use 15%." Pearce (October 2007). Blueprint for Prosperity 2007, Florida Self-Sufficiency Standard, Methodology Appendix, at page 4, available at https://selfsufficiencystandard.org/wp-content/uploads/2021/11/FL2007_methodology.pdf.

1 ranging from a household with a single adult to a household comprised of ten adults
2 and ten children.
3
4 **Q. WHAT IS THE RESULT OF YOUR SELF-SUFFICIENCY STANDARD**
5 **ANALYSIS?**
6 A. In my discussion below, I use the Self-Sufficiency Standard for a four-person
7 household, comprised of two adults and two children (one pre-school and the other
8 school-age). This household composition is used to illustrate the impact of differing
9 levels of the cost-of-living in different parts of the FPL service territory. Table 6 sets
10 forth the Self-Sufficiency Standard in the same selected counties in FPL's service
11 territory that I use in my discussion above.[32] The Table then compares the income
12 needed to reach the Self-Sufficiency Standard to incomes at four different levels of the
13 Federal Poverty Level (100% Fed.PL); 200% of Fed.PL.; 250% of Fed.PL; and 300%
14 of Fed.PL.
15 This comparison is designed to determine the extent to which, if at all, a
16 household living at the different Fed.PLs has sufficient income to be at or above the
17 Self-Sufficiency Standard. In other words, this analysis compares how actual income
18 distribution compares to the income necessary to account for geographic variations in
19 the cost of living. A negative number indicates that the income at that Fed.PL would be
20 insufficient to meet the Self-Sufficiency Standard. A positive number indicates that a
21 household with income at that Fed.PL would be above the Self-Sufficiency Standard.

[32] I use the same protocol as I use elsewhere in this discussion. I do not seek to allocate customers within a county. Nor do I determine whether FPL serves a "sufficient" number of customers to include the county. I have selected roughly half of FPL's counties so as to represent all areas of the State which FPL serves.

The Income Deficit is defined to be the dollar amount by which an income at the specified ranges of Fed.PL fall short of being adequate to meet the Self-Sufficiency Standard for a four-person household (2 adults, 2 children, one preschool and one school-age) in that county. Table 6 and Table 7 each demonstrate that the level of local income does not track the level of the cost-of-living in a given area.

Table 6 shows that there is an Income Deficit for each of the selected FPL counties for households with annual income at 200% of Fed.PL or less. That observation, however, does not tell the complete story. In only four counties (Bradford, Columbia, Desoto and Putnam) is the Income Deficit less than $10,000. In contrast, there are three counties (Broward, Seminole, St. Lucie) where the Income Deficit exceeds $30,000 (but is less than $40,000), and one additional county (Miami-Dade) where the Income Deficit exceeds $40,000 at 200% of Fed.PL.

By definition, as incomes increase, the Income Deficit in each county decreases. Nonetheless, at 250% of Fed.PL, there are only three counties that do *not* continue to have an Income Deficit (Columbia, Desoto, Putnam). At 250% of Fed.PL, the Income Deficit in Miami-Dade County remains at ($26,156), while in Broward, Seminole, and St. Lucie counties, the Income Deficit remains greater than $14,000 but less than $20,000. Only when incomes reach 300% of Fed.PL do the Income Deficits in the Company's counties largely disappear. Only Broward, Miami-Dade, and St. Lucie counties continue to have an Income Deficit at 300% of Fed.PL.

The conclusion to be drawn from this data is not simply the fact that FPL bills will be unaffordable to those households who have incomes substantially exceeding the Fed.PL. The additional conclusion to be drawn is that there is a clear geographic scope

1 to inability-to-pay in the FPL service territory based on the widely varying cost-of-

2 living experienced by FPL customers.

3

Table 6. Income Deficit at 2024 Florida Self-Sufficiency Standard (SSS) by Selected Ranges of Fed.PL
(2 adults / 2 children: preschool and school-age)
Selected Counties in FPL Service Territory

	SSS	2024 Federal Poverty Level (HH of 4)				Income Deficit			
		100%	200%	250%	300%	100%	200%	250%	300%
Bradford	$67,329	$32,150	$64,300	$80,375	$96,450	($35,179)	($3,029)	$13,046	$29,121
Brevard	$86,255	$32,150	$64,300	$80,375	$96,450	($54,105)	($21,955)	($5,880)	$10,195
Broward	$100,339	$32,150	$64,300	$80,375	$96,450	($68,189)	($36,039)	($19,964)	($3,889)
Charlotte	$85,114	$32,150	$64,300	$80,375	$96,450	($52,964)	($20,814)	($4,739)	$11,336
Columbia	$70,784	$32,150	$64,300	$80,375	$96,450	($38,634)	($6,484)	$9,591	$25,666
Desoto	$68,971	$32,150	$64,300	$80,375	$96,450	($36,821)	($4,671)	$11,404	$27,479
Flagler	$86,701	$32,150	$64,300	$80,375	$96,450	($54,551)	($22,401)	($6,326)	$9,749
Indian River	$83,259	$32,150	$64,300	$80,375	$96,450	($51,109)	($18,959)	($2,884)	$13,191
Lee	$87,299	$32,150	$64,300	$80,375	$96,450	($55,149)	($22,999)	($6,924)	$9,151
Martin	$88,131	$32,150	$64,300	$80,375	$96,450	($55,981)	($23,831)	($7,756)	$8,319
Miami-Dade	$106,531	$32,150	$64,300	$80,375	$96,450	($74,381)	($42,231)	($26,156)	($10,081)
Okaloosa	$85,164	$32,150	$64,300	$80,375	$96,450	($53,014)	($20,864)	($4,789)	$11,286
Putnam	$66,555	$32,150	$64,300	$80,375	$96,450	($34,405)	($2,255)	$13,820	$29,895
Sarasota	$87,042	$32,150	$64,300	$80,375	$96,450	($54,892)	($22,742)	($6,667)	$9,408
Seminole	$94,729	$32,150	$64,300	$80,375	$96,450	($62,579)	($30,429)	($14,354)	$1,721
St. Lucie	$97,130	$32,150	$64,300	$80,375	$96,450	($64,980)	($32,830)	($16,755)	($680)
Walton	$84,067	$32,150	$64,300	$80,375	$96,450	($51,917)	($19,767)	($3,692)	$12,383

4 Table 7 begins with the same basic Self-Sufficiency Standard data by county. In Table

5 7, however, the Self-Sufficiency Standard is not compared to incomes at different

1 points of the Fed.P.L, but rather to the average (i.e., mean) income of each income
2 quintile reported for the county[33] for 2024.[34]
3 For space purposes here, I present data for only the bottom three income
4 quintiles. The "bottom quintile" includes the 20% of households with the lowest
5 incomes by county. The third or "middle" quintile presents the middle 20% of
6 households (40% - 60%)[35] and brackets the median income (50%).[36] The actual
7 average income for each income quintile is subtracted from the Self-Sufficiency
8 Standard. As in the Fed.PL examination, a negative number indicates that the income
9 in that quintile would generate an Income Deficit, defined to be an income that is
10 insufficient to meet the Self-Sufficiency Standard. A positive number indicates that a
11 household with income at that quintile on average would be above the Self-Sufficiency
12 Standard.
13 The objective here is to illustrate how the different costs of living, as manifested
14 in the differing levels of the Self-Sufficiency Standard, not only may, but are likely to
15 affect the "affordability" of FPL bills. A county with substantial shortfalls, and
16 especially with shortfalls at all income levels, will have less affordable FPL bills due
17 to higher costs of other necessities.
18 The same results appertain when considering the average income for the bottom three
19 income quintiles in FPL counties. Income data by quintile is presented for the same

[33] Not all counties have income reported by quintiles.
[34] As with the Fed.PL, since the Self-Sufficiency Standard was last prepared in 2014, data from the 2014 American Community Survey is used for comparison purposes.
[35] The "third quintile" (40% - 60%) means that 40% of households have incomes less than the bottom of the quintile (i.e., 1% - 40%) and 40% of households have incomes greater than the top of the quintile (i.e., 61% - 100%).
[36] The "median income" (50%) is that point at which one-half of all households have lower incomes and one-half of all households have higher incomes.

1 selected FPL counties as have been discussed above. In all 17 counties, the average
2 income of the third income quintile (40% - 60%) results in an Income Deficit when
3 compared to the Self-Sufficiency Standard. In two of those counties, the deficit is more
4 than $20,000 (Broward: $25,652; Miami-Dade: $37,602). The Income Deficits for the
5 Third Quintile ranged from a low of $4,818 (Walton County) to a high of $37,602
6 (Miami-Dade County).

7 I found similar results for counties at the second income quintile. In every
8 county, the average income for the second quintile (20% - 40%) was *inadequate* to
9 meet the Self-Sufficiency Standard. The Income Deficit for the second quintile of
10 income ranged from a low of $33,096 (Okaloosa County) to a high of $66,932 (Miami-
11 Dade County).

1

Table 7. Income Deficit at 2024 Florida Self-Sufficiency Standard for Bottom, Second and Middle Income Quintiles for Selected Counties in FPL Service Territory							
	2014 Self-Sufficiency Standard	Average Income by Quintile			Income Deficit		
		Q1 Income	Q2 Income	Q3 Income	Q1 Income	Q2 Income	Q3 Income
Bradford	$67,329	$9,985	$32,113	$58,153	($57,344)	($35,216)	($9,176)
Brevard	$86,255	$18,815	$46,340	$75,694	($67,440)	($39,915)	($10,561)
Broward	$100,339	$15,930	$44,599	$74,687	($84,409)	($55,740)	($25,652)
Charlotte	$85,114	$17,267	$41,931	$66,369	($67,847)	($43,183)	($18,745)
Columbia	$70,784	$13,001	$33,089	$55,022	($57,783)	($37,695)	($15,762)
Desoto	$68,971	$12,058	$30,715	$50,469	($56,913)	($38,256)	($18,502)
Flagler	$86,701	$19,530	$45,803	$73,296	($67,171)	($40,898)	($13,405)
Indian River	$83,259	$16,557	$44,067	$70,808	($66,702)	($39,192)	($12,451)
Lee	$87,299	$17,395	$45,678	$73,567	($69,904)	($41,621)	($13,732)
Martin	$88,131	$18,302	$46,970	$80,814	($69,829)	($41,161)	($7,317)
Miami-Dade	$106,531	$13,855	$39,569	$68,929	($92,676)	($66,962)	($37,602)
Okaloosa	$85,164	$22,444	$52,068	$80,027	($62,720)	($33,096)	($5,137)
Putnam	$66,555	$9,462	$28,499	$47,225	($57,093)	($38,056)	($19,330)
Sarasota	$87,042	$16,411	$44,064	$69,305	($70,631)	($42,978)	($17,737)
Seminole	$94,729	$20,558	$50,449	$80,756	($74,171)	($44,280)	($13,973)
St. Lucie	$97,130	$21,689	$52,478	$83,621	($75,441)	($44,652)	($13,509)
Walton	$84,067	$19,269	$49,301	$79,249	($64,798)	($34,766)	($4,818)

2 Four conclusions can be drawn from this data. First, the affordability of electricity in
3 the FPL service territory has a relative component to it. The range in income deficits
4 for households at 250% of Federal Poverty Level in the selected 17 FPL counties is
5 nearly $40,000, with the largest deficit reaching ($26,156) and the smallest surplus
6 reaching $13,820. In the second quintile of income, the range of Income Deficits is
7 nearly $34,000, with the largest Income Deficit reaching ($66,962) and the smallest
8 Income Deficit reaching ($33,096). In the third quintile of income, the range of Income

Deficits reached nearly $33,000 (with the largest income deficit reaching [$37,602] and the smallest reaching [$4,818]).

Second, there is often a tendency to assume that areas that have a higher cost-of-living also have higher incomes to offset those costs, thus leaving households in relatively similar situations. The data presented above, however, demonstrates that that assumption is simply not true, at least for the FPL service territory. In reality, high cost-of-living areas frequently, if not generally, are not matched with higher incomes. High cost-of-living areas demonstrate identifiable affordability problems when considering electricity bills.

Third, within these first two observations lies a third, and broader, conclusion. In assessing affordability, cost-of-living should be taken into account. The income deficits at a particular level of income vary greatly by county, and the capacity of a household to absorb electric bills is much less if that household faces an Income Deficit of $25,000 or more relative to the area's Self-Sufficiency Standard, as opposed to a household with no income deficit. An examination of affordability based on averages, or an assertion that a certain level of bill is affordable without taking the cost-of-living into account, entirely masks the economic realities in Florida.

Finally, the above discussion demonstrates why it is inappropriate to measure affordability simply by comparing the level of FPL bills to the level of bills for other selected utilities (be those utilities state, regional, or national). Including a consideration of the cost of living in an affordability analysis of electric bills is a necessary component to any consideration of the relative affordability of bills between electric utilities. Given the high Income Deficits in many counties included in FPL's

service territory, the amount that electricity bills contribute to the deficit (i.e., the proportion of the bill that is unaffordable) is correspondingly high as well.

VI. Accounting for the Impacts of Inflation

Q. PLEASE EXPLAIN THE PURPOSE OF THIS SECTION OF YOUR TESTIMONY.

A. In this section of my testimony, I examine the disproportionate impacts which recent levels of inflation have on those FPL customers who are least able to be able to afford FPL rate increases. If nothing else, this analysis finds that now is not the time to allow substantial FPL rate increases.

Q. DOES INFLATION HAVE A PARTICULARLY ADVERSE IMPACT ON LOWER INCOME HOUSEHOLDS?

A. The impact of inflation is felt most severely by low-income households. Research by the U.S. Department of Labor's Bureau of Labor Statistics, the agency that calculates and reports the "rate of inflation" (i.e., the Consumer Price Index [CPI]) each month, reports that "consumers with different incomes experience inflation quite differently."[37] According to this research, households earning the lower incomes spend a higher share of their household budget on household necessities such as rent, food and medical care.

[37] Klick and Stockburger (December 2022). Spotlight on Statistics: Inflation Experiences for Lower and Higher Income Households, U.S. Department of Labor, Bureau of Labor Statistics, available at https://www.bls.gov/spotlight/2022/inflation-experiences-for-lower-and-higher-income-households/home.htm.

1

Table 8. Household budget shares of expenditure items for lowest and highest income quartiles, 2017–2018[38]		
Expenditure	Lowest Income Quartile	Highest Income Quartile
Rent (including owner's equivalent rent)	34.93%	27.93%
Food at home	9.44%	6.58%
Medical care	8.36%	8.09%
Household utilities	4.36%	2.73%
Motor fuels	3.46%	3.42%
Motor vehicle operation	3.44%	3.40%
Telephone service	2.32%	2.00%

2 This difference in the consumption basket of lower and higher income households is
3 significant in that the prices of goods and services that had larger budget shares for
4 lower income households have risen faster than all other items. In particular, the BLS
5 researchers found that, "prices for motor fuel, medical care, fuel and utilities, and
6 shelter rose faster than the overall average. . ."[39] "Because the lowest income
7 households dedicate more of their spending on these categories," the BLS researchers
8 found, "their overall inflation rates grew faster than highest income households."

[38] Id.
[39] Id.

1

Average price change by item, 2005–2020 (starred items defined by BLS to be household necessities)	
Item	2005–2020 average 12-month change
Tuition, other school fees, and childcare	4.03%
Motor Fuel*	3.45%
Medical Care*	3.28%
Rent*	3.06%
Food away from home	2.86%
Fuel and utilities*	2.71%
All items	2.00%
Food at home*	1.89%
Lodging away from home	1.16%
Recreation	0.74%
New and used motor vehicles	0.43%
Apparel	-0.10%
Telephone services*	-0.20%

2 Similar findings were reached by researchers at the Federal Reserve Bank of Dallas.[40]

3 These researchers found that:

4 Families have grappled with surging prices over the past 18 months, as the
5 cost of meeting basic needs rose. Consumer prices were 7.1 percent higher
6 in November 2022 than year earlier.

7 Although inflation may have peaked, prices remain elevated, with food
8 costs up 10.6 percent, gasoline rising 10.1 percent, rent increasing 7.9
9 percent and medical care services up 4.4 percent.[41]

[40] Jayashankar and Murphy (January 2023). High inflation disproportionately hurts low-income households, Federal Reserve Bank of Dallas, available at https://www.dallasfed.org/research/economics/2023/0110#:~:text=Low%2Dincome%20households%20most%20stressed,few%20ways%20to%20reduce%20spending%20.

[41] Id.

The Federal Reserve researchers explained:

> Prior research suggests that inflation hits low-income households hardest for several reasons. They spend more of their income on necessities such as food, gas and rent—categories with greater-than-average inflation rates—leaving few ways to reduce spending. When prices rise, middle-income households may react by consuming cheaper goods and buying more generic brands. Low-income households do not have the same flexibility; in many cases, they are already consuming the cheapest products.
>
> Additionally, many low-income households lack the ability of higher-income households to stock up when prices are discounted, buy in bulk and save, delay purchases if there is an opportunity to save in the future or buy more cheaply online. Low-income households are also likely to have smaller cash buffers to tide them over a period of high inflation.
>
> The recent Household Pulse Survey data confirm these tendencies. Households with incomes ranging from $25,000 to $35,000 in 2021 were about 19.3 percentage points more likely to be very stressed by inflation than households with incomes in the $75,000 to $100,000 range.

The data is clear and it is consistent. Lower income families expend a greater share of their income on necessities (which tend to have higher inflation rates); have smaller financial cushions; and may have less of an ability to switch to lower-priced alternatives. As Lael Brainard, a member of the Board of Governors of the Federal Reserve System, concluded, "All Americans are confronting higher prices, but the burden is particularly great for households with more limited resources."[42]

[42] Brainard (April 2022). Variations in the inflation experiences of households, available at https://www.federalreserve.gov/newsevents/speech/brainard20220405a.htm.

1 **Q. WHAT DO YOU CONCLUDE?**

2 A. The testimony of FPL does not present a complete story about the stress which inflation
3 has placed on utility stakeholders. Just as inflation may have placed stress on the utility,
4 it has also placed stress on utility ratepayers. Indeed, the inflation experienced in recent
5 years has placed far more stress on lower income ratepayers than it has placed on others,
6 and FPL acknowledges that, "[t]he [CPI] is projected to increase 12 percent from 2024
7 through 2029 and 10 percent from 2025 through 2029."[43] Increasing energy prices,
8 which would be exacerbated by the unreasonably higher return on equity sought by
9 FPL in this proceeding, is one of the major drivers of the inflation affecting lower-
10 income households. Given its obligation to balance the interests of investors and
11 ratepayers in setting a reasonable return on equity, the greater adverse impacts that
12 inflation has imposed on low-income ratepayers should be considered by the
13 Commission.

14

15 **VII. Unaffordable Electric Bills and Collections: Introductory Data**

16 **Q. PLEASE EXPLAIN THE PURPOSE OF THIS SECTION OF YOUR**
17 **TESTIMONY.**

18 A. In this section of my testimony, I begin to explain the impact of unaffordability and the
19 inability-to-pay on the collectability of FPL bills. When FPL renders bills that its
20 customers simply cannot afford to pay, that unaffordability not only has an impact on
21 the customers receiving the unaffordable bills, it also has an impact on <u>all other</u>
22 <u>customers</u> as well. As bills become less and less affordable, FPL faces the situation

[43] FPL Witness Tiffany Cohen Direct Testimony, p. 7.

where it is forced to devote an increasing amount of resources to the process of collection, with a decreasing effectiveness arising from its efforts. Due to increasing unaffordability, in other words, FPL spends more and receives less as a result.

The high burdens facing the low-income customers of FPL affect these customers in at least two ways. First, high burdens impede the ability of low-income customers to sustainably pay their bills. Second, high energy burdens adversely affect the quality of life for low-income households. While there is not data specific to FPL, these results nonetheless have been well-documented. The relationship that exists between low-income status and this degradation in quality of life has been documented by the EIA. The EIA convincingly established the relationship between income and "energy insecurity" in nationwide data from its 2020 Residential Energy Consumption Survey (RECS). The data is presented in Table 9 below.

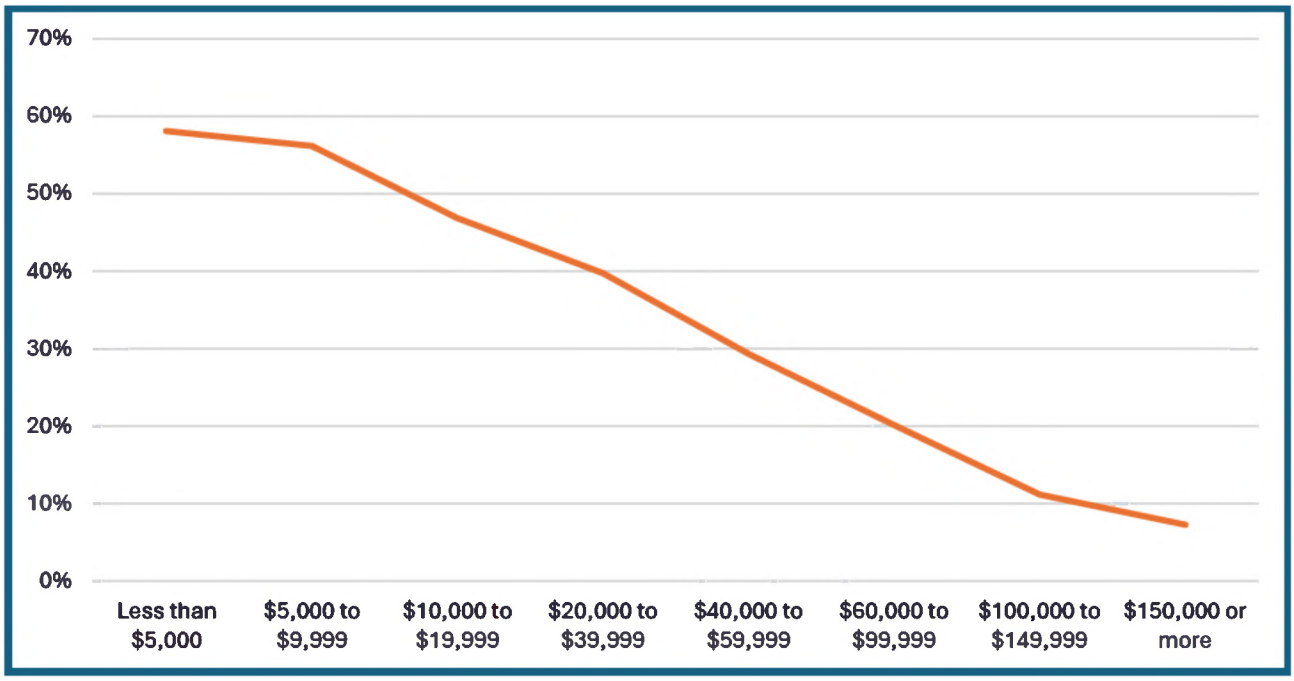
1

Table 9. Household Energy Insecurity, 2020 EIA/DOE Residential Energy Consumption Survey (RECS) [44]					
2020 annual household income	Any household energy insecurity	Reducing or forgoing food or medicine to pay energy costs	Leaving home at unhealthy temperature	Receiving disconnect or delivery stop notice	Unable to use heating equipment
Less than $20,000	58.0%	46.9%	24.8%	26.6%	11.2%
$20,000 to $39,999	56.1%	46.6%	21.2%	19.5%	9.5%
$40,000 to $59,999	46.8%	37.7%	20.7%	18.1%	8.0%
$60,000 to $79,999	39.7%	31.3%	15.0%	14.4%	6.3%
$80,000 to $99,999	29.3%	21.5%	8.9%	11.5%	4.2%
$100,000 to $119,999	20.1%	12.8%	5.7%	7.0%	2.0%
$120,000 to $139,999	11.1%	6.1%	4.1%	3.7%	1.2%
$140,000 or more	7.2%	2.6%	3.1%	1.5%	0.8%

2 The data shows that as household income increases, home energy insecurity decreases.
3 The Figure below shows the relationship between household income and "any
4 household energy insecurity." Nearly half of households with income less than $20,000
5 had experienced an energy insecurity, while that number falls to less than 20% for
6 households with income of $80,000 or more. When income increases to more than
7 $140,000, the percentage experiencing any type of energy insecurity falls below 10%.

[44] U.S. Energy Information Admin., Table HC 11.1 Household Energy Insecurity, 2020, available at chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.eia.gov/consumption/residential/data/2020/hc/pdf/HC%2011.1.pdf (accessed April 27, 2023).

Figure 12. Energy Insecurity by Income (2020) (RECS)



The 2020 results were not unique, nor surprising given similar examinations of earlier RECS data. In 2005, the federal agency administering the Low-Income Home Energy Assistance Program ("LIHEAP") funded a one-time special set of questions through the 2005 RECS. A resulting review of the 2005 data was undertaken for the federal LIHEAP office.[45] The LIHEAP study reported that households with income below the Fed.PL had higher rates of energy insecurity than other households (*e.g.*, households with income at 100% to 150% of the Fed.PL; households with income above 150% of the Fed. PL). The Federal Poverty Level, rather than income, is associated with all types of energy insecurity, the study found (concluding that it is important to consider

[45]APPRISE, Inc. (Feb. 2010). LIHEAP Special Study of the 2005 Residential Energy Consumption Survey, Dimensions of Energy Insecurity for Low-Income Households, Final Report, prepared for U.S. Department of Health and Human Services, Administration for Children and Families, Office of Community Services, Division of Energy Assistance, http://www.appriseinc.org/resource-library/selected-reports/energy-survey-research-and-policy-analysis/ (accessed April 13, 2023).

household size).[46] The study found that higher residential energy burdens are associated with all types of energy insecurity, including both service interruptions and "financial energy insecurity."[47]

Q. DO YOU HAVE REASON TO BELIEVE THAT THIS NATIONAL DATA IS EQUALLY APPLICABLE IN FLORIDA?

A. Yes. The U.S. Census Bureau continues to pursue what it refers to as its periodic "Household Pulse Survey" ("HPS"). While the HPS does not provide data specific to utility service territories, it does provide information specific to Florida. At the time I write this Testimony, the most recent HPS data collection was for the period August 20, 2024 through September 16, 2024.

The most recent HPS results for Florida show that 8% or less of Florida households with income exceeding $100,000 had a "very difficult" time paying their usual household expenses in the summer of 2024. In contrast, more than one-third (34%+) of Florida households with income less than $35,000 had a "very difficult" time in paying their usual household expenses, while one-in-five households with income between $35,000 and $50,000 had a very difficult time. In contrast, while 85% of households with income of $200,000 and above, and 87% of households with income between $150,000 and $200,000 had no difficulty at all (or little difficulty) in paying their usual household expenses, only 39% of households with income less than $25,000

[46] The Federal Poverty Level is income considering household size. In 2022, for example, 100% of the Federal Poverty Level for a 1-person household is $13,590, while 100% of the Federal Poverty Level for a 2-person household is $18,310, and for a 3-person household is $23,030. https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines (accessed April 13, 2023).

[47] Dimensions of Energy Insecurity, *supra*, at 33, 34.

and only 36% of households with income between $25,000 and $49,999 had no difficulty at all (or little difficulty) in paying their usual household expenses.

Table 10. Difficulty in Paying Usual Household Expenses in the Last Seven Days (August 20, 2024 – September 16, 2024) (Florida)[48]

	Not at all difficult	A little difficult	Somewhat difficult	Very difficult
Less than $25,000	11.7%	27.0%	27.3%	34.1%
$25,000 - $34,999	13.6%	22.6%	29.0%	34.8%
$35,000 - $49,999	33.6%	24.6%	20.9%	20.9%
$50,000 - $74,999	23.9%	38.8%	21.9%	15.4%
$75,000 - $99,999	25.2%	35.9%	26.0%	12.8%
$100,000 - $149,999	39.8%	34.5%	20.7%	5.0%
$150,000 - $199,999	50.3%	27.0%	14.5%	8.2%
$200,000 and above	53.2%	31.5%	12.8%	2.5%

This HPS data helps to paint a clear picture of the context within which the affordability of FPL rates should be viewed. The economic difficulties faced by low- and moderate-income households have not ended as the economic crisis associated with the COVID-19 health pandemic has wound down. The economic difficulties facing the customers of FPL continue today. While the difficulties are clearly concentrated in the lowest income ranges, they are not limited exclusively to those low-incomes.

Q. DOES THE HPS PROVIDE ADDITIONAL INSIGHTS INTO THE IMPACT OF HIGHER PRICES ON FPL CUSTOMERS?

A. Yes. The same HPS measures the "stress" experienced by Florida households as a result of increasing prices. The data set forth in the Table below shows that this stress

[48] https://www.census.gov/data/tables/2024/demo/hhp/cycle09.html.

is not exclusively a "low-income" phenomenon. On the one hand, the percentage of Florida households finding price increases to be "very stressful" or "moderately stressful" ranged between roughly 80% and 95% for households with income less than $75,000 in the fall of 2024. In contrast, the percentage of households reporting price increases to be "very stressful" ranged up to 44% for households with income of $75,000 or more. In contrast, fewer than 3% of households with income less than $75,000 found price increases in the summer of 2024 to be "not at all stressful."

Table 11. Stress Caused by Price Increases
(August 20, 2024 – September 16, 2024) (Florida)[49],[50]

	Very stressful	Moderately stressful	A little stressful	Not at all stressful
Less than $25,000	57.4%	23.8%	17.9%	0.2%
$25,000 - $34,999	39.3%	37.5%	20.2%	3.0%
$35,000 - $49,999	51.6%	43.4%	5.0%	0.0%
$50,000 - $74,999	52.7%	25.1%	20.0%	2.2%
$75,000 - $99,999	38.3%	28.6%	19.8%	13.2%
$100,000 - $149,999	44.1%	30.7%	17.6%	7.7%
$150,000 - $199,999	7.8%	57.8%	33.2%	1.2%
$200,000 and above	34.7%	35.3%	13.1%	16.9%

Clearly, the impacts of high prices on consumers should be a real concern to be considered by the Commission.

Q. HOW, IF AT ALL, DOES "STRESS" AND "BILL PAYMENT DIFFICULTIES" RELATE TO UTILITY BILL PAYMENTS IN PARTICULAR?

[49] https://www.census.gov/data/tables/2024/demo/hhp/cycle09.html.
[50] Totals may not sum to exactly 100% due to non-reporting by some households.

The HPS finally reports difficulties in paying home utility bills in particular in the last twelve months for the State of Florida. The lessons for Florida are clearly the same as found with respect to the household stress imposed by high prices and the difficulties in paying "usual household expenses." The percentage of households with annual income of $100,000 or more having "never" found it to be necessary to reduce spending on other household necessities in the last twelve months in order to pay the home utility bills ranged from roughly 80% to more than 90%, while fewer than half of households with income less than $35,000 reported "never" having to do so. While more than 40% of households with income less than $35,000 reported needing to reduce or forego spending on other basic household necessities "almost every month" or "some months," in order to pay their utility bill, only 6% of households with income $200,000 or more, and 10% to 15% of households with income between $100,000 and $200,000 needed to do so.

Similarly, while between 13% and nearly 25% of households with income less than $75,000 reported being "unable to pay the full bill amount" in "almost every month" or in "some" months, only 1% to 4% of households with income of $75,000 or more reported such an inability to pay.

1

Table 12. Difficulties in Paying Home Energy Bills in the Last 12 Months (August 20, 2024 – September 16, 2024) (Florida)[51],[52]				
Household reduced or forwent expenses for basic household necessities, such as medicine or food, in order to pay an energy bill				
	Almost every month	Some months	1 or two months	Never
Less than $25,000	25.2%	14.8%	12.0%	45.4%
$25,000 - $34,999	22.5%	21.0%	11.6%	44.9%
$35,000 - $49,999	7.2%	17.3%	14.1%	61.2%
$50,000 - $74,999	6.7%	21.3%	5.3%	66.8%
$75,000 - $99,999	8.2%	11.3%	14.6%	66.0%
$100,000 - $149,999	1.6%	11.0%	8.0%	79.3%
$150,000 - $199,999	2.4%	13.9%	5.8%	77.9%
$200,000 and above	3.8%	2.6%	0.7%	92.9%
Household was unable to pay an energy bill or unable to pay the full bill amount				
	Almost every month	Some months	1 or two months	Never
Less than $25,000	10.6%	8.0%	27.1%	54.0%
$25,000 - $34,999	8.8%	14.1%	8.9%	68.2%
$35,000 - $49,999	5.5%	10.9%	4.9%	78.7%
$50,000 - $74,999	6.0%	6.9%	6.8%	80.3%
$75,000 - $99,999	2.7%	3.5%	10.2%	83.7%
$100,000 - $149,999	0.0%	0.7%	6.0%	92.8%
$150,000 - $199,999	0.0%	3.6%	3.8%	92.6%
$200,000 and above	0.2%	0.5%	0.7%	98.5%

2

3 **Q. WHAT DO YOU CONCLUDE?**

4 A. Many, if not most, of the decisions which the Commission faces in this proceeding

5 require a balancing of the interests of investors and ratepayers. In deciding upon issues

[51] https://www.census.gov/data/tables/2024/demo/hhp/cycle09.html.

[52] Totals may not sum to exactly 100% due to non-reporting by some households.

ranging from a reasonable return on equity, to appropriate cost allocations, to appropriate capital expenditures, the Commission should understand, and account for, the affordability impacts of FPL's request for higher rates including the adverse impacts that inflation has imposed on ratepayers as I have identified above.

VIII. Unaffordable FPL Bills and Collections in the FPL Service Territory

Q. PLEASE EXPLAIN THE PURPOSE OF THIS SECTION OF YOUR TESTIMONY.

A. The unaffordability of FPL rates adversely affects not only the customers receiving unaffordable bills, but also all other customers as well. Not only does rendering unaffordable bills result in less revenue collected by FPL, but it results in higher levels of expenses as well. These higher expenses and lower revenues result in higher rates to be paid by all other ratepayers.

The level of arrears is one example of how unaffordable bills contribute to higher expenses to be charged to all other ratepayers. The working capital needed by FPL is driven by two factors: (1) the level of arrears; and (2) the age of arrears. Higher levels of arrears increases both of these factors. Moreover, since working capital is a capital expenditure, it will have an equity return associated with it. Given that equity return, there will also be a tax impact associated with it. The rate impact of increased working capital, in other words, is greater than the dollar impact of the working capital itself.

While many people associate only bad debt with increased unaffordability, in fact, the level of bad debt is but a small element of the costs imposed by unaffordability.

Working capital is probably the most substantial element of unaffordability. Also included are bad debt, credit and collection expenses, foregone revenue, and the inefficiencies associated with credit and collection activities.

Q. HAVE YOU HAD AN OPPORTUNITY TO EXAMINE THE RELATIONSHIP BETWEEN AFFORDABILITY AND COSTS TO FPL?

A. Yes. In my examination, I begin by identifying zip codes with higher than average levels of households with annual income less than 150% of Federal Poverty Level. Since FPL does not report data on a zip code basis, I aggregate the FPL zip codes into the Districts reported by FPL. The company reports data on a District-basis. I identify the Districts which have a higher than average penetration of low-income (i.e., households with income less than 150% of the Fed.PL) and compare a range of collection metrics for those Districts with higher-than-average low-income customers against all remaining Districts. Of FPL's 34 Districts, 15 have been identified as having a higher than average penetration of low-income customers (I will refer to these Districts as "High Poverty Level Districts"). Those 15 High Poverty Level Districts have 24.5% of their households with income greater than 150% of the Fed. PL. The remaining Districts have 16.1% of their households with income above this level.[53]

[53] The Census Bureau reports populations by age by different ranges of Federal Poverty Level. American Community Survey, Table B17024 (5-year data) (2023). I use the percentage of adults (age 18+) by these differing ranges of the Fed.PL in my analysis.

1 **Q. WHAT ARE YOUR FINDINGS?**

2 A. The High Poverty Level Districts experienced a disproportionate share of customers in
3 arrears in the twelve most recent months for which FPL has data.[54] I measure the
4 number of customers in arrears by whether or not customers were charged a late
5 payment charge by FPL. According to FPL's data, while 18.9% of customers in the
6 High Poverty Level Districts were charged a late payment charge during the most recent
7 12-month period, only 16.2% of customers in the remaining Districts had a late
8 payment charge imposed on their account due to delinquent bills.

9 Not only were there more customers in arrears in the High Poverty Level
10 Districts, but the arrears which they carried were older arrears as well. According to
11 FPL's data, the High Poverty Level Districts represent 37.5% of all FPL residential
12 customers. In contrast, the High Poverty Level Districts represented 39.2% of FPL's
13 accounts that were 60+ days in arrears, and 40.3% of FPL's dollars that were 60+ days
14 old. Not only were a disproportionate number of customers in High Poverty Level
15 Districts in arrears, but a disproportionate number carried older arrears as well.

16

17 **Q. HAS FPL EVER CONSIDERED OR EXAMINED HOW THE IMPACTS OF**
18 **BILL UNAFFORDABILITY CONTRIBUTE TO FUTURE COLLECTION**
19 **ACTIVITIES (AND THUS FUTURE COLLECTION COSTS) FACED BY THE**
20 **COMPANY?**

[54] The data used throughout this section of my testimony was provided by FPL in response to OPC's Seventh Set of Interrogatories, Nos. 161 and 162.

A. No. Consider how FPL's actions have a direct effect on the inability of low-income customers to retain service when they cannot afford to pay their bills. FPL reports that it uses an automated system to determine when and whether to schedule nonpayment disconnections. According to the Company:

> There is no written document that describes or discusses risk assessment regarding scheduling a disconnection of service. FPL uses an automated system prioritization that considers risk factors including but not limited to age of arrears, length of time a customer has maintained an FPL account, the number of times a customer has been late in a given period, and the number of prior collection activities. Customers are then prioritized systematically, and disconnections are scheduled.[55]

The implications of that automated system on the impacts of unaffordability are evident. As I have discussed throughout my testimony, lower income customers will tend to have older (and larger) arrears. Lower income households also tend to be more mobile than other households (and, accordingly, will have a shorter "length of time a customer has maintained an FPL account"). Lower income customers will have been late more frequently, and thus have been subject to more prior collection activities. FPL practices, in other words, create a spiral downward. The more unaffordable the Company's rates become, the more customers will be unable to pay the resulting bills. In turn, the more unaffordable bills become, the more likely those customers will be scheduled for additional collection activities. The more collection activities that are directed toward these customers, the more likely that additional collection activities will be directed against them in the future.[56]

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[55] FPL Response to OPC's Seventh Set of Interrogatories, No. 182.

[56] See also, FPL Response to OPC's Seventh Set of Interrogatories, Nos. 184(d), (e), (f), (j), (l), (m), and (n).

1 **Q. HAS FPL EVER CONSIDERED THE EFFECTIVENESS AND/OR**
2 **EFFICIENCY OF ITS COLLECTION ACTIVITIES IN REDUCING THE**
3 **COSTS OF NONPAYMENT?**
4 A. No. Without question, FPL tracks the aging of its accounts receivable along with its
5 Days Sales Outstanding and other collections metrics.[57] However, in that document,
6 FPL made no effort to: (1) characterize patterns of nonpayment; (2) identify the
7 characteristics of nonpayers; (3) identify predictors of nonpayment; (4) identify
8 strategies to reduce nonpayment; or (5) identify early indicators of nonpayment.[58]
9 FPL was asked to provide any reports or analysis that assessed the extent to
10 which the following activities reduce residential bad debt: (1) cash security deposits;
11 (2) deferred payment agreements; (3) notices of nonpayment disconnection; (4)
12 nonpayment disconnections; (5) field collections; (6) call center collection calls; (7)
13 budget billing plans; or (8) late payment charges. Their data reporting included no such
14 analysis.[59] Similarly, FPL was asked to provide such an analysis of the extent to which
15 the same activities reduced residential arrears. But its data reporting included no such
16 analysis.[60] Nor did its data reporting include any analysis of the extent to which, if at
17 all, those activities resulted in accelerating residential payments.[61]
18 FPL was asked for any assessment it had made about why residential customers
19 do not complete deferred payment arrangements in order to prevent nonpayment
20 disconnections, but it had neither performed such an analysis nor obtained any such

[57] FPL Response to OPC's Seventh Request for Production of Documents, No. 74. NOTE: Document not included due to size.
[58] FPL Response to OPC's Seventh Set of Interrogatories, No. 204.
[59] FPL Response to OPC's Seventh Set of Interrogatories, No. 205.
[60] FPL Response to OPC's Seventh Set of Interrogatories, No. 206.
[61] FPL Response to OPC's Seventh Set of Interrogatories, No. 207.

analysis performed for someone else.[62] FPL has never assessed why customers do not pay their bills; the order in which customers pay their bills (e.g., rent/mortgage first, utility bills second, credit cards third, etc.); or to whom customers turn for information and/or bill payment assistance.[63]

FPL has never sought to assess or evaluate the source of either residential bad debt,[64] or residential arrears[65] by socio-economic status.[66]

Q. WHY IS THIS LACK OF CONSIDERATION IMPORTANT TO TAKE INTO ACCOUNT IN AN FPL RATE CASE?

A. This lack of knowledge about the collection impacts of the unaffordability I have documented throughout my testimony is important to a rate case because that unaffordability, and the resulting payment difficulties, have a direct impact on increasing costs that FPL then seeks to passthrough to all ratepayers. Consider, for example, that FPL was asked whether it agreed or disagreed with each of the following statements:

a. Reducing the dollar level of arrears to a customer will, all else equal, have the effect of reducing the working capital needed by a utility;

b. Reducing the time (in days or months) that an arrearage remains outstanding will, all else equal, have the effect of reducing the working capital needed by a utility;

c. Working capital is a cost component that has an equity return associated with it.

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[62] FPL Response to OPC's Seventh Set of Interrogatories, No. 208.
[63] FPL Response to OPC's Seventh Set of Interrogatories, No. 209.
[64] FPL Response to OPC's Seventh Set of Interrogatories, No. 210.
[65] FPL Response to OPC's Seventh Set of Interrogatories, No. 211.
[66] See also, FPL Response to OPC's Seventh Set of Interrogatories, No. 212 and FPL Response to OPC's Seventh Set of Interrogatories, No. 217.

d. To the extent that working capital has an equity return associated with it, it will have a tax component associated with it.

e. A higher dollar level of arrearages poses a greater risk of loss due to uncollectibles than a lower dollar level of arrearages.

f. Reducing the number of customers who are off-system due to a disconnection of service will, all else equal, reduce lost sales to a utility.

g. Reducing the number of customers receiving final bills with an unpaid balance will, all else equal, have the effect of reducing costs to a utility.

The Company agreed with each statement.[67]

Q. WHAT DO YOU CONCLUDE?

A. Imposing expenses on ratepayers that exacerbate the unaffordability of FPL rates generates additional costs to ratepayers above and beyond the expenses being challenged. When bills become less and less affordable, FPL is placed in the situation of both carrying increased arrears (along with the associated costs of carrying those arrears) and engaging in additional credit and collection activities (along with both the higher levels of costs and the higher levels of foregone revenue). Reducing FPL's requested rate increase as recommended by OPC witnesses throughout this proceeding will have positive rate impacts for all FPL customers even beyond the specific adjustments being proposed by those witnesses.

Q. HAVE YOU REVIEWED THE ACTIVITIES WHICH FPL CITES AS BEING IN SUPPORT OF ITS LOW-INCOME CUSTOMERS?

[67] FPL Response to OPC's Seventh Set of Interrogatories, No. 213.

1 A. Yes. I have reviewed the testimony of FPL witness Dawn Nichols in this proceeding.
2 While some of the actions explained by Witness Nichols are commendable, they do not
3 substitute for setting affordable rates in the first instance. Consider, for example, that
4 Ms. Nichols testifies that FPL facilitates its customers receiving energy assistance,
5 "including LIHEAP."[68] Company data, however, reports that 64,751 FPL customers
6 received LIHEAP in Calendar Year 2022.[69] Given that FPL reports serving 5,322,804
7 residential customers,[70] that means that only 1.2% (64,571 / 5,322,804 = 0.0122) of the
8 Company's customers received energy assistance through LIHEAP. In contrast, in
9 2023, only 33,159 FPL customers received either LHEAP or EHEAP assistance,
10 representing fewer than 1% of the Company's total residential customer base.[71] In
11 2024, only 36,677 FPL customers received LIHEAP or EHEAP assistance.[72]
12 In comparison, from March 2024 through February 2025, FPL performed
13 1,216,615 nonpayment disconnections. During that same time period, FPL had 669,421
14 customers who defaulted on their deferred payment arrangements. FPL imposed late
15 payment charges for delinquent accounts nearly 11.1 million times.[73] Moreover, in
16 comparison to the fewer than 1% of customers who received LIHEAP or EHEAP
17 assistance, nearly one-in-five households in the FPL service territory live with annual
18 income at or below 150% of the Fed.PL, the *minimum* income eligibility for LIHEAP.[74]

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[68] Direct Testimony of FPL Witness Dawn Nichols, p. 15.
[69] FPL Response to OPC's Seventh Set of Interrogatories, No. 161.
[70] FPL Response to OPC's Seventh Set of Interrogatories, No. 161.
[71] FPL Response to OPC's Seventh Set of Interrogatories, No. 161.
[72] FPL Response to OPC's Seventh Set of Interrogatories, No. 161.
[73] FPL Response to OPC's Seventh Set of Interrogatories, No. 162.
[74] FPL reports that LIHEAP and EHEAP eligibility ranges from 150% of the Fed.PL to 60% of State Median Income, whichever is higher, as determined by the Assist agencies. FPL Response to OPC Interrogatory No. 161.

Ms. Nichols also testified that over the past ten years, FPL Care to Share has provided an average of $2.4 million annually "to help customers in need."[75] To place that figure in context, in the twelve months ending March 2025, the 1,216,615 accounts that FPL disconnected for non-payment carried a total arrears of $258,255,098 at the time of disconnection.[76] That $2.4 million, in other words, does not substitute for ensuring that rates are affordable on the front-end.

Q. CAN LIHEAP BE RELIED UPON TO PROVIDE THIS SAME LEVEL OF ASSISTANCE IN THE FUTURE?

A. No. Even though LIHEAP provides a minimal level of assistance to FPL customers as documented above, even that level of assistance cannot be assumed to exist in the future to offset unaffordable FPL bills. There are three current threats to LIHEAP. First, as noted in Congressional testimony submitted on April 9, 2025, by Mark Wolfe, executive director of the National Energy Assistance Directors Association ("NEADA"), to the House Subcommittee on Labor, Health and Human Services and Education and Related Agencies in support of FY 2026 LIHEAP funding:

> Last week, the Trump Administration eliminated the Division of Energy Assistance (DEA)—the office within the U.S. Department of Health and Human Services (HHS) that oversees LIHEAP—and fired the entire staff.[77]

Second, as noted in a recent Washington Post article, an HHS budget draft, "offers the first full look at the health and social service priorities of President Donald Trump's

[75] Direct Testimony of FPL Witness Dawn Nichols, p. 15.
[76] This figure was calculated by multiplying the number of nonpayment disconnections times the average arrears at the time of disconnection. FPL Response to OPC's Seventh Set of Interrogatories, No. 162.
[77] *See* https://neada.org/wp-content/uploads/2025/04/LIHEAPHouseTestimonyFY26.pdf.

Office of Management and Budget as it prepares to send his 2026 fiscal year budget request to Congress."[78] The budget draft proposes eliminating LIHEAP entirely.

Third, the President's FY2026 budget also calls for the complete elimination of the Community Services Block Grant ("CSBG") program.[79] Local community action agencies ("CAAs") rely upon CSBG to fund the administration of energy assistance through LIHEAP. Even if LIHEAP is funded, the elimination of CSBG would severely limit, if not effectively eliminate, the ability of CAAs to deliver such assistance.[80] In FY2025 and FY2026, for example, Florida's CAAs were budgeted to receive more than $20 million in CSBG funding according to the Florida CSBG State Plan.[81] The Florida CSBG State Plan explicitly states:

> CSBG, LIHEAP, and WAP are located within Florida Commerce's Division of Community Development. This enables efficient coordination of services. The coordination requirement is passed to the eligible entities via the grant award agreement. . .Of the 26 CSBG eligible entities, 21 also provide LIHEAP services that facilitate the coordination of these programs at the local level.[82]

These are concerning developments I have never witnessed in my decades of work in this field. In my many decades of working on these issues, I have never encountered

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[78] *See Internal budget document reveals extent of Trump's proposed health cuts, Lena H. Sun, Carolyn Y. Johnson, Rachel Roubein, Joel Achenbach and Lauren Weber,* April 16, 2025, available at: *https://www.washingtonpost.com/health/2025/04/16/hhs-budget-cut-trump/*.

[79] National Council on Nonprofits (May 2, 2025). President Trump Proposes to Slash Funding for Domestic Programs in FY2026, available at https://www.councilofnonprofits.org/articles/president-trump-proposes-slash-funding-domestic-programs-fy2026.

[80] See, Libby Perl (January 23, 2018). Community Services Block Grants (CSBG): Background and Funding, Congressional Research Service, available at https://www.warnock.senate.gov/wp-content/uploads/2021/05/08-Community-Services-Block-Grants-CSBG.pdf.

[81] State of Florida, Community Services Block Grant Model State Plan, October 1, 2024 – September 30, 2026, at page 24, available at https://floridajobs.org/docs/default-source/community-planning-development-and-services/community-services/community-services-block-grant/csbg_state-plan-ffy2025_2026.pdf?sfvrsn=158333b0_1.

[82] CSBG Florida State Plan, supra, p. 38.

such a threat to the existence of LIHEAP. It would not be accurate to say with any kind of certainty that LIHEAP will be ended, or even cut, and that is not what I am saying. I am merely saying that given the great uncertainty in LIHEAP funding in each year, let alone the coming year, the presumption that LIHEAP benefits will be available in sufficient amounts to effectively support affordability for the Company's financially struggling customers appears misplaced.

IX. The Impact of Unaffordable FPL Rates on Non -Residential Customers

Q. PLEASE EXPLAIN THE PURPOSE OF THIS SECTION OF YOUR TESTIMONY.

A. In this section of my testimony, I explain why unaffordability of FPL rates adversely affects not only the residential customers receiving the resulting unaffordable bills, but adversely affects a wide range of non-residential customers who employ those households. The unaffordability of bills imposes both direct and indirect costs on non-residential customers. An examination of direct costs reveals that poor health among workers facing financial stress at home makes them less reliable and raises the cost of employing them. Indirect costs can be associated with declining productivity. Poverty produces ill-prepared workers whose lives are easily disrupted by small catastrophes. If the car breaks down, if a child gets sick, it suddenly becomes impossible to be a reliable worker.

Q. PLEASE DISCUSS THE HEALTH COSTS YOU IDENTIFY AS A "DIRECT COST" OF ELECTRIC UNAFFORDABILITY TO EMPLOYERS.

1 A. Increased financial stress associated with unaffordable bills results in increased health
2 care costs to employers. These costs to employers arising from the financial stress of
3 employees can be substantial. One white paper presented "an overview of the research
4 literature related to financial stress, how it can affect employee productivity, and real
5 world data regarding the estimated costs to businesses when financially stressed
6 employees are left to struggle on their own."[83]

7 An increase in health care costs is one of the most cited costs imposed on
8 employers due to financial stress. A report in Health Affairs analyzed the health risks
9 and medical expenses of more than 92,000 employees over a three-year period. Those
10 reporting high stress were $413 more costly per year on average than workers who were
11 not at risk from stress. By comparison, smoking – a common health risk targeted by
12 corporate wellness programs – was found to raise health care costs by $587 dollars on
13 average. Since financial problems are an important stress factor, it appears employers
14 may be paying a high cost for employee financial stress, but they do not recognize it
15 because a large portion of that expense shows up indirectly as a health care expense.[84]

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[83] Martha Brown Menard, Ph.D. (June 2017). Improving Employees' Financial Wellness: Why it Matters and What Employers Can Do About It." https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3011461.

[84] CFPB Financial Wellness at Work, supra, citing, Lucia F. Dunn & Ida A. Mirzaie, Working Paper, Determinants of Consumer Debt Stress: Differences by Debt Type and Gender (2012), http://www.chrr.org/content/surveys/cfm/doc/DSI-Working-Paper-07-19-12.pdf; Ron Z. Goetzel et al., Ten Modifiable Health Risk Factors Are Linked To More Than One-Fifth Of Employer-Employee Health Care Spending, 31 Health Affairs 2474 (2012).; Ron Z. Goetzel, et al., The relationship between modifiable health risks and health care expenditures, 40 J. Occup. Environ. Med. 843 (1998) (showing an analysis of the multi-employer HERO health risk and cost database). https://journals.lww.com/joem/Abstract/1998/10000/The_Relationship_Between_Modifiable_Health_Risks.3.aspx. https://www.healthaffairs.org/doi/pdf/10.1377/hlthaff.2011.0819; Health Poll, AP-AOL/ABT SRBI (2008), http://surveys.associatedpress.com/data/SRBI/AP-AOL%20Health%20Poll%20Topline%20040808_FINAL_debt%20stress.pdf.

Q. WHAT DO YOU KNOW ABOUT THE INDIRECT COSTS TO EMPLOYERS ASSOCIATED WITH THE FINANCIAL STRESS OF UNAFFORDABLE HOUSEHOLD BILLS?

A. The indirect costs of unaffordable bills can perhaps exceed even the direct costs. Indirect costs are often associated with declines in employee productivity associated with financial stress at home. A 2014 study by the Consumer Financial Protection Bureau[85] reports that "even when the economy was booming, financial stress was sapping the productivity and hurting the health of millions of American workers."[86] According to the CFPB:

> Multiple surveys offer ample evidence of the impact of financial stress at work. For example, in 2012, roughly one in five employees admitted they had skipped work in the past year to deal with a financial problem. Among workers now in their 30's and 40's – a critical cohort of the American workforce – stress levels are even higher. Many Generation X workers (29%) say their personal finances distract them at work, and a majority (53%) find it stressful to deal with their personal finances. This is a particularly salient finding given that Gen Xers – those born between 1964 and 1980 – are beginning to enter their peak-earning years. If they are financially stressed now, Gen Xers may have more difficulty than other generations finding security in the future. Across workers of all generations, 24% admit their personal finances have been a distraction at work. And, of those workers who are concerned about their finances, 39% spend at least three hours each week either thinking about or dealing with financial problems at work.[87]

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[85] CFPB (August 2014). Financial wellness at work: A review of promising practices and policies. https://www.consumerfinance.gov/data-research/research-reports/financial-wellness-at-work/.

[86] Financial wellness at work, at 6, citing E. Thomas Garman et al., Financial Stress Among American Workers: Final report: 30 Million Workers in America –One in Four—Are Seriously Financially Distressed and Dissatisfied Causing Negative Impacts on Individuals, Families, and Employers, 17 2005).

[87] Id., citing MetLife, Inc., 10th Annual Study of Employee Benefits Trends: Seeing Opportunity in Shifting Tides 51 (2012), http://www.winonaagency.com/img/~www.winonaagency.com/10th annual met life study of benefits trends.pdf ("22% of employees admit that they have taken unexpected time off in the past 12 months to deal with a financial issue and/or spent more time than they think they should at work on personal financial issues . . . ."). 15% of Gen Y respondents, 10% of Gen X respondents, 5% of Younger Boomer respondents, and 1% of Older Boomer

The CFPB reported:

> It's not just employees who want help managing financial stress at work. Managers confront this stress every day. In a recent survey, 61% of human resources professionals say financial stress is having some impact on employee work performance. Twenty-two percent say worries over personal finances have a "large impact" on employee engagement.[88]

Q. PLEASE EXPLAIN THE CONCEPT OF "PRESENTEEISM" AND ITS IMPACT ON EMPLOYEE PRODUCTIVITY.

A. Financial stress adversely affects employers both through absenteeism and presenteeism.[89] According to Menard:

> Academic researchers have studied the costs of absenteeism, presenteeism, and employee turnover specifically associated with employee financial stress, and have estimated these costs based on real world data. Absenteeism from work resulting from worrying about personal finances and employee turnover in particular represents a problem that has been well documented in the literature, and higher levels of financial stress are associated with higher levels of absenteeism, particularly among blue-collar workers. A recent survey of over 5,000 US workers by the company Willis Towers Watson found that employees who are worried about their finances are absent on average for 3.5 days annually.[90]

According to Menard, "financially troubled employees bring [their] concerns to work."

Dr. Menard reports:

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respondents admitted to the same; PricewaterhouseCoopers, LLC, Employee Financial Wellness Survey 10,11 (2014), http://www.pwc.com/en_US/us/private-company-services/publications/assets/pwc-employee-financial-wellness-survey-2014-results.pdf.

[88] Id., citing Society for Human Resource Management, SHRM Research Spotlight: Financial Education Initiatives in the Workplace 2 (2012), https://www.shrm.org/hr-today/trends-and-forecasting/research-and-surveys/Documents/Financial_Education_Flier_FINAL.pdf.

[89] "Presenteeism" has long been recognized in both the industry and academic literature. See, e.g., Paul Hemp (October 2004). Presenteeism: At Work but Out of It, Harvard Business Review https://hbr.org/2004/10/presenteeism-at-work-but-out-of-it.

[90] Menard, supra, at 6 (internal notes omitted).

> The previously mentioned Mercer survey found that 16% of employees reported spending more than 20 working hours each month worrying about money. The average across those surveyed was 13 hours per month. For an individual employee, that is equal to 7.8% of their annual work time spent being distracted as a result of their financial situation. Other estimates are even higher. Garman and colleagues peg financial presenteeism and absenteeism costs at 15-20% of total compensation paid to all employees in the businesses studied. . .The Mercer survey also found that 22 percent of employees report missing at least one day of work to handle financial problems, and a full 20 percent have had to resign from jobs due to financial stress.[91]

Menard's work was confirmed by research of the International Foundation of Employee Benefit Plans. That research concluded:

> Financially distressed workers are more likely to miss work—not surprising given persons with financial stress tend to have more physical and mental health problems than those who are financially healthy. In fact, 70% of all job absenteeism has been tied to stress-related illnesses.
>
> Even when employees do show up for work, they are likely to demonstrate some degree of presenteeism due to fatigue and/or an inability to concentrate. Presenteeism occurs when employees come to work but are not functioning up to their capabilities. It manifests itself in a host of ways including more time spent on tasks, poor-quality work, impaired social functioning, burnout, anger and low morale.

[91] Id., at 7 (internal notes omitted).

One in five employees (20%) reports issues with personal finances have been a distraction at work. More than one-third (37%) say they spend three hours or more each week thinking about or dealing with issues related to personal finances.[92]

Q. DOES INDUSTRY RESEARCH SUPPORT YOUR CONCLUSIONS REGARDING THE IMPACT OF FINANCIAL STRESS ON EMPLOYERS?

A. Yes. The fact that employee financial problems affect the employer is recognized widely within industry circles. For example, according to one report by the Society for Human Resource Management ("SHRM"), "when employees are stressed financially, their health and productivity can both suffer."[93] According to SHRM, 48 percent of human resource managers report workers are struggling and stressed over "covering basic living expenses." SHRM reports that 60% of employers indicate that personal financial issues affect their "workers inability to focus at work" and 34% report such issues result in "absenteeism and tardiness."

A different survey, this one of employers rather than employees, asked employers about their workers' financial stress. "The survey found that financially stressed employees are not able to check their worries at the door; they typically spend over three hours per week dealing with personal finance at work and lose nearly one month of productive work time (23-31 days per year) over financial concerns." This

[92] Patricia Bonner (Nov./Dec. 2016). The Impact of Financial Stress on Your Employees, Plans and Trusts, Vol. 34:6: 18-24. https://www.ifebp.org/inforequest/ifebp/0200354.pdf.

[93] Stephen Miller (April 2016). Employees' Financial Issues Affect Their Job Performance." https://www.shrm.org/resourcesandtools/hr-topics/benefits/pages/employees-financial-issues-affect-their-job-performance.aspx.

survey states that "there may be a strong correlation between poverty and financial stress," though it acknowledges that "low wages" are not "completely to blame."[94]

Q. HOW DOES YOUR DISCUSSION ABOVE APPLY TO THE UNAFFORDABILITY OF FPL BILLS?

A. There is a direct relationship between the unaffordability of FPL bills, as I have documented in detail above, and the resulting adverse impacts on local commercial and industrial customers. For example:

- Turnover costs business money. We know that unaffordable home energy bills lead to the frequent mobility of households.[95]

- Time missed due to family care provision costs business money. We know that unaffordable home energy leads to more frequent childhood illnesses.[96]

- Time missed due to lack of employee productivity and employee illness costs business money. We know that the inability to stay warm due to unaffordable home energy bills leads to increased illnesses, including pneumonia, influenza, and other infectious diseases.[97]

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[94] Dan Macklin (August 2019). Businesses Losing $500 Billion Due to Employees Financial Distress, H.R. Technologist Weekly Newsletter. https://www.hrtechnologist.com/articles/compensation-benefits/businesses-losing-500-billion-due-to-employees-financial-stress-2/.

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1 **Q. WHAT DO YOU CONCLUDE?**

2 A. I conclude that with low-wage employees, in particular, unaffordable home energy
3 directly contributes to lowered productivity. Increased personal illness, increased
4 employee turnover, and increased family care responsibilities are but three of the
5 factors contributing to lower employee productivity. Imposing unaffordable bill
6 burdens on residential customers substantially contributes to each of these productivity
7 factors. Addressing the affordability issues presented by FPL's proposed rate hike, as
8 identified by the whole range of OPC witnesses, will benefit not merely residential
9 customers, but will benefit residential and non-residential customers alike.

10

11 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

12 A. Yes, it does.

Exhibit RDC-1: Summary Vitae
Roger Colton
Fisher, Sheehan & Colton
Public Finance and General Economics
Belmont, MA

* *

EDUCATION:

J.D. (Order of the Coif), University of Florida (1981)

M.A. (Regulatory Economics), McGregor School, Antioch University (1993)

B.A. Iowa State University (1975) (journalism, political science, speech)

PROFESSIONAL EXPERIENCE:

Fisher, Sheehan and Colton, Public Finance and General Economics: 1985 – present.

As a co-founder of this economics consulting partnership, Colton provides services in a variety of areas, including regulatory economics, poverty law and economics, public benefits, fair housing, community development, energy efficiency, utility law and economics (energy, telecommunications, water/sewer), government budgeting, and planning and zoning.

Colton has testified in state and federal courts in the United States and Canada, as well as before regulatory and legislative bodies in more than forty (40) states. He is particularly noted for creative program design and implementation within tight budget constraints.

PROFESSIONAL AFFILIATIONS:

Past Chair:	Belmont Zoning By-law Review Working Committee (climate change)
Member:	Board of Directors, Massachusetts Rivers Alliance
Columnist:	Belmont Citizen-Herald
Producer:	Belmont Media Center: BMC Podcast Network
Host:	Belmont Media Center: Belmont Journal
Member:	Belmont Town Meeting
Vice-chair:	Belmont Light General Manager Screening Committee
Past Chair:	Belmont Goes Solar
Coordinator:	BelmontBudget.org (Belmont's Community Budget Forum)
Coordinator:	Belmont Affordable Shelter Fund (BASF)

Past Chair: Belmont Solar Initiative Oversight Committee
Past Member: City of Detroit Blue Ribbon Panel on Water Affordability
Past Chair: Belmont Energy Committee
Member: Massachusetts Municipal Energy Group (Mass Municipal Association)
Past Chair: Housing Work Group, Belmont (MA) Comprehensive Planning Process
Past Chair: Board of Directors, Belmont Housing Trust, Inc.
Past Chair: Waverley Square Fire Station Re-use Study Committee (Belmont MA)
Past Member: Belmont (MA) Energy and Facilities Work Group
Past Member: Belmont (MA) Uplands Advisory Committee
Past Member: Advisory Board: Fair Housing Center of Greater Boston.
Past Chair: Fair Housing Committee, Town of Belmont (MA)
Past Member: Aggregation Advisory Committee, New York State Energy Research and Development Authority.
Past Member: Board of Directors, Vermont Energy Investment Corporation.
Past Member: Board of Directors, National Fuel Funds Network
Past Member: Board of Directors, Affordable Comfort, Inc.
Past Member: National Advisory Committee, U.S. Department of Health and Human Services, Administration for Children and Families, Performance Goals for Low-Income Home Energy Assistance.
Past Member: Editorial Advisory Board, International Library, *Public Utility Law Anthology*.
Past Member: ASHRAE Guidelines Committee, GPC-8, *Energy Cost Allocation of Comfort HVAC Systems for Multiple Occupancy Buildings*
Past Member: National Advisory Committee, U.S. Department of Housing and Urban Development, Calculation of Utility Allowances for Public Housing.
Past Member: National Advisory Board: Energy Financing Alternatives for Subsidized Housing, New York State Energy Research and Development Authority.

PROFESSIONAL ASSOCIATIONS:

National Association of Housing and Redevelopment Officials (NAHRO)
National Society of Newspaper Columnists (NSNC)
Association for Enterprise Opportunity (AEO)
Iowa State Bar Association
Energy Bar Association
Association for Institutional Thought (AFIT)
Association for Evolutionary Economics (AEE)
Society for the Study of Social Problems (SSSO)
Association for Social Economics

BOOKS

Colton, *et al.,* ***Access to Utility Service***, National Consumer Law Center: Boston (4th edition 2008).

Colton, *et al.*, ***Tenants' Rights to Utility Service***, National Consumer Law Center: Boston (1994).

Colton, ***The Regulation of Rural Electric Cooperatives***, National Consumer Law Center: Boston (1992).

BOOK CHAPTERS

Colton (2018). The equities of efficiency: distributing energy usage reduction dollars, Chapter in Energy Justice: US and International Perspectives (Edited by Raya Salter, Carmen Gonzalez and Elizabeth Ann Kronk Warner), Edward Elgar Publishing (London, England).

JOURNAL PUBLICATIONS

65 publications in industry and academic journals, primarily involving utility regulation and affordable housing. (list available upon request)

TECHNICAL REPORTS

200 technical reports for public-sector and private-sector clients (list available upon request)

JURISDICTIONS IN WHICH EXPERT WITNESS PROVIDED

1. Maine
2. New Hampshire
3. Vermont
4. Massachusetts
5. Rhode Island
6. Connecticut
7. New Jersey
8. Maryland
9. Pennsylvania
10. Washington D.C.
11. Virginia
12. North Carolina
13. South Carolina
14. Florida (Federal Court)
15. Alabama
16. Mississippi
17. Tennessee
18. Kentucky
19. Ohio
20. Indiana
21. Michigan
22. Wisconsin
23. Illinois
24. Minnesota
25. Iowa
26. Missouri
27. Kansas
28. Louisiana
29. Arkansas
30. Texas (Federal Court)
31. South Dakota
32. North Dakota
33. Montana
34. Colorado
35. New Mexico
36. Arizona
37. Utah
38. Idaho
39. Nevada
40. Washington
41. Oregon
42. Florida
43. Hawaii

Canadian Provinces

1. Nova Scotia
2. Ontario
3. Manitoba
4. British Columbia

District Code	District Name	Zip Code
11	Daytona	32010, 32014, 32019, 32021, 32036, 32074, 32110, 32114, 32115, 32117, 32118, 32119, 32124, 32127, 32128, 32129, 32132, 32136, 32137, 32141, 32164, 32168, 32169, 32174, 32175, 32176, 32724, 32744, 32759, 32780, 34222
12	Palatka	32033, 32064, 32086, 32092, 32110, 32112, 32131, 32139, 32145, 32148, 32157, 32177, 32178, 32181, 32187, 32189, 32193, 32640
13	St. Augustine	32033, 32080, 32081, 32082, 32084, 32086, 32092, 32095, 32137, 32145, 32259
21	Cocoa	32754, 32775, 32780, 32796, 32920, 32922, 32925, 32926, 32927, 32931, 32934, 32935, 32937, 32940, 32952, 32953, 32955
22	Melbourne	32780, 32899, 32901, 32903, 32904, 32905, 32907, 32908, 32909, 32919, 32920, 32934, 32935, 32937, 32940, 32948, 32949, 32950, 32951, 32952, 32955, 32958, 32976, 33907
23	Sanford	32168, 32709, 32713, 32725, 32732, 32738, 32744, 32746, 32747, 32754, 32764, 32765, 32766, 32771, 32772, 32773
32	Lake City	32024, 32025, 32038, 32040, 32054, 32055, 32060, 32064, 32072, 32082, 32083, 32087, 32094
34	MacClenny	32009, 32011, 32034, 32040, 32043, 32044, 32046, 32054, 32058, 32063, 32072, 32079, 32083, 32087, 32091, 32097, 32219, 32220, 32234, 32244, 32694

41	Delray Beach	33407, 33415, 33424, 33426, 33427, 33428, 33431, 33432, 33433, 33434, 33435, 33436, 33437, 33444, 33445, 33446, 33449, 33459, 33460, 33461, 33462, 33463, 33467, 33472, 33473, 33474, 33483, 33484, 33486, 33487, 33496, 33498, 33499
42	Glades	33315, 33401, 33405, 33406, 33407, 33409, 33410, 33411, 33412, 33413, 33414, 33415, 33416, 33417, 33430, 33432, 33438, 33440, 33446, 33449, 33459, 33460, 33461, 33462, 33463, 33467, 33470, 33476, 33480, 33493, 34956, 34974
43	Okeechobee	32966, 33852, 33857, 34956, 34972, 34973, 34974
44	Stuart	32789, 32960, 32962, 32966, 32967, 32968, 33451, 33455, 33469, 33497, 34945, 34946, 34947, 34949, 34950, 34951, 34952, 34953, 34954, 34956, 34957, 34974, 34981, 34982, 34983, 34984, 34985, 34986, 34987, 34988, 34990, 34992, 34994, 34996, 34997
45	West Palm Beach	33401, 33402, 33403, 33404, 33405, 33406, 33407, 33408, 33409, 33410, 33411, 33412, 33413, 33414, 33415, 33416, 33417, 33418, 33447, 33455, 33458, 33460, 33461, 33462, 33463, 33467, 33469, 33470, 33477, 33478, 33480
46	St. Lucie	32948, 32958, 32960, 32962, 32963, 32964, 32966, 32967, 32968, 32970, 32976, 33450, 34945, 34947, 34949, 34951, 34952, 34953, 34957, 34981, 34982, 34983, 34986, 34987
51	Arcadia	33852, 33890, 33960, 33982, 34224, 34266, 34267, 34269
52	Bradenton	34201, 34202, 34203, 34205, 34207, 34208, 34209, 34210, 34211, 34212, 34215, 34216, 34217, 34218, 34219, 34221, 34222, 34236, 34238, 34240, 34243, 34250, 34251, 34281

53	Ft. Myers	33471, 33901, 33902, 33903, 33905, 33907, 33908, 33912, 33913, 33916, 33919, 33920, 33928, 33931, 33935, 33936, 33952, 33954, 33965, 33966, 33967, 33971, 33972, 33973, 33975, 33976, 33982
54	Naples	33143, 33923, 33928, 33962, 33999, 34101, 34102, 34103, 34104, 34105, 34108, 34109, 34110, 34112, 34113, 34114, 34116, 34117, 34119, 34120, 34134, 34135, 34240
55	Punta Gorda	33946, 33947, 33948, 33950, 33952, 33953, 33954, 33955, 33980, 33981, 33982, 33983, 34223, 34224, 34266, 34269, 34285, 34286, 34287, 34288, 34289, 34291
56	Sarasota	33947, 34202, 34203, 34208, 34212, 34223, 34228, 34229, 34230, 34231, 34232, 34233, 34234, 34235, 34236, 34237, 34238, 34239, 34240, 34241, 34242, 34243, 34251, 34275, 34278, 34286, 34287, 34288, 34289, 34293
57	Venice	33921, 33946, 33947, 33948, 33950, 33981, 34223, 34224, 34229, 34275, 34285, 34286, 34287, 34292, 34293
71	Ft. Lauderdale	33004, 33009, 33301, 33304, 33305, 33306, 33308, 33309, 33310, 33311, 33312, 33314, 33315, 33316, 33319, 33331, 33334, 33394
72	Hollywood	33004, 33009, 33019, 33020, 33021, 33022, 33023, 33024, 33025, 33026, 33027, 33028, 33029, 33082, 33312, 33314, 33315, 33317, 33322, 33324, 33325, 33326, 33327, 33328, 33330, 33331, 33332

73	North Broward	33060, 33062, 33063, 33064, 33065, 33066, 33067, 33068, 33069, 33071, 33073, 33076, 33301, 33308, 33309, 33319, 33321, 33334, 33351, 33441, 33442
74	Central Broward	33301, 33306, 33309, 33311, 33312, 33313, 33314, 33315, 33317, 33319, 33321, 33322, 33323, 33324, 33325, 33326, 33327, 33328, 33330, 33331, 33332, 33334, 33351, 33388
81	Coral Gables	33031, 33033, 33054, 33132, 33133, 33134, 33135, 33142, 33143, 33144, 33145, 33146, 33155, 33156, 33157, 33158, 33161, 33162, 33165, 33170, 33173, 33174, 33175, 33176, 33177, 33183, 33184, 33185, 33186, 33187, 33189, 33193, 33194, 33196, 33199, 34141
82	Dade South	33015, 33030, 33031, 33032, 33033, 33034, 33035, 33039, 33116, 33125, 33138, 33143, 33156, 33157, 33158, 33165, 33170, 33173, 33175, 33176, 33177, 33183, 33185, 33186, 33187, 33189, 33190, 33193, 33196, 33257
83	Hialeah	33010, 33012, 33013, 33014, 33015, 33016, 33018, 33054, 33055, 33056, 33122, 33125, 33126, 33127, 33134, 33142, 33144, 33147, 33150, 33152, 33155, 33159, 33162, 33166, 33167, 33168, 33169, 33172, 33174, 33178, 33182, 33184, 33191, 33192, 33193, 33194, 33195, 33198
84	Miami Beach	33109, 33133, 33139, 33140, 33141, 33149, 33154, 33165
85	Miami	33013, 33054, 33101, 33125, 33126, 33127, 33128, 33129, 33130, 33131, 33132, 33133, 33134, 33135, 33136, 33137, 33138, 33139, 33142, 33144, 33145, 33146, 33147, 33149, 33150, 33156, 33160, 33161, 33162, 33165, 33166, 33167, 33168, 33178, 33181, 33196
86	Dade North	33015, 33016, 33054, 33055, 33056, 33126, 33128, 33135, 33147, 33150, 33154, 33160, 33161, 33162, 33167, 33168, 33169, 33176, 33179, 33180, 33181

91	Panama City	32404, 32461, 32401, 32428, 32405, 32413, 32407, 32431, 32408, 32462, 32444, 32403, 32440, 32425, 32466, 32541, 32459, 32409, 32426, 32427, 32460
92	Fort Walton	32548, 32579, 32550, 32578, 32536, 32459, 32539, 32541, 32547, 32433, 32580, 32569, 32435, 32455, 32531, 32567, 32566, 32549, 32422, 32542, 32564, 32538, 32537
93	Pensacola	32563, 32504, 32583, 32501, 32570, 32533, 32526, 32505, 32534, 32571, 32566, 32514, 32506, 32503, 32507, 32561, 32535, 32502, 32577, 32530, 32413, 32405, 32568, 32520, 32564

Exhibit RDC-3 (bills using median usage)

FPL Districts	Total Average of Median--BTI--Existing-- <50 Fed.PL	Total Average of Median--BTI--Existing— 50-74 Fed.PL	Total Average of Median--BTI--Existing— 75-99 Fed.PL	Total Average of Median--BTI--Existing— 100-124 Fed.PL	Total Average of Median--BTI--Existing— 125-150 Fed.PL
11	17.3%	11.1%	7.9%	6.1%	5.0%
12	16.7%	10.7%	7.6%	5.9%	4.9%
13	15.8%	10.1%	7.2%	5.6%	4.6%
21	16.4%	10.5%	7.5%	5.8%	4.8%
22	16.3%	10.4%	7.5%	5.8%	4.7%
23	15.5%	9.9%	7.1%	5.5%	4.5%
32	15.6%	10.0%	7.1%	5.6%	4.5%
34	16.0%	10.3%	7.3%	5.7%	4.7%
41	16.7%	10.7%	7.6%	5.9%	4.9%
42	15.5%	9.9%	7.1%	5.5%	4.5%
43	16.7%	10.7%	7.6%	5.9%	4.9%
44	16.4%	10.5%	7.5%	5.8%	4.8%
45	16.0%	10.2%	7.3%	5.7%	4.6%
46	16.1%	10.3%	7.4%	5.7%	4.7%
51	16.6%	10.7%	7.6%	5.9%	4.8%
52	17.1%	11.0%	7.8%	6.1%	5.0%

53	15.7%	10.0%	7.2%	5.6%	4.6%
54	17.0%	10.9%	7.8%	6.0%	4.9%
55	16.8%	10.7%	7.7%	6.0%	4.9%
56	16.8%	10.7%	7.7%	6.0%	4.9%
57	17.9%	11.4%	8.2%	6.4%	5.2%
71	18.8%	12.0%	8.6%	6.7%	5.5%
72	15.8%	10.1%	7.2%	5.6%	4.6%
73	16.2%	10.4%	7.4%	5.8%	4.7%
74	15.6%	10.0%	7.1%	5.6%	4.5%
81	17.2%	11.0%	7.9%	6.1%	5.0%
82	14.2%	9.1%	6.5%	5.1%	4.1%
83	14.9%	9.5%	6.8%	5.3%	4.3%
84	16.8%	10.8%	7.7%	6.0%	4.9%
85	16.4%	10.5%	7.5%	5.8%	4.8%
86	15.1%	9.7%	6.9%	5.4%	4.4%
91	16.1%	10.3%	7.4%	5.7%	4.7%
92	16.2%	10.3%	7.4%	5.7%	4.7%
93	16.1%	10.3%	7.4%	5.7%	4.7%
Grand Total	16.2%	10.3%	7.4%	5.7%	4.7%

Exhibit RDC-4 (bills using mean usage)

FPL Districts	Total Average of Median--BTI--Proposed— <50 Fed.PL	Total Average of Median--BTI—Proposed -- 50-74 Fed.PL	Total Average of Median--BTI--Proposed – 75-99 Fed.PL	Total Average of Median--BTI—Proposed -- 100-124 Fed.PL	Total Average of Median--BTI--Proposed – 125-150 Fed.PL
11	18.3%	11.7%	8.3%	6.5%	5.3%
12	17.6%	11.3%	8.1%	6.3%	5.1%
13	16.7%	10.7%	7.6%	5.9%	4.8%
21	17.3%	11.1%	7.9%	6.2%	5.0%
22	17.2%	11.0%	7.9%	6.1%	5.0%
23	16.4%	10.5%	7.5%	5.8%	4.8%
32	16.5%	10.6%	7.5%	5.9%	4.8%
34	16.9%	10.8%	7.7%	6.0%	4.9%
41	17.6%	11.3%	8.1%	6.3%	5.1%
42	16.4%	10.5%	7.5%	5.8%	4.8%
43	17.6%	11.3%	8.1%	6.3%	5.1%
44	17.3%	11.1%	7.9%	6.1%	5.0%
45	16.9%	10.8%	7.7%	6.0%	4.9%
46	17.0%	10.9%	7.8%	6.0%	4.9%
51	17.6%	11.3%	8.0%	6.3%	5.1%
52	18.1%	11.6%	8.3%	6.4%	5.3%

53	16.6%	10.6%	7.6%	5.9%	4.8%
54	17.9%	11.5%	8.2%	6.4%	5.2%
55	17.7%	11.4%	8.1%	6.3%	5.2%
56	17.7%	11.4%	8.1%	6.3%	5.2%
57	18.9%	12.1%	8.6%	6.7%	5.5%
71	19.8%	12.7%	9.1%	7.1%	5.8%
72	16.6%	10.6%	7.6%	5.9%	4.8%
73	17.2%	11.0%	7.8%	6.1%	5.0%
74	16.5%	10.6%	7.5%	5.9%	4.8%
81	18.2%	11.6%	8.3%	6.5%	5.3%
82	15.0%	9.6%	6.9%	5.3%	4.4%
83	15.7%	10.1%	7.2%	5.6%	4.6%
84	17.8%	11.4%	8.1%	6.3%	5.2%
85	17.3%	11.1%	7.9%	6.1%	5.0%
86	15.9%	10.2%	7.3%	5.7%	4.6%
91	17.0%	10.9%	7.8%	6.0%	4.9%
92	17.1%	10.9%	7.8%	6.1%	5.0%
93	17.0%	10.9%	7.8%	6.0%	4.9%
Grand Total	17.1%	10.9%	7.8%	6.1%	5.0%

QUESTION:
Affordability. For each zip code comprising in whole or part the FPL service territory, please provide in an active Excel spreadsheet:

a. The number of residential customers (including whether a zip code has "0" residential customers);

b. The number of residential customers who are Identified Low-Income Customers; and

c. The number of residential customers having received, within the last three program years, a benefit through the federal Low-Income Home Energy Assistance Program.

RESPONSE:
a. See Attachment No. 1 for the number of residential customers by district as of February 2025. The list of zip codes corresponding to each district was provided in response to OPC's Seventh Set of Interrogatories No. 160.

b. FPL does not request income information from its customers. In addition, the term "Identified Low-Income Customers" is not defined in OPC's discovery request, or by statute, rule, code or Florida Public Service Commission orders. Notwithstanding the foregoing, FPL does offer programs and a tariff that include a low-income component and works with government assistance programs geared toward low-income utility customers. Eligibility requirements for participation, described below, are verified through assistance agencies or through vendor-sourced information.

	Assistance Program or Tariff Offering	Eligibility Criteria
1	Low-Income Home Energy Assistance Program (LIHEAP)	Customer households at or below 150% of the Federal poverty guideline or 60% of the state median income (whichever is higher) as determined by Assist agencies.
2	Emergency Home Energy Assistance for the Elderly Program (EHEAP)	Customer households at or below 150% of the Federal poverty guideline or 60% of the state median income (whichever is higher) as determined by Assist agencies.
3	FPL Care To Share	Eligibility determined by United for ALICE criteria. This criteria is broader than that of LIHEAP/EHEAP as it includes households that earn above the Federal Poverty Level but not enough to afford basic necessities.
4	Demand-Side Management (DSM) Low-	Total household income may not be more than 200% above the national poverty level as

	Assistance Program or Tariff Offering	Eligibility Criteria
	Income Weatherization	determined by Weatherization Assistance Program agencies.
5	Low-income participation in SolarTogether (known as SunAssist) Tariff Sheet 8.932 and 8.933	Customer households at or below 200% of the federal Poverty level. Customers become SunAssist eligible by receiving LIHEAP/EHEAP payments or FPL verifies eligibility through third-party information.

Note: Participation in these assistance programs or tariffs is not necessarily exclusive. Often the same customer participates in multiple programs or receives more than one assistance payment in the same time period.

See Attachment Nos. 2-5 for the number of households that received LIHEAP payments including district and zip codes. Duplicate payments in the same year for the same household were removed. Note that for Attachment No. 5, the district is not available in SAP, but all these accounts are in districts 91, 92, and 93. See Attachment Nos. 6-8 for low-income weatherization participation. Note that for Attachment No. 8, the zip code and district are not available for 2022. See Attachment No. 9 for SunAssist participation.

c. See Attachment Nos. 2-5 provided in response to subpart (b).

Florida Power & Light Company
Docket No. 20250011-EI
OPC's Seventh Set of Interrogatories
Interrogatory No. 161
Attachment No. 1 of 9
Tab 1 of 1

District	Count of Residential Customers
11	225,157
12	21,860
13	106,389
21	143,487
22	170,415
23	75,359
32	16,914
34	37,027
41	322,925
42	181,088
43	19,714
44	236,930
45	201,024
46	81,926
51	13,978
52	184,234
53	214,319
54	267,185
55	131,789
56	154,583
57	122,027
71	120,278
72	296,861
73	292,126
74	161,405
81	159,193
82	195,278
83	213,653
84	76,952
85	271,679
86	160,033
91	112,095
92	109,878
93	225,043

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[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

QUESTION:
Affordability. For each zip code comprising in whole or part the FPL service territory, please provide in an active Excel spreadsheet by month for the most recent 12 months available:

a. The number of residential customers whose service has been disconnected for nonpayment;

b. The number of residential customers whose service has been disconnected for nonpayment and subsequently reconnected;

c. The average arrears at the time of disconnection for residential customers;

d. The number of residential customers who have been issued a notice of a disconnection of service. If multiple types of disconnection notices are issued, please separately provide this data for each type of notice;

e. The number of residential customers who enrolled in a deferred payment arrangement;

f. The number of residential customers who have active deferred payment arrangements;

g. The number of residential customers who defaulted on a deferred payment arrangement;

h. The number of residential customers who were participants in a Budget Billing plan;

i. The total dollars of late fees imposed;

j. The total number of accounts with late fees imposed;

k. The total dollars of arrears aged 60+ days;

l. The total number of accounts with arrears aged 60+ days;

m. The total dollars of arrears billed.

n. The total dollars of bills for current service;

o. The total number of bills rendered for current service;

p. The total number of payments received; and

q. The total dollars of payments received.

RESPONSE:

a. Refer to Attachment No. 1.

b. Refer to Attachment No. 1. The provided data excludes any reconnections occurring after a previous disconnection if the premise is reoccupied through a new move-in by a landlord, property manager, or another tenant.

c. Refer to Attachment No. 1.

d. Refer to Attachment No. 1.

e. Refer to Attachment No. 2.

f. Refer to Attachment No. 2.

g. Refer to Attachment No. 2.

h. Refer to Attachment No. 3. FPL does not have the requested data available for residential accounts only. All numbers in Attachment No. 3 include both residential and commercial customers.

i. Refer to Attachment No. 4.

j. Refer to Attachment No. 4.

k. Refer to Attachment No. 5.

l. Refer to Attachment No. 5.

m. Please refer to Attachment No. 6 for the total dollar amount in arrears at time of billing for residential customers by district for March 2024 through February 2025. The list of zip codes corresponding to each district was provided in response to OPC's Seventh Set of Interrogatories, No. 160.

n. Please refer to Attachment No. 7 for the total dollar amounts of current electric service billed to residential customers by district for March 2024 through February 2025. The list of zip codes corresponding to each district was provided in response to OPC's Seventh Set of Interrogatories, No. 160.

o. Please refer to the Attachment No. 8 for the number of bills issued for current electric service to residential customers by district for March 2024 through February 2025. The list of zip codes corresponding to each district was provided in response to OPC's Seventh Set of Interrogatories, No. 160.

p. Refer to Attachment No. 3.

q. Refer to Attachment No. 3.

Florida Power & Light Company
Docket No. 20250011-EI
OPC's Seventh Set of Interrogatories
Interrogatory No. 162
Attachment No. 1 of 8
Tab 1 of 1

Year	Month	District_Code	Residential Customers Disconnected for Non-payment (Volume) 162(a)	Residential Customers Subsequently Reconnected (Volume) 162(b)	Average Arrears for a Residential Customer Disconnected for Non-payment ($) 162(c)	Residential Customers Issued a Notice for Disconnection (Volume) 162(d)
2024	3	11	3,857	3,631	$189.37	16,031
2024	3	12	562	521	$213.50	2,372
2024	3	13	898	838	$179.02	5,076
2024	3	21	2,181	2,025	$185.80	9,687
2024	3	22	2,695	2,501	$187.91	12,154
2024	3	23	1,431	1,406	$201.72	7,511
2024	3	32	613	605	$244.25	2,528
2024	3	34	577	546	$242.26	3,038
2024	3	41	4,312	4,130	$188.45	18,179
2024	3	42	3,680	3,598	$194.36	15,554
2024	3	43	418	396	$196.79	1,606
2024	3	44	2,950	2,875	$197.96	14,733
2024	3	45	3,440	3,284	$189.21	14,121
2024	3	46	844	801	$190.12	4,039
2024	3	51	366	336	$182.79	1,267
2024	3	52	2,851	2,706	$177.93	11,736
2024	3	53	3,159	2,995	$183.66	13,551
2024	3	54	2,143	2,051	$184.33	9,349
2024	3	55	1,368	1,316	$210.00	6,717
2024	3	56	1,627	1,506	$194.48	7,201
2024	3	57	638	605	$179.69	3,342
2024	3	71	3,135	3,018	$176.42	11,165
2024	3	72	6,777	6,480	$196.95	28,169
2024	3	73	6,585	6,325	$189.70	27,345
2024	3	74	4,895	4,733	$181.40	18,475
2024	3	81	2,239	2,210	$214.14	10,477
2024	3	82	4,393	4,277	$226.45	19,421
2024	3	83	4,761	4,544	$190.10	19,448
2024	3	84	1,183	1,127	$141.08	4,675
2024	3	85	8,903	8,500	$170.80	30,346
2024	3	86	5,322	5,171	$186.93	18,851
2024	3	91	1,442	1,280	$336.15	14,733
2024	3	92	1,458	1,345	$299.25	13,542
2024	3	93	3,324	2,952	$327.89	32,939
2024	4	11	3,930	3,631	$175.16	17,069
2024	4	12	577	517	$190.71	2,443
2024	4	13	895	809	$173.52	5,184
2024	4	21	2,284	2,157	$182.87	10,029
2024	4	22	3,192	2,952	$183.31	13,662
2024	4	23	1,580	1,451	$181.65	7,965
2024	4	32	665	579	$207.32	2,679
2024	4	34	671	596	$209.97	3,130
2024	4	41	4,542	4,422	$192.28	19,357
2024	4	42	4,141	3,975	$191.56	16,841
2024	4	43	466	428	$190.90	1,687
2024	4	44	3,240	3,131	$184.87	16,052
2024	4	45	3,863	3,638	$181.11	15,439
2024	4	46	929	863	$188.68	4,400
2024	4	51	392	362	$172.31	1,404
2024	4	52	3,215	3,039	$176.06	12,628
2024	4	53	3,526	3,206	$179.95	14,473
2024	4	54	2,343	2,246	$176.85	10,224
2024	4	55	1,485	1,386	$189.18	7,158
2024	4	56	1,763	1,672	$177.00	7,793
2024	4	57	670	601	$169.09	3,536
2024	4	71	3,606	3,376	$170.13	12,736
2024	4	72	7,504	7,257	$188.00	30,662
2024	4	73	7,604	7,418	$188.82	29,623
2024	4	74	5,244	4,941	$178.78	20,381
2024	4	81	2,468	2,386	$211.08	11,442
2024	4	82	4,856	4,609	$212.19	21,378
2024	4	83	5,000	4,834	$187.87	19,725
2024	4	84	1,377	1,215	$145.46	5,210
2024	4	85	9,909	9,273	$163.57	32,805
2024	4	86	5,961	5,636	$182.74	20,930
2024	4	91	1,481	1,321	$276.88	15,421
2024	4	92	1,518	1,381	$260.64	13,777
2024	4	93	3,556	3,183	$283.49	34,511
2024	5	11	3,515	3,303	$173.43	17,666

2024	5	12	501	481	$177.10	2,668
2024	5	13	855	759	$156.24	5,629
2024	5	21	1,974	1,833	$179.52	11,205
2024	5	22	2,608	2,505	$194.71	13,224
2024	5	23	1,441	1,362	$182.39	8,566
2024	5	32	589	539	$184.46	2,580
2024	5	34	558	533	$178.67	3,211
2024	5	41	4,098	3,906	$195.30	20,129
2024	5	42	3,800	3,663	$206.78	17,430
2024	5	43	327	310	$179.83	1,778
2024	5	44	2,914	2,803	$200.06	16,437
2024	5	45	3,515	3,330	$187.14	16,358
2024	5	46	811	757	$187.14	4,526
2024	5	51	273	266	$186.91	1,438
2024	5	52	2,449	2,366	$176.17	13,367
2024	5	53	2,849	2,678	$186.16	15,547
2024	5	54	2,107	2,059	$193.87	10,754
2024	5	55	1,035	1,021	$193.41	7,536
2024	5	56	1,649	1,613	$182.95	8,413
2024	5	57	699	645	$175.75	3,815
2024	5	71	3,072	2,907	$182.80	12,423
2024	5	72	6,665	6,255	$200.02	31,850
2024	5	73	7,130	6,731	$189.04	31,401
2024	5	74	4,978	4,789	$189.36	21,023
2024	5	81	2,256	2,208	$227.92	11,985
2024	5	82	4,385	4,227	$228.21	22,458
2024	5	83	4,433	4,230	$208.79	20,703
2024	5	84	1,183	1,059	$140.12	5,145
2024	5	85	8,481	7,888	$177.73	34,331
2024	5	86	5,140	4,949	$196.42	21,784
2024	5	91	491	410	$338.43	9,166
2024	5	92	587	550	$285.44	8,659
2024	5	93	2,225	1,847	$400.47	20,776
2024	6	11	3,998	3,753	$174.30	17,866
2024	6	12	517	499	$166.66	2,492
2024	6	13	1,011	882	$160.97	5,776
2024	6	21	2,358	2,236	$181.14	10,481
2024	6	22	2,960	2,817	$192.66	14,650
2024	6	23	1,499	1,442	$197.89	8,252
2024	6	32	558	533	$175.56	2,668
2024	6	34	526	488	$177.07	3,324
2024	6	41	4,527	4,368	$202.74	21,005
2024	6	42	4,135	4,054	$208.37	18,460
2024	6	43	402	385	$196.29	1,898
2024	6	44	3,454	3,378	$202.95	17,844
2024	6	45	3,603	3,445	$200.24	16,415
2024	6	46	939	886	$190.59	4,822
2024	6	51	413	378	$187.33	1,514
2024	6	52	3,655	3,490	$174.37	13,835
2024	6	53	3,879	3,621	$188.56	15,683
2024	6	54	2,444	2,281	$187.71	11,172
2024	6	55	1,506	1,340	$199.31	8,073
2024	6	56	1,896	1,883	$187.46	8,504
2024	6	57	723	672	$183.96	4,118
2024	6	71	3,230	3,028	$180.76	13,349
2024	6	72	7,303	7,136	$203.98	33,221
2024	6	73	7,441	7,248	$200.04	31,528
2024	6	74	5,478	5,308	$195.18	22,610
2024	6	81	2,450	2,351	$230.23	12,737
2024	6	82	4,704	4,602	$231.57	22,971
2024	6	83	4,899	4,685	$206.58	21,365
2024	6	84	1,195	1,082	$156.61	5,347
2024	6	85	9,629	8,916	$180.34	35,853
2024	6	86	5,731	5,534	$203.38	22,203
2024	6	91	911	783	$291.02	13,824
2024	6	92	1,183	1,072	$244.00	11,645
2024	6	93	2,817	2,568	$270.26	29,305
2024	7	11	4,040	3,748	$203.39	20,184
2024	7	12	580	505	$191.58	2,914
2024	7	13	1,003	852	$179.18	6,549
2024	7	21	1,908	1,723	$215.91	12,254
2024	7	22	3,375	3,073	$215.26	16,065
2024	7	23	1,606	1,492	$210.07	9,449
2024	7	32	585	518	$210.18	2,945
2024	7	34	660	616	$220.48	3,720
2024	7	41	4,571	4,240	$228.53	22,851
2024	7	42	4,075	3,847	$236.21	20,000
2024	7	43	449	414	$225.73	2,088
2024	7	44	3,324	3,156	$235.80	19,809
2024	7	45	3,771	3,535	$229.49	18,549

2024	7	46	962	915	$212.47	5,352
2024	7	51	409	374	$215.77	1,750
2024	7	52	3,475	3,229	$203.91	15,076
2024	7	53	3,728	3,337	$207.98	17,475
2024	7	54	2,370	2,285	$215.50	12,258
2024	7	55	1,713	1,527	$218.58	9,022
2024	7	56	1,844	1,708	$211.43	9,081
2024	7	57	855	756	$209.36	4,606
2024	7	71	2,983	2,763	$220.86	14,479
2024	7	72	6,729	6,418	$250.47	36,302
2024	7	73	6,544	6,165	$236.79	34,577
2024	7	74	4,909	4,718	$232.86	24,274
2024	7	81	2,171	2,109	$285.49	13,572
2024	7	82	4,533	4,401	$269.90	25,158
2024	7	83	4,575	4,428	$244.53	23,143
2024	7	84	1,153	1,003	$184.87	5,890
2024	7	85	8,940	8,548	$210.10	38,393
2024	7	86	5,383	5,106	$246.40	24,368
2024	7	91	1,148	973	$321.53	16,823
2024	7	92	1,188	1,088	$263.35	15,200
2024	7	93	3,232	2,796	$293.35	37,845
2024	8	11	3,762	3,432	$220.89	20,879
2024	8	12	527	493	$225.66	2,954
2024	8	13	737	692	$225.04	6,404
2024	8	21	2,054	1,918	$232.48	13,258
2024	8	22	2,811	2,665	$234.84	15,255
2024	8	23	1,494	1,375	$228.32	9,456
2024	8	32	443	409	$236.88	2,893
2024	8	34	465	407	$243.99	3,712
2024	8	41	3,988	3,778	$249.45	23,017
2024	8	42	3,772	3,569	$255.18	20,267
2024	8	43	435	397	$234.81	2,050
2024	8	44	3,247	3,129	$245.61	19,110
2024	8	45	3,345	3,134	$237.11	18,804
2024	8	46	888	853	$229.16	5,241
2024	8	51	395	331	$217.06	1,674
2024	8	52	2,971	2,791	$217.85	15,105
2024	8	53	3,499	3,189	$221.55	17,699
2024	8	54	1,846	1,697	$236.26	11,765
2024	8	55	1,413	1,275	$235.94	8,869
2024	8	56	1,591	1,504	$233.80	9,065
2024	8	57	692	656	$222.94	4,438
2024	8	71	2,650	2,449	$241.75	14,398
2024	8	72	5,847	5,524	$265.84	36,016
2024	8	73	5,855	5,510	$262.98	35,962
2024	8	74	4,120	3,830	$259.85	24,497
2024	8	81	1,799	1,771	$317.82	13,765
2024	8	82	3,361	3,262	$307.82	25,271
2024	8	83	3,590	3,467	$284.15	23,929
2024	8	84	727	654	$220.17	6,068
2024	8	85	6,295	5,904	$258.94	39,132
2024	8	86	4,409	4,213	$288.84	25,653
2024	8	91	1,062	878	$333.34	17,546
2024	8	92	1,235	1,087	$293.39	16,152
2024	8	93	2,584	2,241	$312.02	38,418
2024	9	11	3,819	3,480	$214.38	16,398
2024	9	12	518	478	$216.31	2,345
2024	9	13	958	836	$201.66	4,690
2024	9	21	2,625	2,430	$222.01	11,571
2024	9	22	2,916	2,705	$216.81	16,571
2024	9	23	1,564	1,440	$216.53	9,125
2024	9	32	579	555	$227.38	2,415
2024	9	34	621	590	$229.24	3,179
2024	9	41	4,389	4,101	$235.28	22,810
2024	9	42	4,140	3,891	$242.97	19,732
2024	9	43	400	381	$220.96	1,967
2024	9	44	3,222	3,045	$244.52	20,453
2024	9	45	3,760	3,531	$223.62	18,446
2024	9	46	896	837	$224.62	5,114
2024	9	51	342	315	$232.49	1,321
2024	9	52	3,181	2,983	$208.14	12,065
2024	9	53	3,520	3,173	$210.37	12,280
2024	9	54	1,989	1,887	$217.33	9,925
2024	9	55	1,494	1,355	$224.41	7,649
2024	9	56	1,617	1,503	$213.66	6,860
2024	9	57	676	645	$224.28	3,649
2024	9	71	2,675	2,581	$225.11	14,200
2024	9	72	6,217	6,077	$254.88	36,395
2024	9	73	6,303	6,122	$243.42	34,366
2024	9	74	4,291	4,257	$251.43	24,148

2024	9	81	1,899	1,859	$298.28	13,006
2024	9	82	3,772	3,736	$281.97	25,377
2024	9	83	3,887	3,786	$261.67	23,369
2024	9	84	874	830	$189.60	5,753
2024	9	85	7,717	7,484	$228.06	37,511
2024	9	86	4,893	4,732	$257.20	24,729
2024	9	91	984	825	$337.81	14,196
2024	9	92	1,272	1,162	$284.23	11,989
2024	9	93	3,590	3,171	$292.44	29,770
2024	10	11	4,076	3,618	$224.10	24,142
2024	10	12	605	529	$220.86	3,461
2024	10	13	1,043	908	$203.76	8,196
2024	10	21	2,317	2,091	$237.74	13,767
2024	10	22	3,413	3,061	$235.59	15,325
2024	10	23	1,588	1,465	$229.26	9,589
2024	10	32	598	536	$248.69	3,384
2024	10	34	716	629	$228.58	4,214
2024	10	41	4,670	4,465	$244.21	23,121
2024	10	42	4,293	4,086	$252.09	20,461
2024	10	43	393	364	$242.79	2,109
2024	10	44	3,578	3,312	$246.71	19,462
2024	10	45	3,918	3,642	$233.75	18,563
2024	10	46	919	884	$224.04	5,460
2024	10	51	424	404	$237.19	1,995
2024	10	52	2,048	1,889	$256.85	14,021
2024	10	53	3,892	3,379	$225.62	23,038
2024	10	54	2,263	2,110	$240.35	13,607
2024	10	55	1,821	1,579	$249.24	10,271
2024	10	56	1,116	991	$266.02	9,104
2024	10	57	761	670	$231.11	5,107
2024	10	71	3,967	3,700	$222.42	15,097
2024	10	72	8,613	8,110	$240.83	36,049
2024	10	73	8,305	7,871	$237.05	35,705
2024	10	74	6,474	6,098	$231.10	24,554
2024	10	81	2,597	2,499	$285.14	13,726
2024	10	82	5,456	5,204	$269.06	24,574
2024	10	83	5,456	5,252	$245.80	23,264
2024	10	84	1,542	1,389	$176.90	6,095
2024	10	85	10,853	10,124	$212.06	39,481
2024	10	86	7,129	6,652	$233.53	25,025
2024	10	91	1,468	1,240	$320.44	18,962
2024	10	92	1,596	1,440	$270.66	16,924
2024	10	93	4,536	4,011	$261.70	39,910
2024	11	11	4,727	4,406	$193.83	19,442
2024	11	12	658	621	$200.69	2,687
2024	11	13	1,056	994	$188.69	6,274
2024	11	21	3,055	2,880	$216.43	11,825
2024	11	22	3,266	3,037	$212.95	15,948
2024	11	23	1,835	1,757	$209.83	8,893
2024	11	32	595	556	$199.48	2,619
2024	11	34	670	640	$202.99	3,605
2024	11	41	5,258	5,011	$216.94	22,696
2024	11	42	4,989	4,822	$233.83	19,792
2024	11	43	470	423	$224.81	1,987
2024	11	44	4,016	3,773	$230.59	19,884
2024	11	45	4,608	4,339	$215.98	17,873
2024	11	46	1,082	1,020	$208.43	5,222
2024	11	51	394	368	$214.88	1,515
2024	11	52	3,905	3,638	$195.08	13,366
2024	11	53	4,327	3,976	$208.61	16,832
2024	11	54	2,888	2,712	$211.71	11,853
2024	11	55	1,914	1,773	$216.09	9,040
2024	11	56	2,191	2,084	$204.63	8,602
2024	11	57	1,079	909	$187.47	4,514
2024	11	71	3,825	3,642	$196.44	14,471
2024	11	72	8,709	8,404	$222.45	35,680
2024	11	73	8,985	8,640	$217.72	34,019
2024	11	74	6,108	5,861	$223.19	23,715
2024	11	81	2,874	2,830	$265.66	13,178
2024	11	82	5,726	5,514	$257.25	24,789
2024	11	83	5,743	5,554	$224.50	22,299
2024	11	84	1,463	1,379	$164.53	5,729
2024	11	85	11,293	10,722	$202.16	37,533
2024	11	86	7,092	6,797	$221.09	24,053
2024	11	91	916	773	$273.43	12,423
2024	11	92	1,042	962	$230.17	10,875
2024	11	93	2,588	2,379	$229.47	26,778
2024	12	11	4,176	3,740	$187.27	20,168
2024	12	12	550	492	$190.74	2,900
2024	12	13	998	943	$180.85	6,315

2024	12	21	2,673	2,458	$203.83	12,613
2024	12	22	3,269	2,991	$212.99	15,694
2024	12	23	1,708	1,602	$199.18	9,250
2024	12	32	539	490	$198.23	2,894
2024	12	34	649	565	$181.14	3,707
2024	12	41	5,012	4,692	$214.62	22,446
2024	12	42	4,570	4,355	$218.09	19,286
2024	12	43	416	378	$205.76	1,883
2024	12	44	3,874	3,708	$215.75	19,433
2024	12	45	4,164	3,901	$203.52	18,105
2024	12	46	985	941	$198.16	5,172
2024	12	51	379	338	$203.49	1,566
2024	12	52	3,531	3,271	$199.60	15,074
2024	12	53	3,986	3,674	$196.23	17,590
2024	12	54	2,733	2,578	$211.10	12,045
2024	12	55	1,692	1,584	$206.84	8,958
2024	12	56	1,972	1,874	$202.11	9,029
2024	12	57	812	706	$188.23	4,580
2024	12	71	3,547	3,301	$196.17	13,872
2024	12	72	8,332	7,901	$217.66	34,296
2024	12	73	8,098	7,702	$207.59	34,313
2024	12	74	5,783	5,429	$208.76	22,744
2024	12	81	2,749	2,637	$250.64	13,129
2024	12	82	5,547	5,244	$253.83	24,381
2024	12	83	5,536	5,289	$219.73	23,244
2024	12	84	1,307	1,173	$165.87	6,015
2024	12	85	10,272	9,479	$193.04	36,768
2024	12	86	6,569	6,164	$220.05	24,433
2024	12	91	750	627	$278.84	14,445
2024	12	92	902	764	$253.42	11,964
2024	12	93	2,815	2,444	$233.85	30,544
2025	1	11	4,406	3,963	$169.27	17,979
2025	1	12	557	502	$178.42	2,534
2025	1	13	1,019	891	$164.32	5,701
2025	1	21	2,634	2,400	$173.67	10,600
2025	1	22	3,644	3,287	$172.28	14,191
2025	1	23	1,769	1,603	$174.69	8,247
2025	1	32	574	509	$191.00	2,685
2025	1	34	592	532	$201.81	3,368
2025	1	41	5,229	4,713	$174.34	20,234
2025	1	42	4,818	4,478	$186.16	17,643
2025	1	43	437	396	$165.52	1,797
2025	1	44	3,768	3,465	$185.91	17,718
2025	1	45	4,242	3,886	$174.09	15,789
2025	1	46	1,057	987	$165.62	4,654
2025	1	51	385	348	$174.01	1,384
2025	1	52	3,752	3,321	$160.75	12,774
2025	1	53	4,056	3,589	$166.23	15,106
2025	1	54	2,660	2,392	$169.17	10,270
2025	1	55	1,779	1,593	$177.74	7,733
2025	1	56	2,010	1,825	$162.81	7,809
2025	1	57	824	722	$157.14	3,731
2025	1	71	3,974	3,607	$159.95	13,180
2025	1	72	8,309	7,659	$176.82	32,044
2025	1	73	8,530	7,842	$171.23	30,529
2025	1	74	6,292	5,726	$170.43	21,542
2025	1	81	2,761	2,615	$212.49	11,712
2025	1	82	5,229	4,863	$210.30	22,824
2025	1	83	5,571	5,214	$184.09	20,510
2025	1	84	1,614	1,407	$133.15	5,008
2025	1	85	11,293	10,171	$157.33	34,761
2025	1	86	6,946	6,335	$171.73	21,759
2025	1	91	583	444	$309.93	16,561
2025	1	92	681	575	$254.75	15,321
2025	1	93	2,175	1,834	$257.73	37,044
2025	2	11	4,007	3,598	$189.23	17,402
2025	2	12	585	533	$205.61	2,534
2025	2	13	1,045	930	$175.99	4,973
2025	2	21	2,368	2,172	$188.20	10,147
2025	2	22	2,929	2,681	$191.59	13,978
2025	2	23	1,677	1,518	$186.54	8,190
2025	2	32	667	584	$219.04	2,689
2025	2	34	607	555	$220.02	3,347
2025	2	41	4,202	3,869	$183.66	18,133
2025	2	42	3,736	3,434	$188.61	15,817
2025	2	43	411	385	$186.54	1,652
2025	2	44	3,269	2,998	$194.36	16,610
2025	2	45	3,495	3,150	$182.04	14,769
2025	2	46	840	759	$176.31	4,292
2025	2	51	369	310	$167.86	1,384

2025	2	52	3,100	2,771	$166.08	12,614
2025	2	53	3,405	2,933	$171.38	14,047
2025	2	54	2,137	1,948	$170.75	9,496
2025	2	55	1,587	1,461	$181.82	7,423
2025	2	56	1,657	1,498	$178.09	7,539
2025	2	57	710	631	$183.86	3,739
2025	2	71	3,072	2,772	$161.37	11,371
2025	2	72	6,612	6,142	$188.18	28,361
2025	2	73	6,907	6,337	$184.52	28,310
2025	2	74	4,740	4,343	$173.77	19,085
2025	2	81	2,152	2,056	$222.37	10,330
2025	2	82	4,362	4,053	$217.04	20,348
2025	2	83	4,530	4,199	$189.19	18,661
2025	2	84	1,100	961	$144.88	4,599
2025	2	85	9,020	8,089	$163.57	30,200
2025	2	86	5,357	4,918	$189.01	19,661
2025	2	91	627	503	$329.80	14,705
2025	2	92	776	667	$261.29	12,543
2025	2	93	2,354	2,052	$282.70	31,705

Florida Power & Light Company
Docket No. 20250011-EI
OPC's Seventh Set of Interrogatories
Interrogatory No. 162
Attachment No. 2 of 8
Tab 1 of 1

Year	Month	dstr_cd	residential customers who	residential customers who	residential customers who
2024	3	11	7,700	11,599	1,915
2024	3	12	1,332	2,009	310
2024	3	13	1,845	2,664	408
2024	3	21	4,366	6,439	1,003
2024	3	22	5,362	8,651	1,247
2024	3	23	4,158	6,352	919
2024	3	32	1,474	2,299	412
2024	3	34	1,401	2,151	292
2024	3	41	6,485	10,060	1,514
2024	3	42	6,960	10,654	1,591
2024	3	43	657	1,057	184
2024	3	44	6,404	9,809	1,292
2024	3	45	5,890	9,009	1,544
2024	3	46	1,781	2,756	395
2024	3	51	536	831	115
2024	3	52	4,384	6,725	1,081
2024	3	53	4,923	7,368	1,115
2024	3	54	2,484	3,890	566
2024	3	55	2,375	3,683	477
2024	3	56	2,241	3,349	570
2024	3	57	846	1,352	172
2024	3	71	4,406	6,925	1,274
2024	3	72	12,367	19,048	2,991
2024	3	73	11,941	18,522	2,947
2024	3	74	8,474	13,399	2,203
2024	3	81	4,307	6,854	875
2024	3	82	9,387	14,605	2,107
2024	3	83	8,538	13,403	1,848
2024	3	84	1,038	1,631	310
2024	3	85	11,093	17,198	3,030
2024	3	86	7,661	11,921	1,900
2024	4	11	8,266	12,130	1,988
2024	4	12	1,367	2,067	294
2024	4	13	1,896	2,719	404
2024	4	21	4,705	6,807	1,069
2024	4	22	6,043	9,300	1,367
2024	4	23	4,595	6,793	976
2024	4	32	1,596	2,364	402
2024	4	34	1,534	2,266	308
2024	4	41	7,037	10,549	1,604
2024	4	42	7,668	11,465	1,726
2024	4	43	788	1,134	164
2024	4	44	7,097	10,362	1,368
2024	4	45	6,424	9,553	1,603
2024	4	46	2,007	2,984	392
2024	4	51	632	932	143
2024	4	52	5,020	7,402	1,228
2024	4	53	5,587	8,186	1,331
2024	4	54	2,642	4,035	578
2024	4	55	2,723	4,024	554
2024	4	56	2,452	3,614	586
2024	4	57	976	1,459	222

2024	4	71	4,962	7,412	1,391
2024	4	72	13,507	20,303	3,121
2024	4	73	13,412	19,885	3,242
2024	4	74	9,788	14,611	2,444
2024	4	81	4,630	7,036	920
2024	4	82	10,475	15,566	2,269
2024	4	83	9,389	14,189	2,001
2024	4	84	1,179	1,735	351
2024	4	85	12,297	18,427	3,254
2024	4	86	8,393	12,776	2,071
2024	5	11	8,522	12,586	2,161
2024	5	12	1,382	2,100	360
2024	5	13	1,925	2,814	449
2024	5	21	4,991	7,246	1,268
2024	5	22	6,234	9,659	1,556
2024	5	23	4,770	7,165	1,103
2024	5	32	1,598	2,417	460
2024	5	34	1,497	2,264	342
2024	5	41	7,297	10,907	1,867
2024	5	42	7,891	11,879	1,980
2024	5	43	801	1,222	207
2024	5	44	7,430	11,027	1,585
2024	5	45	6,903	10,184	1,985
2024	5	46	2,005	3,088	459
2024	5	51	634	960	160
2024	5	52	5,119	7,707	1,358
2024	5	53	5,704	8,467	1,551
2024	5	54	2,817	4,235	642
2024	5	55	2,887	4,318	678
2024	5	56	2,448	3,696	650
2024	5	57	988	1,483	197
2024	5	71	5,158	7,737	1,589
2024	5	72	13,864	21,007	3,564
2024	5	73	13,730	20,584	3,674
2024	5	74	9,967	15,263	2,844
2024	5	81	4,828	7,313	1,012
2024	5	82	10,885	16,304	2,651
2024	5	83	9,682	14,695	2,182
2024	5	84	1,224	1,816	379
2024	5	85	12,903	19,364	3,822
2024	5	86	8,910	13,391	2,491
2024	6	11	8,371	12,714	2,310
2024	6	12	1,375	2,115	360
2024	6	13	1,877	2,801	477
2024	6	21	4,739	7,179	1,336
2024	6	22	6,117	9,648	1,564
2024	6	23	4,601	7,063	1,139
2024	6	32	1,470	2,300	415
2024	6	34	1,501	2,253	352
2024	6	41	7,140	10,946	2,013
2024	6	42	7,864	11,927	2,039
2024	6	43	838	1,260	215
2024	6	44	7,127	11,004	1,685
2024	6	45	6,781	10,219	2,061
2024	6	46	1,986	3,081	468
2024	6	51	648	992	173
2024	6	52	5,010	7,726	1,479
2024	6	53	5,673	8,479	1,557
2024	6	54	2,844	4,346	748

2024	6	55	2,919	4,356	670
2024	6	56	2,471	3,728	671
2024	6	57	1,036	1,587	246
2024	6	71	5,149	7,813	1,702
2024	6	72	13,591	20,807	3,808
2024	6	73	13,464	20,507	3,862
2024	6	74	9,869	15,193	2,953
2024	6	81	4,752	7,358	1,097
2024	6	82	10,785	16,329	2,737
2024	6	83	9,330	14,508	2,348
2024	6	84	1,167	1,832	368
2024	6	85	12,540	19,286	3,958
2024	6	86	8,897	13,493	2,582
2024	7	11	10,384	14,561	2,657
2024	7	12	1,637	2,369	386
2024	7	13	2,260	3,162	519
2024	7	21	5,997	8,298	1,540
2024	7	22	7,574	11,058	1,843
2024	7	23	5,808	8,224	1,379
2024	7	32	1,845	2,632	482
2024	7	34	1,864	2,647	425
2024	7	41	8,688	12,363	2,227
2024	7	42	9,790	13,881	2,411
2024	7	43	1,041	1,481	233
2024	7	44	9,169	12,814	1,882
2024	7	45	8,233	11,545	2,265
2024	7	46	2,428	3,490	509
2024	7	51	791	1,141	198
2024	7	52	6,278	8,843	1,624
2024	7	53	7,153	9,932	1,824
2024	7	54	3,557	5,040	853
2024	7	55	3,601	5,025	782
2024	7	56	2,987	4,232	759
2024	7	57	1,265	1,796	279
2024	7	71	6,360	9,012	1,936
2024	7	72	16,628	23,653	4,193
2024	7	73	16,497	23,304	4,224
2024	7	74	12,167	17,404	3,300
2024	7	81	5,727	8,323	1,249
2024	7	82	12,650	18,120	3,041
2024	7	83	11,407	16,343	2,508
2024	7	84	1,502	2,132	434
2024	7	85	15,299	21,738	4,267
2024	7	86	10,806	15,383	2,888
2024	8	11	10,702	15,475	2,698
2024	8	12	1,734	2,512	408
2024	8	13	2,314	3,287	532
2024	8	21	5,974	8,591	1,531
2024	8	22	7,470	11,389	1,792
2024	8	23	5,688	8,409	1,327
2024	8	32	1,871	2,779	561
2024	8	34	1,856	2,743	410
2024	8	41	8,657	12,664	2,165
2024	8	42	9,579	14,094	2,367
2024	8	43	995	1,497	245
2024	8	44	9,103	13,353	1,896
2024	8	45	8,271	11,880	2,197
2024	8	46	2,445	3,569	540
2024	8	51	820	1,209	202

2024	8	52	6,277	9,171	1,722
2024	8	53	7,055	10,185	1,877
2024	8	54	3,348	5,030	788
2024	8	55	3,667	5,333	809
2024	8	56	3,032	4,378	751
2024	8	57	1,304	1,864	264
2024	8	71	6,113	9,083	1,818
2024	8	72	16,800	24,436	4,123
2024	8	73	16,179	23,770	4,159
2024	8	74	11,705	17,539	3,182
2024	8	81	5,734	8,478	1,175
2024	8	82	12,587	18,417	2,938
2024	8	83	11,216	16,761	2,453
2024	8	84	1,483	2,194	434
2024	8	85	14,972	22,169	4,198
2024	8	86	10,587	15,638	2,977
2024	9	11	10,450	15,459	2,740
2024	9	12	1,647	2,488	409
2024	9	13	2,297	3,357	525
2024	9	21	5,688	8,425	1,566
2024	9	22	7,578	11,653	1,884
2024	9	23	5,507	8,285	1,346
2024	9	32	1,827	2,688	493
2024	9	34	1,873	2,761	389
2024	9	41	8,593	12,734	2,238
2024	9	42	9,255	13,875	2,455
2024	9	43	949	1,437	212
2024	9	44	9,160	13,521	2,049
2024	9	45	7,958	11,881	2,308
2024	9	46	2,437	3,615	567
2024	9	51	774	1,188	214
2024	9	52	6,060	9,030	1,631
2024	9	53	6,980	10,181	1,860
2024	9	54	3,482	5,116	819
2024	9	55	3,740	5,459	793
2024	9	56	2,945	4,323	754
2024	9	57	1,281	1,905	291
2024	9	71	6,032	9,130	1,962
2024	9	72	16,523	24,718	4,435
2024	9	73	16,241	24,178	4,380
2024	9	74	11,649	17,665	3,328
2024	9	81	5,555	8,404	1,190
2024	9	82	12,323	18,517	3,064
2024	9	83	11,080	16,808	2,584
2024	9	84	1,428	2,180	427
2024	9	85	14,890	22,322	4,440
2024	9	86	10,402	15,671	2,962
2024	10	11	11,353	16,322	3,414
2024	10	12	1,791	2,638	490
2024	10	13	2,454	3,495	626
2024	10	21	6,356	8,916	1,733
2024	10	22	7,774	11,857	2,157
2024	10	23	6,045	8,733	1,663
2024	10	32	1,925	2,882	623
2024	10	34	1,924	2,829	518
2024	10	41	8,823	13,013	2,484
2024	10	42	9,755	14,171	2,660
2024	10	43	1,016	1,529	289
2024	10	44	9,786	14,108	2,339

2024	10	45	8,299	12,019	2,612
2024	10	46	2,598	3,788	696
2024	10	51	887	1,281	273
2024	10	52	6,730	9,767	2,227
2024	10	53	7,774	11,113	2,441
2024	10	54	3,754	5,492	1,045
2024	10	55	4,127	5,901	1,105
2024	10	56	3,480	4,903	1,104
2024	10	57	1,464	2,127	419
2024	10	71	6,262	9,265	2,102
2024	10	72	17,035	24,859	4,696
2024	10	73	17,064	24,896	4,822
2024	10	74	12,077	17,980	3,650
2024	10	81	5,837	8,630	1,336
2024	10	82	12,913	18,851	3,352
2024	10	83	11,587	17,106	2,832
2024	10	84	1,560	2,314	474
2024	10	85	15,463	22,697	4,798
2024	10	86	10,884	15,959	3,232
2024	11	11	8,934	13,732	2,661
2024	11	12	1,463	2,305	390
2024	11	13	2,118	3,143	567
2024	11	21	5,100	7,843	1,485
2024	11	22	6,711	10,777	1,835
2024	11	23	4,967	7,709	1,349
2024	11	32	1,511	2,372	423
2024	11	34	1,532	2,423	385
2024	11	41	7,773	11,928	2,262
2024	11	42	8,564	13,115	2,396
2024	11	43	808	1,312	212
2024	11	44	8,128	12,646	1,964
2024	11	45	7,085	10,822	2,175
2024	11	46	2,031	3,191	523
2024	11	51	684	1,061	178
2024	11	52	5,032	7,947	1,664
2024	11	53	6,239	9,562	1,961
2024	11	54	3,152	4,847	848
2024	11	55	3,309	5,020	821
2024	11	56	2,555	4,062	791
2024	11	57	1,067	1,693	298
2024	11	71	5,460	8,371	1,783
2024	11	72	14,993	22,935	4,187
2024	11	73	14,481	22,349	4,230
2024	11	74	10,739	16,637	3,235
2024	11	81	5,060	7,977	1,216
2024	11	82	11,299	17,400	3,021
2024	11	83	9,984	15,649	2,490
2024	11	84	1,357	2,110	431
2024	11	85	13,472	20,822	4,280
2024	11	86	9,457	14,635	2,778
2024	12	11	9,590	14,077	2,561
2024	12	12	1,556	2,376	383
2024	12	13	2,229	3,262	499
2024	12	21	5,560	7,984	1,479
2024	12	22	7,319	11,345	1,884
2024	12	23	5,362	7,988	1,378
2024	12	32	1,715	2,576	515
2024	12	34	1,746	2,564	425
2024	12	41	7,986	12,142	2,193

2024	12	42	8,944	13,400	2,420
2024	12	43	905	1,359	238
2024	12	44	8,771	12,978	1,982
2024	12	45	7,486	11,077	2,284
2024	12	46	2,174	3,284	523
2024	12	51	738	1,131	223
2024	12	52	5,396	8,035	1,574
2024	12	53	6,633	9,682	1,867
2024	12	54	3,182	4,899	935
2024	12	55	3,419	5,115	799
2024	12	56	2,802	4,090	747
2024	12	57	1,125	1,663	253
2024	12	71	5,790	8,776	1,863
2024	12	72	15,660	23,641	4,199
2024	12	73	15,428	23,137	4,298
2024	12	74	11,000	16,918	3,233
2024	12	81	5,441	8,253	1,240
2024	12	82	12,044	18,157	3,127
2024	12	83	10,827	16,263	2,583
2024	12	84	1,361	2,088	461
2024	12	85	13,935	21,266	4,386
2024	12	86	10,003	15,076	2,873
2025	1	11	9,455	14,015	2,364
2025	1	12	1,526	2,341	407
2025	1	13	2,127	3,160	509
2025	1	21	5,396	7,869	1,397
2025	1	22	6,704	10,766	1,685
2025	1	23	5,130	7,787	1,246
2025	1	32	1,743	2,605	512
2025	1	34	1,772	2,639	427
2025	1	41	7,650	11,514	1,914
2025	1	42	8,344	12,670	2,003
2025	1	43	891	1,377	239
2025	1	44	8,286	12,502	1,838
2025	1	45	6,866	10,359	1,940
2025	1	46	2,167	3,285	516
2025	1	51	662	1,027	174
2025	1	52	5,237	7,879	1,414
2025	1	53	6,193	9,262	1,670
2025	1	54	2,863	4,419	712
2025	1	55	3,272	4,991	784
2025	1	56	2,591	3,893	708
2025	1	57	1,035	1,586	256
2025	1	71	5,298	8,134	1,673
2025	1	72	14,875	22,494	3,807
2025	1	73	14,399	21,904	3,821
2025	1	74	10,413	16,063	2,949
2025	1	81	5,086	7,846	1,159
2025	1	82	11,417	17,403	2,779
2025	1	83	10,154	15,540	2,372
2025	1	84	1,241	1,882	408
2025	1	85	13,204	20,066	3,940
2025	1	86	9,303	14,249	2,614
2025	2	11	8,704	13,351	2,567
2025	2	12	1,437	2,258	406
2025	2	13	1,956	2,947	515
2025	2	21	4,584	7,072	1,294
2025	2	22	6,274	10,142	1,626
2025	2	23	4,577	7,206	1,224

2025	2	32	1,673	2,562	508
2025	2	34	1,601	2,470	429
2025	2	41	6,717	10,604	1,789
2025	2	42	7,387	11,721	1,958
2025	2	43	699	1,181	224
2025	2	44	7,266	11,527	1,697
2025	2	45	6,120	9,596	1,828
2025	2	46	1,947	3,055	476
2025	2	51	632	997	161
2025	2	52	4,811	7,485	1,414
2025	2	53	5,380	8,356	1,597
2025	2	54	2,594	4,032	682
2025	2	55	2,952	4,604	711
2025	2	56	2,525	3,796	658
2025	2	57	998	1,546	237
2025	2	71	4,677	7,422	1,473
2025	2	72	12,918	20,498	3,514
2025	2	73	13,013	20,369	3,614
2025	2	74	9,123	14,619	2,639
2025	2	81	4,467	7,136	999
2025	2	82	10,023	15,932	2,667
2025	2	83	8,965	14,356	2,232
2025	2	84	1,037	1,642	333
2025	2	85	11,710	18,498	3,612
2025	2	86	8,387	13,198	2,478
2024	3	91	2,910	5,193	1,449
2024	3	92	2,075	3,579	1,035
2024	3	93	7,719	13,086	3,630
2024	4	91	2,814	5,070	1,369
2024	4	92	2,043	3,527	977
2024	4	93	7,627	13,294	3,665
2024	5	91	2,854	4,860	1,412
2024	5	92	2,095	3,481	1,014
2024	5	93	7,786	13,186	3,794
2024	6	91	2,976	4,650	1,087
2024	6	92	2,117	3,297	753
2024	6	93	7,710	12,192	3,028
2024	7	91	3,375	5,642	1,306
2024	7	92	2,366	3,955	992
2024	7	93	8,829	15,009	3,745
2024	8	91	3,755	6,065	1,694
2024	8	92	2,627	4,175	1,219
2024	8	93	9,347	15,490	4,638
2024	9	91	3,629	6,042	1,683
2024	9	92	2,653	4,258	1,249
2024	9	93	9,224	15,355	4,122
2024	10	91	3,908	6,473	2,041
2024	10	92	2,839	4,584	1,427
2024	10	93	9,968	16,388	5,621
2024	11	91	3,449	5,799	1,676
2024	11	92	2,460	4,056	1,286
2024	11	93	8,949	14,746	4,324
2024	12	91	3,312	5,562	1,599
2024	12	92	2,416	3,895	1,155
2024	12	93	8,179	13,970	4,320
2025	1	91	3,436	5,077	1,635
2025	1	92	2,358	3,551	1,166
2025	1	93	8,510	12,524	4,142
2025	2	91	2,739	4,389	1,018

2025	2	92	2,048	3,127	760
2025	2	93	7,247	11,123	2,547

Florida Power & Light Company
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Tab 1 of 1
For each zip code comprising in whole or part the FPL service territory, please provide in an active Excel spreadsheet by month for the most recent 12 months available:

h. The number of residential customers who were participants in a Budget Billing plan
* Number below for BB is total accounts (Res+Comm).

Month	BB Total Customers
24-Mar	1,386,645
24-Apr	1,374,683
24-May	1,365,734
24-Jun	1,370,466
24-Jul	1,389,545
24-Aug	1,406,798
24-Sep	1,423,829
24-Oct	1,436,721
24-Nov	1,443,871
24-Dec	1,442,135
25-Jan	1,434,630
25-Feb	1,429,626

p. The total number of payments received and
p. The total number of payments received

Month	Total Payments	Total Payment Dollars
24-Mar	5,807,874	$1,340,591,870.01
24-Apr	6,110,168	$1,427,221,897.25
24-May	5,863,156	$1,391,208,787.87
24-Jun	5,574,960	$1,442,454,554.03
24-Jul	6,280,651	$1,676,954,729.04
24-Aug	6,055,023	$1,667,297,951.82
24-Sep	6,018,691	$1,639,011,613.01
24-Oct	6,039,981	$1,596,839,703.90
24-Nov	5,651,177	$1,388,674,996.13
24-Dec	6,388,836	$1,437,788,190.86
25-Jan	5,846,656	$1,309,523,199.66
25-Feb	5,447,444	$1,261,085,730.69

Florida Power & Light Company
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OPC's Seventh Set of Interrogatories
Interrogatory No. 162
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Tab 1 of 1

Year	Month	District_Code	Total Dollars of Late Fees Imposed ($) 162(i)	Number of accounts with Late Fees Imposed (Volume) 162(j)
2024	3	11	$154,672.41	30,014
2024	3	12	$23,537.58	4,541
2024	3	13	$57,443.45	11,253
2024	3	21	$99,869.23	19,302
2024	3	22	$121,147.55	23,483
2024	3	23	$71,752.22	13,913
2024	3	32	$23,323.04	4,407
2024	3	34	$31,464.95	6,012
2024	3	41	$190,081.44	36,377
2024	3	42	$163,164.79	31,250
2024	3	43	$17,714.10	3,437
2024	3	44	$157,588.89	30,503
2024	3	45	$140,945.92	26,980
2024	3	46	$44,464.51	8,660
2024	3	51	$13,129.65	2,553
2024	3	52	$123,053.48	24,031
2024	3	53	$139,129.64	27,085
2024	3	54	$108,583.17	20,978
2024	3	55	$69,798.65	13,475
2024	3	56	$80,765.01	15,605
2024	3	57	$40,903.43	7,945
2024	3	71	$102,073.55	19,713
2024	3	72	$270,152.64	51,660
2024	3	73	$260,223.03	50,063
2024	3	74	$182,211.48	35,124
2024	3	81	$116,828.12	21,828
2024	3	82	$189,130.65	35,274
2024	3	83	$190,473.79	36,560
2024	3	84	$51,835.59	9,940
2024	3	85	$273,666.74	52,689
2024	3	86	$179,850.21	34,240
2024	3	91	$121,202.24	22,544

2024	3	92	$115,349.95	21,738
2024	3	93	$279,566.67	50,521
2024	4	11	$171,334.89	33,403
2024	4	12	$25,746.39	5,012
2024	4	13	$63,519.59	12,492
2024	4	21	$111,417.18	21,593
2024	4	22	$134,813.22	26,121
2024	4	23	$78,176.37	15,199
2024	4	32	$24,538.72	4,728
2024	4	34	$34,198.30	6,625
2024	4	41	$210,571.64	40,274
2024	4	42	$178,380.35	34,243
2024	4	43	$19,407.46	3,784
2024	4	44	$176,946.19	34,322
2024	4	45	$160,795.46	30,899
2024	4	46	$50,884.89	9,868
2024	4	51	$15,247.37	2,969
2024	4	52	$133,504.67	26,119
2024	4	53	$151,846.71	29,644
2024	4	54	$124,465.78	24,071
2024	4	55	$79,203.17	15,366
2024	4	56	$86,677.59	16,865
2024	4	57	$45,544.74	8,874
2024	4	71	$116,725.77	22,542
2024	4	72	$304,633.19	58,358
2024	4	73	$296,546.53	57,061
2024	4	74	$197,277.21	38,086
2024	4	81	$130,916.81	24,532
2024	4	82	$214,982.69	40,520
2024	4	83	$215,547.46	41,495
2024	4	84	$56,180.62	10,782
2024	4	85	$312,121.81	60,565
2024	4	86	$197,551.72	37,971
2024	4	91	$105,178.18	19,661
2024	4	92	$93,140.39	17,764
2024	4	93	$239,726.19	43,964
2024	5	11	$181,106.40	35,353
2024	5	12	$26,989.84	5,280
2024	5	13	$64,109.74	12,560
2024	5	21	$120,925.73	23,504
2024	5	22	$129,112.27	25,160
2024	5	23	$84,321.47	16,443

2024	5	32	$24,553.47	4,792
2024	5	34	$34,400.37	6,722
2024	5	41	$215,991.83	41,281
2024	5	42	$182,711.17	34,973
2024	5	43	$19,057.66	3,720
2024	5	44	$178,058.93	34,532
2024	5	45	$168,763.68	32,349
2024	5	46	$52,128.12	10,158
2024	5	51	$14,932.40	2,904
2024	5	52	$137,783.18	26,864
2024	5	53	$160,745.30	31,407
2024	5	54	$128,509.24	24,757
2024	5	55	$79,518.14	15,466
2024	5	56	$89,767.36	17,484
2024	5	57	$46,680.76	9,105
2024	5	71	$117,378.36	22,602
2024	5	72	$308,702.71	59,049
2024	5	73	$310,315.06	59,748
2024	5	74	$198,858.71	38,227
2024	5	81	$135,100.96	25,247
2024	5	82	$220,278.17	41,405
2024	5	83	$227,920.99	43,841
2024	5	84	$58,337.45	11,153
2024	5	85	$322,346.72	62,346
2024	5	86	$202,995.96	38,891
2024	5	91	$450,439.18	83,820
2024	5	92	$412,789.87	77,746
2024	5	93	$1,064,658.58	193,475
2024	6	11	$150,791.26	29,250
2024	6	12	$22,381.75	4,335
2024	6	13	$48,996.99	9,587
2024	6	21	$91,121.72	17,651
2024	6	22	$132,098.41	25,606
2024	6	23	$70,707.05	13,636
2024	6	32	$21,442.14	4,181
2024	6	34	$31,273.90	6,052
2024	6	41	$192,956.83	36,299
2024	6	42	$164,357.58	31,036
2024	6	43	$17,549.56	3,379
2024	6	44	$174,076.26	33,358
2024	6	45	$146,122.12	27,674
2024	6	46	$44,796.40	8,650

2024	6	51	$14,087.51	2,703
2024	6	52	$121,441.42	23,621
2024	6	53	$131,217.29	25,293
2024	6	54	$114,274.13	21,902
2024	6	55	$73,096.45	14,060
2024	6	56	$79,776.55	15,383
2024	6	57	$41,874.14	8,124
2024	6	71	$108,143.29	20,654
2024	6	72	$286,668.22	53,686
2024	6	73	$269,972.74	51,123
2024	6	74	$187,005.23	35,404
2024	6	81	$117,035.71	21,094
2024	6	82	$205,760.72	37,906
2024	6	83	$197,871.20	37,190
2024	6	84	$50,395.07	9,519
2024	6	85	$283,251.45	54,203
2024	6	86	$183,862.09	34,549
2024	6	91	$111,461.45	21,333
2024	6	92	$100,824.60	19,602
2024	6	93	$245,141.91	46,787
2024	7	11	$189,781.91	36,496
2024	7	12	$27,047.78	5,158
2024	7	13	$73,480.14	14,275
2024	7	21	$120,741.18	23,124
2024	7	22	$142,016.45	27,180
2024	7	23	$82,117.98	15,685
2024	7	32	$25,044.68	4,805
2024	7	34	$36,395.63	6,948
2024	7	41	$225,175.08	41,948
2024	7	42	$192,010.04	35,818
2024	7	43	$19,943.67	3,799
2024	7	44	$187,428.28	35,534
2024	7	45	$171,448.11	32,260
2024	7	46	$55,862.31	10,681
2024	7	51	$16,150.90	3,071
2024	7	52	$143,820.47	27,765
2024	7	53	$167,358.22	32,187
2024	7	54	$131,638.17	25,012
2024	7	55	$86,283.50	16,478
2024	7	56	$92,585.31	17,689
2024	7	57	$49,508.44	9,535
2024	7	71	$127,677.18	24,259

2024	7	72	$334,317.62	62,457
2024	7	73	$313,868.65	59,028
2024	7	74	$211,202.16	39,512
2024	7	81	$142,346.88	25,577
2024	7	82	$228,956.80	41,449
2024	7	83	$220,364.06	41,236
2024	7	84	$60,755.48	11,478
2024	7	85	$339,916.19	64,716
2024	7	86	$212,750.75	39,702
2024	7	91	$126,542.52	23,313
2024	7	92	$114,698.17	21,436
2024	7	93	$281,402.50	51,369
2024	8	11	$192,835.16	36,797
2024	8	12	$29,061.35	5,517
2024	8	13	$65,825.83	12,685
2024	8	21	$131,589.02	24,956
2024	8	22	$140,781.15	26,745
2024	8	23	$87,756.78	16,570
2024	8	32	$25,223.84	4,778
2024	8	34	$36,584.80	6,931
2024	8	41	$230,638.36	42,460
2024	8	42	$198,896.69	36,779
2024	8	43	$19,849.69	3,783
2024	8	44	$191,954.81	36,217
2024	8	45	$179,852.31	33,505
2024	8	46	$55,526.97	10,561
2024	8	51	$16,533.61	3,126
2024	8	52	$142,480.94	27,401
2024	8	53	$169,494.24	32,603
2024	8	54	$129,222.98	24,547
2024	8	55	$83,894.91	15,973
2024	8	56	$93,250.31	17,694
2024	8	57	$48,886.80	9,374
2024	8	71	$125,424.24	23,582
2024	8	72	$333,358.25	61,181
2024	8	73	$333,906.18	62,218
2024	8	74	$215,853.27	39,905
2024	8	81	$148,030.08	26,105
2024	8	82	$239,558.32	42,862
2024	8	83	$244,665.47	45,472
2024	8	84	$60,463.00	11,413
2024	8	85	$346,139.00	65,209

2024	8	86	$221,424.31	40,657
2024	8	91	$143,221.56	26,261
2024	8	92	$134,382.97	24,878
2024	8	93	$315,549.24	57,486
2024	9	11	$136,092.23	25,855
2024	9	12	$21,338.45	4,054
2024	9	13	$43,044.14	8,319
2024	9	21	$101,400.23	19,220
2024	9	22	$147,037.41	27,871
2024	9	23	$76,315.48	14,447
2024	9	32	$19,268.58	3,676
2024	9	34	$28,563.83	5,426
2024	9	41	$212,079.67	39,141
2024	9	42	$180,547.84	33,514
2024	9	43	$18,410.87	3,511
2024	9	44	$189,591.26	35,810
2024	9	45	$161,200.77	30,049
2024	9	46	$48,155.44	9,220
2024	9	51	$12,610.43	2,373
2024	9	52	$110,880.14	21,314
2024	9	53	$108,124.55	20,687
2024	9	54	$100,954.51	19,282
2024	9	55	$71,451.19	13,600
2024	9	56	$68,495.75	12,974
2024	9	57	$38,885.71	7,455
2024	9	71	$114,946.24	21,677
2024	9	72	$313,735.27	57,561
2024	9	73	$294,196.12	54,716
2024	9	74	$203,569.90	37,824
2024	9	81	$125,865.07	22,257
2024	9	82	$221,426.31	40,088
2024	9	83	$218,024.09	40,397
2024	9	84	$54,366.74	10,210
2024	9	85	$305,417.82	57,559
2024	9	86	$203,548.77	37,425
2024	9	91	$113,516.45	20,821
2024	9	92	$103,060.52	19,032
2024	9	93	$256,221.76	46,562
2024	10	11	$234,218.83	44,913
2024	10	12	$34,467.69	6,536
2024	10	13	$89,972.71	17,430
2024	10	21	$145,688.72	27,606

2024	10	22	$147,396.27	27,821
2024	10	23	$91,973.56	17,604
2024	10	32	$29,083.07	5,561
2024	10	34	$43,491.31	8,315
2024	10	41	$244,210.45	45,320
2024	10	42	$210,123.03	39,030
2024	10	43	$21,779.74	4,144
2024	10	44	$201,759.53	38,233
2024	10	45	$183,876.40	34,289
2024	10	46	$59,575.65	11,347
2024	10	51	$20,121.25	3,773
2024	10	52	$176,653.62	33,476
2024	10	53	$221,495.86	42,388
2024	10	54	$156,706.95	29,588
2024	10	55	$103,407.77	19,601
2024	10	56	$112,878.93	21,167
2024	10	57	$62,368.03	11,936
2024	10	71	$139,061.33	26,268
2024	10	72	$360,088.95	66,934
2024	10	73	$354,726.68	66,549
2024	10	74	$227,031.51	42,387
2024	10	81	$159,621.18	28,593
2024	10	82	$247,274.47	44,658
2024	10	83	$255,563.54	47,854
2024	10	84	$65,735.40	12,486
2024	10	85	$373,806.11	70,879
2024	10	86	$235,210.59	43,557
2024	10	91	$158,705.04	29,387
2024	10	92	$143,442.13	26,946
2024	10	93	$339,329.37	62,590
2024	11	11	$178,584.52	34,540
2024	11	12	$25,823.31	5,004
2024	11	13	$65,027.96	12,701
2024	11	21	$112,305.18	21,559
2024	11	22	$147,308.86	28,280
2024	11	23	$79,038.59	15,242
2024	11	32	$23,428.01	4,566
2024	11	34	$35,189.94	6,818
2024	11	41	$219,959.24	41,375
2024	11	42	$186,522.80	35,337
2024	11	43	$19,287.76	3,725
2024	11	44	$193,142.18	37,030

2024	11	45	$165,002.44	31,260
2024	11	46	$51,687.39	9,960
2024	11	51	$15,244.78	2,937
2024	11	52	$137,724.20	26,561
2024	11	53	$160,011.09	30,871
2024	11	54	$128,404.17	24,729
2024	11	55	$82,960.61	16,036
2024	11	56	$89,508.78	17,261
2024	11	57	$47,900.96	9,320
2024	11	71	$123,027.13	23,533
2024	11	72	$325,678.32	61,228
2024	11	73	$302,022.53	57,369
2024	11	74	$208,398.44	39,462
2024	11	81	$136,225.90	24,842
2024	11	82	$227,509.98	41,805
2024	11	83	$218,209.82	41,277
2024	11	84	$57,810.81	11,010
2024	11	85	$325,495.19	62,165
2024	11	86	$205,587.07	38,670
2024	11	91	$119,535.75	22,427
2024	11	92	$107,907.76	20,498
2024	11	93	$270,322.60	50,509
2024	12	11	$199,439.22	38,898
2024	12	12	$29,682.19	5,759
2024	12	13	$71,554.35	14,003
2024	12	21	$132,542.01	25,581
2024	12	22	$153,693.65	29,741
2024	12	23	$88,010.24	17,133
2024	12	32	$25,527.60	4,966
2024	12	34	$38,475.56	7,489
2024	12	41	$236,861.16	45,172
2024	12	42	$198,474.66	37,947
2024	12	43	$20,041.09	3,915
2024	12	44	$199,027.25	38,413
2024	12	45	$182,761.81	35,024
2024	12	46	$57,178.64	11,087
2024	12	51	$16,459.20	3,194
2024	12	52	$149,760.98	29,218
2024	12	53	$179,330.68	34,955
2024	12	54	$139,884.94	27,093
2024	12	55	$90,570.75	17,614
2024	12	56	$98,209.31	19,051

2024	12	57	$53,480.00	10,420
2024	12	71	$129,069.20	24,818
2024	12	72	$334,179.90	63,748
2024	12	73	$336,217.07	64,604
2024	12	74	$215,732.92	41,305
2024	12	81	$147,672.74	27,494
2024	12	82	$241,265.46	45,114
2024	12	83	$244,927.98	46,995
2024	12	84	$62,609.08	12,006
2024	12	85	$346,463.91	66,693
2024	12	86	$223,867.98	42,582
2024	12	91	$141,201.50	26,666
2024	12	92	$127,159.26	24,372
2024	12	93	$305,272.11	57,207
2025	1	11	$179,141.73	34,897
2025	1	12	$24,861.30	4,825
2025	1	13	$65,587.37	12,820
2025	1	21	$106,736.18	20,699
2025	1	22	$140,832.03	27,374
2025	1	23	$77,065.80	15,032
2025	1	32	$23,682.63	4,571
2025	1	34	$36,212.07	7,015
2025	1	41	$207,429.73	39,781
2025	1	42	$179,211.97	34,477
2025	1	43	$18,611.91	3,637
2025	1	44	$183,504.82	35,532
2025	1	45	$156,491.29	30,074
2025	1	46	$51,578.34	10,046
2025	1	51	$14,858.64	2,889
2025	1	52	$132,620.20	26,022
2025	1	53	$152,574.37	29,798
2025	1	54	$125,007.46	24,278
2025	1	55	$82,253.10	16,043
2025	1	56	$84,484.36	16,490
2025	1	57	$46,116.20	9,016
2025	1	71	$117,429.38	22,815
2025	1	72	$312,546.93	59,993
2025	1	73	$289,417.67	55,988
2025	1	74	$197,746.08	38,122
2025	1	81	$126,650.82	23,713
2025	1	82	$215,452.89	40,632
2025	1	83	$205,218.46	39,570

2025	1	84	$54,624.75	10,514
2025	1	85	$317,446.63	61,612
2025	1	86	$200,790.99	38,601
2025	1	91	$138,037.50	26,027
2025	1	92	$123,074.48	23,483
2025	1	93	$298,759.27	55,530
2025	2	11	$171,920.64	33,205
2025	2	12	$26,029.34	4,956
2025	2	13	$53,626.01	10,401
2025	2	21	$105,339.59	20,323
2025	2	22	$140,906.25	27,273
2025	2	23	$77,565.04	14,985
2025	2	32	$23,631.54	4,415
2025	2	34	$35,003.26	6,599
2025	2	41	$200,109.79	38,451
2025	2	42	$168,630.82	32,476
2025	2	43	$17,660.05	3,456
2025	2	44	$180,889.45	35,080
2025	2	45	$155,814.58	30,050
2025	2	46	$47,554.88	9,258
2025	2	51	$15,519.22	3,014
2025	2	52	$128,048.09	25,069
2025	2	53	$146,698.05	28,618
2025	2	54	$119,613.73	23,164
2025	2	55	$79,838.74	15,537
2025	2	56	$86,070.89	16,736
2025	2	57	$46,632.00	9,057
2025	2	71	$111,356.89	21,727
2025	2	72	$289,628.92	55,757
2025	2	73	$286,639.60	55,467
2025	2	74	$184,947.44	35,796
2025	2	81	$118,922.32	22,386
2025	2	82	$211,638.86	40,209
2025	2	83	$205,407.29	39,836
2025	2	84	$52,962.46	10,245
2025	2	85	$294,072.89	57,238
2025	2	86	$189,642.83	36,573
2025	2	91	$119,625.52	21,986
2025	2	92	$108,319.88	20,274
2025	2	93	$268,013.30	48,257

Florida Power & Light Company
Docket No. 20250011-EI
OPC's Seventh Set of Interrogatories
Interrogatory No. 162
Attachment No. 5 of 8
Tab 1 of 1

Year	Month	District_Code	Total Dollars of Arrears Aged 60+ days ($) 162(k)	Total Number of Accounts with Arrears Aged 60+ days (Volume) 162(l)
2024	3	11	$104,912.58	880
2024	3	12	$26,557.07	182
2024	3	13	$25,714.54	237
2024	3	21	$112,879.67	520
2024	3	22	$181,015.09	1,011
2024	3	23	$53,747.86	454
2024	3	32	$39,505.77	229
2024	3	34	$28,907.18	173
2024	3	41	$111,414.68	931
2024	3	42	$120,749.57	794
2024	3	43	$15,162.18	121
2024	3	44	$117,616.68	778
2024	3	45	$130,623.88	845
2024	3	46	$32,224.88	263
2024	3	51	$10,271.59	83
2024	3	52	$88,315.49	729
2024	3	53	$94,943.44	689
2024	3	54	$65,992.30	440
2024	3	55	$57,135.70	389
2024	3	56	$42,910.06	366
2024	3	57	$25,164.69	174
2024	3	71	$134,297.53	863
2024	3	72	$230,375.66	1,372
2024	3	73	$286,885.54	1,633
2024	3	74	$189,114.37	1,217
2024	3	81	$81,381.59	490
2024	3	82	$234,798.87	1,030
2024	3	83	$160,198.00	911
2024	3	84	$45,228.41	399
2024	3	85	$315,987.22	2,063
2024	3	86	$192,501.78	1,241
2024	3	91	$317,456.10	1,980
2024	3	92	$213,041.45	1,573
2024	3	93	$1,164,593.11	5,147
2024	4	11	$123,837.32	1,085
2024	4	12	$31,061.48	211

2024	4	13	$33,884.11	272
2024	4	21	$90,818.75	458
2024	4	22	$149,813.09	1,027
2024	4	23	$52,835.01	457
2024	4	32	$32,775.98	285
2024	4	34	$29,279.57	236
2024	4	41	$102,231.55	991
2024	4	42	$111,952.79	848
2024	4	43	$11,302.01	101
2024	4	44	$119,407.95	878
2024	4	45	$117,983.54	850
2024	4	46	$27,291.31	276
2024	4	51	$13,158.79	133
2024	4	52	$72,855.48	766
2024	4	53	$91,846.26	707
2024	4	54	$68,218.47	467
2024	4	55	$44,891.47	417
2024	4	56	$37,562.24	355
2024	4	57	$20,938.04	160
2024	4	71	$125,244.10	970
2024	4	72	$187,327.70	1,344
2024	4	73	$230,893.92	1,639
2024	4	74	$160,486.23	1,193
2024	4	81	$73,153.41	465
2024	4	82	$214,642.37	1,123
2024	4	83	$143,341.49	876
2024	4	84	$34,964.36	357
2024	4	85	$299,275.88	2,177
2024	4	86	$210,370.76	1,269
2024	4	91	$333,840.42	2,271
2024	4	92	$264,166.26	1,870
2024	4	93	$1,206,067.33	5,732
2024	5	11	$112,160.05	898
2024	5	12	$23,115.23	209
2024	5	13	$23,232.76	221
2024	5	21	$51,049.54	424
2024	5	22	$93,497.01	881
2024	5	23	$49,525.03	465
2024	5	32	$31,593.49	227
2024	5	34	$21,198.35	177
2024	5	41	$88,356.62	845
2024	5	42	$108,682.59	784
2024	5	43	$9,683.41	119
2024	5	44	$104,214.77	785
2024	5	45	$103,313.76	852
2024	5	46	$26,529.05	247

2024	5	51	$9,210.48	109
2024	5	52	$72,601.27	770
2024	5	53	$79,412.75	728
2024	5	54	$48,417.32	442
2024	5	55	$51,660.64	398
2024	5	56	$45,305.81	361
2024	5	57	$27,328.78	169
2024	5	71	$108,898.57	839
2024	5	72	$196,425.52	1,506
2024	5	73	$220,879.14	1,568
2024	5	74	$157,799.61	1,190
2024	5	81	$63,874.13	397
2024	5	82	$209,741.45	1,076
2024	5	83	$146,681.72	908
2024	5	84	$34,903.77	302
2024	5	85	$306,087.54	2,041
2024	5	86	$175,193.87	1,248
2024	5	91	$321,995.33	2,441
2024	5	92	$234,902.60	1,879
2024	5	93	$893,641.37	5,531
2024	6	11	$115,623.66	869
2024	6	12	$24,960.58	179
2024	6	13	$23,233.55	212
2024	6	21	$51,661.71	299
2024	6	22	$94,301.53	850
2024	6	23	$41,534.00	377
2024	6	32	$18,705.04	170
2024	6	34	$22,147.62	164
2024	6	41	$84,393.09	787
2024	6	42	$90,845.36	668
2024	6	43	$8,200.90	92
2024	6	44	$128,536.41	763
2024	6	45	$96,004.55	777
2024	6	46	$20,959.30	197
2024	6	51	$13,464.12	100
2024	6	52	$64,311.51	585
2024	6	53	$86,843.50	613
2024	6	54	$54,523.54	439
2024	6	55	$38,793.04	334
2024	6	56	$33,790.36	282
2024	6	57	$23,087.08	159
2024	6	71	$91,987.85	677
2024	6	72	$183,794.71	1,116
2024	6	73	$196,202.97	1,285
2024	6	74	$140,528.86	1,098
2024	6	81	$54,653.57	349

2024	6	82	$196,730.85	887
2024	6	83	$127,279.25	756
2024	6	84	$42,233.88	290
2024	6	85	$273,776.84	1,946
2024	6	86	$155,228.10	1,010
2024	6	91	$310,040.20	2,015
2024	6	92	$217,450.40	1,500
2024	6	93	$805,191.72	4,352
2024	7	11	$108,895.25	875
2024	7	12	$30,088.57	210
2024	7	13	$29,414.59	212
2024	7	21	$54,686.86	338
2024	7	22	$138,820.05	1,010
2024	7	23	$47,578.24	411
2024	7	32	$23,853.44	182
2024	7	34	$24,104.03	182
2024	7	41	$106,036.37	866
2024	7	42	$111,262.87	830
2024	7	43	$13,341.53	115
2024	7	44	$133,699.70	813
2024	7	45	$126,412.96	816
2024	7	46	$37,720.05	290
2024	7	51	$13,959.08	111
2024	7	52	$71,741.06	655
2024	7	53	$80,991.58	597
2024	7	54	$63,381.91	483
2024	7	55	$43,995.79	351
2024	7	56	$40,514.12	280
2024	7	57	$27,806.37	156
2024	7	71	$148,540.26	986
2024	7	72	$197,129.12	1,339
2024	7	73	$254,041.14	1,502
2024	7	74	$185,149.67	1,278
2024	7	81	$91,874.39	439
2024	7	82	$330,387.65	1,363
2024	7	83	$189,853.94	1,042
2024	7	84	$44,737.85	344
2024	7	85	$392,640.61	2,429
2024	7	86	$247,640.03	1,411
2024	7	91	$258,150.95	1,734
2024	7	92	$206,208.03	1,315
2024	7	93	$670,544.85	3,530
2024	8	11	$159,352.25	1,226
2024	8	12	$27,535.82	223
2024	8	13	$29,989.14	286
2024	8	21	$173,656.38	1,062

2024	8	22	$154,960.68	1,055
2024	8	23	$67,062.94	596
2024	8	32	$32,401.48	270
2024	8	34	$39,620.05	270
2024	8	41	$149,280.33	1,162
2024	8	42	$155,083.56	1,149
2024	8	43	$10,834.08	132
2024	8	44	$154,042.82	1,106
2024	8	45	$141,875.55	1,054
2024	8	46	$32,033.23	285
2024	8	51	$16,253.03	145
2024	8	52	$103,686.72	981
2024	8	53	$130,136.08	1,072
2024	8	54	$89,175.78	762
2024	8	55	$65,872.24	566
2024	8	56	$63,408.20	502
2024	8	57	$38,452.64	233
2024	8	71	$132,166.53	1,172
2024	8	72	$276,857.82	2,044
2024	8	73	$309,558.32	2,120
2024	8	74	$246,009.19	2,129
2024	8	81	$86,502.04	545
2024	8	82	$229,099.49	1,499
2024	8	83	$197,055.27	1,400
2024	8	84	$49,488.17	512
2024	8	85	$438,335.48	3,295
2024	8	86	$323,210.45	2,115
2024	8	91	$281,158.76	2,135
2024	8	92	$206,271.69	1,430
2024	8	93	$765,493.81	4,556
2024	9	11	$157,910.95	1,184
2024	9	12	$35,745.84	283
2024	9	13	$37,017.85	303
2024	9	21	$107,691.34	597
2024	9	22	$210,379.76	1,358
2024	9	23	$58,284.61	569
2024	9	32	$34,178.14	262
2024	9	34	$31,821.06	232
2024	9	41	$150,509.76	1,133
2024	9	42	$147,900.94	1,073
2024	9	43	$14,571.06	132
2024	9	44	$122,068.29	963
2024	9	45	$128,695.49	1,051
2024	9	46	$29,063.26	288
2024	9	51	$21,516.68	148
2024	9	52	$107,395.95	918

2024	9	53	$117,233.30	934
2024	9	54	$90,454.01	648
2024	9	55	$58,961.25	484
2024	9	56	$48,291.92	416
2024	9	57	$27,848.50	195
2024	9	71	$151,183.07	1,214
2024	9	72	$269,793.25	1,863
2024	9	73	$313,872.87	2,154
2024	9	74	$231,491.32	1,866
2024	9	81	$107,254.25	555
2024	9	82	$282,426.16	1,501
2024	9	83	$217,148.27	1,498
2024	9	84	$51,860.49	441
2024	9	85	$446,602.46	2,896
2024	9	86	$321,500.71	2,006
2024	9	91	$357,829.78	2,298
2024	9	92	$254,507.41	1,714
2024	9	93	$829,577.25	4,463
2024	10	11	$166,093.91	1,260
2024	10	12	$32,650.37	238
2024	10	13	$40,300.85	379
2024	10	21	$130,559.00	650
2024	10	22	$210,009.62	1,227
2024	10	23	$55,708.84	535
2024	10	32	$28,321.42	251
2024	10	34	$34,613.05	256
2024	10	41	$146,304.56	1,053
2024	10	42	$136,854.72	915
2024	10	43	$13,452.93	119
2024	10	44	$123,185.88	910
2024	10	45	$136,556.09	1,097
2024	10	46	$33,739.00	290
2024	10	51	$18,487.00	129
2024	10	52	$204,683.17	1,745
2024	10	53	$120,858.67	859
2024	10	54	$94,422.45	687
2024	10	55	$59,967.74	481
2024	10	56	$97,930.02	785
2024	10	57	$30,551.77	229
2024	10	71	$149,058.95	1,036
2024	10	72	$239,821.01	1,607
2024	10	73	$283,831.49	1,768
2024	10	74	$203,389.37	1,470
2024	10	81	$70,630.28	417
2024	10	82	$213,934.21	1,097
2024	10	83	$165,492.47	1,051

2024	10	84	$40,041.52	329
2024	10	85	$359,844.83	2,551
2024	10	86	$232,647.18	1,580
2024	10	91	$392,740.40	2,430
2024	10	92	$261,575.33	1,812
2024	10	93	$867,286.28	4,737
2024	11	11	$180,391.76	1,321
2024	11	12	$38,243.03	262
2024	11	13	$43,032.78	363
2024	11	21	$168,498.85	749
2024	11	22	$205,686.90	1,335
2024	11	23	$66,850.61	615
2024	11	32	$31,384.83	282
2024	11	34	$39,805.28	269
2024	11	41	$156,243.46	1,052
2024	11	42	$139,552.71	1,037
2024	11	43	$20,298.49	142
2024	11	44	$181,024.64	1,208
2024	11	45	$141,763.91	1,084
2024	11	46	$49,280.69	405
2024	11	51	$13,885.01	142
2024	11	52	$251,606.84	1,483
2024	11	53	$143,117.98	967
2024	11	54	$107,851.18	722
2024	11	55	$73,095.45	518
2024	11	56	$106,873.07	657
2024	11	57	$38,303.08	263
2024	11	71	$151,264.09	1,112
2024	11	72	$255,674.44	1,732
2024	11	73	$282,466.12	1,980
2024	11	74	$231,685.02	1,686
2024	11	81	$106,561.01	603
2024	11	82	$305,539.71	1,450
2024	11	83	$184,634.37	1,205
2024	11	84	$45,415.74	331
2024	11	85	$431,812.13	2,911
2024	11	86	$284,296.89	1,748
2024	11	91	$377,427.84	2,104
2024	11	92	$257,340.60	1,542
2024	11	93	$880,589.35	4,384
2024	12	11	$178,198.79	1,458
2024	12	12	$37,831.61	287
2024	12	13	$59,356.44	408
2024	12	21	$212,375.33	831
2024	12	22	$274,628.32	1,692
2024	12	23	$81,436.08	735

2024	12	32	$45,409.26	310
2024	12	34	$53,378.79	317
2024	12	41	$171,177.04	1,366
2024	12	42	$164,757.53	1,270
2024	12	43	$17,057.83	155
2024	12	44	$194,041.53	1,319
2024	12	45	$151,452.25	1,262
2024	12	46	$54,767.24	425
2024	12	51	$19,283.51	178
2024	12	52	$131,221.85	1,180
2024	12	53	$132,661.83	1,063
2024	12	54	$89,995.34	764
2024	12	55	$69,448.54	606
2024	12	56	$68,429.27	566
2024	12	57	$33,592.89	278
2024	12	71	$196,652.03	1,408
2024	12	72	$349,272.92	2,121
2024	12	73	$409,347.00	2,704
2024	12	74	$317,248.77	2,146
2024	12	81	$126,641.34	691
2024	12	82	$350,465.58	1,769
2024	12	83	$220,460.10	1,441
2024	12	84	$54,808.54	434
2024	12	85	$504,708.54	3,241
2024	12	86	$316,467.56	2,030
2024	12	91	$421,713.99	2,626
2024	12	92	$281,227.00	2,078
2024	12	93	$1,039,537.33	5,577
2025	1	11	$131,595.70	1,013
2025	1	12	$26,999.03	207
2025	1	13	$34,526.53	260
2025	1	21	$161,461.36	625
2025	1	22	$193,639.80	1,148
2025	1	23	$57,131.58	541
2025	1	32	$23,951.09	237
2025	1	34	$35,770.93	215
2025	1	41	$121,256.03	967
2025	1	42	$109,956.58	844
2025	1	43	$12,303.58	107
2025	1	44	$137,278.29	1,005
2025	1	45	$112,990.91	859
2025	1	46	$28,050.03	277
2025	1	51	$13,563.26	118
2025	1	52	$86,000.68	855
2025	1	53	$105,977.20	819
2025	1	54	$69,856.71	502

2025	1	55	$53,612.09	465
2025	1	56	$59,841.19	398
2025	1	57	$29,936.69	205
2025	1	71	$110,623.71	923
2025	1	72	$201,827.20	1,532
2025	1	73	$261,835.59	1,754
2025	1	74	$181,131.47	1,414
2025	1	81	$113,829.58	498
2025	1	82	$240,624.67	1,268
2025	1	83	$142,463.75	1,017
2025	1	84	$40,607.78	283
2025	1	85	$351,881.60	2,185
2025	1	86	$185,015.12	1,353
2025	1	91	$430,057.55	2,297
2025	1	92	$294,373.28	1,934
2025	1	93	$1,092,753.77	4,955
2025	2	11	$108,356.13	832
2025	2	12	$22,417.53	169
2025	2	13	$25,610.67	210
2025	2	21	$176,997.18	530
2025	2	22	$214,049.32	1,128
2025	2	23	$37,663.02	373
2025	2	32	$21,770.43	166
2025	2	34	$34,945.30	178
2025	2	41	$94,378.38	788
2025	2	42	$92,304.28	783
2025	2	43	$10,896.40	101
2025	2	44	$105,311.85	816
2025	2	45	$86,653.09	757
2025	2	46	$19,868.98	203
2025	2	51	$7,037.06	76
2025	2	52	$54,359.36	619
2025	2	53	$78,712.44	584
2025	2	54	$56,009.42	399
2025	2	55	$33,248.77	340
2025	2	56	$49,827.03	327
2025	2	57	$19,854.70	142
2025	2	71	$105,770.22	875
2025	2	72	$201,723.36	1,287
2025	2	73	$229,103.10	1,477
2025	2	74	$174,817.18	1,278
2025	2	81	$81,612.82	446
2025	2	82	$238,776.88	1,237
2025	2	83	$115,118.87	892
2025	2	84	$34,857.31	268
2025	2	85	$286,095.20	2,107

2025	2	86	$207,474.76	1,325
2025	2	91	$383,246.99	1,943
2025	2	92	$266,958.53	1,656
2025	2	93	$988,794.07	4,230

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Residential Arrearage Balances on Bill by District

District	Mar-24	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25
11	$ 3,310,289	$ 3,093,000	$ 2,966,451	$ 3,297,393	$ 3,873,041	$ 4,382,419	$ 4,381,020	$ 4,709,556	$ 4,085,136	$ 3,587,112	$ 3,364,622	$ 3,720,202
12	$ 572,100	$ 483,762	$ 461,217	$ 506,457	$ 648,630	$ 685,582	$ 699,383	$ 830,358	$ 608,798	$ 505,533	$ 528,088	$ 623,261
13	$ 1,037,306	$ 930,095	$ 896,833	$ 982,224	$ 1,133,913	$ 1,310,730	$ 1,262,658	$ 1,440,295	$ 1,239,672	$ 1,109,381	$ 1,035,203	$ 1,139,971
21	$ 2,150,953	$ 2,070,081	$ 1,987,291	$ 2,044,883	$ 2,515,268	$ 2,780,530	$ 2,912,975	$ 3,156,587	$ 2,926,925	$ 2,508,935	$ 2,280,825	$ 2,249,343
22	$ 2,531,832	$ 2,470,069	$ 2,467,319	$ 2,960,054	$ 3,182,680	$ 3,556,320	$ 3,528,419	$ 3,772,211	$ 3,433,725	$ 3,046,910	$ 2,673,243	$ 2,949,464
23	$ 1,611,026	$ 1,536,471	$ 1,540,677	$ 1,701,140	$ 1,959,385	$ 2,139,877	$ 2,100,680	$ 2,229,806	$ 2,030,263	$ 1,769,764	$ 1,656,193	$ 1,730,478
32	$ 626,034	$ 542,324	$ 480,915	$ 521,261	$ 590,888	$ 688,501	$ 637,963	$ 679,329	$ 551,892	$ 511,942	$ 576,561	$ 671,919
34	$ 788,956	$ 669,912	$ 626,119	$ 663,490	$ 793,130	$ 917,238	$ 867,384	$ 922,650	$ 816,265	$ 709,415	$ 751,376	$ 865,204
41	$ 3,856,144	$ 3,807,091	$ 3,873,611	$ 4,325,049	$ 4,771,768	$ 5,169,625	$ 5,128,088	$ 5,485,958	$ 5,063,294	$ 4,462,005	$ 3,827,239	$ 3,845,780
42	$ 3,559,079	$ 3,471,630	$ 3,630,786	$ 3,984,085	$ 4,554,475	$ 4,900,808	$ 4,839,301	$ 5,100,837	$ 4,756,177	$ 4,122,479	$ 3,608,818	$ 3,537,927
43	$ 344,336	$ 355,982	$ 361,414	$ 407,598	$ 453,866	$ 477,330	$ 453,754	$ 501,812	$ 466,885	$ 380,131	$ 347,640	$ 353,874
44	$ 3,381,295	$ 3,281,495	$ 3,396,321	$ 3,784,377	$ 4,377,190	$ 4,670,637	$ 4,568,139	$ 5,024,932	$ 4,573,754	$ 4,162,821	$ 3,574,814	$ 3,670,613
45	$ 2,952,172	$ 2,937,866	$ 3,074,255	$ 3,355,544	$ 3,771,438	$ 4,111,592	$ 4,030,200	$ 4,198,534	$ 3,950,941	$ 3,472,308	$ 2,959,385	$ 2,989,392
46	$ 885,634	$ 871,713	$ 882,723	$ 968,529	$ 1,113,094	$ 1,197,341	$ 1,163,715	$ 1,281,437	$ 1,190,691	$ 1,028,492	$ 910,801	$ 929,761
51	$ 264,024	$ 274,438	$ 274,134	$ 312,558	$ 374,104	$ 397,555	$ 371,959	$ 428,622	$ 374,179	$ 305,475	$ 276,511	$ 293,073
52	$ 2,362,870	$ 2,258,812	$ 2,275,100	$ 2,573,773	$ 2,904,124	$ 3,223,722	$ 3,079,539	$ 3,972,294	$ 3,271,569	$ 2,685,493	$ 2,322,329	$ 2,383,643
53	$ 2,568,300	$ 2,578,631	$ 2,696,081	$ 2,958,470	$ 3,468,578	$ 3,637,037	$ 3,526,781	$ 4,105,723	$ 3,670,793	$ 3,209,064	$ 2,751,148	$ 2,773,484
54	$ 1,943,650	$ 1,906,596	$ 1,991,383	$ 2,208,210	$ 2,449,652	$ 2,565,804	$ 2,522,150	$ 2,894,786	$ 2,591,860	$ 2,273,928	$ 1,924,266	$ 1,938,147
55	$ 1,463,650	$ 1,389,096	$ 1,416,735	$ 1,622,750	$ 1,781,082	$ 1,975,649	$ 1,911,897	$ 2,249,910	$ 1,911,957	$ 1,646,417	$ 1,448,205	$ 1,506,864
56	$ 1,492,818	$ 1,365,161	$ 1,375,446	$ 1,517,606	$ 1,767,754	$ 1,924,683	$ 1,833,812	$ 2,385,387	$ 1,952,219	$ 1,643,432	$ 1,389,386	$ 1,534,524
57	$ 672,233	$ 647,695	$ 652,194	$ 741,422	$ 843,574	$ 925,212	$ 905,104	$ 1,118,575	$ 903,318	$ 783,346	$ 652,267	$ 712,351
71	$ 2,090,850	$ 2,136,096	$ 2,222,622	$ 2,574,426	$ 2,776,106	$ 3,024,983	$ 2,969,395	$ 3,008,502	$ 2,849,008	$ 2,512,155	$ 2,090,512	$ 2,117,750
72	$ 6,188,524	$ 6,128,596	$ 6,347,168	$ 7,252,706	$ 7,931,620	$ 8,583,239	$ 8,492,384	$ 8,638,161	$ 8,237,420	$ 7,296,079	$ 6,219,515	$ 6,196,582
73	$ 5,809,735	$ 5,791,507	$ 5,991,442	$ 6,764,042	$ 7,456,497	$ 8,091,080	$ 8,029,144	$ 8,221,205	$ 7,756,849	$ 6,904,521	$ 5,842,184	$ 5,936,828
74	$ 3,880,294	$ 3,936,064	$ 4,137,130	$ 4,681,326	$ 5,220,276	$ 5,652,955	$ 5,656,590	$ 5,689,703	$ 5,389,601	$ 4,780,536	$ 4,025,858	$ 3,967,976
81	$ 2,615,142	$ 2,558,036	$ 2,673,103	$ 2,986,709	$ 3,333,084	$ 3,502,626	$ 3,441,012	$ 3,662,495	$ 3,424,897	$ 3,092,575	$ 2,626,761	$ 2,586,019
82	$ 4,847,590	$ 4,678,668	$ 4,948,933	$ 5,408,381	$ 6,215,577	$ 6,690,713	$ 6,469,420	$ 6,769,550	$ 6,340,950	$ 5,785,461	$ 4,914,414	$ 4,906,501
83	$ 4,180,878	$ 4,218,267	$ 4,313,827	$ 4,691,579	$ 5,305,259	$ 5,695,899	$ 5,736,744	$ 5,860,682	$ 5,435,374	$ 4,845,968	$ 4,209,562	$ 4,131,124
84	$ 806,589	$ 772,737	$ 790,591	$ 874,831	$ 959,456	$ 1,009,370	$ 994,103	$ 1,066,760	$ 997,678	$ 913,312	$ 731,126	$ 744,931
85	$ 5,725,311	$ 5,613,055	$ 5,956,760	$ 6,532,923	$ 7,328,653	$ 8,049,088	$ 7,936,928	$ 8,066,502	$ 7,677,896	$ 6,806,977	$ 5,758,598	$ 5,684,795
86	$ 3,985,606	$ 3,968,008	$ 4,241,428	$ 4,696,165	$ 5,279,970	$ 5,903,870	$ 5,880,213	$ 5,867,716	$ 5,471,478	$ 4,845,349	$ 4,002,370	$ 4,072,096
91	$ 2,790,121	$ 2,474,836	$ 2,651,231	$ 3,142,757	$ 3,648,823	$ 4,225,767	$ 4,131,730	$ 4,227,619	$ 3,525,551	$ 3,331,760	$ 3,438,414	$ 3,525,295
92	$ 2,546,346	$ 2,125,072	$ 2,176,844	$ 2,553,299	$ 2,963,880	$ 3,436,250	$ 3,457,933	$ 3,327,395	$ 2,754,096	$ 2,534,432	$ 2,559,801	$ 2,765,160
93	$ 8,755,192	$ 7,571,113	$ 7,472,508	$ 8,330,517	$ 9,334,440	$ 10,609,744	$ 10,427,398	$ 10,188,331	$ 8,820,688	$ 8,174,307	$ 8,643,833	$ 9,075,798

Note: Arrearage balances include all past due balances that remain outstanding at the time of billing.

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Residential Total Current Electric Bill Amount												
District	Mar-24	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25
11	$24,014,203	$23,285,327	$27,170,565	$34,336,337	$38,329,329	$35,967,790	$36,336,234	$30,410,705	$25,509,602	$24,436,975	$30,984,744	$30,229,846
12	$2,417,940	$2,324,066	$2,803,962	$3,605,607	$3,976,610	$3,607,375	$3,602,283	$2,933,433	$2,338,281	$2,616,364	$3,458,342	$3,195,052
13	$11,162,802	$10,973,428	$12,721,341	$16,439,171	$19,048,767	$17,349,199	$17,775,450	$14,668,967	$12,128,268	$11,912,033	$15,233,237	$15,411,625
21	$15,435,110	$15,967,037	$17,464,285	$23,359,220	$24,744,896	$24,865,301	$25,122,863	$22,235,639	$17,857,444	$15,441,779	$17,422,015	$20,050,544
22	$18,652,746	$19,316,770	$24,208,863	$27,109,842	$29,996,822	$28,495,860	$27,738,918	$24,555,324	$19,919,986	$17,260,000	$22,377,540	$19,871,095
23	$9,189,615	$9,494,031	$11,281,805	$13,740,299	$14,849,888	$14,109,971	$13,809,902	$12,140,705	$9,762,812	$9,230,522	$11,329,758	$11,163,796
32	$2,000,796	$1,862,609	$2,132,925	$2,773,403	$3,157,958	$2,872,222	$2,830,188	$2,136,954	$1,897,288	$2,309,213	$3,067,805	$2,782,958
34	$4,588,460	$4,336,286	$5,070,009	$6,431,597	$7,337,194	$6,765,779	$6,560,174	$5,382,967	$4,539,178	$5,118,861	$6,777,225	$6,574,328
41	$40,659,560	$43,926,126	$49,587,565	$57,535,968	$59,133,806	$59,219,745	$57,925,035	$52,374,728	$44,570,713	$37,372,921	$41,534,673	$43,207,095
42	$23,903,362	$26,251,207	$29,391,286	$34,966,667	$35,778,826	$35,294,601	$34,869,915	$31,741,624	$26,559,266	$22,366,623	$24,381,563	$25,443,879
43	$2,252,466	$2,320,912	$2,654,291	$3,126,733	$3,254,712	$3,139,932	$3,166,546	$2,803,441	$2,240,020	$2,061,134	$2,480,502	$2,582,506
44	$27,934,890	$29,926,307	$33,635,332	$40,770,099	$42,970,650	$41,258,159	$41,481,096	$37,276,724	$31,392,052	$26,826,010	$31,004,314	$31,409,368
45	$25,492,578	$27,437,524	$30,902,258	$35,533,518	$37,433,274	$36,534,247	$35,776,194	$32,819,117	$28,221,475	$23,521,325	$26,659,991	$27,432,394
46	$10,034,955	$10,494,474	$11,551,533	$13,480,448	$14,433,134	$13,834,410	$13,673,760	$12,508,741	$10,480,258	$9,436,820	$11,401,300	$11,804,598
51	$1,542,144	$1,573,881	$1,830,242	$2,153,182	$2,168,428	$2,080,947	$2,139,955	$1,875,644	$1,531,414	$1,446,019	$1,731,954	$1,775,203
52	$20,767,501	$21,343,638	$25,112,489	$30,281,288	$31,305,323	$29,658,695	$30,570,543	$25,205,446	$21,111,108	$19,151,365	$23,184,404	$23,846,922
53	$23,899,963	$25,445,605	$28,202,283	$32,522,930	$32,474,449	$31,790,756	$32,961,944	$29,626,813	$25,257,659	$22,004,804	$25,786,545	$27,080,969
54	$36,339,568	$38,254,776	$40,475,056	$44,672,808	$43,732,071	$42,617,409	$44,638,395	$40,419,365	$35,600,760	$31,132,836	$36,988,395	$39,706,775
55	$15,031,651	$15,494,064	$17,786,271	$20,840,975	$21,215,875	$20,453,731	$20,913,674	$18,423,677	$15,446,898	$13,942,632	$16,809,942	$17,860,886
56	$17,759,433	$18,100,933	$20,971,095	$25,395,565	$26,346,660	$25,069,980	$25,740,715	$21,338,479	$18,221,404	$16,289,367	$20,210,697	$20,178,839
57	$13,738,457	$14,003,056	$15,511,951	$18,109,932	$19,010,851	$18,274,157	$18,463,061	$15,608,073	$13,422,929	$12,196,947	$15,102,511	$15,563,121
71	$13,066,386	$14,484,847	$15,765,416	$18,448,425	$18,949,263	$18,915,370	$18,724,208	$16,975,075	$14,744,508	$12,351,307	$13,098,988	$13,475,016
72	$37,257,132	$41,068,344	$48,724,963	$53,599,787	$57,172,389	$56,034,211	$54,032,056	$49,265,614	$41,363,582	$33,811,739	$36,206,940	$37,591,165
73	$33,935,688	$37,313,133	$43,406,605	$48,441,384	$51,019,672	$50,222,391	$48,490,610	$44,158,439	$37,279,177	$31,242,418	$33,856,780	$34,484,019
74	$19,547,367	$21,624,133	$25,525,964	$29,373,847	$30,287,882	$29,801,241	$28,593,480	$26,748,773	$22,077,188	$18,023,871	$19,285,442	$20,116,970
81	$24,388,240	$27,400,243	$31,908,594	$36,759,889	$37,985,708	$37,733,093	$36,867,484	$34,058,376	$28,671,784	$23,328,913	$24,101,679	$24,637,937
82	$28,654,044	$31,824,504	$36,961,343	$42,735,485	$44,343,950	$43,481,641	$42,761,538	$39,567,649	$33,612,183	$27,395,080	$28,458,787	$29,425,054
83	$26,535,564	$29,463,416	$33,800,513	$39,451,576	$40,448,906	$40,164,078	$38,807,188	$35,931,985	$30,267,108	$25,046,604	$25,595,636	$26,321,719
84	$7,634,672	$8,190,352	$9,077,829	$10,194,921	$10,517,079	$10,503,024	$10,512,653	$9,659,830	$8,452,495	$7,166,050	$7,564,213	$7,809,398
85	$28,083,703	$30,681,606	$34,576,646	$40,603,078	$41,663,087	$41,445,637	$40,996,969	$37,479,076	$31,943,986	$26,536,050	$27,561,263	$28,947,519
86	$18,483,945	$20,479,981	$23,704,474	$27,160,746	$28,712,307	$28,438,359	$27,286,200	$25,212,040	$21,225,197	$17,122,281	$17,971,397	$18,813,056
91	$12,160,531	$11,964,389	$13,992,317	$19,010,511	$23,006,232	$21,584,985	$20,295,749	$15,892,223	$13,054,294	$13,048,977	$16,686,063	$17,079,906
92	$12,090,238	$12,084,321	$14,443,650	$19,420,037	$23,373,942	$21,974,116	$20,380,059	$15,982,986	$12,784,899	$12,692,149	$16,464,642	$16,200,303
93	$26,663,942	$25,511,507	$30,724,972	$39,263,272	$46,905,841	$45,079,250	$42,920,938	$33,635,000	$27,758,265	$29,661,875	$39,739,082	$37,937,910

Note: These amounts exclude municipal and franchise taxes, as these are collected on behalf of the taxing authority and vary by area.

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Residential Total Bill Count

District	Mar-24	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25
11	224,362	224,977	225,552	226,235	226,790	227,155	227,496	227,701	227,967	227,979	228,390	228,803
12	21,913	21,955	21,984	21,989	22,013	22,012	21,997	21,965	21,978	22,033	22,033	22,072
13	102,453	103,230	103,936	104,729	105,098	105,443	105,687	106,069	106,350	107,016	107,536	107,717
21	143,813	144,184	144,363	144,659	144,838	144,751	145,053	144,832	144,901	144,981	145,139	145,335
22	169,547	170,188	170,505	171,179	171,890	172,038	172,215	172,279	172,468	172,758	172,843	173,431
23	76,076	76,581	76,665	76,841	76,949	76,932	76,913	76,721	76,575	76,636	76,600	76,679
32	17,158	17,178	17,153	17,206	17,264	17,207	17,220	17,142	17,100	17,107	17,120	17,192
34	36,488	36,646	36,852	37,032	37,114	37,121	37,116	37,182	37,268	37,301	37,371	37,472
41	326,248	326,845	327,482	328,288	328,519	328,704	328,064	327,402	327,311	327,140	326,992	327,366
42	182,992	183,352	183,590	183,819	183,859	183,801	183,739	183,509	183,586	183,344	183,067	183,451
43	19,907	19,883	19,806	19,764	19,737	19,735	19,752	19,756	19,777	19,840	19,879	19,937
44	234,982	235,971	236,741	237,163	237,437	237,831	238,280	238,479	238,794	239,076	239,138	239,736
45	202,372	203,040	203,625	204,007	204,149	204,072	204,225	204,086	203,872	203,972	203,876	204,232
46	81,672	82,018	82,208	82,111	82,248	82,313	82,258	82,386	82,431	82,568	82,622	82,798
51	14,025	14,167	14,002	13,880	13,891	13,884	13,939	13,870	14,042	14,089	14,114	14,146
52	184,571	185,333	185,544	185,566	186,304	186,338	186,194	185,973	186,213	186,137	186,224	186,821
53	211,229	212,417	213,008	213,693	214,829	215,270	215,675	215,505	215,953	216,675	217,113	218,402
54	266,059	267,196	267,575	267,853	267,907	268,255	268,716	268,817	269,117	269,332	269,458	269,854
55	128,823	129,600	130,106	130,698	131,091	131,633	132,067	132,326	132,817	133,018	133,043	133,466
56	154,332	155,070	155,783	156,210	156,463	156,495	156,762	156,325	156,345	156,507	156,599	156,845
57	120,258	121,015	121,372	121,832	122,178	122,598	122,901	122,718	122,418	122,739	122,858	123,236
71	121,546	121,822	122,002	122,109	122,776	122,889	122,959	122,939	122,837	122,610	122,470	123,132
72	300,712	301,061	301,362	301,883	303,014	302,517	302,067	301,187	301,174	301,503	301,150	301,800
73	296,361	296,854	297,208	297,278	297,567	297,446	297,249	297,223	297,050	296,731	296,381	296,797
74	164,385	164,433	164,496	164,712	165,045	164,882	164,710	164,430	164,229	164,302	164,195	164,492
81	161,434	161,555	161,705	162,204	162,321	162,562	161,772	161,425	161,365	161,245	161,181	161,257
82	193,775	194,400	194,511	195,109	195,628	195,847	196,365	196,571	196,911	197,492	197,693	198,365
83	217,258	217,780	218,216	218,726	218,951	218,860	218,698	218,356	217,944	217,836	217,434	217,841
84	78,335	78,536	78,601	78,906	78,765	78,841	78,957	78,728	78,674	78,579	78,452	78,561
85	272,037	272,694	273,192	274,737	276,016	277,527	277,837	277,158	277,446	277,426	277,982	279,119
86	161,365	161,954	162,229	162,235	162,695	162,841	162,906	162,870	162,702	163,225	162,669	162,981
91	113,322	113,724	114,538	114,917	115,616	116,047	116,023	116,578	116,429	116,907	116,862	116,818
92	108,854	109,032	109,141	109,437	109,822	110,043	109,978	110,079	110,059	110,291	110,455	110,586
93	221,801	222,471	223,004	223,151	224,353	224,394	224,504	224,908	224,758	225,659	225,852	226,123

Florida Power & Light Company
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OPC's Seventh Set of Interrogatories
Interrogatory No. 167
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QUESTION:
Affordability. In Excel format, for each month for the most recent 36 months available, please provide the mean and median electric bill (in dollars) for:

a. Residential customers as a whole; and

b. Identified Low-Income customers.

RESPONSE:
a. Please refer to Attachment No. 1 for the mean and median dollar amount of current electric service billed to residential customers by month for March 2022 through February 2025.

b. "Identified Low Income Customers" is not a term defined in Florida statutes, regulations, rules or PSC orders. FPL does not collect monthly mean and median residential electric bill amounts for customers who receive assistance from low income or need-based programs. Please see FPL's response to OPC's Seventh Set of Interrogatories, No. 166b for electric bill information for customers who receive LIHEAP assistance.

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Residential Mean and Median Current Electric Bill Amount

Period	Mean	Median
Mar-22	$117	$96
Apr-22	$128	$104
May-22	$137	$112
Jun-22	$162	$135
Jul-22	$182	$154
Aug-22	$185	$157
Sep-22	$178	$150
Oct-22	$142	$117
Nov-22	$127	$104
Dec-22	$123	$100
Jan-23	$129	$105
Feb-23	$119	$98
Mar-23	$130	$106
Apr-23	$155	$127
May-23	$156	$127
Jun-23	$176	$146
Jul-23	$201	$171
Aug-23	$207	$177
Sep-23	$201	$170
Oct-23	$166	$137
Nov-23	$136	$111
Dec-23	$123	$100
Jan-24	$125	$100
Feb-24	$122	$99
Mar-24	$119	$98
Apr-24	$126	$102
May-24	$144	$115
Jun-24	$170	$142
Jul-24	$179	$151
Aug-24	$174	$146
Sep-24	$172	$144
Oct-24	$153	$125
Nov-24	$128	$104
Dec-24	$112	$90
Jan-25	$129	$103

Feb-25	$131	$106

Note: These amounts exclude municipal and franchise taxes, as these are collected on behalf of the taxing authority and vary by area.

Florida Power & Light Company
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Interrogatory No. 182
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QUESTION:
Affordability. Please identify each written document that presents, describes or discusses any risk assessment that is used to determine whether and/or when to schedule a disconnection of service to a residential customer for nonpayment.

RESPONSE:
There is no written document that describes or discusses risk assessment regarding scheduling a disconnection of service. FPL uses an automated system prioritization that considers risk factors including but not limited to age of arrears, length of time a customer has maintained an FPL account, the number of times a customer has been late in a given period, and the number of prior collection activities. Customers are then prioritized systematically, and disconnections are scheduled.

QUESTION:
Affordability. Please confirm or deny whether the following factors are taken into account in any fashion in deciding whether and/or when to schedule a disconnection of service to a particular residential customer for nonpayment:

a. The homeowner/renter status of the customer;

b. Whether a customer is employed;

c. Whether a customer receives public assistance income;

d. The level of arrears (in dollars);

e. The length of time a balance has been unpaid;

f. The length of time a customer has been a customer;

g. The length of time a customer has lived at his or her current address;

h. The level of income of a customer;

i. The source of income of a customer;

j. Whether a customer has incurred late payment fees within a prescribed prior period (e.g., prior 12 months, prior 6 months);

k. Whether the Company has held, or newly imposed, a cash security deposit within a prescribed prior period (e.g., prior 12 months, prior 6 months);

l. Whether a customer has received a disconnection notice one or more times within a prescribed prior period (e.g., prior 12 months, prior 6 months);

m. Whether a customer has had service disconnected for nonpayment one or more times within a prescribed prior period (e.g., prior 12 months, prior 6 months);

n. The number of disconnection notices issued to the customer within a prescribed prior period (e.g., more an two notices within prior 12 months);

o. Whether a customer is an Identified Low-Income customer; and

p. Any other (please specify).

RESPONSE:

a. Not considered

b. Not considered

c. Not considered

d. Considered

e. Considered

f. Considered

g. Considered

h. Not considered

i. Not considered

j. Considered

k. Not considered

l. Considered

m. Considered

n. Considered

o. Not considered

p. Customers enrolled in our Medically Essential Service Program

Florida Power & Light Company
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OPC's Seventh Set of Interrogatories
Interrogatory No. 204
Page 1 of 1

QUESTION:
Affordability. Please identify all reports, evaluations, memos, analyses or other written documents of any nature prepared since January 1, 2019, containing the Company methodology, procedure or process designed to systematically review, study or assess the Company residential billing and/or payment records in an effort to:

a. Characterize patterns of nonpayment;

b. Identify the characteristics of nonpayers;

c. Identify predictors of nonpayment;

d. Identify strategies to reduce nonpayment; and

e. Identify early indicators of nonpayment.

RESPONSE:
Please see FPL's response to OPC's Seventh Request for Production, No. 74.

Florida Power & Light Company
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OPC's Seventh Set of Interrogatories
Interrogatory No. 205
Page 1 of 1

QUESTION:
Affordability. Please identify all written studies currently within the Company's custody or control, whether or not prepared by or for the Company, prepared since January 1, 2019, that explicitly assess the extent to which the following activities reduce residential *bad debt*:

a. Cash security deposits;

b. Deferred payment agreements;

c. Notices of disconnection for nonpayment;

d. Disconnections for nonpayment;

e. Field collections;

f. Call center collection calls;

g. Budget billing plans; and

h. Late payment charges.

RESPONSE:
Please see FPL's response to OPC's Seventh Request for Production, No. 74.

Florida Power & Light Company
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OPC's Seventh Set of Interrogatories
Interrogatory No. 206
Page 1 of 1

QUESTION:
Affordability. Please identify all written studies currently within the Company's custody or control, whether or not prepared by or for the Company, prepared since January 1, 2019, that explicitly assess the extent to which the following activities reduce residential arrears:

a. Cash security deposits;

b. Deferred payment agreements;

c. Notices of disconnection for nonpayment;

d. Disconnections for nonpayment;

e. Field collections;

f. Call center collection calls;

g. Budget billing plans; and

h. Late payment charges.

RESPONSE:
Please see FPL's response to OPC's Seventh Request for Production, No. 74.

Florida Power & Light Company
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Interrogatory No. 207
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QUESTION:
Affordability. Please identify all written studies currently within the Company's custody or control, whether or not prepared by or for the Company, prepared since January 1, 2019, that explicitly assess the extent to which the following activities accelerate *residential payments*:

a. Cash security deposits;

b. Deferred payment agreements;

c. Notices of disconnection for nonpayment;

d. Disconnections for nonpayment;

e. Field collections;

f. Call center collection calls;

g. Budget billing plans; and

h. Late payment charges.

RESPONSE:
Please see FPL's response to OPC's Seventh Request for Production, No. 74 for the requested documents.

Florida Power & Light Company
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OPC's Seventh Set of Interrogatories
Interrogatory No. 208
Page 1 of 1

QUESTION:
Affordability. Please identify all reports, evaluations, studies or other written documents of any nature, within the custody or control of the Company, whether or not prepared by or for the Company, prepared since January 1, 2019, identifying, evaluating or otherwise discussing why residential customers do not successfully complete deferred payment plans (sometimes known as payment agreements or other similar terms) in order to avoid the disconnection of service for nonpayment.

RESPONSE:
FPL has no such materials.

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OPC's Seventh Set of Interrogatories
Interrogatory No. 209
Page 1 of 1

QUESTION:
Affordability. Please identify all studies, memos or other written documents of any nature within the possession or control of the Company, prepared since January 1, 2019, evaluating, assessing or otherwise discussing:

a. Why utility customers do not pay their utility bills;

b. The order in which residential customers pay their bills (e.g., rent/mortgage first, utility bills second, credit cards third, etc.); and

c. To whom or to where customers turn for information and/or bill payment assistance when they have unpaid utility bills.

RESPONSE:
a. FPL has no such materials.

b. FPL has no such materials.

c. FPL has processes in place for representatives to refer customers to agencies and programs offering assistance including 211, LIHEAP, EHEAP, Care to Share, Federal Emergency Management Agency Emergency Food and Shelter Program (FEMA/EFSP), AWARE, Elder Helpline, and Medically Essential Service program (MESP). FPL provides additional information on its webpage (https://www.fpl.com/help/payment-assistance.html and https://www.fpl.com/northwest/help). See FPL's response to OPC's Seventh Request for Production of Documents, No. 91 for responsive documents.

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Interrogatory No. 210
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QUESTION:
Affordability. Please identify all studies, analyses, memos, workpapers, or written documents of any nature within the custody or control of the Company, prepared since January 1, 2019, that disaggregate the source of *bad debt* to the Company by the following by socio-economic status of the customer (for residential bad debt).

RESPONSE:
None. Such studies, analyses, memos, workpapers, or written documents do not exist.

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OPC's Seventh Set of Interrogatories
Interrogatory No. 211
Page 1 of 1

QUESTION:
Affordability. Please identify all studies, analyses, memos, workpapers, or written documents of any nature within the custody or control of the Company, prepared since January 1, 2019, that disaggregate the source of *arrears* to the Company by socio-economic status of the customer (for residential arrears).

RESPONSE:
None. Such studies, analyses, memos, workpapers, or written documents do not exist.

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OPC's Seventh Set of Interrogatories
Interrogatory No. 212
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QUESTION:
Affordability. Please identify all studies, reports, memos, or other written documents of any nature in the custody or control of the Company, whether or not of Company customers, prepared since January 1, 2019, that considers, evaluates or discusses the relationship between residential payment-troubles and low-income status. Separately provide any such study, memo, report or other written document that examines these relationships for Company customers.

RESPONSE:
FPL has no such materials.

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OPC's Seventh Set of Interrogatories
Interrogatory No. 213
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QUESTION:
Affordability. Please indicate whether the Company agrees or disagrees with each of the following statements. If it disagrees, provide a detailed explanation of the basis for the disagreement:

a. Reducing the dollar level of arrears to a customer will, all else equal, have the effect of reducing the working capital needed by a utility;

b. Reducing the time (in days or months) that an arrearage remains outstanding will, all else equal, have the effect of reducing the capital needed by a utility;

c. Working capital is a cost component that has equity return associated with it.

d. To the extent that working capital has equity return associated with it, it will have a tax component associated with it;

e. A higher dollar level of arrearages poses a greater risk of loss due to uncollectibles than a lower dollar level of arrearages;

f. Reducing the number of customers who are off-system due to a disconnection of service will, all else equal, reduce lost sales to a utility; and

g. Reducing the number of customers receiving final bills with an unpaid balance will, all else equal, have the effect of reducing costs to a utility.

RESPONSE:
a. All else equal, agree

b. All else equal, agree

c. We interpret this statement to mean that working capital is a component of jurisdictional adjusted rate base. The jurisdictional adjusted rate base has an equity return for the portion funded by common equity as determined by the Company's equity ratio. To the extent that working capital assets or liabilities are included in the jurisdictional adjusted rate base and are funded by common equity, an associated equity return would be applicable. Assuming this interpretation of the statement, we agree.

d. We interpret this statement to mean that there is income tax expense associated with the equity return on the working capital included in the jurisdictional adjusted rate base. Assuming this interpretation of the statement, agree.

e. All else equal, agree this is true in most instances but not all.

f. All else equal, agree

g. All else equal, agree

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QUESTION:
Affordability. Please identify the most recent study or survey, if any, undertaken by the Company examining the demographic characteristics (e.g., income, age) of the Company's:

a. Disconnections for nonpayment;

b. Payment-troubled customers;

c. Identified Low-Income customers;

d. Incidence of arrears;

e. Level of arrears;

f. Customers with and without cash security deposits; and

g. Customers with and without deferred payment arrangements.

h. If no such studies or surveys exist, please so indicate.

RESPONSE:
No such survey exists.

CORRECTED DECLARATION

I, Dawn Nichols, sponsor the answers to **Interrogatory Nos. 160-186, 189, 190-199, 201-212, 214, 215, 217 and 218** and co-sponsor the answers to **Interrogatory Nos. 187, 188, 200, 213, 216 and 219** from OPC's Seventh Set of Interrogatories to Florida Power & Light Company in Docket No. 20250011, and the responses are true and correct based on my personal knowledge.

Under penalties of perjury, I declare that I have read the foregoing declaration, and the interrogatory answers identified above, and that the facts stated therein are true.

Dawn Nichols

Date: 4-24-25

DECLARATION

I, Ian Laney, sponsor the answer to **Interrogatory No. 220** and co-sponsor the answers to **Interrogatory Nos. 213 and 219** from OPC's Seventh Set of Interrogatories to Florida Power & Light Company in Docket No. 20250011, and the responses are true and correct based on my personal knowledge.

Under penalties of perjury, I declare that I have read the foregoing declaration, and the interrogatory answers identified above, and that the facts stated therein are true.

Ian Laney

Ian Laney

Date: 4/3/2025