William P. Cox
Senior Attorney
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408-0420
(561) 304-5662
(561) 691-7135 (Facsimile)
E-mail: Will.Cox@fpl.com

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-VIA ELECTRONIC FILING-

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

RE: Docket No. 20200170-EI: Florida Power & Light Company's Petition for Approval of Optional Electric Vehicle Public Charging Pilot Tariffs

Dear Mr. Teitzman:

Please find attached Florida Power & Light Company's responses to Staff's Fourth Data Request (Nos. 1-6).

If there are any questions regarding this filing, please contact me at (561) 304-5662.

Sincerely,

/s/ *William P. Cox*
William P. Cox
Fla. Bar No. 0093531

cc: Shaw Stiller, Senior Attorney
Holly Forrest, Public Utility Analyst I
Tripp Coston, Economic Supervisor

QUESTION:
In response to staffs first data request, question 9, the Company states that the EVolution pilot will "install more than 1,000 charging ports, including level 2 . . . and DC fast charging in high-traffic areas ... " In addition, the Company's response to staffs first data request, question 2, states that "FPL is currently focused on building out an initial 15-20 fast-charging sites."

a. Please clarify how may charging stations, by charger type, the Company is planning to construct under its EVolution pilot over the term of the pilot.

b. Please provide the number of chargers, by type, anticipated to be deployed in each market segment (i.e., DC Fast-Charging, Workplace, destination, residential).

RESPONSE:
As discussed in FPL's Ten Year Site Plan and in FPL's response to Staff's First Data Request, No. 2, FPL began implementation of the new FPL EVolution pilot program in 2019 to support the growth of EVs with the goal to install more than 1,000 charging ports, thereby increasing the availability of public charging stations for EVs in Florida by 50%. This pilot program will be conducted in partnership with interested host customers. FPL has provided an initial estimate of the breakdown of ports, charger types and market segments in the table below. This breakdown should be used as a guide only; FPL is focused on ensuring chargers are deployed efficiently, with adequate coverage across FPL's territory, with a focus on ensuring pilot objectives are met. The final number of charging ports and segmentation will be dependent on site selection.

Segment	Charger Type	Ports
Workplace	Level 2	850
Destination	Level 2	250
Residential	Level 2	50
Highway	DC Fast	90
Metro	DC Fast	48
Fleet	DC Fast	80
Total Estimated Level 2: 1,150 Ports, $6.2 MM		
Total Estimated DC Fast: 218 Ports, $23.8 MM		

QUESTION:
In response to staffs first data request, question 5, the Company states that the "Revenue collected under the proposed UEV tariff will offset a portion of the revenue requirements related to the broader FPL EVolution pilot."

a. Please provide the Company's total anticipated investment in the EVolution pilot program and the investment amount the Company will seek recovery for in its next base rate case.

b. Please provide the Company's anticipated investment, by charger type, under the EVolution pilot program.

c. Please provide the average cost to install a single level 2 charger and a single DC fastcharging charger.

d. In addition to the average cost of a charger, please describe what factors contribute to the overall cost of the EVolution pilot.

RESPONSE:
a. FPL anticipates the Company's total investment in the FPL EVolution pilot program to be $30 million through the end of 2022, which will be included for recovery in FPL's next base rate proceeding. However, a portion of this investment will be offset by any revenues received under the proposed UEV tariff. FPL believes this limited investment will enable the integrated utility to examine EV use, technology, adoption, potential new rate structures, power quality, and customer experience ahead of mass adoption of electric vehicles to ensure future electric vehicle investments enhance service for all electric customers.

b. Please see FPL's response to Staffs Fourth Data Request, No 1.

c. Based on FPL's experience to date, the average cost to install a single level 2 charger (non-residential, per port) is approximately $5,500 (ranging from $3,500 to $7,500). The average cost to install a single port DC fast charger is approximately $80,000 (ranging from $70,000 to $100,000) for Metro and $100,000 (ranging from $80,000 to $130,000) for Highway. FPL's estimated average installation costs includes equipment costs (charger, electrical equipment, bollards, conduit, space demarcation, wire, and other materials), labor and site prep (civil work, equipment installation and activation) and grid make-ready (transformer) costs. Actual costs are dependent on site selection, charger location, technology and interconnection, among other factors.

d. In addition to the installation costs detailed in subpart c to this response, the overall cost of the EVolution Pilot includes software development and project management costs.

QUESTION:
Please provide the estimated number of DC fast-charging stations under the EVolution pilot that will assess the rate included in the proposed tariff sheet No. 8.936.

RESPONSE:
For planning purposes, FPL has assumed 8 DC fast-charging sites (36 stations) will assess the rate included in the proposed tariff sheet No. 8.936. However, the actual number has yet to be determined. As stated in FPL's response to Staff's First Data Request No. 2, determination of which charging stations will utilize the proposed UEV tariff will be made on a site by site basis; FPL will work with the site host to determine if the UEV tariff is appropriate for the site based on site host preference and the FPL EVolution pilot and UEV pilot tariff objectives.

QUESTION:
For the EVolution DC fast-charging stations that will not take service under the proposed tariff sheet No. 8.936, (a) Please describe how the Company will establish a rate for these facilities. (b) Please describe how the Company will recover the revenue requirements for the facilities that do not take service under the proposed tariff sheet No. 8.936. (c) Please explain how will the Company apply any revenue from third-party hosts to the EVolution revenue requirement.

RESPONSE:
FPL EVolution DC fast-charging stations that do not assess rates under the proposed UEV rate schedule, tariff sheet No. 8.936, will purchase electricity and assess rates for the facilities as follows:

(a) The site host will purchase electricity from FPL under the applicable commercial tariffs including proposed optional tariff sheet Nos 8.106 (rate schedule GSD-1EV) or 8.311 (rate schedule GSLD-1EV), if approved by the Commission and selected by the site host. The rate charged to drivers will be set by the site host, subject to guidelines defined in the specific site host agreement with FPL, for example $0.25/kWh - $0.35/kWh. Revenue collected by the site host for use of the facilities will be retained by the site host and is intended to offset these electricity costs and provide compensation for FPL's use of the site.

(b) Revenue requirements related to the electricity sold to the site host will be recovered through the applicable tariff discussed in subpart (a) above. Revenue requirements associated with the FPL EVolution facilities will be recovered from the general body of customers, if approved by the Commission in FPL's next base rate case.

(c) Please see response to subpart (b) above.

QUESTION:
Will the proposed tariff sheet Nos 8.106 and 8.311 apply to existing and new charging stations owned by competitive marketers, private businesses and governments within FPL territory? Please explain.

RESPONSE:
Yes, the proposed tariff sheets Nos. 8.106 (schedule GSD-1EV) and 8.311 (schedule GSLD-1EV) will apply to both new and existing charging stations, including, but not limited to, those owned by competitive marketers, private businesses, and governments. It is FPL's intention that the proposed tariffs spur investment in the market and promote wider EV adoption.

QUESTION:
On page 10 of the Company's petition, Chart 1 shows an average rate of $0.35/kWh across three providers. Please discuss why FPL proposed a rate of $0.30/kWh (as opposed to the calculated average of $0.35/kWh).

RESPONSE:
In choosing the rate of $0.30/kWh for the UEV tariff, FPL considered a number of factors, including the equivalent cost per mile for gasoline-powered vehicles, which as indicated on page 10 of the Petition, was estimated at $0.31/kWh. Additionally, when examining rates charged by other providers, more consideration was given to the Tesla rate of $0.28/kWh because, at the time [1], it was the only provider that charged on a per-kWh basis; as opposed to a per-minute basis which, due to varying charging speeds, presents a level of uncertainty when converting to a price per kWh. Finally, FPL considered the possibility that the higher-priced providers may lower their rates in response to the demand limiter mechanism in FPL's proposed pilot GSD-1EV and GSLD-1EV tariffs, which have the potential to substantially lower these providers' electricity cost per kWh. For example, as illustrated in Chart 5 on page 19 of the Petition, the stations that are currently paying between $0.33 /kWh and $1.33 /kWh (approximately 50 % of all stations) are likely to see their cost per kWh drop to approximately $0.22 /kWh – creating substantial savings that could be passed down to EV drivers.

[1] In October 2020, Electrify America announced that it would start charging $0.43 /kWh for Guest and Pass members and $0.31 /kWh (with $4 monthly fee) for Pass+ members.