

STATE OF FLORIDA

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

# Public Service Commission

September 10, 2021

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

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

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

Dear Ms. Moncada:

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

1. Please refer to witness Bores' pre-filed settlement testimony, Exhibit SRB-14.
  - a. Please provide data similar to Schedule 7.1 and 7.2 of the Company's Ten-Year Site Plan for the No STE Resource Plan and SolarTogether Extension Resource Plan. As part of this response, please include an additional column with the net reserve margin capacity above or below the 20 percent planning reserve margin level.
  - b. Please explain why there are no solar units utilized after 2025. As a part of this response, include a revised SRB-14 plan that utilizes solar units after 2025, if available.
2. Please refer to witness Bores' pre-filed settlement testimony, Exhibit SRB-15.
  - a. Please verify that only SolarTogether Extension costs and benefits are present in table SRB-15. If not, please provide a revised SRB-15 with only SolarTogether Extension costs and benefits. If applicable, use this revised SRB-15 for the remaining subparts.
  - b. Please explain why subscription credits are not reflected in the table. As a part of this response, please provide a revised version of SRB-15 that includes subscription credits.
  - c. Please provide the annual values (in nominal and net present value) for SRB-15. Provide this in electronic (excel) format.
  - d. Please refer to FPL's response to Staff's 8<sup>th</sup> Data Request No. 6, Attachment No. 1, tab "System Impacts (Extension)". Please explain the differences between this tab and

Exhibit SRB-15, if any. This response should include any variation in years, values and factors included in the calculations.

3. Please refer to Attachment No. 1, "FPL SolarTogether Extended Program", in response to Staff's 8th Data Request No. 6, tab 13 of 21. Explain what factors were included in FPL's determination for the projected values of the following categories: Generation Capital, Fixed O&M, Incremental Gas Transport and Emissions. This explanation should include specific avoided units, deferred units, emissions savings and any other relevant information used in making determinations for the projected values.
4. Please refer to witness Bores' pre-filed settlement testimony, Exhibit SRB-16.
  - a. Please provide a revised "SolarTogether Original Phase" table that utilizes the original Subscription Credits as approved by Order No. PSC-2020-0084-S-EI. Please provide this in both Adobe PDF and electronic (excel) format.
  - b. Please provide a revised "SolarTogether Extended Program" table that utilizes the revised "SolarTogether Original Phase" and original "SolarTogether Extension" table. Please provide this in both Adobe PDF and electronic (excel) format

Please file all responses electronically no later than Friday, September 17, 2021, from the Commission's website at [www.floridapsc.com](http://www.floridapsc.com), by selecting the Clerk's Office tab and Electronic Filing Web Form. Please feel free to call me at (850) 413-6218 if you have any questions.

Sincerely,

*/s/ Suzanne S. Brownless*

Suzanne S. Brownless  
Special Counsel

SBr/csc

cc: Office of Commission Clerk  
All parties of record