



John T. Burnett
Vice President & General Counsel
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408
(561) 304-5253

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 Dawn Nichols.

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 6 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:

Shaw Stiller
Timothy Sparks
Florida Public Service Commission
Office of the General Counsel
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850
sstiller@psc.state.fl.us
tspark@psc.state.fl.us

Walt Trierweiler
Mary A. Wessling
Office of Public Counsel
c/o The Florida Legislature
111 W. Madison St., Rm 812
Tallahassee, Florida 32399-1400
trierweiler.walt@leg.state.fl.us
wessling.mary@leg.state.fl.us
**Attorneys for the Citizens
of the State of Florida**

By: s/ John T. Burnett
John T. Burnett

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BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 20250011-EI
FLORIDA POWER & LIGHT COMPANY
DIRECT TESTIMONY OF DAWN NICHOLS

Filed: February 28, 2025

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1 **I. INTRODUCTION**

2 **Q. Please state your name and business address.**

3 A. My name is Dawn Nichols. My business address is 700 Universe Boulevard, Juno
4 Beach, Florida 33408.

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 Vice
7 President of Customer Service.

8 **Q. Please describe your duties and responsibilities in that position.**

9 A. As Vice President of Customer Service for FPL, I am responsible for the organization
10 that maintains, enhances, develops, and implements the processes and technologies that
11 support our customer programs and services. The Customer Service organization
12 ensures the delivery of outstanding, low-cost, and efficient customer service to FPL’s
13 more than 6 million customers.

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

15 A. I am a graduate of the Pennsylvania State University with a bachelor’s degree in
16 Management Science and Information Systems. From 1994 to 2005, I led large
17 organizations through the design, development, testing and deployment of the leading
18 enterprise resource software, SAP. In 2005, I joined NextEra Energy, Inc., where I have
19 held positions of increasing responsibility in Information Technology, Customer
20 Service and Human Resources. Since May 2023, I have served as Vice President of
21 Customer Service for FPL.

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

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

- 1 • Exhibit DN-1 List of MFRs Sponsored or Co-Sponsored by Dawn Nichols
- 2 • Exhibit DN-2 FPL Customer Service Awards and Recognitions
- 3 • Exhibit DN-3 Florida Public Service Commission Logged Complaints

4 **Q. Are you sponsoring or co-sponsoring any Minimum Filing Requirements in this**
5 **case?**

6 A. Yes. Exhibit DN-1 lists the minimum filing requirements (“MFR”) that I am sponsoring
7 and co-sponsoring.

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

9 A. The purpose of my testimony is to describe how FPL achieves the right balance
10 between providing outstanding service to our customers while maintaining low-cost
11 and efficient operations. My testimony also supports the development and
12 implementation of a new customer service platform. Lastly, it supports the
13 reasonableness of the projected O&M and capital costs set forth in the MFRs for
14 customer service.

15 **Q. Please summarize your testimony.**

16 A. My testimony details FPL’s dedication to outstanding service and efficient operations,
17 and the transition to a new customer service platform. The customer service
18 organization meets customers’ growing and diverse needs through various channels
19 such as customer care agent, web, mobile app, face-to-face, interactive voice response
20 (“IVR”), social media, and chat. FPL develops its programs and processes in response
21 to customer feedback to continuously improve the customer experience. Since the last
22 rate case, the rate of complaints from FPL’s customers has decreased, a credit to the
23 Company’s customer-centric initiatives. My testimony also demonstrates that FPL

1 achieved outstanding performance in Customer Service while keeping our operations
2 and maintenance (“O&M”) expenses low. This is evidenced by an eight percent
3 reduction in cost per customer when comparing the 2026 projected test year to 2022.
4 FPL’s Customer Service costs are reasonable and necessary and support our mission to
5 provide great customer value by providing outstanding service, while keeping bills as
6 low as possible.

7
8 FPL’s strategy includes personalized customer interactions and increased self-service
9 capabilities. This approach ensures customers receive support aligned with their
10 preferences, whether digitally or through more traditional methods. Additionally, FPL
11 facilitates payment assistance for eligible customers through programs such as the
12 federal Low-Income Home Energy Assistance Program (“LIHEAP”) and FPL Care To
13 Share and helps customers manage consumption through phone energy surveys, energy
14 tools available through our digital channels, and energy specialists.

15
16 FPL has garnered a number of recognitions for exemplary customer service. FPL’s
17 focus on continuous improvement has led to enhancements such as adding natural
18 language understanding (“NLU”) in our IVR phone system and digital offerings such
19 as Guest Pay and an improved mobile app for detailed energy usage tracking.

20
21 My testimony also describes FPL’s need to transition to a new customer service
22 platform because the current, decades-old technology is becoming obsolete. FPL plans
23 to replace its existing Customer Information System (“CIS”) with a new customer

1 service platform, ensuring FPL can continue to offer high-quality service efficiently.
2 This transition, slated for completion by the end of 2027, aims to maintain operational
3 efficiency and provide streamlined experiences.
4

5 **II. OVERVIEW OF CUSTOMER SERVICE**

6 **Q. Please provide an overview of the Customer Service organization.**

7 A. FPL’s customer service organization is responsible for building connections with our
8 customers and developing solutions to meet their evolving needs and expectations. We
9 are responsible for establishing and executing policies, processes, and systems to
10 enhance our customers’ experience. Primarily, the organization is comprised of
11 Customer Care Operations, Customer Success, Revenue Management, and Smart
12 Meter Network Operations. Customer Care Operations includes the contact center,
13 customer experience and complaint resolution. Customer Success is responsible for
14 large commercial, industrial and governmental accounts, residential and business
15 energy efficiency education, and demand side management (“DSM”). The Revenue
16 Management group ensures bills and payments are processed timely and accurately,
17 and it is responsible for customer receivables. Smart Meter Network Operations is
18 responsible for meter testing, reading, and maintenance.

19 **Q. Has FPL been recognized for its customer service?**

20 A. Yes. FPL has been recognized for its outstanding customer service in national surveys
21 for both residential and business segments in the areas of service satisfaction, brand
22 trust and product experience.
23

1 For example, in J.D. Power’s 2024 U.S. Electric Utility Residential Customer
2 Satisfaction Study, FPL ranked among the best large utilities in the nation – second in
3 the southern region and in the top decile nationally. FPL’s ranking was bolstered by
4 first-place performance in power quality and reliability and second-place performances
5 in corporate citizenship, billing and payment, and communications.

6

7 The Edison Electric Institute’s (“EEI”) Customer Advisory Group, a group of national
8 business customers that provides feedback, guidance, and support to EEI’s National
9 Key Accounts program, has also recognized FPL’s commitment to customers. Award
10 criteria include outstanding customer service, innovative programs and tools, ease of
11 access to programs, executive involvement in customer engagement, ease and speed of
12 new service connections and appropriate communication and support before, during
13 and after outages. The advisory group includes 30 key energy principals and thought
14 leaders from large customer organizations in the U.S. Most recently, a member of
15 FPL’s Customer Service team was one of only 10 individuals to win the National Key
16 Accounts Award for Outstanding Customer Engagement. In addition, FPL was
17 recognized for exceeding customer expectations in providing clean energy solutions
18 for corporate customers.

19

20 FPL was recognized in 2023 as a Trusted Business Partner by Escalent, based on
21 Cogent Syndicated surveys conducted with business customers of utilities across the
22 country. FPL ranked No. 1 in the South, fifth nationally, and was the only utility in
23 Florida to be recognized with this honor in 2023. FPL’s Brand Trust score was in the

1 top decile of the industry and was the top score in its benchmark segment, with
2 Customer Focus and Business Customer Support cited as positive customer
3 experiences. Notably, customers rated FPL strongly for overall utility value (“offers
4 reasonable rates for service provided”) and helping attract new businesses to the local
5 community.

6
7 FPL was also recognized as an Escalent Business Customer Champion in 2021 through
8 2024. In 2023, FPL was the only utility in Florida to receive this recognition, scoring
9 in the top decile in the industry and outpacing its peer utilities in several indices. In
10 2024, FPL scored in the top quartile of the industry nationally. FPL’s Customer Focus
11 Index score ranked second amongst utilities in the Southern region, with strong ratings
12 for providing great customer service, trust to do the right thing for customers, and ethics
13 in dealings with customers, demonstrating overall exceptional performance. FPL was
14 also rated strongly for Billing and Payment Performance, with outstanding scores for
15 ease of understanding and useful information provided in FPL’s bill.

16

17 **III. FPL’S APPROACH TO CUSTOMER SERVICE**

18 **Q. Please describe FPL’s approach to customer service.**

19 A. FPL is committed to continuous improvement in customer service. We recognize that
20 our multi-generational customer base has diverse needs and preferences. Our goal is to
21 meet customers where and how they want to be met, enabling them to receive support
22 from their preferred channel and method of communication.

23

1 To address a variety of customer preferences, we offer a range of service channels
2 through which customers receive assistance and obtain information. These include
3 customer care agent, web, mobile app, face-to-face, IVR, social media, and chat. For
4 example, customers can learn how to manage their energy use by calling an agent, using
5 our online self-services, or scheduling a visit from our field energy specialists. Our
6 large commercial, industrial, and governmental customers may engage with their
7 assigned customer advisors or choose to utilize any of the self-service features.

8 **Q. How does FPL support this approach?**

9 A. Recognizing that one size does not fit all, our customer support structure is designed to
10 gather customer feedback, monitor customers' evolving needs and expectations, and
11 provide solutions based on effective processes and current technologies. Our support
12 structure also ensures that we are continually enhancing our tools and empowering our
13 agents and field specialists to provide solutions for customers throughout our
14 geographically diverse service area.

15 **Q. What are examples of services that FPL has developed using this approach?**

16 A. Through the use of technology, listening to our customers and using data to gather
17 insight, we have been able to improve our customers' experiences. For example:

- 18 • FPL successfully completed the implementation of NLU in the IVR which
19 easily identifies the reason for the customer's call and quickly routes them to
20 the appropriate IVR menu or agent for assistance. NLU allows customers to
21 verbalize the reason for calling instead of having to navigate a series of menus.
22 NLU is prepared to handle keywords for most scenarios within the industry and
23 can ask for confirmation to increase accuracy and provide a better experience.

1 and seamlessly operates from several locations. Our operations handle inbound and
2 outbound calls in English and Spanish, for both residential and business customers, as
3 well as social media, emails, live chat, faxes, and letters. Our contact center receives
4 more than 20 million customer calls annually. Of these calls received, our IVR utilizes
5 technologies including natural language processing and account analysis to resolve
6 approximately 16 million customer calls. It anticipates customers' needs, offering self-
7 service options or routing them to the most appropriate agent. These technologies
8 enable customer inquiries to be resolved quickly and allows the contact center to
9 maintain low operating costs. The remaining more than 4 million customer calls are
10 handled by a live agent. Some examples of the inquiries our agents assist with are
11 opening and closing service, bill explanations, providing information on program
12 offerings, setting up electronic bills and payments, extending due dates, as well as
13 conducting phone energy surveys. More complex requests are handled by agents with
14 the necessary subject matter expertise.

15 **Q. How do you serve the customers who prefer to conduct business digitally?**

16 A. At FPL, we understand our customers also want to interact digitally through our
17 website and mobile app and we support their preferences by making it easy to open an
18 account, pay bills, view energy usage, manage accounts and more. Additionally, our
19 customers can engage with our virtual chat agent or with a live chat agent while on our
20 website, if preferred. One of our digital features provides customers the ability to view
21 their daily and monthly usage, which assists them in understanding their consumption.
22 Additionally, the [FPL.com/WaysToPay](https://www.fpl.com/WaysToPay) page consolidates various payment methods,

1 allowing customers to quickly and easily select the best option that suits their needs. In
2 2024, there were approximately 79 million web and mobile application interactions.

3 **Q. How does FPL support larger commercial, industrial, and governmental**
4 **customers?**

5 A. Recognizing that larger commercial, industrial and governmental customers have
6 complex needs, FPL's Customer Success organization has an account management
7 team throughout the state. In addition to having access to our digital tools, our large
8 customers have assigned account managers. Account managers are comprised of
9 subject matter experts, primarily engineers, that act as the single point of contact for
10 over 3,000 business customers and serve as the customer's advisor for all energy-
11 related needs and requests. Since 2023, FPL has been utilizing a modern customer
12 relationship management tool that allows account managers to view business
13 customers' information and track interactions and requests.

14 **Q. Has FPL been recognized for support provided to large commercial, industrial**
15 **and governmental customers?**

16 A. Yes, in addition to being recognized as a 2023 Business Customer Champion and
17 Trusted Business Partner, EEI recognized an FPL team member for Outstanding
18 Customer Engagement in 2024. This is awarded to individuals who deliver outstanding
19 service and help customers meet their clean energy and business-related goals.

20 **Q. Do you provide any additional support to customers who need assistance with**
21 **managing their energy usage?**

22 A. Yes. In addition to the phone energy surveys provided by our contact center agents and
23 the energy tools available through our digital channels, residential and business

1 customers are supported by our energy specialists. This group is dedicated to serving
2 individual customers at their home, place of business, or by phone. Services include
3 on-site analysis of home or business energy usage, high bill investigations, education
4 on energy efficiency measures and support for any other inquiries that customers may
5 have about their account. Our energy specialists conducted more than 30,000 energy
6 surveys in 2024. The results of the surveys provide a customized energy management
7 plan that guides customers on how to analyze their usage data, maximize energy
8 conservation practices, and reduce consumption.

9

10 In addition to conducting individualized energy surveys, the energy specialists are
11 visible and accessible to the broader community in different ways. In 2024, energy
12 specialists attended 92 community events including home shows, HOA meetings,
13 church events, and community fairs where approximately 21,000 customers had an
14 opportunity to meet face-to-face with an energy specialist. FPL also conducts phone
15 banks, another medium to connect with our customers. Phone banks are short-term
16 telephone information centers that provide additional opportunities for customers to
17 speak with agents who can provide information related to their energy needs. FPL has
18 conducted energy-efficiency phone banks, in both English and Spanish, with major TV,
19 radio and digital platforms, reaching more than 90,000 viewers. Our team also
20 conducted over 70 interviews to educate our customers on how to become more energy
21 efficient and lower their bills. These interviews were broadcast multiple times reaching
22 over 2.2 million viewers.

23

1 **Q. Do these programs and events support the achievement of the objectives of the**
2 **Florida Energy Efficiency and Conservation Act (“FEECA”)?**

3 A. Yes. These programs and events support the objectives embodied by FEECA and FPL’s
4 DSM plan, which was most recently approved by the Commission in 2021. Under
5 FEECA, the Commission is required to adopt appropriate energy conservation goals,
6 as well as utility plans to achieve those goals (“DSM Plans”), at least every five years.
7 Once the Commission establishes a utility’s DSM goals and approves that utility’s
8 DSM Plan, the utility can then seek recovery of prudently incurred costs related to the
9 plan through the Energy Conservation Cost Recovery Clause.

10 **Q. What is the status of the Commission’s review of FPL’s DSM goals and plan?**

11 A. At this time, the Commission is in the middle of its DSM Plan review cycle. In 2024,
12 the Commission approved new increased goals for FPL. FPL will submit a plan to
13 achieve the goals approved by the Commission by March 18, 2025, and that plan will
14 be evaluated concurrently with this base rate proceeding. FPL reports to the
15 Commission on its progress toward achieving its DSM goals on an annual basis.¹

16

17 **V. ECONOMIC ASSISTANCE FOR CUSTOMERS**

18 **Q. Please discuss FPL’s payment assistance initiatives.**

19 A. FPL helps eligible customers by facilitating emergency payment assistance, including
20 LIHEAP, through state and community action agencies, nonprofit groups, and social
21 service and faith-based organizations. Since 2021, FPL has grown its network to

¹ FPL’s most recent annual report on achievement of its DSM goals is available at the following link:
<https://www.floridapsc.com/pscfiles/website-files/PDF/Utilities/Electricgas/ARDemandSide/2023/Florida%20Power%20and%20Light%20Company.pdf>

1 comprise more than 1,000 partners, including entities such as the Salvation Army,
2 community action agencies and churches. These partners are Florida-based or maintain
3 a Florida presence and help administer payment assistance by determining customer
4 eligibility for assistance and disbursing funds. The FPL Assist Portal provides an
5 efficient way for agencies to support customers by enabling them to view account status
6 and balances and extend payment due dates.

7
8 For more than 30 years, FPL has sponsored the FPL Care To Share program which
9 combines donations from NextEra Energy shareholders, NextEra Energy employees
10 and customers. Over the past ten years, FPL Care To Share has provided an average of
11 \$2.4 million annually to help customers in need.

12
13 Assist agencies have a direct line to a dedicated FPL team that collaborates with them
14 to develop plans to support our more vulnerable customers. In 2024, low-income
15 customers received over 93,000 assistance payments from numerous agencies and
16 FPL's Care To Share, representing nearly \$49 million credited toward their electric
17 bills.

18 **Q. What other initiatives has FPL worked on to increase payment assistance to**
19 **customers?**

20 A. FPL continues to focus on increasing available energy assistance resources, including
21 the identification of new funding sources. FPL is a co-founder of the Coalition for
22 Energy Assistance Modernization, a utility partnership that advocates for federal
23 funding for energy assistance and helps improve the fairness in distribution of LIHEAP

1 funds for Florida and other warm-weather states. FPL also serves on the board of the
2 National Energy and Utility Affordability Coalition, which works to address the energy
3 burden needs of customers across the country.

4 To ensure that customers in need are aware of the availability of assistance funds, we
5 provide them contact information for local agencies that partner with FPL. We provide
6 a specific agency name and phone number to customers in need on FPL’s website based
7 on the customer’s county. Our Customer Care representatives also offer the same
8 information to callers when appropriate.

9 **Q. Please describe additional ways that FPL offers economic assistance.**

10 A. In addition to Care To Share funding and connecting customers with external assistance
11 resources, FPL offers programs that help customers to reduce their bill or manage their
12 monthly payment.

13 • In 2021, FPL modified the Care To Share eligibility criteria to make funding
14 available to customers who are struggling financially but do not qualify for
15 federal programs such as LIHEAP. To that end, FPL adopted United Way’s
16 eligibility criteria: Asset Limited, Income Constrained, Employed (“ALICE”).

17 In 2024, more than \$235,000 in Care To Share assistance helped customers who
18 did not qualify for federal assistance and previously would not have qualified
19 for Care To Share before FPL adopted the ALICE criteria.

20 • In the aftermath of Hurricane Ian, FPL permanently expanded its Care To Share
21 program to include assistance up to \$2,000 for repairs and replacement of meter
22 can and related customer-owned electrical equipment. This program enables

1 low-income customers to make the necessary repairs to ensure that they can
2 safely receive electrical service.

- 3 • We have also made it easier for customers to help others by rounding up their
4 payment in support of Care To Share.
- 5 • FPL offers online and onsite energy efficiency surveys as a part of energy
6 affordability initiatives to educate customers on how to keep their bills low.
- 7 • FPL offers its SolarTogether SunAssist[®] program to qualified low-income
8 customers, which provides day-one bill savings, lowering their monthly energy
9 bill immediately by an average of \$4.20.
- 10 • For qualifying low-income customers, FPL installs weatherization measures
11 aimed at lowering their bill, such as installing LED lighting, faucet aerators,
12 low-flow showerheads, caulking, or door sweeps. In 2024, these weatherization
13 measures positively impacted more than 18,500 low-income customers. FPL's
14 DSM goals approved in 2024 anticipate programs that expand low-income
15 weatherization assistance as well as a new pilot program for low-income
16 renters, which offers financial incentives to landlords for installing high-
17 efficiency HVAC equipment that reduces renters' energy consumption. In
18 addition, FPL conducts Community Saver events bringing low-income
19 community members together with localized assist agencies to heighten
20 awareness around energy efficiency measures and programs to help customers
21 reduce their bill. Customers in need are eligible to sign up for a program that
22 extends their payment due date by 10 days.

- FPL works with the Florida Council on Aging to visit communities throughout Florida to present information to seniors about how to apply for financial assistance and how to lower their bill.

VI. INQUIRY AND COMPLAINT RESOLUTION

Q. How does FPL resolve customer inquiries?

A. FPL's goal is to ensure that all customers are completely satisfied with the handling of their inquiries. We have developed a process that is designed to maximize the opportunity to successfully address customers' concerns. Customers who contact the care center and want their inquiry escalated are offered the option of speaking with a care center account supervisor. Account supervisors are a group of experienced employees who are dedicated to resolving the more complex customer inquiries. They resolve most calls directly.

Q. Please explain the process for calls that require follow-up.

A. If a call requires follow-up with a department outside of the care center, the customer is provided the department name to which their matter is being referred, as well as a timeframe in which the appropriate representative will contact the customer for resolution. A ticket for follow-up is then created, and the matter is monitored for completion in a timely manner. For escalated customer inquiries, a care center account manager will contact the customer, provide their name and phone number, and guide the process to resolution.

1 **Q. Please describe what happens if an inquiry is not resolved to a customer's**
2 **satisfaction.**

3 A. If an inquiry is not resolved to the customer's satisfaction, the customer may choose to
4 contact the Commission. As part of our complaint handling process, FPL participates
5 in the Transfer-Connect and Email processes established by the Commission to help
6 resolve disputes between regulated companies and their customers as quickly,
7 effectively, and inexpensively as possible. These processes involve transferring the
8 customer call or email directly from the Commission to a specialized group of FPL
9 customer advocates for expedited handling, if the customer agrees.

10 **Q. How has the number of FPL customer contacts with the Commission changed in**
11 **recent years?**

12 A. Since the last rate case, FPL has reduced the number of complaints logged in the Florida
13 Public Service Commission Consumer Activity Report. FPL and Gulf Power combined
14 recorded 0.036 complaints per 1,000 customers in 2021, compared to 0.028 complaints
15 per 1,000 customers in 2024, achieving a 24% reduction in complaint rate. Attached to
16 my testimony is Exhibit DN-3, Florida Public Service Commission Logged
17 Complaints, which is a summary of FPL's and the other Florida investor-owned
18 utilities' complaints per 1,000 customers from 2021 through 2024. Over the last four
19 years, FPL had the lowest rate of logged complaints when compared to the other Florida
20 utilities. FPL's low rate of reliability-related logged complaints is referenced in the
21 direct testimony of FPL witness De Varona.

1 **VII. CUSTOMER SERVICE PLATFORMS**

2 **Q. What is FPL’s plan for its Customer Information System?**

3 A. FPL plans to replace our aging CIS and its integrated systems with a new customer
4 service platform (or “the new platform”).

5 **Q. Please describe the functionality of FPL’s existing CIS.**

6 A. FPL’s CIS has managed customer data, interactions, and transactions for all accounts
7 located in the legacy (peninsular) FPL area. This includes but is not limited to account
8 information, meter reading, billing, invoicing, customer moves, and integrations with
9 systems throughout the Company. The integrated systems include more than 200
10 applications that interact with CIS either by sending or receiving data. Examples of the
11 integrated applications and their functions are described below:

- 12 • **Outage Management** – Leverages customer and premise data from CIS to
13 track customer outages to assign work, track customer impacts, and report
14 projected restoration times for customers.
- 15 • **Power Delivery Work Management System** – Leverages customer and
16 premise data and sends updated premise data to CIS to use in the management
17 of Power Delivery work for customers such as new construction, grid
18 improvements or installations, and planned outages.
- 19 • **Web and Mobile** – Leverages customer, billing, payment, and premise data
20 from CIS to enable online self-service applications for customers to view and
21 update their information, log in to their accounts to view and pay bills, and
22 interact with FPL digitally.

- 1 • **Contact Center IVR and Telephony** – Leverages customer, billing, payment,
2 and premise data from CIS to enable the automated phone system that allows
3 customers to call in and use self-service phone options as well as the option to
4 connect with customer care agents.
- 5 • **Bill Presentation** – Leverages billing and customer data from CIS to generate
6 the presentation of the bill to either email or print for the customer.

7

8 In FPL Northwest, a separate customer account management system (“CAMS”)
9 manages all customer data, interactions and transactions for accounts located in the
10 former Gulf service area and is currently integrated with about 80 of the 200
11 applications at FPL. CAMS is an SAP-based, leading customer service technology
12 solution that will serve as the foundation for the new platform.

13 **Q. Why is it necessary to replace CIS?**

14 A. After more than three decades of use, CIS is reaching its end of serviceable life. CIS,
15 which is a mainframe system originally programmed in a version of COBOL, is now
16 outdated and increasingly challenging to support due to limited resource availability in
17 the workforce. In addition, CIS and many of its associated applications are built on
18 aging architecture that has become obsolete. Throughout the years, FPL has enhanced
19 CIS alongside hundreds of other internal systems to streamline operational processes
20 by improving self-service options for customers, reducing manual work through
21 process and work automation. This enabled new programs and services as the industry
22 and technology evolved and improved customer experiences and processes such as
23 smart grid. Many of these internal systems are also reaching the end of their serviceable

1 lives. If not replaced in the near future, the mainframe system will become more and
2 more difficult to secure against new cyber threats as patches and support will become
3 increasingly more limited. Given these circumstances and our continuous focus on
4 cyber security, FPL has determined now is the right time to replace these systems to
5 mitigate future support issues and customer impacts.

6 **Q. What will replace CIS?**

7 A. CIS is being replaced with the new Customer Service Platform, which includes CAMS,
8 other integrated applications being replaced alongside CIS, and additional applications
9 being consolidated into a single platform. After Gulf was acquired and CAMS was put
10 in place, the technology and processes were set up only to scale to Gulf's approximately
11 500,000 customers. In order to support all of FPL's 6 million customers across Florida,
12 the system and processes must be enhanced to scale. For example, meter disconnect
13 processes must be properly batched to handle larger transactions across the metering
14 technology, and the data integrations between power delivery applications must be
15 updated to include all applicable data from CAMS for the full set of customers.

16 **Q. What is the impact to the other integrated systems?**

17 A. There are more than 200 systems across FPL that interact with, and rely upon, CIS. As
18 part of the transition, FPL will change or replace only the systems that need to be
19 changed as a direct result of the new platform implementation. Specifically, FPL will
20 replace integrated systems that are at or reaching end of serviceable life, which includes
21 the contact center IVR and telephony, agent desktop, and Customer Service field meter
22 management system. Other systems, by contrast, only need to be modified to meet new
23 technology requirements.

1 **Q. Please describe some of the benefits of the new platform.**

2 A. The new platform is designed to enable us to continuously improve the customer
3 experience and ensure we maintain and build on the efficiencies we have achieved over
4 the last 30 years. Below are examples:

5 • Self-service capabilities will be improved through personalized interactions. In
6 the future, the web will anticipate what a customer's intent is based on their
7 account status, history, or recent interactions. By comparison, today, customers
8 must navigate through the website to find what they need.

9 • Customers will be able to contact FPL on the web and seamlessly transition to
10 chat or an agent without having to repeat their intent. Today, transitioning from
11 the web to an agent requires customers to reauthenticate and re-explain their
12 reason for contacting FPL.

13 • Manual work in CAMS will be automated to avoid the need for increased
14 resources once customers are migrated.

15 • New programs and rates will be implemented in less time than it would typically
16 take in CIS.

17 • The performance of automated and scheduled tasks will be enhanced to enable
18 more efficient processing that scales with the growth in customers.

19 **Q. Please provide an overview of the plan to implement the new platform.**

20 A. Both CAMS and the integrated systems will be enhanced or built over time through
21 2027. By the third quarter of 2026, our first set of customers will be transitioned to the
22 new platform with the goal of having all customers transitioned by the end of 2027 with
23 a total capital cost of \$751 million.

1 **Q. Why do you have to make additional enhancements before moving the customers?**

2 A. CAMS was originally built to handle approximately 500,000 customers, and the system
3 needs to be enhanced and scaled to manage a larger number of customers. In addition
4 to scaling up the system, the following are examples of enhancements, which will be
5 completed in CAMS prior to moving customers.

6 • **Payment Extension** – Optimization of payment extension processes to enable
7 installment plans and additional options during storm scenarios.

8 • **Optimization of Remote Connect and Disconnect** – Expand the uses of
9 remote connect and disconnect functions to be able to handle multiple service
10 areas in blue sky and business continuity modes.

11 • **Rate Calculations** – Build out of rates and programs not currently in CAMS.

12 • **Customer Moves** – Enhance customer moves process to automate transfer of
13 balances and deposits for customers.

14 • **Manual Billing** – Eliminate manual billing functions to avoid increase of
15 operational costs associated with billing certain customer groups manually such
16 as special contracts.

17 • **Billing and Customer Account Exceptions** – Automation or elimination of
18 exceptions to reduce the need for manual interventions.

19 • **Optimize Scheduled System Jobs** – Enhance scheduled system jobs to be able
20 to efficiently process additional customers.

1 **Q. What is the status of the development of the new platform and customer**
2 **transition?**

3 A. The development and transition are progressing according to schedule. We remain
4 confident in our ability to transition all legacy FPL customers to the new platform by
5 the end of 2027. So far, we have onboarded the project teams across the platforms;
6 identified all the capabilities that need to be enhanced in CAMS; begun development
7 of requirements across all systems; and completed the necessary upgrade to the SAP
8 system.

9

10 Below is a summary of the program objectives by phase:

- 11 • **Business Case Creation and Assessment (August 2023 - January 2024) –**
12 Identified overall scope required to implement the new platform, evaluated new
13 technologies through various pilots, and assessed the overall impact of the
14 replacement of CIS across all integrated applications. This resulted in the
15 detailed scope for the program, the selection of the technology for the contact
16 center IVR, telephony, agent desktop, Customer Service field management
17 system, and the changes required for all integrated applications. The overall
18 program approach and timeline was benchmarked against other utility
19 implementations.
- 20 • **Program Initiation and Ramp up (February 2024 - September 2024) –**
21 Selected resources and vendors through competitive bid processes to help
22 develop and deliver new solutions. We successfully upgraded the SAP
23 application and developed and delivered over fifty enhancements across the

1 platform. These enhancements include processes like automatic transfer of
2 balances when customers move, mitigation of manual billing exceptions, and
3 upgrading web applications to improve the self-service experience.

4 • **Development and Delivery (October 2024 - January 2026)** – Develop and
5 incrementally deliver enhancements into CAMS and web/mobile, and
6 implement new agent desktop, contact center IVR and telephony, and Customer
7 Service field management in Northwest.

8 • **Train, Prepare, and Begin Migrations (January 2026 – December 2026)** –
9 Continue remaining enhancements, begin training of CIS users, conduct end to
10 end testing of conversion programs across the system and practice incremental
11 conversions through a series of dress rehearsals leading up to the first group of
12 customer account conversions.

13 • **Complete Conversions and Post Implementation Support (January 2027 -**
14 **December 2027)** – Monitor system and conduct remaining customer account
15 conversions. Transition to post implementation support and operations and
16 prepare to sunset old systems.

17 **Q. What steps are you taking to ensure a successful program?**

18 A. Drawing from our experience with the original CAMS implementation and industry
19 best practices, we have developed a comprehensive strategy to ensure program success.

20 Key elements of this strategy include:

21 • **Defined Scope** – Through the first phase of the program, FPL set up a well-
22 defined governance process to manage the scope that will be delivered as part

1 of the new platform. Managing the scope and timeline is critical to ensuring the
2 success of the program.

3 • **Rigorous Testing** – Extensive testing will be performed across all applications
4 leveraging both a designated test team as well as business subject matter
5 experts. In addition, planning and executing testing will start as early as design
6 of the solution in order to define detailed acceptance criteria for
7 implementation.

8 • **Phased Implementation** – FPL will move customer accounts into the system
9 in phases to minimize risks associated with moving all accounts at once, which
10 would require an extended system outage. In between phases, we will watch
11 and monitor all processes to ensure quality.

12 • **Program Reporting** – Frequent status reports will be produced to monitor the
13 progress of the project.

14 • **Focus on Employee Training and Change Management** – Prioritizing
15 employee training and change management plan throughout the entirety of the
16 platform’s implementation to ensure employees using the new platform are
17 prepared to serve our customers. This is done through early training, adoption,
18 and clear and timely communications.

19 • **Post Implementation Support** – Hyper care is a critical phase following the
20 implementation of a new system or major system upgrade. It ensures that the
21 system transition is smooth and that any issues are promptly addressed. The key
22 components of hyper care include enhanced support, active monitoring, user

1 assistance, issue resolution, performance metrics, obtaining feedback,
2 documentation, and regular updates.

3 4 **VIII. CUSTOMER SERVICE O&M EXPENSE**

5 **Q. Please provide an overview of Customer Service’s O&M expenses.**

6 A. Customer Service O&M is driven by several key activities including billing, payment
7 processing, customer care operations, credit and collections, and various field and
8 support activities to serve our customers. In addition to these activities, uncollectible
9 expense is a cost driver for Customer Service O&M. FPL Customer Service systems
10 and processes provide customers with options to serve them in a manner they choose
11 while keeping costs low, as demonstrated by MFR C-41, O&M Benchmark Variance
12 by Function. When comparing the Customer Accounts, Customer Service, and Sales
13 functional areas’ O&M expenses, adjusted to exclude energy conservation cost
14 recovery cost, FPL’s forecasted cost per customer for 2026 is \$20.06 vs. \$21.89 in 2022
15 – an 8% reduction and a testament to our focus on efficiency.

16 **Q. How do the Customer Accounts, Customer Service & Information, and Sales**
17 **functional areas’ O&M expenses for the 2026 Projected Test Year compare to the**
18 **Commission’s O&M benchmarks (MFR C-41, O&M Benchmark Variance by**
19 **Function)?**

20 A. The Customer Accounts, Customer Service & Information, and Sales 2026 Test Year
21 adjusted O&M expenses are below the Commission’s O&M benchmark thresholds for
22 each functional area.

1 **Q. How do the Customer Accounts, Customer Service & Information, and Sales**
2 **functional areas' O&M expenses for the 2027 Projected Test Year compare to the**
3 **Commission's O&M benchmarks (MFR C-41, O&M Benchmark Variance by**
4 **Function)?**

5 A. The Customer Accounts, Customer Service & Information, and Sales 2027 Test Year
6 adjusted O&M expenses are below the Commission's O&M benchmark thresholds for
7 each functional area.

8 **Q. Are the projected Customer Service O&M expense and capital expenditures for**
9 **2026 and 2027 reasonable?**

10 A. Yes. FPL's O&M and capital expenditures for the 2026 Projected Test Year and 2027
11 Projected Test Year are reasonable and necessary and support FPL's mission to
12 continue providing outstanding customer service while keeping bills as low as possible.
13 The transition from CIS and related systems to a new customer platform across our
14 entire service area reflects a prudent and necessary investment for FPL customers for
15 the reasons previously discussed in my testimony.

16

17

IX. SERVICE CHARGES

18 **Q. Is FPL proposing any changes to its service charges?**

19 A. Yes. FPL has updated the cost basis of the Company's service charges as shown on
20 MFR E-7.

21 **Q. Does this conclude your direct testimony?**

22 A. Yes.

Florida Power & Light Company

MFRs SPONSORED OR CO-SPONSORED BY DAWN NICHOLS

MFR	Period	Title
SOLE SPONSOR:		
C-11	2024 Historic Year 2026 Projected Test Year 2027 Projected Test Year	UNCOLLECTIBLE ACCOUNTS
F-09	2026 Projected Test Year	PUBLIC NOTICE
CO-SPONSOR:		
C-08	2025 Prior Year 2026 Projected Test Year 2027 Projected Test Year	DETAIL OF CHANGES IN EXPENSES
C-15	2024 Historic Year 2026 Projected Test Year 2027 Projected Test Year	INDUSTRY ASSOCIATION DUES
D-06	2024 Historic Year 2025 Prior Year 2026 Projected Test Year 2027 Projected Test Year	CUSTOMER DEPOSITS
E-07	2026 Projected Test Year 2027 Projected Test Year	DEVELOPMENT OF SERVICE CHARGES
E-13b	2026 Projected Test Year 2027 Projected Test Year	REVENUES BY RATE SCHEDULE - SERVICE CHARGES (ACCOUNT 451)



FPL Customer Service Awards and Recognition

J.D. Power

J.D. Power 2024 U.S. Electric Utility Residential Customer Satisfaction StudySM – FPL came in second in customer satisfaction in the South Region large segment.

» *The study examines satisfaction across six factors: power quality and reliability; price; billing and payment; communications; corporate citizenship and customer care.*

J.D. POWER

Edison Electric Institute (EEI)

Recognized FPL in 2023 and 2022 for providing outstanding customer service and innovative energy solutions for business customers.

In 2023, one of FPL's key account executives was recognized for outstanding customer engagement and exceeding customer expectations.

» *Selection criteria included outstanding customer service, innovative programs and tools, ease of access to programs, ease and speed of new service connections and appropriate communication and support before, during and after outages.*





FPL Customer Service Awards and Recognition

Cogent Syndicated

Award in 2024: Business Customer Champion

- » *Ranked first quartile nationally*
- » *Gain in Brand Trust had significant impact on the Engaged Customer Relationship (ECR) score.*

Award in 2023: Trusted Business Partner

- » *Ranked No. 1 in the South, 5th nationally.*
- » *Cited Customer Focus and Business Customer Support as positive customer experiences.*

Award in 2023: Business Customer Champion

- » *Only utility in Florida to receive this recognition.*
- » *Ranked 2nd in the South, 6th nationally.*

Award in 2022: Residential Customer Champion

- » *FPL's engaged customer relationship (ECR) score was above the industry average.*
- » *Ranked 5th (out of 30) in the Electric South, 26th (out of 141) nationally.*

Award in 2022: Most Trusted Brand

- » *Based on customer perceptions of FPL's customer focus, company reputation, and more.*
- » *FPL's Brand Trust score was above the industry average.*





Florida Public Service Commission Logged Complaints

Logged Complaints for Florida Investor Owned Utilities 2021-2024

