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February 28, 2025

## VIA ELECTRONIC FILING

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. 20250011-EI

Petition by Florida Power & Light Company for Base Rate Increase

Dear Mr. Teitzman:

Attached for filing on behalf of Florida Power & Light Company ("FPL") in the above docket are the direct testimony and exhibits of FPL witness Liz Fuentes.

Please let me know if you have any questions regarding this submission.

Sincerely,

s/ John T. Burnett

John T. Burnett Vice President & General Counsel Florida Power & Light Company

(Document 14 of 30)

# CERTIFICATE OF SERVICE Docket 20250011-EI

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

by electronic service this 28th day of February 2025 to the following:

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of the State of Florida

By: s/John T. Burnett

John T. Burnett

1	BEFORE THE
2	FLORIDA PUBLIC SERVICE COMMISSION
3	DOCKET NO. 20250011-EI
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8	FLORIDA POWER & LIGHT COMPANY
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10	DIRECT TESTIMONY OF LIZ FUENTES
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23	Filed: February 28, 2025

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### I. INTRODUCTION

2 Q. Please state your name and business address.

- 3 A. My name is Liz Fuentes. My business address is Florida Power & Light Company,
- 4 4200 West Flagler Street, Miami, Florida 33134.
- 5 Q. By whom are you employed and what is your position?
- 6 A. I am employed by Florida Power & Light Company ("FPL" or the "Company") as
- 7 Executive Director of Regulatory Accounting.
- 8 Q. Please describe your duties and responsibilities in that position.
- 9 A. I am responsible for planning, guidance, and management of most regulatory
- accounting activities for FPL. In this role, I ensure that financial books and records
- 11 comply with multi-jurisdictional regulatory accounting requirements and regulations.
- 12 Q. Please describe your educational background and professional experience.
- 13 A. I graduated from the University of Florida in 1999 with a Bachelor of Science Degree
- in Accounting. I began my employment with FPL that same year. During my tenure
- at the Company, I have held various accounting and regulatory positions of increasing
- responsibility with most of my career focused in regulatory accounting and the
- calculation of revenue requirements. Specifically, I have filed testimony or provided
- accounting support in multiple FPL retail base rate filings, clause filings, and other
- regulatory dockets filed at the Florida Public Service Commission ("Commission") as
- well as the Federal Energy Regulatory Commission ("FERC"). My responsibilities
- 21 have included the management of the accounting for FPL's cost recovery clauses and
- 22 the preparation, review, and filing of FPL's monthly Earnings Surveillance Reports

I		("ESR") at the Commission. I am a Certified Public Accountant ("CPA") licensed in					
2		the Commonwealth of Virginia and member of the American Institute of CPAs.					
3	Q.	Are you sponsoring or co-sponsoring any exhibits in this case?					
4	A.	Yes. I am sponsoring the following exhibits:					
5		• Exhibit LF-1 – List of MFRs Sponsored or Co-Sponsored by Liz Fuentes					
6		• Exhibit LF-2 – MFR A-1 for the 2026 and 2027 Projected Test Year					
7		• Exhibit LF-3 – List of Proposed Company Adjustments for the 2026 and 2027					
8		Projected Test Year					
9		• Exhibit LF-4 – 2026 and 2027 ROE Calculation Without Rate Adjustment					
10		• Exhibit LF-5 – ADIT Proration Adjustment to Capital Structure for 2026 and					
11		2027 Projected Test Year					
12		• Exhibit LF-6 – 2026 and 2027 Plant Daniel Costs and Expenses					
13		I am co-sponsoring the following exhibit:					
14		• Exhibit SRB-7 - Solar and Battery Base Rate Adjustment Mechanism, filed					
15		with the direct testimony of FPL witness Bores.					
16	Q.	Are you sponsoring or co-sponsoring any Minimum Filing Requirements in this					
17		case?					
18	A.	Yes. Exhibit LF-1 lists the minimum filing requirements ("MFR") that I am sponsoring					
19		and co-sponsoring.					
20	Q.	What time periods are presented in the MFRs?					
21	A.	The MFRs and associated schedules reflect information for the 2024 Historical Test					
22		Year, 2025 Prior Year, 2026 Projected Test Year, and 2027 Projected Test Year.					

# Q. What is the purpose of your testimony?

- A. The purpose of my testimony is to support the calculation of the proposed revenue requirements and appropriateness of certain ratemaking adjustments. My testimony supports accounting and ratemaking practices that affect the determination of rate base, working capital, rate of return, capital structure, and net operating income. Specifically, this includes:
  - The calculation of the revenue requirement requested for the 2026 Projected
     Test Year;
    - The calculation of the revenue requirement requested for the 2027 Projected

      Test Year; and
    - FPL's proposed adjustments to rate base, net operating income, and capital structure for the 2026 Projected Test Year and 2027 Projected Test Year.
    - In addition, I support the calculation of the revenue requirements for FPL's proposed Solar and Battery Base Rate Adjustment ("SoBRA") mechanism as summarized in Exhibit SRB-7 attached to the direct testimony of FPL witness Bores.

## **O.** Please summarize your testimony.

I sponsor and co-sponsor many MFRs and provide the calculation of net operating income, working capital, rate base, capital structure, and revenue requirements for the 2026 Projected Test Year and 2027 Projected Test Year. Based on these supporting calculations, FPL's requested base rate increase for the 2026 Projected Test Year and 2027 Projected Test Year is \$1,545 million and \$927 million, respectively. Finally, I support the methodology for the revenue requirement and true-up calculations for the

1		proposed SoBRA mechanism reflected in Exhibit SRB-7 attached to the direct			
2		testimony of FPL witness Bores.			
3					
4		II. 2026 PROJECTED TEST YEAR REVENUE REQUIREMENT			
5	Q.	What is the amount of FPL's requested base rate increase for the 2026 Projected			
6		Test Year?			
7	A.	FPL's requested base revenue increase for the 2026 Projected Test Year is \$1,545			
8		million.			
9	Q.	Which MFRs directly support the 2026 Projected Test Year revenue increase			
10		calculation?			
11	A.	Page 1 of Exhibit LF-2 reflects the MFRs that directly support FPL's proposed			
12	jurisdictional revenue requirement increase for the 2026 Projected Test Year. Thos				
13		MFRs include schedules that support jurisdictional adjusted rate base of \$75,130			
14		million, jurisdictional adjusted net operating income of \$4,580 million, and the			
15		calculation of the jurisdictional revenue expansion factor of 1.34115 used to derive the			
16	requested revenue increase. Additionally, page 1 of Exhibit LF-2 references MFR D-				
17	1a that supports the jurisdictional adjusted capital structure and the overall rate of return				
18		("ROR") of 7.63% and reflects FPL's requested return on equity ("ROE") of 11.9%.			
19	Q.	Did FPL apply any proposed Company adjustments in its calculation of the			
20		jurisdictional revenue requirements for the 2026 Projected Test Year?			
21	A.	Yes. Each of the proposed rate base and net operating income Company adjustments			
22		for the 2026 Projected Test Year and their amounts are reflected on Exhibit LF-3 and			
23		explained in more detail below.			

1	Q.	Has FPL reflected the flow-through of battery storage Investment Tax Credits		
2		("ITC") in its 2026 Projected Test Year revenue requirements?		
3	A.	Yes. As described in FPL witness Laney's testimony, FPL proposes to reflect the flow-		
4		through of battery storage ITC in the year in which the assets are placed into service.		
5		This flow-through approach will provide an immediate benefit to customers by		
6		reducing revenue requirements for the first year of operations. Under this		
7		methodology, the ITC associated with battery storage assets will conclude at the end of		
8		the first calendar year of operations. Consistent with this approach, FPL's revenue		
9		requirement for the 2026 Projected Test Year reflects the full amount of ITCs		
10		associated with the battery storage assets to be installed in 2026.		
	•	Are there any other items you would like to address regarding the calculation of		
11	Q.	Are there any other items you would like to address regarding the calculation of		
11 12	Q.	the revenue requirements for the 2026 Projected Test Year?		
	<b>Q.</b> A.			
12		the revenue requirements for the 2026 Projected Test Year?		
12 13		the revenue requirements for the 2026 Projected Test Year?  Yes. On June 29, 2023, the FERC issued Order 898, Accounting and Reporting		
12 13 14		the revenue requirements for the 2026 Projected Test Year?  Yes. On June 29, 2023, the FERC issued Order 898, Accounting and Reporting  Treatment of Certain Renewable Energy Assets in Docket No. RM21-11-000, which,		
12 13 14 15		the revenue requirements for the 2026 Projected Test Year?  Yes. On June 29, 2023, the FERC issued Order 898, Accounting and Reporting Treatment of Certain Renewable Energy Assets in Docket No. RM21-11-000, which, among other things, amended the Uniform System of Accounts for public utilities by		
12 13 14 15 16		the revenue requirements for the 2026 Projected Test Year?  Yes. On June 29, 2023, the FERC issued Order 898, Accounting and Reporting Treatment of Certain Renewable Energy Assets in Docket No. RM21-11-000, which, among other things, amended the Uniform System of Accounts for public utilities by creating new plant and Operating and Maintenance ("O&M") accounts for wind, solar,		
12 13 14 15 16 17		the revenue requirements for the 2026 Projected Test Year?  Yes. On June 29, 2023, the FERC issued Order 898, Accounting and Reporting Treatment of Certain Renewable Energy Assets in Docket No. RM21-11-000, which, among other things, amended the Uniform System of Accounts for public utilities by creating new plant and Operating and Maintenance ("O&M") accounts for wind, solar, energy storage, and other renewable generating assets. The new accounts under FERC		
12 13 14 15 16 17		the revenue requirements for the 2026 Projected Test Year?  Yes. On June 29, 2023, the FERC issued Order 898, Accounting and Reporting Treatment of Certain Renewable Energy Assets in Docket No. RM21-11-000, which, among other things, amended the Uniform System of Accounts for public utilities by creating new plant and Operating and Maintenance ("O&M") accounts for wind, solar, energy storage, and other renewable generating assets. The new accounts under FERC Order 898 became effective January 1, 2025. As a result, FPL's forecast for the 2026		

1	Q.	What would FPL's ROE for the 2026 Projected Test Year be without the			
2		requested base rate adjustment?			
3	A.	As shown on page 1 of Exhibit LF-4, FPL's jurisdictional adjusted ROE for the 2026			
4		Projected Test Year is projected to be 8.84% absent the rate relief requested for the			
5		2026 Projected Test Year. This is well below the bottom end of the current authorized			
6		ROE range, as well as the ROE range supported by FPL witness Coyne.			
7					
8		III. 2027 PROJECTED TEST YEAR REVENUE REQUIREMENT			
9	Q.	What is the amount of FPL's requested base rate increase for the 2027 Projected			
10		Test Year?			
11	A.	The 2027 Projected Test Year requested by FPL yields a base revenue increase of \$927			
12		million.			
13	Q.	Which MFRs directly support the 2027 Projected Test Year calculation?			
14	A.	Page 2 of Exhibit LF-2 reflects the MFRs that directly support the 2027 Projected Test			
15		Year. Those MFRs include schedules that support FPL's jurisdictional adjusted rate			
16		base of \$80,752 million, jurisdictional adjusted net operating income of \$4,326 million,			
17		and the calculation of the jurisdictional revenue expansion factor of 1.34113 to arrive			
18		at the requested revenue increase. Additionally, page 2 of Exhibit LF-2 also references			
19		MFR D-1a that supports the jurisdictional adjusted capital structure and an overall ROR			
20		of 7.64% and reflects FPL's requested ROE of 11.9%.			
21	Q.	What Company adjustments did FPL apply to the 2027 Projected Test Year?			
22	A.	FPL applied the same Company adjustments proposed for the 2026 Projected Test Year			
23		to the 2027 Projected Test Year and reflected the amount of those adjustments in th			

1		calculation of jurisdictional revenue requirements for the 2027 Projected Test Year		
2		Each of the proposed rate base and net operating income Company adjustments for the		
3		2027 Projected Test Year and their amounts are reflected on Exhibit LF-3 and		
4		explained in more detail below.		
5	Q.	Has FPL reflected the flow-through of battery storage ITC in its 2027 Projected		
6		Test Year revenue requirements?		
7	A.	Yes. Consistent with the one-year ITC flow back methodology described above and		
8		further explained by FPL witness Laney, FPL's revenue requirement for the 2027		
9		Projected Test Year reflects the conclusion of the 2026 ITCs and the addition of the		
10		full amount of ITCs associated with the battery storage assets to be installed in 2027.		
11	Q.	What would FPL's ROE be for the 2027 Projected Test Year without the		
12		requested base rate adjustment?		
13	A.	Page 1 of Exhibit LF-4 shows that FPL's jurisdictional adjusted ROE for the 2027		
14		Projected Test Year is projected to be 7.34% absent the requested rate relief for both		
15		the 2026 Projected Test Year and 2027 Projected Test Year. This is well below the		
16		bottom end of the current authorized ROE range, as well as the ROE range supported		
17		by FPL witness Coyne. Exhibit LF-4 also shows that, even with FPL's requested base		
18		adjustment for the 2026 Projected Test Year, FPL's jurisdictional adjusted ROE for the		
19		2027 Projected Test Year is projected to be 10.19% without the requested rate		

adjustment for the 2027 Projected Test Year. This is below the bottom end of the ROE

range supported by FPL witness Coyne.

1		IV. ADJUSTMENTS TO 2026 PROJECTED TEST YEAR			
2		AND 2027 PROJECTED TEST YEAR			
3	Q.	Has FPL included the Commission's adjustments to rate base and net operating			
4		income for the 2026 Projected Test Year and 2027 Projected Test Year?			
5	A.	Yes. Consistent with prior Commission orders, FPL has reflected Commission rate			
6		base and net operating income adjustments in the calculation of the 2026 Projected Test			
7		Year and 2027 Projected Test Year revenue requirement calculations. These			
8		adjustments are detailed in MFRs B-2 and C-3 for their respective periods and are the			
9		same Commission adjustments reflected in FPL's monthly ESR.			
10	Q.	Has FPL proposed any Company adjustments in its calculation of rate base and			
11		net operating income for the 2026 Projected Test Year and 2027 Projected Test			
12		Year?			
13	A.	Yes. FPL is proposing various Company adjustments to its rate base and net operating			
14		income calculations for both the 2026 Projected Test Year and 2027 Projected Test Year.			
15		Each of FPL's proposed Company adjustments, their impact on rate base and/or net			
16		operating income, and the FPL witness supporting each one are provided in Exhibit			
17		LF-3.			
18	Q.	Would you like to elaborate on any of FPL's proposed Company adjustments?			
19	A.	Yes. Please see a summary of certain FPL proposed Company adjustments below,			
20		which I sponsor or co-sponsor:			

Rate Case Expense Amortization – Consistent with FPL's 2021 Rate
Settlement, <sup>1</sup> 2016 Rate Settlement, <sup>2</sup> and 2012 Rate Settlement, <sup>3</sup> FPL is
requesting a four-year amortization period for the estimated, incremental rate
case expenses totaling \$5.0 million. The amortization of the rate case expenses
over a four-year period result in an increase to operating expenses of \$1.3
million in 2026 and 2027, and a reduction to rate base of (\$0.6) million and
(\$1.9) million in 2026 and 2027, respectively. In addition, FPL is requesting
that the unamortized balance remain in rate base in the 2026 Projected Test Year
and 2027 Projected Test Year as currently forecasted in order to avoid ar
implicit disallowance of reasonable and necessary costs required by the
Company to present its evidence, respond to discovery, and litigate this case
FPL's proposed multi-year rate plan reduces the amount of rate case expenses
FPL would otherwise incur for multiple, back-to-back base rate case
proceedings. Full recovery of necessary rate case expenses is appropriate bu
will not occur unless FPL is afforded the opportunity to earn a return on the
unamortized balance of those expenses.

 <u>Capital Recovery Schedule Income Tax Adjustments</u> – Under the Tax Cuts and Jobs Act of 2017 (the "TCJA"), FPL is required to follow the Internal Revenue Service ("IRS") normalization requirements for excess accumulated deferred income taxes ("EADIT") attributable to the book and tax differences related to

<sup>&</sup>lt;sup>1</sup> Stipulation and Settlement Agreement approved in FPL's 2021 Rate Case in Docket No. 20210015-EI, Commission Order Nos. PSC-2021-0446-S-EI and PSC 2021-0446A-S-EI.

<sup>&</sup>lt;sup>2</sup> Stipulation and Settlement Agreement approved in FPL's 2016 Rate Case in Docket No. 160021-EI, Commission Order No. PSC-16-0560-AS-EI.

<sup>&</sup>lt;sup>3</sup> Revised Stipulation and Settlement Agreement approved in FPL's 2012 Rate Case in Docket No. 120015-EI, Commission Order No. PSC-13-0023-S-EI.

depreciation of public utility property as protected and to employ the Average
Rate Assumption Method ("ARAM"). The ARAM ensures that the
amortization occurs no sooner than would occur as the book and tax differences
turnaround. Per Commission Order No. PSC-2019-0225-FOF-EI in Docket
No. 20180046-EI, FPL is employing the ARAM for the turnaround of all
protected EADIT and reflecting the amortization via base revenue requirements
regardless of whether they relate to base or clause assets. However, when a
major depreciable asset is retired early, it is proper to align any remaining
EADIT amortization associated with the retired asset with the recovery of any
unrecovered investment remaining at the time of retirement. <sup>4</sup> Therefore, FPL
proposes to accelerate the amortization of the remaining EADIT associated with
the total unrecovered investment reflected in the capital recovery schedules
proposed and discussed in detail by FPL witness Ferguson over the same 10-
year recovery period. In addition, FPL also proposes an adjustment to deferred
income tax expense to account for permanent timing differences resulting from
the capital recovery schedule amortization. The net reduction to operating
expenses in 2026 and 2027 for these items is (\$1.1) million and (\$1.0) million,
respectively.

Depreciation Income Tax Adjustments – As discussed in the testimony of FPL witness Ferguson, FPL is proposing the use of new depreciation rates and asset lives beginning on January 1, 2026. Because this proposal changes the calculation of book depreciation and impacts the calculation of ARAM, FPL

<sup>&</sup>lt;sup>4</sup> Rev. Proc. 2020-39, 2020-36 IRB 546, 08/14/2020, IRC Sec(s). 168

proposes to adjust EADIT amortization similar to the capital recovery schedule EADIT adjustment above in order to properly align depreciation expense and the turnaround of EADIT. In addition, FPL also proposes to increase the amount of ITC amortization due to a decrease in lives of certain solar equipment reflected in FPL's 2025 Depreciation Study and increase deferred income tax expense to consider permanent timing differences resulting from changes in forecasted book depreciation expense. The net reduction to operating expenses in both 2026 and 2027 for these items is (\$5.3) million.

- Storm Protection Plan ("SPP") Costs FPL is proposing to move certain costs and expenses from base rates to the Storm Protection Plan Cost Recovery Clause ("SPPCRC") starting in 2026 to better align the recovery of these costs with how they are incurred consistent with the ratemaking principle of cost causation, while ensuring there is no double-recovery. The realignment of these SPP costs from base to the SPPCRC will result in a net decrease in operating expenses and rate base in 2026 of (\$86.0) million and (\$66.6) million, respectively, and in 2027 of (\$104.5) million and (\$85.5) million, respectively. If these proposed reclassifications are approved, each of these costs will be subject to review and true-up as part of FPL's annual SPPCRC filings. Below is a summary of each proposed reclassification from base to the SPPCRC:
  - SPP Projects As discussed by FPL witness De Varona, FPL is requesting authority to move the recovery of SPP related costs associated with FPL's transmission visual patrols and wire and cable

materials associated specifically with FPL's SPP projects from base to
the SPPCRC.

Retirements and Cost of Removal – As described by FPL witness
Ferguson, FPL is requesting to discontinue the recovery of cost of

 Inventory – FPL is requesting to move all the inventory associated with the SPP from base to the SPPCRC.

removal and retirements associated with SPP projects in base rates.

- Property Taxes FPL is proposing to recover the property taxes associated with SPP investments through the SPPCRC, reducing the base recoverable property tax expenses. The calculation was computed by multiplying the beginning balance in the 2026 Projected Test Year and 2027 Projected Test Year times the average millage rates for each respective year reflected on MFR F-8.
- Environmental Cost Recovery Clause ("ECRC") Costs FPL is proposing to move certain expenses related to existing environmental projects from base rates to the ECRC beginning in 2026 to better align with the ratemaking principles of cost causation, while ensuring there is no double-recovery. The costs associated with these projects have already been approved by the Commission for recovery from customers; however, a portion of these costs have continued to be recovered in FPL's base rates rather than through the ECRC. Therefore, the Company is proposing to reclassify costs for certain environmental projects from base to the ECRC. The realignment of these costs from base to the ECRC will result in a net decrease in operating expenses and

1 rate base in 2026 of (\$4.4) million and (\$0.5) million, respectively, and in 2027 2 of (\$4.5) million and (\$0.5) million, respectively. If these proposed reclassifications are approved, each of these costs will be subject to review and 3 4 true-up as part of FPL's annual ECRC filings. Below is a summary of each 5 proposed reclassification from base to the ECRC: 6 <u>Project 1 - ECRC Air Emission Fees</u>: Currently, certain air emission fees 7 for some generation sites are being recovered by FPL in base rates while other fees are recovered in the ECRC. This adjustment will align the 8

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O Project 19 - Oil filled Equipment and Hazardous Substance Remediation: Currently, FPL recovers only the spill response expense related to substations in its ECRC. This adjustment aligns the recovery of all O&M expenses for spill response activities related to distribution assets to FPL's ECRC.

recovery of all applicable air emission fees to the ECRC.

- O Project 21 St. Lucie Turtle Nets: Currently, FPL recovers capital and O&M costs in base rates for certain but not all turtle nets at the St. Lucie nuclear site. This adjustment aligns the recovery of all turtle net capital and O&M expenses in FPL's ECRC.
- Net Energy Metering Payments Per Rule 25-6.065, Florida Administrative Code, the Company is required to pay net metering customers for any unused energy credits at the end of each calendar year. Since these payments are the functional equivalent to payments made to other qualifying facilities for the purchase of power and recovered through FPL's Fuel and Purchased Power Cost

1	Recovery Clause ("FCR"), FPL proposes to recover the annual payments to net
2	metering customers for 2026 and 2027 of \$0.7 million each period through the
3	FCR instead of base rates. If approved, these payments will be subject to review
4	and true-up as part of FPL's annual FCR filings.

- Q. Have all of FPL's proposed Company adjustments reflected on Exhibit LF-3 been incorporated into the calculation of the jurisdictional rate base and net operating income for the 2026 Projected Test Year and 2027 Projected Test Year?
- A. Yes. As reflected on MFRs B-2 and C-3 for their respective periods, FPL has included all proposed Company adjustments reflected on Exhibit LF-3 in its calculation of the jurisdictional rate base and net operating income for the 2026 Projected Test Year and 2027 Projected Test Year.
  - Has FPL incorporated any adjustments other than Commission or Company adjustments in its calculation of the revenue requirements for the 2026 Projected Test Year or 2027 Projected Test Year?
  - Yes. As reflected on MFR D-1a for their respective periods and consistent with Section 1.167(l)-1(h)(6) of the Internal Revenue Service Treasury Regulations,<sup>5</sup> FPL has incorporated an adjustment to decrease the amount of Accumulated Deferred Income Tax ("ADIT") included in the calculation of FPL's weighted average cost of capital. ADIT that is treated as zero cost capital or a component of rate base in determining a utility's cost of service must be calculated based on the same period used in determining the income tax expense for ratemaking purposes. The Treasury Regulations go on to state that a utility may use either historical data or projected data

Q.

A.

<sup>&</sup>lt;sup>5</sup> See 26 C.F.R. § 1.167(1)-1(h)(6).

in calculating these two amounts, but the periods used must be consistent. If the amounts are computed using projected data, in whole or in part, and the rates go into effect during the projected period, then the utility must use the formula provided in Section 1.167(l)-1(h)(6)(ii) of the Internal Revenue Service Treasury Regulations to calculate the amount of ADIT to be included for ratemaking purposes. Because FPL is presenting a change in base rates at the beginning of both the 2026 Projected Test Year and 2027 Projected Test Year, the Company is required to comply with these Treasury Regulations.

Q. Please describe the required formula FPL must follow to adjust ADIT in the 2026
 Projected Test Year and 2027 Projected Test Year.

Section 1.167(l)-1(h)(6)(ii) of the Internal Revenue Service Treasury Regulations contain a precise formula ("Proration Requirement") for computing the amount of depreciation-related ADIT to be treated as zero cost capital when a future test period is used. The Proration Requirement is as follows:

The pro rata portion of any increase to be credited or decrease to be charged during a future period...shall be determined by multiplying any such increase or decrease by a fraction, the numerator of which is the number of days remaining in the period at the time such increase or decrease is to be accrued, and the denominator of which is the total number of days in the period.<sup>7</sup>

A.

<sup>&</sup>lt;sup>6</sup> See 26 C.F.R. § 1.167(l)-1(h)(6)(ii).

<sup>&</sup>lt;sup>7</sup> *Id*.

1 Q. Please explain the calculation of the Proration Requirement and its impact to

FPL's capital structure for the 2026 Projected Test Year and 2027 Projected Test

3 Year.

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A. As reflected on page 1 of Exhibit LF-5, the calculations of the Proration Requirement for ADIT for the 2026 Projected Test Year and 2027 Projected Test Year begin with prorated average balances of (\$256) million and (\$291) million, respectively. FPL then compared the prorated average balances to the per-book 13-month average ADIT balances for 2026 and 2027 of (\$275) million and (\$313) million, respectively. The difference results in an adjustment to ADIT of \$19 million for the 2026 Projected Test Year and \$22 million for the 2027 Projected Test Year, which are reflected as decreases to ADIT on MFR D-1a for their respective periods.

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### V. PLANT DANIEL UNITS 1 AND 2

- 14 Q. Please summarize FPL's request related to the Plant Daniel Units 1 and 2

  15 currently pending before the Commission.
- 16 On November 8, 2024, FPL filed a Petition in Docket No. 20240155-EI seeking A. 17 approval from the Commission to establish a regulatory asset associated with the 18 transfer of FPL interests in Plant Daniel Units 1 and 2 ("Plant Daniel Petition"). As 19 explained in that Petition, FPL entered into a purchase and sale agreement with 20 Mississippi Power Company ("MPC") that provides FPL will pay up to \$45 million to 21 MPC and relinquish its 50% ownership interest in Units 1 and 2 to MPC. FPL has 22 requested the establishment of a regulatory asset for up to \$45 million, of which \$39.3 23 million would be base rate recoverable and \$5.7 million would be ECRC recoverable.

- 1 Q. Has the Commission approved FPL's request to establish a regulatory asset in
- 2 **Docket No. 20240155-EI?**
- 3 A. No. As of the time I prepared and filed my testimony, FPL's Plant Daniel Petition
- 4 remains pending before the Commission.
- 5 Q. Has FPL included the impact associated with the Plant Daniel transaction in this
- 6 **proceeding?**
- 7 A. No, it has not because the Plant Daniel Petition has not yet been approved by the
- 8 Commission.
- 9 Q. If the Plant Daniel Petition is approved by the Commission, how does FPL propose
- 10 to incorporate that approval in this proceeding?
- 11 A. If the Plant Daniel Petition is approved prior to the record being closed in this
- proceeding, FPL proposes that it be allowed to appropriately reflect the impact
- associated with the Plant Daniel transaction in this proceeding. As reflected on Exhibit
- 14 LF-6, FPL would need to make the following changes to the 2026 Projected Test Year
- and 2027 Projected Test Year: (i) add the unamortized balance of the Plant Daniel
- regulatory asset to rate base and related amortization to total amortization expense; and
- 17 (ii) remove O&M expenses, property taxes, and insurance associated with Plant Daniel
- that FPL will no longer incur. If necessary, FPL will provide an adjustment to its
- revenue requirement calculations for 2026 and 2027 either in rebuttal testimony or
- promptly after the Commission renders a decision on the Plant Daniel Petition.
- 21 Q. Does this conclude your direct testimony?
- 22 A. Yes.

MFR	Period	Title		
SOLE SPONSOR:				
A-01	2026 Projected Test Year 2027 Projected Test Year	FULL REVENUE REQUIREMENTS INCREASE REQUESTED		
B-01	2024 Historic Year 2025 Prior Year 2026 Projected Test Year 2027 Projected Test Year	ADJUSTED RATE BASE		
B-03	2024 Historic Year	13 MONTH AVERAGE BALANCE SHEET - SYSTEM BASIS		
B-04	2024 Historic Year 2027 Projected Test Year	TWO YEAR HISTORICAL BALANCE SHEET		
B-18	2024 Historic Year	FUEL INVENTORY BY PLANT		
B-21	2024 Historic Year	ACCUMULATED PROVISION ACCOUNTS - 228.1, 228.2 and 228.4		
C-01	2024 Historic Year 2025 Prior Year 2026 Projected Test Year 2027 Projected Test Year	ADJUSTED JURISDICTIONAL NET OPERATING INCOME		
C-02	2024 Historic Year 2025 Prior Year	NET OPERATING INCOME ADJUSTMENTS		
C-07	2026 Projected Test Year 2027 Projected Test Year	OPERATION AND MAINTENANCE EXPENSES - TEST YEAR		
C-09	2024 Historic Year 2027 Projected Test Year	FIVE YEAR ANALYSIS - CHANGE IN COST		
C-13	2027 Projected Test Year	MISCELLANEOUS GENERAL EXPENSES		
C-18	2024 Historic Year 2026 Projected Test Year 2027 Projected Test Year	LOBBYING EXPENSES, OTHER POLITICAL EXPENSES AND CIVIC/CHARITABLE CONTRIBUTIONS		
C-22	2024 Historic Year	STATE AND FEDERAL INCOME TAX CALCULATION		
C-24	2024 Historic Year	PARENT(S) DEBT INFORMATION		

MFR	Period	Title
SOLE SPONSO	R:	
C-26	2024 Historic Year 2027 Projected Test Year	INCOME TAX RETURNS
C-28	2024 Historic Year	MISCELLANEOUS TAX INFORMATION
C-38	2026 Projected Test Year 2027 Projected Test Year	O & M ADJUSTMENTS BY FUNCTION
C-39	2024 Historic Year 2027 Projected Test Year	BENCHMARK YEAR RECOVERABLE O & M EXPENSES BY FUNCTION
C-44	2026 Projected Test Year 2027 Projected Test Year	REVENUE EXPANSION FACTOR
D-01a	2024 Historic Year	COST OF CAPITAL - 13-MONTH AVERAGE
D-01b	2026 Projected Test Year 2027 Projected Test Year	COST OF CAPITAL - ADJUSTMENTS
CO-SPONSOR:		
B-02	2024 Historic Year 2025 Prior Year 2026 Projected Test Year 2027 Projected Test Year	RATE BASE ADJUSTMENTS
B-06	2024 Historic Year 2026 Projected Test Year 2027 Projected Test Year	JURISDICTIONAL SEPARATION FACTORS - RATE BASE
B-17	2026 Projected Test Year 2027 Projected Test Year	WORKING CAPITAL - 13 MONTH AVERAGE
B-19	2026 Projected Test Year 2027 Projected Test Year	MISCELLANEOUS DEFERRED DEBITS
B-20	2026 Projected Test Year 2027 Projected Test Year	OTHER DEFERRED CREDITS
B-22	2026 Projected Test Year 2027 Projected Test Year	TOTAL ACCUMULATED DEFERRED INCOME TAXES
B-23	2026 Projected Test Year 2027 Projected Test Year	INVESTMENT TAX CREDITS - ANNUAL ANALYSIS
C-02	2026 Projected Test Year 2027 Projected Test Year	NET OPERATING INCOME ADJUSTMENTS
C-03	2024 Historic Year 2025 Prior Year 2026 Projected Test Year 2027 Projected Test Year	JURISDICTIONAL NET OPERATING INCOME ADJUSTMENTS

MFR	Period	Title
CO-SPONSOR:		
C-04	2024 Historic Year 2026 Projected Test Year 2027 Projected Test Year	JURISDICTIONAL SEPARATION FACTORS-NET OPERATING INCOME
C-06	2026 Projected Test Year 2027 Projected Test Year	BUDGETED VERSUS ACTUAL OPERATING REVENUES AND EXPENSES
C-10	2026 Projected Test Year	DETAIL OF RATE CASE EXPENSES FOR OUTSIDE CONSULTANTS
C-12	2026 Projected Test Year 2027 Projected Test Year	ADMINISTRATIVE EXPENSES
C-13	2024 Historic Year	MISCELLANEOUS GENERAL EXPENSES
C-14	2024 Historic Year	ADVERTISING EXPENSES
C-15	2024 Historic Year	INDUSTRY ASSOCIATION DUES
C-16	2024 Historic Year	OUTSIDE PROFESSIONAL SERVICES
C-17	2026 Projected Test Year 2027 Projected Test Year	PENSION COST
C-20	2024 Historic Year 2025 Prior Year 2026 Projected Test Year 2027 Projected Test Year	TAXES OTHER THAN INCOME TAXES
C-21	2026 Projected Test Year 2027 Projected Test Year	REVENUE TAXES
C-23	2026 Projected Test Year 2027 Projected Test Year	INTEREST IN TAX EXPENSE CALCULATION
C-25	2026 Projected Test Year 2027 Projected Test Year	DEFERRED TAX ADJUSTMENT
C-36	2026 Projected Test Year 2027 Projected Test Year	NON-FUEL OPERATION AND MAINTENANCE EXPENSE COMPARED TO CPI
C-37	2026 Projected Test Year 2027 Projected Test Year	O & M BENCHMARK COMPARISON BY FUNCTION

MFR	Period	Title
CO-SPONSOR:		
C-41	2026 Projected Test Year 2027 Projected Test Year	O & M BENCHMARK VARIANCE BY FUNCTION
C-42	2026 Projected Test Year	HEDGING COSTS
C-43	2026 Projected Test Year 2027 Projected Test Year	SECURITY COSTS
D-01a	2025 Prior Year 2026 Projected Test Year 2027 Projected Test Year	COST OF CAPITAL - 13-MONTH AVERAGE
D-06	2024 Historic Year	CUSTOMER DEPOSITS
F-05	2026 Projected Test Year 2027 Projected Test Year	FORECASTING MODELS
F-08	2026 Projected Test Year 2027 Projected Test Year	ASSUMPTIONS

FLORIDA PUBLIC SERVICE COMMISSION

EXPLANATION: Provide the calculation of the requested

Type of Data Shown:

	NY: FLORIDA POWER & LIGHT COMPANY AND SUBSIDIARIES	LANATION: Provide the calculation of full revenue requirements increa	•	
DOCKET	NO.: 20250011-EI			Witness: Liz Fuentes
	(1)	(2)	(3)	
Line No.	DESCRIPTION	SOURCE	AMOUNT (\$000)	
1	JURISDICTIONAL ADJUSTED RATE BASE	SCHEDULE B-1	\$ 75,129,876	
2	RATE OF RETURN ON RATE BASE REQUESTED	SCHEDULE D-1A	7.63%	
3	JURISDICTIONAL NET OPERATING INCOME REQUI	ESTE LINE 1 X LINE 2	\$ 5,731,953	
4	JURISDICTIONAL ADJUSTED NET OPERATING INC	OME SCHEDULE C-1	\$ 4,580,123	
5	NET OPERATING INCOME DEFICIENCY (EXCESS)	LINE 4 - LINE 5	\$ 1,151,831	
6	EARNED RATE OF RETURN	LINE 4 / LINE 1	6.10%	
7	NET OPERATING INCOME MULTIPLIER	SCHEDULE C-44	1.34115	
8	REVENUE REQUIREMENT (1)	LINE 5 X LINE 7	\$ 1,544,780	

(1) Total requested increase, excluding the effect of proposed Company adjustments related to cost recovery clauses shown on MFR B-2 and C-2, is \$1,638,085.

Docket No. 202500111-EI MFR A-1 for the 2026 and 2027 Projected Test Year Exhibit LF-2, Page 1 of 2

Note:

FLORIDA PUBLIC SERVICE COMMISSION

EXPLANATION: Provide the calculation of the requested full revenue requirements increase.

COMPANY: FLORIDA POWER & LIGHT COMPANY

AND SUBSIDIARIES

Type of Data Shown:

\_Projected Test Year Ended: \_/\_/\_

\_ Prior Year Ended: \_/\_/\_

Historical Test Year Ended: //

X Projected Test Year Ended: 12/31/27

Witness: Liz Fuentes

DOCKET NO.: 20250011-EI

	(1)	(2)		(3)				
Line No.	DESCRIPTION	SOURCE	AM	OUNT (\$000)				
1	JURISDICTIONAL ADJUSTED RATE BASE	SCHEDULE B-1	\$	80,751,580				
2	RATE OF RETURN ON RATE BASE REQUESTED	SCHEDULE D-1A		7.64%				
3	JURISDICTIONAL NET OPERATING INCOME REQUESTED	LINE 1 X LINE 2	\$	6,173,269				
4	JURISDICTIONAL ADJUSTED NET OPERATING INCOME	SCHEDULE C-1	\$	4,325,766				
5	NET OPERATING INCOME DEFICIENCY (EXCESS)	LINE 3 - LINE 4	\$	1,847,502				
6	EARNED RATE OF RETURN	LINE 4 / LINE 1		5.36%				
7	NET OPERATING INCOME MULTIPLIER	SCHEDULE C-44		1.34113				
8	REVENUE REQUIREMENT	LINE 5 X LINE 7	\$	2,477,747				
9	2026 REVENUE INCREASE REQUESTED (1)	SEE NOTE 1	\$	1,550,393				
10	RATE INCREASE REQUESTED (AFTER FULL 2026 RATE INCREASE)	LINE 8 - LINE 9	\$	927,354				
	Notes:  (1) Represents the 2026 Revenue increase of \$1,544,780 requested on the 20 (2) Total requested increase, excluding the effect of proposed company adjust					both 2026 and	2027, is \$946,6	Exhibit LF-2, Page
	g Schedules: B-1, B-2, C-1, C-2, C-44, D-1A				Recap	Schedules:		—62
supporting	3 conceance. 2 1, 2 2, c 1, c 2, c 11, 2 11				·			of 2

### FLORIDA POWER & LIGHT COMPANY LIST OF PROPOSED COMPANY ADJUSTMENTS<sup>(1)</sup> (\$000's)

	(1)	(2)	(3	)	(4) = (3) X (1-Tax Rate)		(5)		(6)		) = (6) X Tax Rate)	(8)	(9)
Line No.	Company Adjustment	2026 Rate Base MFR B-2) <sup>(2)</sup>	202 Expe		2026 NOI Adjustment (MFR C-3)		2027 Rate Base MFR B-2) <sup>(2)</sup>		2027 Expense	Ad	027 NOI justment IFR C-3)	Adjustment Description	Sponsoring Witness
1		\$ (67,401)	\$ 1:	35,503	\$ 101,160	\$	(205,984)	\$	141,839	<del>()</del>	105,890	FPL proposes to increase base depreciation expense to reflect the application of FPL's proposed depreciation rates contained in the 2025 Depreciation Study beginning January 1, 2026.	Keith Ferguson (KF - 2)
2	Depreciation	\$ -	\$	(3,709)	\$ (3,709)	\$		\$	(3,716)	\$	(3,716)	FPL proposes to increase EADIT amortization due to an increase in depreciation expense resulting from the application of FPL's proposed depreciation rates.	Liz Fuentes
3	Depredation	\$ -	\$	(1,801)	\$ (1,801)	\$		\$	(1,801)	\$	(1,801)	FPL proposes to increase ITC amortization to align with the decrease in lives of certain solar equipment reflected in the 2025 Depreciation Study.	Liz Fuentes
4		\$ -	\$	242	\$ 242	\$	-	\$	257	\$	257	FPL proposes an increase to deferred income taxes to take into account permanent timing differences resulting from changes in book depreciation.	Liz Fuentes
5		\$ (67,401)	\$ 13	30,235	\$ 95,892	\$	(205,984)	\$	136,579	\$	100,630		
6		\$ (29,778)	\$	59,556	\$ 44,462	\$	(89,334)	\$	59,556	\$	44,462	FPL proposes to increase base dismantlement expense to reflect the application of the proposed dismantlement accruals contained in the 2025 Dismantlement Study beginning January 1, 2026.	Keith Ferguson (KF - 4)
7	Dismantlement	\$ 11,520	\$	-	\$ -	\$	12,481	\$	-	\$	-	FPL proposes to transfer dismantlement reserves: 1) between units and 2) between base and ECRC, in order to minimize the increase in the proposed dismantlement accruals.	Keith Ferguson (KF - 4)
8		\$ (18,258)	\$	59,556	\$ 44,462	\$	(76,854)	\$	59,556	\$	44,462	Total	
9		\$ (969)	\$	1,938	\$ 1,447	\$	(2,908)	\$	1,938	\$	1,447	Plant Daniel Units 1 and 2 - FPL is requesting to amortize the base portion of unrecovered early retired investment over a 10-year period beginning on January 1, 2026.	Keith Ferguson (KF - 3)
10		\$ (2,117)	¢									500 kV System (2024 & 2025) - FPL is requesting to	
			¥	4,235	\$ 3,161	\$	(6,352)	\$	4,235	\$	3,161	amortize the balance of unrecovered early retired investment and related cost of removal as of December 31, 2025 over a 10-year period.	Keith Ferguson (KF - 3)
11	Capital Recovery Schedule (Base Portions Only)	\$ (498)		4,235 996	\$ 3,161 \$ 744		(6,352)		·	\$	1,008	amortize the balance of unrecovered early retired investment and related cost of removal as of	
11		\$ (498)						\$	·	\$	1,008	amortize the balance of unrecovered early retired investment and related cost of removal as of December 31, 2025 over a 10-year period.  500 kV Tranches (2026 & 2027) - FPL requests permission for the continuation to accumulate amounts of unrecovered plant and related cost of removal each year in tranches and amortize over a 10-year period beginning on January 1st of the following year (i.e. amortization of tranches).  Customer Billing System (CIS) - FPL is requesting to amortize all unrecovered investment over a 10-year period beginning on January 1, 2027 related to existing CIS.	(KF - 3)  Keith Ferguson
		(498) - -	\$		\$ 744 \$ -	\$	(1,671)	\$	1,351	\$	3,161 1,008 3,340 (1,157)	amortize the balance of unrecovered early retired investment and related cost of removal as of December 31, 2025 over a 10-year period.  500 kV Tranches (2026 & 2027) - FPL requests permission for the continuation to accumulate amounts of unrecovered plant and related cost of removal each year in tranches and amortize over a 10-year period beginning on January 1st of the following year (i.e. amortization of tranches).  Customer Billing System (CIS) - FPL is requesting to amortize all unrecovered investment over a 10-year period beginning on January 1, 2027 related to existing CIS.  FPL proposes to increase EADIT amortization due to an increase in amortization expense resulting from the proposed Capital Recovery Schedules requested in this docket.	(KF - 3)  Keith Ferguson (KF - 3)
12		\$ (498) - -	\$ \$	996	\$ 744 \$ - \$ (1,191) \$ 105	\$ \$	(2,237)	\$ \$	1,351	\$ \$	3,161 1,008 3,340 (1,157)	amortize the balance of unrecovered early retired investment and related cost of removal as of December 31, 2025 over a 10-year period.  500 kV Tranches (2026 & 2027) - FPL requests permission for the continuation to accumulate amounts of unrecovered plant and related cost of removal each year in tranches and amortize over a 10-year period beginning on January 1st of the following year (i.e. amortization of tranches).  Customer Billing System (CIS) - FPL is requesting to amortize all unrecovered investment over a 10-year period beginning on January 1, 2027 related to existing CIS.  FPL proposes to increase EADIT amortization due to an increase in amortization expense resulting from the proposed Capital Recovery Schedules requested in this docket.  FPL proposes an increase to deferred income taxes to take into account permanent timing differences resulting from Capital Recovery Schedules amortization.	(KF - 3)  Keith Ferguson (KF - 3)  Keith Ferguson (KF - 3)

### **FLORIDA POWER & LIGHT COMPANY** LIST OF PROPOSED COMPANY ADJUSTMENTS<sup>(1)</sup> (\$000's)

	(1)	(2)	(	(3)	(4) = (3) X (1-Tax Rate)		(5)	(6)	(7) = (6) X 1-Tax Rate)	(8)	(9)
Line No.	Company Adjustment	2026 Rate Base MFR B-2) <sup>(2)</sup>		026 ense	2026 NOI Adjustment (MFR C-3)		2027 Rate Base (MFR B-2) <sup>(2)</sup>	2027 Expense	2027 NOI Adjustment (MFR C-3)	Adjustment Description	Sponsoring Witness
16	Rate Case Expense Amortization	\$	\$	1,257	\$ 939	\$	(1,886)	\$ 1,257	\$ 939	FPL has reflected the deferral of rate case expenses related to this docket in rate base and proposes to amortize them over a 4-year period beginning on January 1, 2026.	Liz Fuentes
17		\$ -	\$	(597)	\$ (445	) \$	1	\$ (596)	\$ (445)	FPL proposes an adjustment to transfer expenses associated with the SPP transmission visual patrols program from base to clause which were inadventently included in base rates in FPL's last rate case.	Liz Fuentes/ Ed De Varona
18		\$ (1,117)	\$	-	\$ -	\$	(1,263)	\$ -	\$ -	FPL proposes to directly assign and recover wire and cable materials related to SPP projects in its SPPCRC.	Liz Fuentes/ Ed De Varona
19	Storm Protection Plan Cost Recovery Clause (SPPCRC)	\$ (58,475)	\$	-	\$ -	\$	(61,502)	\$ -	\$ -	FPL proposes to transfer its inventory balance related to SPP projects from base rates to its SPPCRC.	Liz Fuentes
20		\$ (7,041)	\$	-	\$ -	\$	(22,718)	\$ 1	\$ -	FPL proposes to cease recording retirements and cost of removal associated with SPP projects in base rates and record these amounts in FPL's SPPCRC.	Keith Ferguson
21		\$ -	\$	(85,448)	\$ (63,791	) \$	-	\$ (103,877)	(77,549)	FPL proposes to recover property taxes associated with SPP projects in FPL's SPPCRC.	Liz Fuentes
22		\$ (66,634)	\$	(86,044)	\$ (64,236	) \$	(85,483)	\$ (104,473)	\$ (77,994)	Total	
23		\$ -	\$	(54)	\$ (40	\$	-	\$ (58)	\$ (43)	FPL proposes to move certain air emission fees for some generation sites from base to ECRC in order to align recovery under one mechanism.	Liz Fuentes
24	Environmental Cost Recovery Clause (ECRC)	\$ -	\$	(3,925)	\$ (2,930	\$	-	\$ (4,018)	\$ (3,000)	FPL proposes to move spill response expenses related to substations from base to ECRC in order to align recovery under one mechanism.	Liz Fuentes
25		\$ (499)	\$	(419)	\$ (313	) \$	(530)	\$ (419)	\$ (313)	FPL proposes to move St. Lucie turtle net costs and expenses from base to ECRC in order to align recovery of all turtle nets under one mechanism.	Liz Fuentes
26		\$ (499)	\$	(4,397)	\$ (3,283	) \$	(530)	\$ (4,495)	\$ (3,355)	Total	_
27	Net Metering Annual Payment	\$ -	<i>\$</i>	(722)	\$ (539	) \$	-	\$ (722)	\$ (539)	FPL proposes to recover the payments made to customers for any unused energy credits annually through FPL's FCR instead of base rates. These payments are equivalent to payments made to other qualifying facilities for the purchase of power and recovered through FPL's FCR.	Liz Fuentes
Total	Per Book Adjustments	\$ (157,004)	\$	105,968	\$ 77,500	\$	(383,904)	\$ 98,663	\$ 72,061		

Notes:

(1) Amounts on this exhibit are Per Book amounts and have not been jurisdictionalized.

<sup>(2)</sup> Amounts reflected are 13-month average.

# FLORIDA POWER & LIGHT COMPANY 2026 AND 2027 RETURN ON EQUITY CALCULATION WITHOUT RATE ADJUSTMENT (\$000)

Line No.		MFR Reference	2026	2027 (A)	2027 (B)
1	Adjusted Jurisdictional Net Operating Income	C-1	\$ 4,580,123	\$ 4,325,766	\$ 5,481,798
2	Adjusted Jurisdictional Rate Base	B-1	75,129,876	80,751,580	80,751,580
3	Estimated Earned Rate of Return (Line 1 / Line 2)		6.10%	5.36%	6.79%
4					
5	Adjusted Jurisdictional Non-Equity Component of Weighted Average Cost of Capital	D-1a	1.67%	1.68%	1.68%
6	Earnings Available for Common (Lines 3 - 5)		4.43%	3.68%	5.11%
7					
8	Adjusted Jurisdictional Common Equity Ratio	D-1a	50.07%	50.12%	50.12%
9					
10	Jurisdictional Return on Common Equity (Line 6 / Line 8)		8.84%	7.34%	10.19%

 $<sup>\</sup>label{eq:bounds} \frac{\text{Notes:}}{\text{(A) Calculation assumes the requested base rate increase for 2026 is } \underline{\text{not }} \text{granted.}$ 

 $<sup>^{\</sup>rm (B)}$  Calculation assumes the requested base rate increase for 2026 is granted.

### FLORIDA POWER & LIGHT COMPANY ADIT PRORATION ADJUSTMENT CALCULATION 2026 PROJECTED TEST YEAR

		F	(1) Per Book		(2)	(3)	(4)		(5) Prorated	(6)
Line No.	Month	AE Ass De	OIT Activity ociated with epreciation (\$000s)	A	ocumulated Activity (\$000s)	Days to Prorate	Future Days in Test Period		Monthly Activity (4)/Total (3) (\$000s)	Prorated ccumulated Activity (\$000s)
1 2	Beg Balance - Dec 31, 20	)25								\$ -
3	Jan-26	\$	(46,659)	\$	(46,659)	31	335	\$	(42,824)	\$ (42,824)
4	Feb-26	·	(46,969)	•	(93,628)	28	307	•	(39,505)	(82,329)
5	Mar-26		(46,955)		(140,582)	31	276		(35,506)	(117,835)
6	Apr-26		(46,341)		(186,924)	30	246		(31,233)	(149,067)
7	May-26		(46,622)		(233,546)	31	215		(27,462)	(176,530)
8	Jun-26		(45,560)		(279,106)	30	185		(23,092)	(199,622)
9	Jul-26		(44,730)		(323,836)	31	154		(18,873)	(218,494)
10	Aug-26		(44,293)		(368,129)	31	123		(14,926)	(233,420)
11	Sep-26		(44,209)		(412,338)	30	93		(11,264)	(244,685)
12	Oct-26		(43,556)		(455,894)	31	62		(7,399)	(252,083)
13	Nov-26		(42,780)		(498,674)	30	32		(3,751)	(255,834)
14	Dec-26		(41,804)		(540,478)	31	1		(115)	(255,948)
15 16	Total	\$	(540,478)			365		\$	(255,948)	
17										
18	13-Month Average			\$	(275,369)					
19 20	Adjustment to Decrease	Per B	ook 13-Mon	th A	verage ADIT	to Prorat	ted Balance			\$ 19,420

### FLORIDA POWER & LIGHT COMPANY ADIT PRORATION ADJUSTMENT CALCULATION 2027 PROJECTED TEST YEAR

			(1) Per Book		(2)	(3)	(4)		(5) Prorated		(6)
			IT Activity				Future		Monthly		Prorated
			ociated with	A	ccumulated	Days to	Days in		Activity	Α	ccumulated
Line			preciation		Activity	Prorate	Test Period		(4)/Total (3)		Activity
No.	Month		(\$000s)		(\$000s)			٠,	(\$000s)		(\$000s)
21 22	Beg Balance - Dec 31, 20	26								\$	=
23	Jan-27	\$	(53,686)	\$	(53,686)	31	335	\$	(49,274)	\$	(49,274)
24	Feb-27		(53,795)		(107,481)	28	307		(45,247)		(94,520)
25	Feb-27		(53,459)		(160,940)	31	276		(40,424)		(134,944)
26	Feb-27		(52,857)		(213,797)	30	246		(35,624)		(170,568)
27	Feb-27		(52,439)		(266,235)	31	215		(30,889)		(201,457)
28	Feb-27		(51,457)		(317,692)	30	185		(26,081)		(227,537)
29	Feb-27		(50,657)		(368,349)	31	154		(21,373)		(248,910)
30	Feb-27		(50,038)		(418,387)	31	123		(16,862)		(265,772)
31	Feb-27		(49,948)		(468,334)	30	93		(12,726)		(278,499)
32	Feb-27		(49,392)		(517,727)	31	62		(8,390)		(286,889)
33	Feb-27		(49,207)		(566,934)	30	32		(4,314)		(291,203)
34	Feb-27		(48,408)		(615,342)	31	1		(133)		(291,335)
35	Total	\$	(615,342)			365	•	\$	(291,335)		
36											
37											
38	13-Month Average			\$	(313,454)						
39	9		:=		· · · · · ·						
40	Adjustment to Decrease	Per B	ook 13-Mon	th A	verage ADIT	to Prorat	ted Balance			\$	22,119

### FLORIDA POWER & LIGHT COMPANY 2026 AND 2027 PLANT DANIEL COSTS AND EXPENSES <sup>(1)</sup> (\$000)

Line No.	Costs/Expenses to be Removed <sup>(2)</sup>	Rate Base/ NOI	FERC Account	Account Description	2026	2027
1	Common Facilities Expenses	NOI	500	OperSupv Eng Stm	(\$357)	(\$349)
2	Common Facilities Expenses	NOI	502	SteamExpenses	(\$290)	(\$284)
3	Common Facilities Expenses	NOI	505	ElectricExp Steam	(\$328)	(\$323)
4	Common Facilities Expenses	NOI	506	MiscSteamPowerExp	(\$1,879)	(\$1,840)
5	Common Facilities Expenses	NOI	510	MaintSupv Enginer	(\$533)	(\$522)
6	Common Facilities Expenses	NOI	511	MaintofStructures	(\$292)	(\$286)
7	Common Facilities Expenses	NOI	512	MaintBoilerPlt	(\$1,505)	(\$1,472)
8	Common Facilities Expenses	NOI	513	MaintElectPlt	(\$184)	(\$180)
9	Common Facilities Expenses	NOI	514	MtcMiscSteamPlt	(\$87)	(\$85)
10	Common Facilities Expenses	NOI	925	Injury Damage W CEp	(\$0)	(\$0)
11	Common Facilities Expenses	NOI	926	EmplPension Benfs	(\$2)	(\$2)
12	Payroll Taxes	NOI	408.1	Taxes Other Than Income Taxes - Payroll	(\$2)	(\$2)
13	Property Tax Expense	NOI	408.1	Taxes Other Than Income Taxes - Property	(2,787)	(2,787)
				_	(\$8,246)	(\$8,131)
		Rate Base/	FERC			
	Costs/Expenses to be Added <sup>(3)</sup>	NOI	Account		2026	2027
14	Regulatory Asset	Rate Base	182.3	Other Regulatory Assets	\$37,326	\$33,397
15	Amortization Expense	NOI	407.3	Regulatory Debits	3,929	3,929

### Notes:

<sup>&</sup>lt;sup>(1)</sup> Amounts are Per Book and have not been jurisdictionalized.

<sup>&</sup>lt;sup>(2)</sup> Represents on-going cost obligations associated with FPL's 50% ownership interest in Plant Daniel that would need to be removed from the 2026 Projected Test Year and 2027 Projected Test Year should the Commission approve FPL's request in Docket No. 20240155-EI, Petition for approval of accounting treatment for the transfer of proportional share of Plant Daniel Units 1 and 2 to Mississippi Power Company, by Florida Power & Light Company.

<sup>(3)</sup> Represents the 13-month average base rate regulatory asset and related annual amortization expense that would need to be added to the 2026 Projected Test Year and 2027 Projected Test Year should the Commission approve FPL's request in Docket No. 20240155-EI. See page 2 for additional information.

# FLORIDA POWER & LIGHT COMPANY PLANT DANIEL BASE RATE REGULATORY ASSET<sup>(1)</sup> (\$000)

Line				
No.	Month	Beginning Balance	Amortization <sup>(2)</sup>	Ending Balance
1	Dec-25			\$39,291
2	Jan-26	- 39,291	(327)	38,963
3	Feb-26	38,963	(327)	38,636
4	Mar-26	38,636	(327)	38,308
5	Apr-26	38,308	(327)	37,981
6	May-26	37,981	(327)	37,654
7	Jun-26	37,654	(327)	37,326
8	Jul-26	37,326	(327)	36,999
9	Aug-26	36,999	(327)	36,671
10	Sep-26	36,671	(327)	36,344
11	Oct-26	36,344	(327)	36,016
12	Nov-26	36,016	(327)	35,689
13	Dec-26	35,689	(327)	35,362
14	Total Amortization		(\$3,929)	
15	13-Month Average			\$37,326
16				
17	Jan-27	\$35,362	(327)	35,034
18	Feb-27	35,034	(327)	34,707
19	Mar-27	34,707	(327)	34,379
20	Apr-27	34,379	(327)	34,052
21	May-27	34,052	(327)	33,724
22	Jun-27	33,724	(327)	33,397
23	Jul-27	33,397	(327)	33,070
24	Aug-27	33,070	(327)	32,742
25	Sep-27	32,742	(327)	32,415
26	Oct-27	32,415	(327)	32,087
27	Nov-27	32,087	(327)	31,760
28	Dec-27	31,760	(327)	31,432
29	Total Amortization		(\$3,929)	<u> </u>
30	13-Month Average			\$33,397

## Notes:

<sup>(1)</sup> Represents the base rate recoverable component of up to a total \$45 million transfer price requested to be established as a regulatory asset in Docket No. 20240155-EI. Subject to Commission approval, the final transfer price as reflected in Exhibit C of the Purchase and Sale Agreement filed in the referenced docket will depend on the actual closing date.

<sup>(2)</sup> Based on a 10-year recovery period requested by FPL in Docket No. 20240155-EI.