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April 24, 2026

-VIA ELECTRONIC DELIVERY-

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

Re: Docket No. 20240149-EI
Petition for limited proceeding for recovery of incremental storm restoration costs
related to Hurricanes Debby, Helene, and Milton, by Florida Power & Light
Company

Dear Mr. Teitzman:

Enclosed for filing on behalf of Florida Power & Light Company ("FPL") is FPL's
response to Staff's First Data Request (Nos. 1-7) in Docket No. 20240149-EI.

Thank you for your assistance. Please contact me should you or your staff have any
questions regarding this filing.

Sincerely,

/s/ Joel T. Baker

Joel T. Baker
Fla. Bar No. 0108202

JTB
Enclosure

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of the foregoing have been furnished by Electronic Mail to the following parties of record this 24th day of April 2026:

Jennifer Crawford Suzanne Brownless Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399 jcrowfor@psc.state.fl.us sbrownle@psc.state.fl.us discovery-gcl@psc.state.fl.us <i>For Commission Staff</i>	Walt Trierweiler Charles J. Rehwinkel Austin A. Watrous c/o The Florida Legislature 111 West Madison Street, Room 812 Tallahassee, FL 32399-1400 Trierweiler.walt@leg.state.fl.us rehwinkel.charles@leg.state.fl.us watrous.austin@leg.state.fl.us <i>For Office of Public Counsel</i>
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s/ Joel T. Baker

Joel T. Baker

Fla. Bar No. 0108202

Attorney for Florida Power & Light Company

**Florida Power & Light Company
Docket No. 20240149-EI
Staff's First Data Request
Request No. 1
Page 1 of 1**

QUESTION:

Please refer to Witness Jarro's direct testimony filed on December 19, 2025, for the following data request:

Refer to page 11, lines 13-19. Is the cost of using Starlink devices included in the storm recovery costs? If so, what category is it included in and what is the amount?

RESPONSE:

Yes, the cost of using Starlink devices (including the cost of units and services/connectivity) for the purpose of supporting storm restoration activities is included in FPL's storm recovery costs. These costs were assigned to Hurricane Milton and are included in the "Logistics" and "Other" categories. The associated costs total \$102,465 (\$38,175 categorized as "Logistics" and \$64,290 categorized as "Other").

**Florida Power & Light Company
Docket No. 20240149-EI
Staff's First Data Request
Request No. 2
Page 1 of 1**

QUESTION:

Please refer to Witness Jarro's direct testimony filed on December 19, 2025, for the following data request:

Refer to page 12, line 4-9. Is the cost of using "wash trucks" included in the storm recovery costs? If so, what category is it included in and what is the amount?

RESPONSE:

All wash trucks utilized during storm restoration activities were FPL-owned assets; therefore, no wash truck acquisition costs were included in storm recovery costs. Fuel costs associated with wash truck operations during the storm period were evaluated in accordance with the Incremental Cost and Capitalization Approach ("ICCA"), which compares actual storm-period fuel costs to the prior three-year historical average. All wash trucks were operated by FPL employees, and accordingly, related labor costs are included in payroll and subject to ICCA adjustment.

**Florida Power & Light Company
Docket No. 20240149-EI
Staff's First Data Request
Request No. 3
Page 1 of 1**

QUESTION:

Please refer to Witness Jarro's direct testimony filed on December 19, 2025, for the following data request:

Refer to page 23, lines 6-14. What date were the restoration personnel released for Hurricane Debby

RESPONSE:

The majority of restoration personnel supporting Hurricane Debby, including both internal and external resources, were released between August 6 and August 7, 2024. At that time, most internal personnel returned to their normal "blue-sky" business roles, with only a limited number of personnel remaining briefly thereafter to close out restoration activities. Similarly, on those dates most external crews commenced travel back to their home utilities or were redeployed to assist other electric utilities still restoring from Hurricane Debby, with only a limited number of external crews remaining to complete follow-up work.

**Florida Power & Light Company
Docket No. 20240149-EI
Staff's First Data Request
Request No. 4
Page 1 of 1**

QUESTION:

Please refer to Witness Jarro's direct testimony filed on December 19, 2025, for the following data request:

Refer to page 26, lines 5-13. What date did FPL begin to pre-position resources for Hurricane Helene?

RESPONSE:

FPL strategically opens staging sites and pre-positions resources and supplies within its service area based on National Hurricane Center forecasts in anticipation of landfall. Restoration personnel were onsite and pre-positioned for Hurricane Helene beginning on September 25, 2024.

**Florida Power & Light Company
Docket No. 20240149-EI
Staff's First Data Request
Request No. 5
Page 1 of 1**

QUESTION:

Please refer to Witness Jarro's direct testimony filed on December 19, 2025, for the following data request:

Refer to page 28, lines 15-21. What date were the restoration personnel released for Hurricane Helene?

RESPONSE:

The majority of restoration personnel supporting Hurricane Helene, including both internal and external resources, were released between September 28 and October 1, 2024. At that time, most internal personnel returned to their normal "blue-sky" business roles, with only a limited number of personnel remaining briefly thereafter to close out restoration activities. Similarly, during that time most external crews commenced travel back to their home utilities or were redeployed to assist other electric utilities still restoring from Hurricane Helene, with only a limited number of external crews remaining to complete follow-up work.

**Florida Power & Light Company
Docket No. 20240149-EI
Staff's First Data Request
Request No. 6
Page 1 of 1**

QUESTION:

Please refer to Witness Jarro's direct testimony filed on December 19, 2025, for the following data request:

Refer to page 31, lines 15-23. What date did FPL begin to pre-position resources for Hurricane Milton?

RESPONSE:

FPL strategically opens staging sites and pre-positions resources and supplies within its service area based on National Hurricane Center forecasts in anticipation of landfall. Restoration personnel were onsite and pre-positioned for Hurricane Milton beginning on October 9, 2024.

**Florida Power & Light Company
Docket No. 20240149-EI
Staff's First Data Request
Request No. 7
Page 1 of 1**

QUESTION:

Please refer to Witness Jarro's direct testimony filed on December 19, 2025, for the following data request:

Refer to page 34, lines 4-10. What date were the restoration personnel released for Hurricane Milton?

RESPONSE:

The majority of restoration personnel supporting Hurricane Milton, including both internal and external resources, were released between October 17 and October 19, 2024. During that period, most internal personnel returned to their normal "blue-sky" business roles, with only a limited number remaining briefly thereafter to close out restoration activities. Similarly, during that time most external crews commenced travel back to their home utilities or were redeployed to assist other electric utilities still restoring from Hurricane Milton, with only a limited number of external crews remaining to complete follow-up work.