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December 23, 2021

REDACTED

VIA HAND DELIVERY

Mr. Adam Teitzman
Division of the Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

RECEIVED-FPSC
2021 DEC 22 PM 3:31
COMMISSION
CLERK

Re: **Docket No. 20210178-EI
Florida Power & Light Company's Request for Confidential Classification of
Information Provided in Support of Florida Power & Light Company's Notice
of Filing Confidential Supporting Materials in Support of its Petition for
Evaluation of Hurricane Isaias and Tropical Storm Eta Storm Costs**

Dear Mr. Teitzman:

I enclose for filing in the above docket Florida Power & Light Company's ("FPL") Request for Confidential Classification of Information identified in Office of Public Counsel's First Set of Interrogatories and First Request for Production of Documents in this docket. The Request includes Exhibits A, B (two copies), C and D

COM
AFD 1/24/21

Exhibit A consists of the documents containing confidential information, wherein all information asserted by FPL to be confidential has been highlighted. Exhibit B is an edited version of Exhibit A, in which the information FPL asserts is confidential has been redacted. Exhibit C is a justification table in support of FPL's Request for Confidential Classification. Exhibit D contains the declarations in support of FPL's Request. In accordance with Rule 25-22.006(3)(d), FPL requests confidential treatment of the information in Exhibit A pending disposition of FPL's Request for Confidential Classification.

APA
ECO
ENG
GCL
IDM
CLK

Please contact me if you or your Staff has any questions regarding this filing at (561) 691-7108 or jason.higginbotham@fpl.com.

Sincerely,

/s/ Jason A. Higginbotham
Jason A. Higginbotham

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Evaluation of storm costs for Florida
Power & Light Company related to Hurricane
Isaias and Tropical Storm Eta

Docket No: 20200241-EI

Date: December 22, 2021

**FLORIDA POWER & LIGHT COMPANY'S REQUEST
FOR CONFIDENTIAL CLASSIFICATION OF INFORMATION
IDENTIFIED IN OFFICE OF PUBLIC COUNSEL'S
FIRST SET OF INTERROGATORIES**

Pursuant to Section 366.093, Florida Statutes ("F.S."), and Rule 25-22.006, Florida Administrative Code ("F.A.C."), Florida Power & Light Company ("FPL") hereby requests confidential classification of certain documents and information specified in the Office of Public Counsel's ("OPC") First Set of Interrogatories, which were served on FPL in this docket on December 16, 2021.

1. This Request is being filed in accordance with Rule 25-22.006, F.A.C., in order to request confidential classification of certain information related to FPL's Hurricane Isaias and Tropical Storm Eta storm costs. Specifically, FPL seeks confidential classification of the information specified in OPC Interrogatory Nos. 9 through 14, which contain specific names of vendors and dollar amounts taken from invoices associated with costs incurred during Hurricane Isaias and Tropical Storm Eta storm restoration (together, the "Confidential Documents").

2. The following exhibits are attached to and made a part of this Request:

- a. Exhibit A consists of a copy of the Confidential Documents, wherein all the information asserted by FPL to be confidential is highlighted.
- b. Exhibit B is an edited version of Exhibit A, in which the information FPL asserts is confidential has been redacted.

- c. Exhibit C is a table that identifies the information in Exhibit A and references the specific statutory basis for the claim of confidentiality and identifies the Declarant who supports the requested classification.
- d. Exhibit D is the written declaration of Clare Gerard in support of this Request.

3. FPL submits that the information in Exhibit A is proprietary and confidential business information, and its disclosure would cause harm to FPL and its customers. Pursuant to Section 366.093, F.S. such materials are entitled to confidential treatment and are exempt from the disclosure provisions of the applicable public records laws. Thus, once the Commission determines that the information in question is proprietary confidential business information, the Commission is not required to engage in any further analysis or review such as weighing the harm of disclosure against the public interest in access to the information.

4. As described in the declarations in Exhibit D, the confidential business information includes information relating to bids or other contractual data, the disclosure of which would impair the efforts of the public utility or its affiliates to contract for goods or services on favorable terms. Specifically, the information contains the names of vendors and dollar amounts taken from invoices associated with costs incurred by FPL during its Hurricane Isaias and Tropical Storm Eta restoration efforts. This information is protected by Section 366.093(3) (d), F.S.

5. Upon a finding by the Commission that the information contained in the Confidential Documents is proprietary and confidential business information, the information should not be declassified for at least eighteen (18) month period and should be returned to FPL as soon as it is no longer necessary for the Commission to conduct its business. *See* Section 366.093(4), F.S.

WHEREFORE, for the above and foregoing reasons, as more fully set forth in the supporting materials, Florida Power & Light Company respectfully requests that its Request for Confidential Classification be granted.

Respectfully submitted this 22nd day of December 2021.

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Telephone: (561) 691-7108
Facsimile: (561) 691-7135

By: /s/ Jason A. Higginbotham
Jason A. Higginbotham
Florida Authorized Counsel No. 1017875

CERTIFICATE OF SERVICE

20200241-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing* has been furnished
by electronic mail this 22nd day of December 2021 to the following parties:

Office of Public Counsel
Richard Gentry
Patricia A. Christensen
c/o The Florida Legislature
111 W. Madison St., Rm 812
Tallahassee FL 32399-1400
gentry.richard@leg.state.fl.us
christensen.patty@leg.state.fl.us
**Attorneys for the Citizens
of the State of Florida**

By: /s/ Jason A. Higginbotham
Jason A. Higginbotham
Florida Authorized Counsel No. 1017875

* The exhibits to this Request are not included with the service copies, but copies of Exhibits B, C and D are available upon request.

EXHIBIT B

REDACTED

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for evaluation of Hurricane
Isaias and Tropical Storm Eta storm costs, by
Florida Power & Light Company.

DOCKET NO.: 20210178-EI

FILED: December 16, 2021

**CITIZENS' FIRST SET OF INTERROGATORIES TO
FLORIDA POWER & LIGHT COMPANY (Nos. 1-35)**

Pursuant to § 350.0611(1), F.S., Rule 28-106.206, Fla. Admin. Code, and Rule 1.340, Fla. R. Civ. P., the Citizens of the State of Florida (Citizens), through the Office of Public Counsel (OPC), propound the following interrogatories to Florida Power & Light Company (FPL or Company), to be answered on or before January 17, 2022. These interrogatories shall be answered under oath by the Company or its agent, who is qualified and who will be identified. As provided by Rule 1.340(a), Florida Rules of Civil Procedure, each interrogatory shall be answered separately and fully in writing under oath unless it is objected to. Each answer shall be signed by the person making it. Please supply the name, address, and relationship to the Company of those persons providing the answers to each of the following interrogatories

To the extent the Company provides documents in response to an interrogatory, Citizens request the Company produce the documents for inspection and copying at the Office of Public Counsel, Claude Pepper Building, 111 West Madison Street, Room 812, Tallahassee, Florida 32399-1400.

DEFINITIONS

As used herein, the following words shall have the meanings indicated:

“You”, “your”, “Company” or “FPL” refers to Florida Power & Light Company and Gulf Power Company, their employees, consultants, agents, representatives, attorneys of the Company, and any other person or entity acting on behalf of the Company, both jointly and separately and interpreted in the broadest and most inclusive sense.

“Document” refers to written matter of any kind, regardless of its form, and to information recorded on any storage medium, whether in electrical, optical or electromagnetic form, and capable of reduction to writing by the use of computer hardware and software.

“Identify” means:

- (a) With respect to a person, to state the person's name, address and business relationship (e.g., "employee") to the Company;
- (b) With respect to a document, to state the nature of the document in sufficient detail for identification in a request for production, its date, its author, and to identify its custodian. If the information or document identified is recorded in electrical, optical or electromagnetic form, identification includes a description of the computer hardware or software required to reduce it to readable form.

INSTRUCTIONS

1. To the extent an interrogatory calls for information which cannot now be precisely and completely furnished, such information as can be furnished should be included in the answer, together with a statement that further information cannot be furnished, and a statement as to the reasons therefore. If you expect to obtain further information between the time answers are served and the time of hearing, you are requested to state this fact in each answer. If the information which cannot now be furnished is believed to be available to another person, identify such other person and the reasons for believing such person has the described information.
2. In the event any interrogatory herein calls for information or documents which you deem to be privileged, in whole or in part, you shall
 - (a) make the claim expressly and specify the grounds relied upon for the claim of privilege,
 - (b) produce the information or documents in redacted form, and
 - (c) to the extent any information or documents are withheld, you shall identify and describe the nature of each document not disclosed and each redacted provision in a manner that will enable other parties to assess the applicability of the privilege or protection.
3. Documents or reports to be identified shall include all documents in your possession, custody and control and all other documents of which you have knowledge. If a document is produced in response to an interrogatory, please produce a copy of the original and all versions that are different in any way from the original, whether by interlineation, receipt stamp or notation. If you do not have possession, custody, or control of the originals of the

documents requested, please produce a copy of the version(s) in your possession, custody, or control, however, made.

4. Separate answers shall be furnished for each interrogatory, although where the context permits, an interrogatory may be answered by reference to the answer furnished to another interrogatory.
5. For each interrogatory, identify the name, address, telephone number and position of the person responsible for providing the answer.
6. Responsive documents available in an electronic format shall be provided in their native electronic format, unless the parties have reached a specific agreement in advance for production of the documents in a different, agreed-upon format or medium. OPC requests that responses for each production of document request be provided in separate electronic folders that include the documents responsive to the request.
7. Documents should be produced in an OCR (Optical Character Recognition) searchable format.
8. Please provide all responses to these interrogatories that include workpapers, data, calculations and spreadsheets in non-password protected and executable PC-compatible computer program/models/software. Formulae, links, and cells, formatting, metadata and any other original features assisting in calculation should be intact. For example, Excel documents and documents of a similar format shall be produced in their native electronic format, with all spreadsheets, formulas, and links unlocked and intact. To the extent the data requested does not exist in the form requested, please notify the undersigned counsel so that the parties can confer to reach a resolution for timely production.

INTERROGATORIES

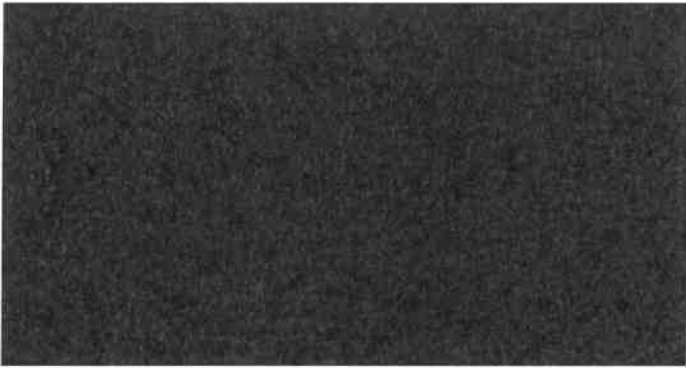
1. Logistics. For Hurricane Isaias and Tropical Storm Eta restoration work, identify and describe all costs that the Company considers logistics costs. In addition, describe the Company's policies for contractors with respect to fueling, meals and lodging while working in-territory on restoration activities.
2. Mobilization/Demobilization. For Hurricane Isaias and Tropical Storm Eta restoration activities, describe in detail the Company policy for determining whether mobilization/demobilization travel time is considered reasonable, why that policy should be considered reasonable, and whether the Company (or any other entity) has performed a study supporting that policy.
3. Mobilization/Demobilization. For Hurricane Isaias and Tropical Storm Eta restoration work, provide a summary of the amount of line contractor costs and the amount of line clearing costs by cost category and by contractor, included in the respective totals requested, that were incurred for mobilization and demobilization. If the information is not available, explain why it is not available and how the Company was able to verify the billing for mobilization and demobilization.
4. Standby. For Hurricane Isaias and Tropical Storm Eta, does the Company have any information that would identify the costs specifically incurred for standby time of line contractors and/or line clearing contractors once mobilized? If not, explain why the Company does not analyze these costs, how the Company mitigates standby time, and how the Company can support the position that all the costs requested are reasonable.
5. Embedded Line Contractors. Provide the amount of annual expense associated with embedded line contractors providing day-to-day service that was included in base rates in effect during 2020. Identify and provide the source of this expense amount, e.g., rate filing schedule and/or workpapers.

6. Embedded Line Contractors. Refer to the summary cost support Excel files included with the Confidential files attached to the November 12, 2021 petition for Hurricane Isaias and Tropical Storm Eta storm cost recovery entitled “DH-1 Isaias Final Costs as of July 2021” and “DH-2 Eta Final Costs as of July 2021.” Refer further to worksheet tabs 3(b) in each file which shows the Company’s ICCA calculation pertaining to line clearing costs. Provide the same type of calculation for each storm in similar format associated with embedded line contractors providing day-to-day service for each of the years 2017-2020, excluding any costs that were capitalized or deferred and included in storm recovery requests in unlocked format.

7. Materials and Supplies. Provide the amount of annual expense associated with materials and supplies that was included in base rates in effect during 2020. Identify and provide the source of this expense amount, e.g., rate filing schedule and/or workpapers.

8. Materials and Supplies. Refer to the summary cost support Excel file included with the Confidential files attached to the November 12, 2021 petition for Hurricane Isaias and Tropical Storm Eta storm cost recovery entitled “DH-1 Isaias Final Costs as of July 2021” and “DH-2 Eta Final Costs as of July 2021.” Refer further to worksheet tab 3(b) in each file which shows the Company’s ICCA calculation pertaining to line clearing costs. Provide the same type of calculation in similar format associated with materials and supplies for each of the years 2017-2020, excluding any costs that were capitalized or deferred and included in storm recovery requests in unlocked format.

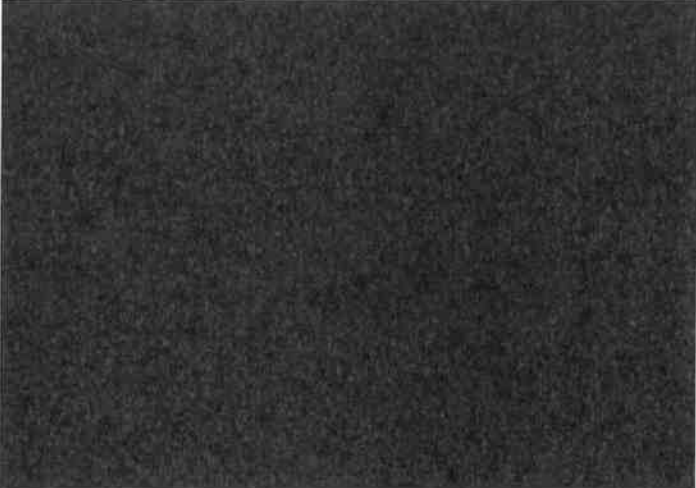
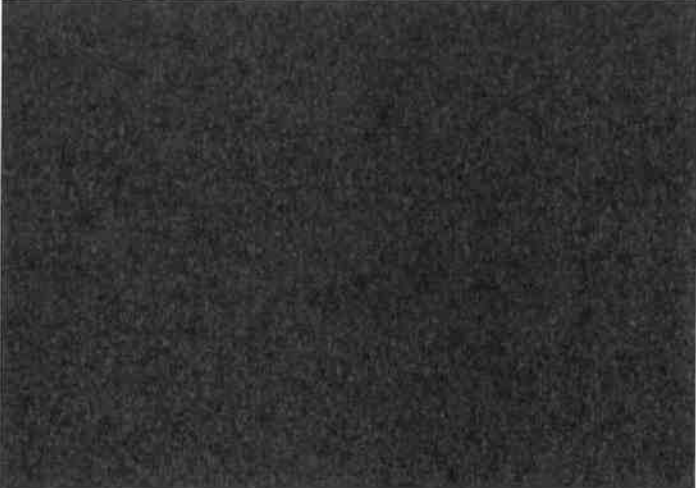
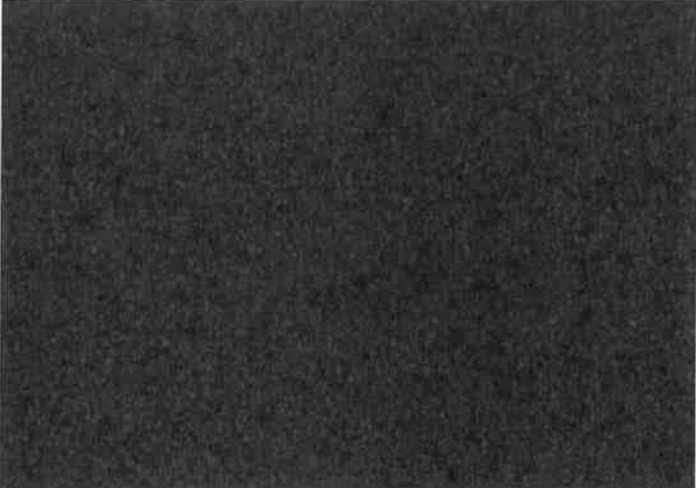
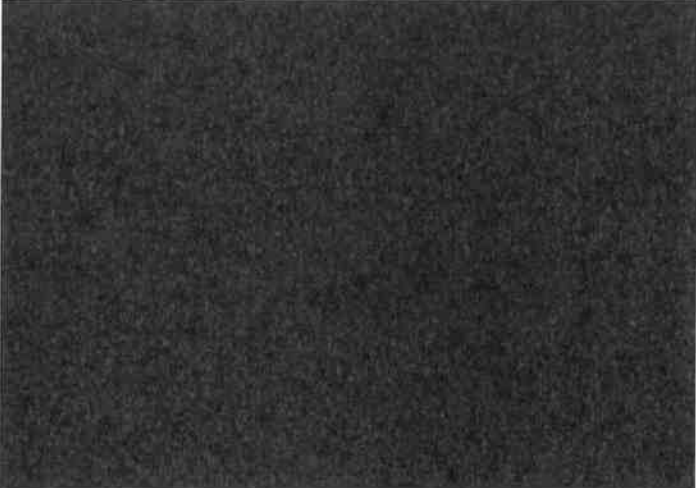
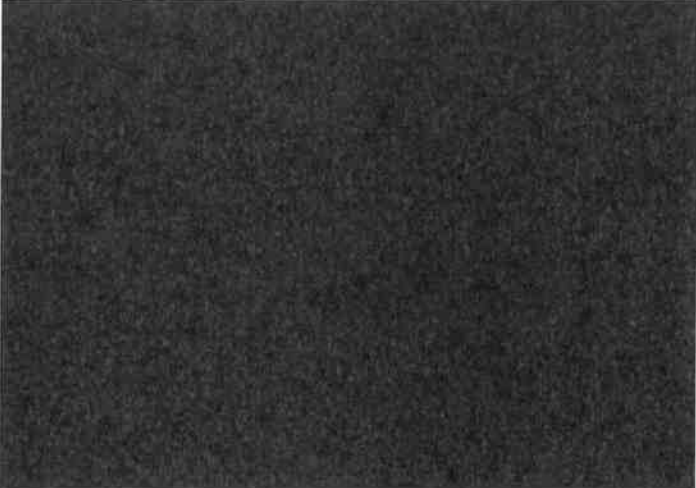
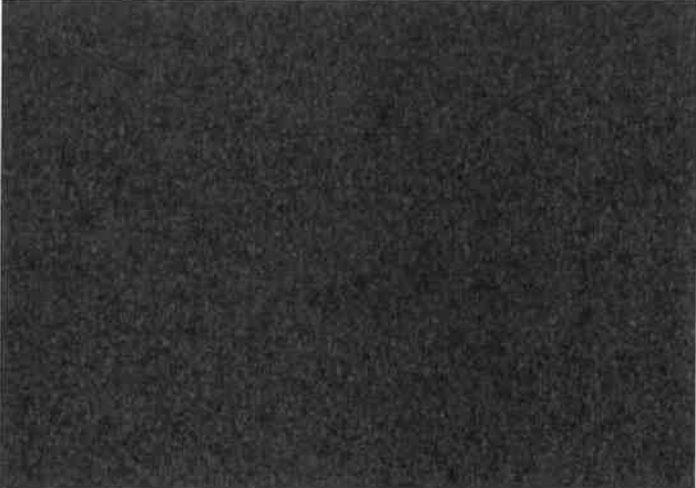
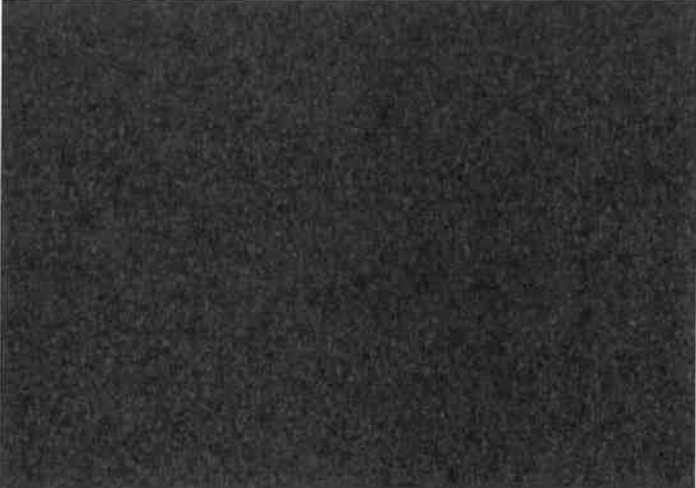
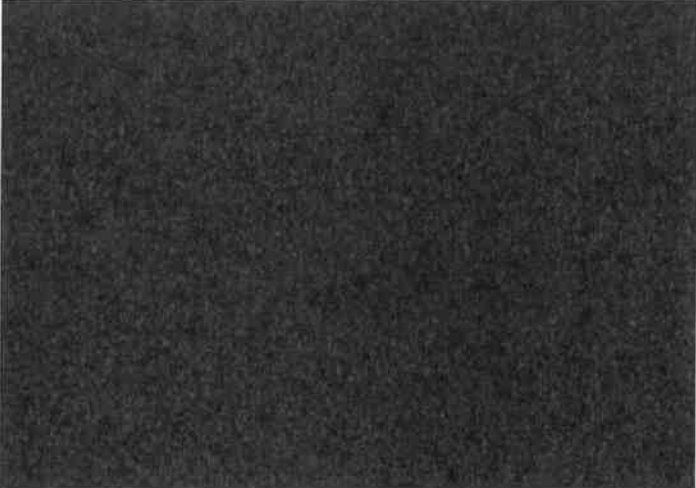
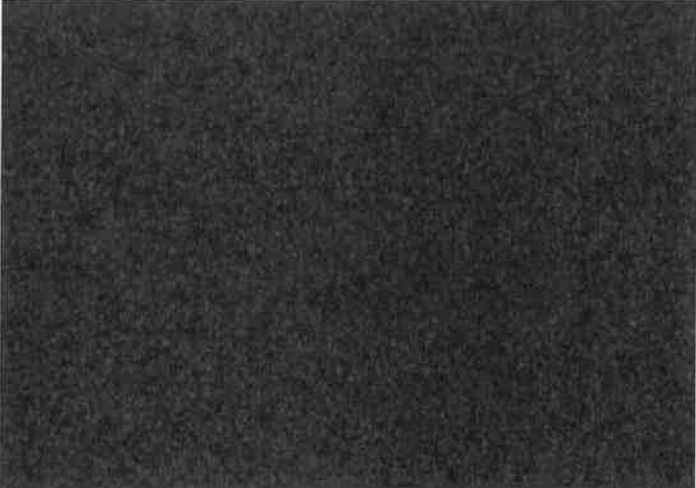
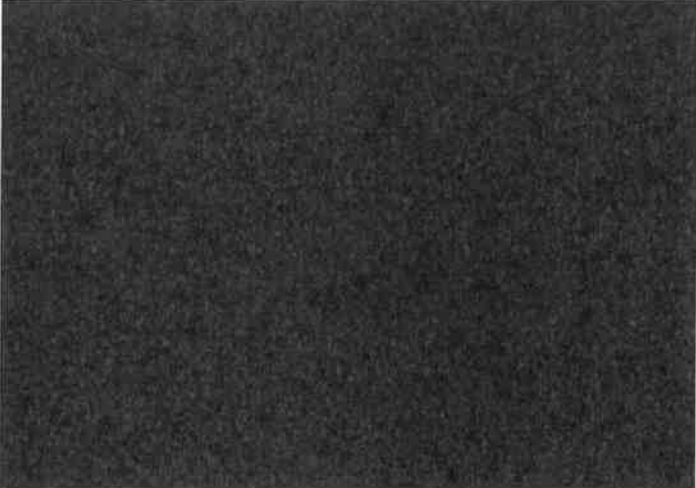
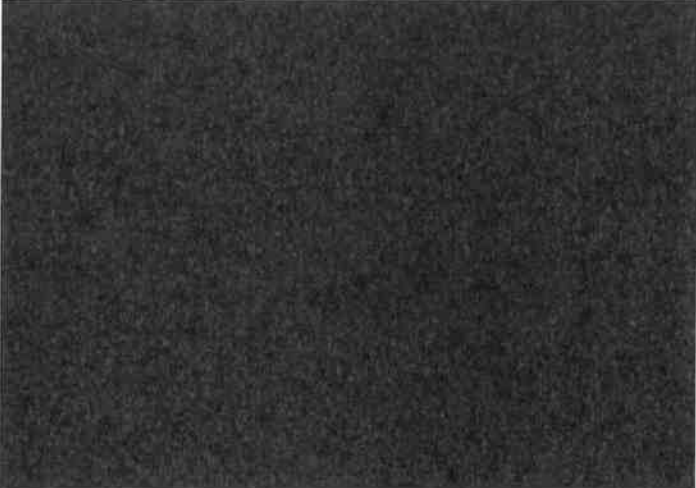
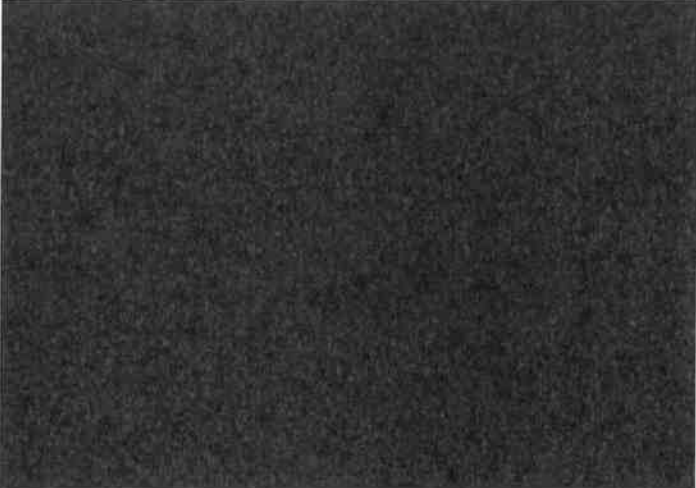
9. Contractors. Refer to the Confidential Excel flat files provided as part of the Company’s November 12, 2021 filing related to Hurricane Isaias. Refer also to the Confidential summary cost support Excel file provided with the filing entitled “DH-1 Isaias Final Costs as of July 2021.” Refer further to worksheet tab 1(c) which provides the summary of all contractor costs (excluding line clearing costs) and 1(d) which provides the summary of all line clearing contractor costs. For each of the contractors and invoice related amounts listed below and listed by worksheet tab and Excel cell reference, there were additional invoices processed for contractors that had costs summarized by Excel flat files but not associated with the Excel flat files provided.

<u>Contractor</u>	<u>Cost Amount</u>	<u>Worksheet Tab & Cell Reference</u>
		Tab 1(c) at J79
		Tab 1(c) at J95
		Tab 1(c) at J112
		Tab 1(c) at J113
		Tab 1(c) at J183
		Tab 1(c) at J184
		Tab 1(c) at J185
		Tab 1(d) at M33
		Tab 1(c) at J177

(The Volt Power LLC amount represents the difference between the flat file amount of \$461,346.17 and the amount in the referenced cell of \$497,977.67.)

- a. Explain why there was not an Excel flat file provided for each of these additional invoice related amounts for the various contractors.
- b. Explain the verification process for these invoice related amounts compared to the Excel flat file verification process described in testimony.

10. Contractors. Refer to the Confidential Excel flat files provided as part of the Company's November 12, 2021 filing. Refer also to the Confidential summary cost support Excel file provided with the filing entitled "DH-2 Eta Final Costs as of July 2021." Refer further to worksheet tab 1(c) which provides the summary of all contractor costs (excluding line clearing costs). For each of the contractors and invoice related amounts listed below and listed by Excel cell reference, there were additional invoices processed for contractors that had costs summarized by Excel flat files but not associated with the Excel flat files provided.

<u>Contractor</u>	<u>Cost Amount</u>	<u>Cell Reference</u>
		J47
		J48
		J65
		J90
		J91
		J94
		J109
		J110
		J114
		J133
		J172
		J201

- a. Explain why there was not an Excel flat file provided for each of these additional invoice related amounts for the various contractors.
- b. Explain the verification process for these invoice related amounts compared to the Excel flat file verification process described in testimony.

11. Contractors. Refer to the Confidential Excel flat files provided as part of the Company's November 12, 2021 filing related to Hurricane Isaias. Refer also to the Confidential summary cost support Excel file provided with the filing entitled "DH-1 Isaias Final Costs as of July 2021." Refer further to worksheet tab 1(d) which provides the summary of all line clearing contractor costs. For each of the contractors and invoice related amounts listed below, there were line clearing costs listed on worksheet tab 1(d) but there were no Excel flat files provided.

<u>Contractor</u>	<u>Cost Amount</u>	<u>Cell Reference</u>
		M13
		M25
		M26
		M27
		M35



- a. Explain why there was not an Excel flat file provided for each of these additional invoice related amounts for the various contractors.
- b. Explain why each of these vendor amounts were included as line clearing costs. If a more appropriate classification should have been made, detail each such classification change that should be made.

12. Contractors. Refer to the Confidential Excel flat files provided as part of the Company’s November 12, 2021 filing related to Hurricane Isaias. Refer also to the Confidential summary cost support Excel file provided with the filing entitled “DH-2 Eta Final Costs as of July 2021.” Refer further to worksheet tab 1(d) which provides the summary of all line clearing contractor costs. For each of the contractors and invoice related amounts listed below, there were line clearing costs listed on worksheet tab 1(d) but there were no Excel flat files provided.

<u>Contractor</u>	<u>Cost Amount</u>	<u>Cell Reference</u>
		J12
		J17
		J18







- a. Explain why there was not an Excel flat file provided for each of these additional invoice related amounts for the various contractors.
- b. Explain why each of these vendor amounts were included as line clearing costs. If a more appropriate classification should have been made, detail each such classification change that should be made.

13. Contractors. Refer to the Confidential summary cost support Excel file provided with the filing entitled “DH-1 Isaias Final Costs as of July 2021.” Refer further to worksheet tab 1(c) which provides the summary of all contractor costs other than line clearing contractors. For each of the contractors and invoice related amounts listed below, there were contractor costs listed on worksheet tab 1(c) that may have been misclassified since they appear to be line clearing related.

<u>Contractor</u>	<u>Cost Amount</u>	<u>Cell Reference</u>
		J189
		J190

- a. For each cost amount referenced above, indicate whether the costs should have been classified as line clearing contractor costs. If not, explain why not.
- b. Refer to the response to subpart a. If line clearing contractor costs were misclassified, explain whether the misclassification would have any bearing on the ICCA adjustment related to line clearing costs and the amount of net costs portrayed on Exhibit DH-1(Isaias).

14. Contractors. Refer to the Confidential Excel flat files provided as part of the Company’s November 12, 2021 filing related to Hurricane Isaias. Refer also to the Confidential summary cost support Excel file provided with the filing entitled “DH-1 Eta Final Costs as of July 2021.” Refer further to worksheet tab 1(c) which provides the summary of all contractor costs other than line clearing contractors. For each of the contractors and invoice related amounts listed below, there were contractor costs listed on worksheet tab 1(c) that may have been misclassified since they appear to be line clearing related.

<u>Contractor</u>	<u>Cost Amount</u>	<u>Cell Reference</u>
		J84
		J116
		J181

- a. For each cost amount referenced above, indicate whether the costs should have been classified as line clearing contractor costs. If not, explain why not.
- b. Refer to the response to subpart a. If line clearing contractor costs were misclassified, explain whether the misclassification would have any bearing on the ICCA adjustment related to line clearing costs and the amount of net costs portrayed on Exhibit DH-1(Eta).

15. Line Contractors. Refer to the Confidential Excel flat files for each storm pertaining to all line contractors provided as part of the Company's filing. Refer further to the hourly rates for each employee that were standard for each employee and not differentiated by position.
 - a. Explain all reasons why the line contractor vendors were allowed to charge one hourly rate for all its contractors that was not differentiated on the contractor employee positions and/or the level of expertise of the individual contractor employee (e.g. foreman vs apprentice).
 - b. Describe the derivation of the individual hourly rates for the line contractor vendors. In your description, include a discussion of equipment charges and any other overhead components that may be included in the hourly rates.
16. Line Contractors. Refer to the Confidential Excel flat files pertaining to all line contractors for each storm provided as part of the Company's filing. Refer further to the hourly rates charged by the contractors. Explain all reasons why most of the line contractors were allowed to charge higher hourly rates for mobilization/demobilization than for actual restoration and follow-up work.
17. Line Contractors. Explain what measures the Company takes to determine that line contractor rates are reasonable and comparable from contractor to contractor.
18. Line Contractors. Has the Company performed any analysis of line contractor rates charged to other utilities in Florida or elsewhere that would allow the Company to determine whether rates it agreed to for Hurricane Isaias and Tropical Storm Eta restoration work are reasonable and/or comparable to rates other utilities are being charged under the similar emergency conditions? If not, explain why not and whether the Company would consider that information important.
19. Contractor Rates. Describe any differences in contractor rates (line contractors and/or vegetation management contractors) that depend on whether the contractor is performing

embedded and/or day-to-day services or performing storm restoration services and/or that depend on the type of storm restoration services, e.g., the intensity of the storm. Cite to relevant contract provisions.

20. Restoration vs Follow-Up. Provide an explanation for costs included in the Company's request broken down between "restoration" costs and "follow-up" costs. If the costs are distinguished by date of incurrence, explain.
21. Line Clearing. Separately for Hurricane Isaias and Tropical Storm Eta restoration work, provide a summary, by vendor, showing the date line clearing crews were mobilized, the number of crews mobilized, and the date the crews were demobilized.
22. Line Contractors. Separately for Hurricane Isaias and Tropical Storm Eta restoration work, provide a summary, by vendor, showing the date line contractor crews were mobilized, the origin city of each crew, the number of crews mobilized, and the date the crews were demobilized. If crews were released to another Utility, please note the date and utility the crew was released to. If the crew was released to home, please indicate as such.
23. Other. Refer to the Confidential summary cost support Excel files provided with the filing entitled "DH-1 Isaias Final Costs as of July 2021" and "DH-2 Eta Final Costs as of July 2021" and further to worksheet tabs 1(h) and GL Detail in each file which show a summary breakdown of 'other costs' associated with Hurricane Isaias and Tropical Storm Eta. Explain what type of costs are included in the 'other costs' requested in this docket and explain all reasons why costs were recorded in months after July through November 2020 and through at least July 2021.
24. Other. Refer to the Confidential summary cost support Excel files provided with the filing entitled "DH-1 Isaias Final Costs as of July 2021" and "DH-2 Eta Final Costs as of July 2021" and further to worksheet tabs AP Detail in each file which shows a number of invoices recorded for Allegis Group Services Inc. that were recorded in months after the end of 2020 and through at least June 2021. Describe what these costs represent and why they are appropriate for storm cost recovery.

25. Other. Refer to the Confidential summary cost support Excel files provided with the filing entitled “DH-1 Isaias Final Costs as of July 2021” and “DH-2 Eta Final Costs as of July 2021” and further to worksheet tabs AP Detail in each file which shows a number of invoices recorded for Robert Half International Inc. that were recorded in months after the end of 2020 and through at least June 2021. Describe what these costs represent and why they are appropriate for storm cost recovery.
26. Other. Refer to the Confidential summary cost support Excel files provided with the filing entitled “DH-1 Isaias Final Costs as of July 2021” and “DH-2 Eta Final Costs as of July 2021” and further to worksheet tabs AP Detail in each file which shows a number of invoices recorded for KForce that were recorded in months after the end of 2020 and through at least June 2021. Describe what these costs represent and why they are appropriate for storm cost recovery.
27. Non-incremental Costs. For Hurricane Isaias and Tropical Storm Eta restoration work and for each of the ICCA amounts reflected on Exhibit DH-1(Isaias) and Exhibit DH-2 (Eta), provide an explanation as to why the cost categories selected were utilized and why other cost categories such as contractor costs and materials and supplies were not selected in the determination of non-incremental costs.
28. Non-incremental Costs. Refer to the Confidential summary cost support Excel files provided with the filing entitled “DH-1 Isaias Final Costs as of July 2021” and “DH-2 Eta Final Costs as of July 2021.” and further to worksheet tabs 1(h) which indicates that affiliate payroll costs of approximately \$1.055 million and \$1.277 million were included for Hurricane Isaias and Tropical Storm Eta, respectively, in the Company’s request. Refer further to worksheet tabs GL Detail which shows the affiliate labor costs by source and date for each storm.
 - a. Indicate whether an ICCA determination was made in regards to affiliate labor costs.

- b. If such an ICCA determination was made in regards to affiliate labor costs, explain in detail how it was done.
 - c. If no such ICCA determination was made in regards to affiliate labor costs, explain all reasons why not.
 - d. Of the affiliate cost amounts cited for each storm above, describe all amounts subsequently removed for capitalized amounts, ICCA adjustments, and for any other reasons.
 - e. Explain all reasons why affiliate payroll costs were recorded in months after the restoration months and through at least July 2021. In addition, describe to what extent these amounts subsequent to the restoration months were removed as part of the ICCA adjustment. Provide the response for costs associated with each separate affiliate.
29. Overhead Costs. If an overhead rate was used for benefits and other related costs for any payroll related to Hurricane Isaias and Tropical Storm Eta restoration work, provide a summary of costs, the corresponding overhead rate(s), a description of how the rate(s) was (were) determined, and the calculation of each such rate.
30. Payroll. Refer to the Confidential summary cost support Excel file provided with the filing entitled “DH-1 Isaias Final Costs as of July 2021” and “DH-2 Eta Final Costs as of July 2021” and further to worksheet tabs 1(a) in each file which show a summary breakdown of payroll costs associated with Hurricane Isaias and Tropical Storm Eta. Explain all reasons why payroll costs, both regular and overtime, were recorded in months after the restoration months and through at least June 2021 for Hurricane Isaias and July for Tropical Storm Eta. In addition, describe to what extent these amounts subsequent to the restoration months were removed as part of the ICCA adjustment.
31. Payroll. Provide the amount of straight time payroll included in O&M expense in each of the years 2017-2020 and provide the amount of straight time payroll charged to storm costs in each of the years 2017-2020.

32. Payroll. Provide the amount of overtime payroll included in O&M expense in each of the years 2017-2020 and provide the amount of overtime payroll charged to storm costs in each of the years 2017-2020.
33. Payroll. Provide the straight time transmission payroll expense and straight time distribution payroll expense included in the base rates that were in effect during 2020 (based on the Company's last base rate proceeding). In addition, provide the percentage of straight time transmission payroll costs charged to expense in the last base rate proceeding and the percentage of straight time distribution payroll costs charged to expense in the last base rate proceeding. Identify and provide the source of these expense amounts and the percentages, e.g., rate filing schedule and/or workpapers.
34. Payroll. Provide the overtime transmission payroll expense and overtime distribution payroll expense included in the base rates that were in effect during 2020 based on the Company's last base rate proceeding. In addition, provide the percentage of overtime transmission payroll costs charged to expense and the percentage of overtime distribution payroll costs charged to expense in the last base rate proceeding. Identify and provide the source of these expense amounts and the percentages, e.g., rate filing schedule and/or workpapers.

35. Payroll. Refer to the Confidential summary cost support Excel files provided with the filing entitled “DH-1 Isaias Final Costs as of July 2021” and “DH-2 Eta Final Costs as of July 2021” and further to worksheet tab 3(a) in each file which shows the calculation of incremental payroll expense. Explain how the incremental and non-incremental amounts were determined.

Respectfully submitted,

Richard Gentry
Public Counsel

/s/ Patricia A. Christensen
Patricia A. Christensen
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Office of Public Counsel
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Room 812
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Attorneys for the Citizens
of the State of Florida

CERTIFICATE OF SERVICE
Docket No. 20210178-EI

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic mail on this 16th day of December 2021, to the following:

Kenneth M. Rubin
Florida Power & Light Company
700 Universe Boulevard
Juno Beach FL 33408
ken.rubin@fpl.com

/s/ Patricia A. Christensen
Patricia A. Christensen
Associate Public Counsel

AFFIDAVIT

STATE OF FLORIDA)

COUNTY OF _____)

I hereby certify that on this _____ day of _____, 2021, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared _____, who is personally known to me, and he/she acknowledged before me that he/she provided the answers to interrogatory number(s) _____ from in CITIZENS FIRST SET OF INTERROGATORIES (NOS. 1-35) to FLORIDA POWER & LIGHT COMPANY, in Docket No. 20210178-EI, and that the responses are true and correct based on his/her personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this _____ day of _____, 2021.

Notary Public
State of Florida, at Large

My Commission Expires:

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: Petition for Limited Proceeding for Recovery of Incremental Storm Restoration Costs Related to Hurricane Isaias and Tropical Storm Eta, By Florida Power & Light Company.
DOCKET NO: 20210178
DATE: December 22, 2021

Int/POD No.	Begin Bates Number	End Bates Number	Description	Page No.	Line Nos.	Florida Statute 366.093 (3) Subsection	Declarant
9	000590	000590	Vendor Names and Dollar Amounts	6	2-10	(d)	Clare Gerard
10	000591	000591	Vendor Names and Dollar Amounts	7	1-12	(d)	Clare Gerard
11	000592	000592	Vendor Names and Dollar Amounts	8	1-5	(d)	Clare Gerard
12	000593	000593	Vendor Names and Dollar Amounts	9	1-3	(d)	Clare Gerard
13	000593	000593	Vendor Names and Dollar Amounts	9	4-5	(d)	Clare Gerard
14	000594	000594	Vendor Names and Dollar Amounts	10	1-2	(d)	Clare Gerard

EXHIBIT D

DECLARATIONS

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Evaluation of storm costs for
Florida Power & Light Company related to
Hurricane Isaias and Tropical Storm Eta

Docket No: 20210178-EI

DECLARATION OF CLARE GERARD

1. My name is Clare Gerard. I am currently employed by NextEra Energy Marketing, LLC., a subsidiary of NextEra Energy, Inc., as the Vice President of Risk and Credit Exposure Management. I have personal knowledge of the matters stated in this declaration.

2. I have reviewed the documents and information included in Exhibit A to Florida Power & Light Company's ("FPL's") Request for Confidential Classification, for which I am listed as the declarant on Exhibit C. The documents and files that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain or constitute information concerning bids or other contractual data, the disclosure of which would impair the efforts of FPL to contract for goods or services on favorable terms. Specifically, the information contains vendor names and dollar amounts from invoices. To the best of my knowledge, FPL has maintained the confidentiality of this information.

3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of eighteen (18) months. In addition, they should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business so that FPL can continue to maintain the confidentiality of these documents.

4. Under penalties of perjury, I declare that I have read the foregoing declaration and that the facts stated in it are true to the best of my knowledge and belief.



Clare Gerard

Date: December 22, 2021