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April 3, 2026

**-VIA ELECTRONIC FILING-**

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

**Re: Docket No. 20260001-EI**

Dear Mr. Teitzman:

Attached for electronic filing in the above docket is the prepared testimony and exhibits of Florida Power & Light Company ("FPL") witness Andrew W. Whitley. This testimony is submitted in support of FPL's Petition for Approval of 2027 Solar Base Rate Adjustment Revenue Requirement and Factor.

Please contact me if you have or your Staff has any questions regarding this filing.

Sincerely,

*s/ Maria Jose Moncada*  
\_\_\_\_\_  
Maria Jose Moncada

Attachments

cc: Counsel for Parties of Record (w/ attachments)

Florida Power & Light Company

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23618816

**CERTIFICATE OF SERVICE**

**Docket No. 20260001-EI**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished

by electronic service on this 3rd day of April 2026 to the following:

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By: s/ Maria Jose Moncada  
Maria Jose Moncada  
Florida Bar No. 0773301

1 **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

2 **FLORIDA POWER & LIGHT COMPANY**

3 **TESTIMONY OF ANDREW W. WHITLEY**

4 **DOCKET NO. 20260001-EI**

5 **APRIL 3, 2026**

6  
7 **Q. Please state your name and business address.**

8 A. My name is Andrew W. Whitley. My business address is Florida Power & Light  
9 Company, 700 Universe Boulevard, Juno Beach, Florida 33408.

10 **Q. By whom are you employed and what is your position?**

11 A. I am employed by Florida Power & Light Company (“FPL” or the “Company”) as  
12 Senior Engineering Manager of Integrated Resource Planning (“IRP”) in the Energy  
13 Marketing and Trading Department.

14 **Q. Please describe your educational background and professional experience.**

15 A. I graduated from Lehigh University in 2004 with a Bachelor of Science in Mechanical  
16 Engineering. I joined FPL in 2004 as part of the Power Delivery team, undertaking  
17 various engineering duties related to initiating new service to FPL customers and  
18 maintaining the reliability of customers’ existing services. In 2007, I joined the team  
19 now known as the IRP group. Since that time, I have been involved in and supported  
20 a variety of resource planning projects for FPL, including FPL’s Ten Year Site Plans  
21 (“TYSP”), solar base rate adjustments, need determination proceedings for new power  
22 plants under the Florida Power Plant Siting Act (including the Okeechobee Clean  
23 Energy Center in 2015 and the Dania Beach Clean Energy Center in 2018), base rate

1 proceedings, and the Demand-Side Management (“DSM”) Goals proceedings. I  
2 became the Manager of the IRP group in 2022 and have served as the project leader for  
3 FPL’s TYSPs since 2022.

4 **Q. Please describe your duties and responsibilities in your current position.**

5 A. In my current position, I am responsible for the management and coordination of  
6 economic analyses that identify and evaluate resource alternatives to meet FPL’s  
7 resource needs and maintain system reliability. The analyses I oversee are designed to  
8 determine the magnitude and timing of resource needs for FPL’s system and are used  
9 to develop the Company’s integrated resource plan.

10 **Q. Have you previously testified on resource planning issues before the Florida  
11 Public Service Commission (“Commission”)?**

12 A. Yes. I testified in FPL’s 2019 DSM Goals (Docket No. 20190015-EG) and FPL’s 2024  
13 DSM Goals (Docket No. 20240012-EG). My testimony in those dockets focused on  
14 FPL’s resource planning process and how it related to the development of FPL’s DSM  
15 portfolios. I also provided testimony on the economic analysis of FPL’s 2024 and 2025  
16 solar base rate adjustments in Docket Nos. 20230001-EI and 20240001-EI,  
17 respectively. Finally, I provided testimony in FPL’s 2025 base rate adjustment docket  
18 (Docket No. 20250011-EI) that covered various resource planning issues. I have also  
19 appeared before the Commission at its 2022 and 2023 workshops on the Florida  
20 utilities’ Ten-Year Site Plans.

21 **Q. Are you sponsoring any exhibits in this case?**

22 A. Yes. I am sponsoring the following exhibits:

- 23
- Exhibit AWW-1 Load Forecast

- 1 • Exhibit AWW-2 FPL Fuel Price Forecast
- 2 • Exhibit AWW-3 FPL Resource Plans
- 3 • Exhibit AWW-4 CPVRR – Costs and (Benefits)
- 4 • Exhibit AWW-5 Yearly PTC Impact
- 5 • Exhibit AWW-6 Avoided Natural Gas
- 6 • Exhibit AWW-7 Avoided Air Emissions

7 **Q. What is the purpose of your testimony?**

8 A. The purpose of my testimony is to present the results of the economic analysis, which  
9 shows that the addition of 1,192 megawatts alternating current (“MW<sub>AC</sub>”) of universal  
10 solar photovoltaic (“PV”) generation scheduled to be placed in service throughout 2027  
11 (the “2027 Project” or “Project”) is cost-effective. My testimony covers several areas.  
12 First, I identify the 16 sites that make up the 2027 Project. Second, I discuss the major  
13 assumptions and the methodology used to perform the economic analysis. Third, I  
14 present the results of the economic analysis demonstrating that the addition of the 2027  
15 Project is cost-effective. Lastly, I discuss non-economic benefits derived from the  
16 construction and operation of these facilities.

17 **Q. Please summarize your testimony.**

18 A. FPL is proposing the construction and operation of the 2027 Project: 1,192 MW<sub>AC</sub> of  
19 solar PV generation, consisting of 16 universal solar energy centers which are expected  
20 to enter service throughout 2027. FPL performed an economic analysis and determined  
21 that the 2027 Project will result in a reduction in the cumulative present value of  
22 revenue requirements (“CPVRR”) to FPL customers, for a total savings of  
23 approximately \$908 million. In addition, these centers are projected to result in a

1 significant reduction in the projected use of fossil fuels, which will in turn lower FPL’s  
2 system reliance on generation fueled by natural gas. The 2027 Project is cost-effective  
3 and meets both a 1.15 to 1 benefit-to-cost ratio and a payback period of less than 10  
4 years, as required to qualify for a Solar and Battery Base Rate Adjustment (“SoBRA”)  
5 under FPL’s 2025 Rate Case Settlement (“2025 Rate Settlement”) approved by the  
6 Commission in Order No. PSC-2026-0022-S-EI.

7 **Q. Please describe the 2027 Project.**

8 A. The 2027 Project comprises 16 solar energy centers with a total nameplate capacity of  
9 1,192 MW<sub>AC</sub>, of which eight are expected to be placed in service by January 31, 2027,  
10 and eight expected to be placed in service by July 31, 2027. Each of these centers is  
11 projected to generate about 165,400 MWh per year. This is enough energy to serve the  
12 annual energy needs of about 12,800 homes. FPL witness Stankiewicz describes the  
13 technology to be employed at each center in greater detail and demonstrates that the  
14 construction cost for the proposed solar generation is reasonable.

15 **Q. What are the major system assumptions used in this analysis?**

16 A. The major assumptions used in this analysis are the following:

- 17 • **Load Forecast** – The analysis uses FPL’s most recent long-term load forecast,  
18 approved as FPL’s official load forecast in January 2026. This load forecast,  
19 including system peaks and net energy for load, is used in FPL’s 2026 TYSP  
20 and is shown in Exhibit AWW-1;
- 21 • **Fuel Price Forecast** – The analysis uses FPL’s most recent long-term fuel  
22 forecast, based on FPL’s standard long-term fuel forecasting methodology,  
23 approved as FPL’s official fuel price forecast in September 2025. This fuel

1 price forecast is used in FPL’s 2026 TYSP and is shown in Exhibit AWW-2;  
2 and

3 • **CO<sub>2</sub> Emission Price Forecast** - The CO<sub>2</sub> cost projections used in this filing are  
4 based on ICF’s proprietary CO<sub>2</sub> compliance cost forecast dated September 26,  
5 2022. ICF is a consulting firm with extensive experience in forecasting the cost  
6 of air emissions and is recognized as one of the industry leaders in this field.  
7 This forecast, which assumes that CO<sub>2</sub> compliance costs will start in the year  
8 2036, was used in preparing FPL’s 2026 TYSP.

9 **Q. Please describe the resource plans that formed the basis for FPL’s cost-**  
10 **effectiveness analysis.**

11 A. For purposes of this filing, FPL developed two resource plans. The first resource plan,  
12 called the “No 2027 SoBRA Plan,” does not include any new solar facilities beyond  
13 those already in-service as of the end of 2027. In this plan, future resource needs are  
14 met by combined cycle units, combustion turbines, and battery storage.

15  
16 The second resource plan, called the “2027 SoBRA Plan,” adds the 2027 Project  
17 described above. Because each center is assumed to provide approximately 4% of the  
18 nameplate capacity as firm capacity to meet FPL’s reliability obligations, 149 MW of  
19 batteries in 2031 and 2034 are avoided. These two resource plans are shown in Exhibit  
20 AWW-3.

21 **Q. What is the net capacity factor of the facilities in the 2027 Project?**

22 A. The 2027 centers are projected to have an average yearly net capacity factor (or “NCF”)  
23 of 25.4%.

1 **Q. How did FPL determine the firm capacity that solar facilities will provide?**

2 A. Firm capacity value is based on the expected output of a solar facility at the time of  
3 summer peak load, which typically occurs annually in August from 4 p.m. to 5 p.m.,  
4 and winter peak load, which typically occurs in January from 7 a.m. to 8 a.m. FPL uses  
5 a “net peak load” methodology to determine what firm capacity value at FPL’s summer  
6 and winter peak hours would be appropriate to apply to PV facilities. The potential  
7 capacity contribution of PV facilities is dependent upon several factors including: site  
8 location, technology, design, and the total amount of solar that is operating on FPL’s  
9 system. FPL applies this same methodology to evaluate all its solar PV facilities,  
10 existing or new.

11

12 Based on this methodology, the 2027 centers are projected to have an average summer  
13 firm capacity value of 4.4% of their nameplate rating. Therefore, the 16 centers with a  
14 total nameplate capacity of 1,192 MW<sub>AC</sub> are assumed to have a total firm capacity value  
15 of 53 MW<sub>AC</sub> at time of summer peak. These solar installations are assumed to have a  
16 3.9% firm capacity value at time of winter peak due to FPL’s winter peak occurring in  
17 the early morning, when there is little solar generation output.

18 **Q. Please provide an overview of the analytical process that FPL used to determine**  
19 **the cost-effectiveness of the 2027 Project.**

20 A. FPL used the capacity expansion and hourly production cost functions of the Aurora  
21 model to forecast the system economics and develop resource plans that include or  
22 exclude the 2027 Project. This model has been used by FPL in prior proceedings at the  
23 Commission. Each Aurora modeling run is used to determine the optimal resource plan

1 and associated generation system costs, consisting of capital costs, fixed operations and  
2 maintenance (“O&M”) costs, capital replacement costs, fuel costs, variable O&M  
3 costs, and emissions costs for a given resource plan. The Aurora model is used to  
4 determine the CPVRR for each resource plan.

5 **Q. Please provide the result of the economic analysis.**

6 A. To determine the CPVRR impact of the proposed solar generation, FPL subtracted the  
7 CPVRR of the No 2027 SoBRA Plan from the CPVRR of the 2027 SoBRA Plan. As  
8 shown in Exhibit AWW-4, the CPVRR benefit to FPL customers from the 2027 Project  
9 is approximately \$908 million.

10 **Q. Does the economic analysis include the effects of Production Tax Credits**  
11 **(“PTCs”)?**

12 A. Yes, the economic analysis includes the effects of PTCs that were part of the Inflation  
13 Reduction Act that was passed in 2022. The calculation of the PTCs from the 2027  
14 Project is shown in Exhibit AWW-5.

15 **Q. Does the 2027 Project meet the additional cost-effectiveness parameters identified**  
16 **in the 2025 Rate Settlement?**

17 A. Yes. The 2027 Project has a benefit-to-cost ratio of 1.63, which is higher than the 1.15  
18 requirement in the 2025 Rate Settlement. The Project is also CPVRR beneficial in  
19 eight years, which is faster than the 10-year requirement in the 2025 Rate Settlement.

20 **Q. Will the 2027 Project reduce FPL’s use of fossil fuel?**

21 A. Yes. As shown on Exhibit AWW-6, the energy from the 2027 Project will displace  
22 fossil fuel generation, specifically natural gas. The Project is expected to reduce the  
23 annual average use of natural gas by 16,960 million cubic feet. By adding the Project

1 to its generation fleet, FPL reduces its reliance on natural gas, reduces exposure to fuel  
2 price volatility, and reduces the future need to obtain firm gas transport capability for  
3 FPL's system.

4 **Q. What effect will these solar energy centers have with respect to greenhouse gases**  
5 **and other air emissions?**

6 A. As shown in Exhibit AWW-7, reducing the use of fossil fuel results in an average  
7 annual reduction of 1,017,000 tons of CO<sub>2</sub>. This reduction in CO<sub>2</sub> is equivalent to  
8 removing approximately 12,500 cars from the road. Sulfur dioxide emissions are  
9 reduced by an annual average of 31 tons and nitrogen oxide emissions are reduced by  
10 an annual average of 129 tons.

11 **Q. Is the 2027 Project still cost-effective without considering the future impact of CO<sub>2</sub>**  
12 **compliance costs?**

13 A. Yes. Avoided CO<sub>2</sub> compliance costs represent \$178 million of the CPVRR benefit for  
14 the 2027 Project. If these costs are removed, the Project is still cost-effective with a  
15 CPVRR benefit of \$730 million and a benefit-to-cost ratio of 1.51 and remains CPVRR  
16 beneficial in eight years.

17 **Q. What is your conclusion regarding the 2027 Project?**

18 A. As demonstrated by the economic analysis described in my testimony, the addition of  
19 the 2027 Project will result in CPVRR savings of approximately \$908 million, has a  
20 benefit-to-cost ratio of 1.63, and remains CPVRR beneficial in eight years. Therefore,  
21 the 2027 Project meets the SoBRA cost-effectiveness requirements established in the  
22 2025 Rate Settlement. Additionally, the 2027 Project will reduce the use of fossil fuel,  
23 reduce air emissions, and reduce FPL's reliance on natural gas.

1 Q. Does this conclude your testimony?

2 A. Yes.

**Load Forecast  
 January 2026**

<b>Year</b>	<b>Summer Peak MW</b>	<b>Winter Peak MW</b>	<b>Net Energy for Load MWh</b>
2026	28,868	23,478	146,497,757
2027	29,259	23,962	147,682,504
2028	30,033	24,515	151,233,813
2029	30,682	25,070	155,770,121
2030	31,325	25,405	159,908,354
2031	32,175	26,018	164,134,859
2032	33,115	26,716	168,854,895
2033	34,038	27,404	173,334,325
2034	34,874	28,000	177,487,460
2035	35,623	28,544	180,672,545
2036	36,371	29,214	184,085,078
2037	36,978	29,647	185,940,060
2038	37,563	30,063	187,653,711
2039	38,102	30,444	189,126,727
2040	38,596	30,837	190,311,270
2041	39,090	31,230	191,409,152
2042	39,389	31,467	190,992,310
2043	39,886	31,863	192,095,502
2044	40,401	32,274	193,367,713
2045	40,928	32,695	194,526,634
2046	41,105	32,835	195,322,343
2047	41,282	32,975	196,121,848
2048	41,460	33,116	196,986,370
2049	41,638	33,258	197,732,325
2050	41,818	33,400	198,543,334
2051	41,999	33,543	199,358,213
2052	42,180	33,687	200,238,182
2053	42,362	33,831	200,999,660
2054	42,545	33,977	201,826,266
2055	42,729	34,122	202,656,819
2056	42,914	34,269	203,552,536
2057	43,100	34,416	204,329,838
2058	43,286	34,564	205,172,345
2059	43,474	34,713	206,018,875
2060	43,662	34,862	206,930,647
2061	43,852	35,012	207,724,082
2062	44,042	35,163	208,582,799

**FPL Fuel Price Forecast  
 September 2025**

<b>Year</b>	<b>FGT Firm Gas (\$/MMBTU)</b>	<b>Gulfstream Firm Gas (\$/MMBTU)</b>	<b>Sabal Trail Firm Gas (\$/MMBTU)</b>	<b>Residual Oil (\$/MMBTU)</b>	<b>Distillate Oil (\$/MMBTU)</b>	<b>Scherer 3 Coal Price (\$/MMBTU)</b>
2026	4.04	4.00	4.61	13.62	17.65	3.15
2027	4.22	4.04	4.46	13.38	17.35	3.23
2028	4.50	4.36	4.60	13.14	16.90	3.31
2029	4.14	3.97	4.18	13.43	17.63	3.51
2030	4.08	3.95	4.15	14.04	18.49	3.56
2031	4.73	4.60	4.79	14.56	19.20	3.66
2032	5.73	5.59	5.77	15.07	19.81	3.71
2033	5.54	5.40	5.58	15.59	20.60	3.77
2034	5.81	5.68	5.85	16.11	21.41	3.82
2035	5.90	5.76	5.93	16.56	22.34	3.86
2036	6.20	6.06	6.23	16.92	23.18	3.91
2037	6.40	6.25	6.42	17.00	23.57	3.97
2038	6.70	6.55	6.71	17.07	23.98	4.03
2039	6.86	6.71	6.87	17.13	24.29	4.09
2040	7.29	7.14	7.29	17.18	24.70	4.16
2041	7.78	7.63	7.77	17.20	25.09	4.23
2042	8.10	7.94	8.08	17.29	25.56	4.30
2043	8.39	8.23	8.37	17.38	26.00	4.37
2044	8.70	8.54	8.67	17.46	26.46	4.44
2045	9.07	8.90	9.03	17.52	26.93	4.52
2046	9.54	9.37	9.49	17.59	27.43	4.60
2047	10.03	9.86	9.97	17.64	27.87	4.68
2048	10.45	10.28	10.38	17.69	28.35	--
2049	10.76	10.58	10.68	17.78	28.83	--
2050	11.29	11.11	11.20	17.92	29.26	--
2051	11.42	11.24	11.33	17.95	29.47	--
2052	11.56	11.37	11.46	17.99	29.68	--
2053	11.69	11.51	11.59	18.03	29.90	--
2054	11.83	11.64	11.72	18.06	30.12	--
2055	11.97	11.78	11.86	18.10	30.34	--
2056	12.11	11.92	11.99	18.13	30.56	--
2057	12.25	12.06	12.13	18.17	30.78	--
2058	12.39	12.20	12.27	18.20	31.00	--
2059	12.54	12.34	12.41	18.24	31.23	--
2060	12.68	12.49	12.56	18.27	31.46	--
2061	12.83	12.64	12.70	18.31	31.69	--
2062	12.98	12.79	12.85	18.35	31.92	--

**FPL Resource Plans**

<b>Year</b>	<b>No 2027 SoBRA Plan</b>	<b>2027 SoBRA Plan</b>
2026	894 MW Solar 1,419.5 MW Battery	894 MW Solar 1,419.5 MW Battery
2027	819.5 MW Battery Vandolah CTs	<b>1,192 MW 2027 SoBRA</b> 819.5 MW Battery Vandolah CTs
2028	--	--
2029	--	--
2030	--	--
2031	1,043 MW Battery	968.5 MW Battery
2032	Martin 2x1 Once Thru CC (1,308 MW)	8x0 Martin CT (1,872 MW)
2033	8x0 Martin CT (1,872 MW)	Martin 2x1 Once Thru CC (1,308 MW)
2034	8x0 Martin CT (1,872 MW) 521.5 MW Battery	447 MW Battery
2035	2,980 MW Battery	8x0 Martin CT (1,872 MW) 2,980 MW Battery

\* MW values shown above for solar projects are nameplate AC. MW values for fossil units are based on summer MW ratings.

**CPVRR - Costs and (Benefits)\***

Solar Revenue Requirements			Non-Solar (Avoided) Generation Costs				Avoided System Costs			PTC Impacts	Total CPVRR (Millions)
Generation Capital** (Millions)	Fixed O&M + Capital Replacement (Millions)	Transmission Interconnection (Millions)	Generation Capital (Millions)	Fixed O&M + Capital Replacement (Millions)	Transmission Interconnection (Millions)	Incremental Gas Transport (Millions)	System Net Fuel (Millions)	Startup + VOM (Millions)	Emission (Millions)	PTC Impacts (Millions)	
\$1,966	\$126	\$223	(\$220)	(\$58)	(\$2)	(\$600)	(\$1,274)	(\$125)	(\$178)	(\$765)	<b>(\$908)</b>

Benefit-to-Cost Ratio = 1.63

CPVRR Beneficial within X-Years = 8 (Year = 2034)

\* Negative ( ) indicates savings to FPL customers

\*\* Based on the total installed cost of the project, \$1,695/kW

**Yearly PTC Impact**

<b>Year</b>	<b>2027 Solar Project Generation (MWh)</b>	<b>PTC Forecast* (\$/MWh)</b>	<b>Total PTC Impact (Millions)</b>
2027	1,763,223	\$42.86	\$75.58
2028	2,646,015	\$42.86	\$113.42
2029	2,630,265	\$44.20	\$116.27
2030	2,621,056	\$45.54	\$119.37
2031	2,611,883	\$46.88	\$122.45
2032	2,609,161	\$46.88	\$122.32
2033	2,593,644	\$48.22	\$125.07
2034	2,584,578	\$49.56	\$128.10
2035	2,575,512	\$50.90	\$131.10

\* PTC forecast values represent impact to customers after adjusting for taxes

**Avoided Natural Gas**

<b>Year</b>	<b>Avoided Natural Gas MMCF</b>
2027	11,735
2028	17,608
2029	17,714
2030	17,397
2031	17,611
2032	10,266
2033	17,933
2034	18,121
2035	18,676
2036	18,098
2037	18,805
2038	17,969
2039	17,494
2040	18,005
2041	17,806
2042	17,953
2043	17,140
2044	16,917
2045	16,933
2046	17,429
2047	17,678
2048	17,167
2049	17,306
2050	17,002
2051	17,194
2052	16,969
2053	16,765
2054	16,918
2055	16,690
2056	16,783
2057	16,594
2058	16,443
2059	16,430
2060	16,408
2061	16,294
2062	16,327
<b>Average =</b>	<b>16,961</b>

**Avoided Air Emissions**

<b>Year</b>	<b>Avoided CO<sub>2</sub> Short Tons</b>	<b>Avoided SO<sub>2</sub> Short Tons</b>	<b>Avoided NO<sub>x</sub> Short Tons</b>
2027	714,860	2	85
2028	1,062,180	5	191
2029	1,069,420	3	181
2030	1,080,680	19	240
2031	1,120,890	16	257
2032	560,680	164	(172)
2033	1,068,620	12	181
2034	1,120,900	22	232
2035	1,093,150	8	168
2036	1,149,760	19	282
2037	1,074,100	3	169
2038	1,128,680	23	245
2039	1,190,700	33	319
2040	1,090,100	9	219
2041	1,101,730	33	192
2042	1,064,150	26	156
2043	1,058,680	35	136
2044	1,061,940	32	164
2045	1,084,920	41	167
2046	1,010,280	25	60
2047	952,640	13	14
2048	1,006,870	42	68
2049	1,016,820	38	92
2050	1,002,640	23	101
2051	1,010,800	35	95
2052	996,100	40	46
2053	985,000	36	80
2054	993,000	45	85
2055	978,450	39	65
2056	974,850	67	60
2057	973,770	41	80
2058	973,880	18	71
2059	958,500	53	44
2060	958,620	56	77
2061	963,190	21	111
2062	959,080	35	79
<b>Average =</b>	<b>1,016,962</b>	<b>31</b>	<b>129</b>