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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 Tim Oliver.

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

BEFORE THE

FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 20250011-EI

FLORIDA POWER & LIGHT COMPANY

DIRECT TESTIMONY OF TIM OLIVER

Filed: February 28, 2025

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I. INTRODUCTION

Q. Please state your name and business address.

A. My name is Tim Oliver. My business address is Florida Power & Light Company, 700 Universe Boulevard, Juno Beach, Florida 33408.

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

A. I am employed by Florida Power & Light Company ("FPL" or the "Company") as the Vice President of Development.

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

A. I am responsible for leading new project and program development in various technologies for the Company, including solar, battery storage, natural gas, transmission, shore power, electric vehicles ("EVs"), and clean hydrogen. I have been in this role since April 2022. Some major efforts during my tenure have focused on development of new power generation projects that lower costs, increase reliability, and enhance fuel diversity to better serve our customers.

Q. Please describe your educational background and professional experience.

A. Prior to my current role, I was Vice President of Renewable Origination and Prospecting for NextEra Energy Resources, LLC, where I led the team responsible for initiating utility-scale wind, solar, and battery storage projects and customer origination efforts across the U.S., with more than 15 years of experience in renewable energy development. Prior to that role, I served as Vice President of Corporate Real Estate at FPL, where I was responsible for the acquisition of the Company's first 10 GW of solar sites in its development pipeline.

I hold a Bachelor of Arts in Business Administration from James Madison University and a Master of Business Administration from the University of North Carolina. I am also a certified public accountant. I began my career working for KPMG's Washington DC office.

Q. Are you sponsoring or co-sponsoring any exhibits in this case?

A. Yes. I am sponsoring the following exhibits:

- Exhibit TO-1 List of MFRs Sponsored or Co-sponsored by Tim Oliver
- Exhibit TO-2 2026 and 2027 Solar Project Details
- Exhibit TO-3 Layout of Major Equipment Components for Solar Energy Centers
- Exhibit TO-4 2026 and 2027 Battery Storage Project Details
- Exhibit TO-5 Layout of Major Equipment Components for Battery Storage
- Exhibit TO-6 Property Held for Future Use

I am co-sponsoring the following exhibit:

- Exhibit SRB-7 Solar and Battery Base Rate Adjustment Mechanism, filed with the direct testimony of FPL witness Bores.

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

A. Yes. Exhibit TO-1 lists the minimum filing requirements ("MFR") that I am sponsoring and co-sponsoring.

Q. What is the purpose of your testimony?

A. My testimony addresses new solar generation and battery storage projects that will be put into service between 2026 and 2027, building on the success of FPL's solar and

battery experience to date. For 2028 and 2029 solar projects, I describe the proposed cost recovery mechanism, a Solar and Battery Base Rate Adjustment ("SoBRA"), that is a part of the Company's proposed multi-year rate plan. I also address Property Held for Future Use ("PHFU") in connection with FPL's generation planning and development. My testimony also addresses FPL's efforts in natural gas and nuclear development. Finally, my testimony addresses investments in pilot programs previously approved by the Florida Public Service Commission ("Commission"), as well as a new long duration battery pilot project within FPL's service area.

Q. Please summarize your testimony.

A. Since its last rate case in 2021, FPL has continued to develop cost-effective solar generation. As of January 31, 2025, FPL operates 108 photovoltaic ("PV") solar power plants representing approximately 7,932 megawatts alternating current ("MW_{AC}") of utility-scale solar capacity. FPL has also been a leader in battery storage applications, with 469 MW of utility-scale, grid-connected battery storage in operation and another 522 MW of new battery storage expected to be completed by November 2025.

FPL proposes to add 2,086 MW_{AC} of cost-effective solar generation and 2,239 MW of utility-scale battery storage from 2026 through the end of 2027 to support continued reliable operation of the electric system. As FPL witness Whitley describes, the combined solar and battery storage additions allow FPL to reliably meet the needs of an increasing customer base and higher loads and to deliver power when customers need it.

FPL's pilot programs provide important learnings. Through its EV pilot programs, the Company has learned about EV adoption, charging, and usage of EVs by FPL's customers. Finally, and consistent with FPL's track record as a leader in innovative technologies that benefit customers, FPL is seeking approval of a long duration battery pilot project. This pilot aims to test the use of advanced storage technologies and to evaluate their performance and reliability. This project will support FPL's commitment to innovation and U.S. manufacturing, provide an understanding of cost versus benefits and how to diversify the Company's supply chain while utilizing non-lithium materials that can be sourced domestically.

II. CURRENT STATE

Q. In general, what is the current state of solar power generation and battery storage in Florida?

A. Solar power generation remains a highly viable, cost-effective, and favorable energy resource option in Florida. This is due to relatively low equipment and construction costs, availability of equipment, and the fact that solar energy does not require fuel. Furthermore, the Inflation Reduction Act of 2022 ("IRA") introduced a solar production tax credit, enhancing cost-effectiveness by reducing revenue requirements and ultimately customer bills. As of January 31, 2025, FPL has successfully constructed 7,932 MW_{AC} of solar power, including 2,980 MW_{AC} under the SoBRA mechanism approved by the Commission in Order Nos. PSC-16-0560-AS-EI and PSC-2021-0446-S-EI. FPL's solar program has reduced customer exposure to volatile fuel pricing, resulting in greater customer bill stability through significant avoided fuel

costs. Additionally, FPL paid $114 million in property taxes, created 12,600 construction jobs, and avoided 14 million tons of carbon dioxide emissions from 2021 to 2024.

Battery storage technology has also continued to advance, achieving increased efficiency at lower costs, with projections indicating further cost declines over the long term. The IRA provided an investment tax credit ("ITC"), which supports continued investment in battery storage in Florida for the benefit of customers by reducing revenue requirements and ultimately customer bills. Utility-scale battery storage has become an economically competitive and reliable firm capacity option for FPL's system. FPL currently has 469 MW of utility-scale, grid-connected battery storage. Moreover, FPL is currently constructing 522 MW of new battery storage at seven solar energy centers, expected to be completed by November 2025.

Utility-scale battery storage systems provide year-round capacity, ensuring a reliable electricity supply by utilizing stored energy and delivering it when needed. These solutions enhance system reliability, flexibility, and cost-effectiveness by addressing evening peak demand, supporting cold winter mornings, and providing grid stability. Pairing solar and battery storage investments allows for the most cost-effective integration with the existing power generation fleet.

Q. Please describe FPL's experience designing and constructing solar generation and battery storage facilities.

A. FPL has extensive experience in designing and building both utility-scale solar generation and battery storage facilities, placing it among the leaders in the U.S.

From 2009 through January 2025, FPL has completed construction of 108 utility-scale solar centers totaling approximately 7,932 MW_{AC}. The existing FPL utility-scale solar energy centers range in size from 10 MW_{AC} to 74.5 MW_{AC}, demonstrating FPL's capability to design and build significant solar infrastructure across Florida.

Regarding battery storage facilities, FPL's 2016 Rate Settlement authorized 50 MW of battery pilot projects, expanding the range of storage configurations FPL could test and leading to the deployment of larger projects. FPL's experience started in the 2016-2017 timeframe with small-scale storage pilot projects. The primary objectives of these projects were to demonstrate the operational capabilities of batteries and learn how to integrate them into FPL's system. Initial storage use cases focused on grid applications like peak shaving, frequency response, and backup power, providing FPL with opportunities to determine how to integrate, dispatch, and control storage systems.

In 2021, FPL placed 469 MW of battery storage into commercial operation adjacent to three operational solar energy centers in its service area. The largest facility is the 409 MW, 2.2-hour duration battery located adjacent to FPL's existing Manatee Solar Energy Center in Manatee County. The remaining 60 MW is comprised of two projects,

each featuring 30 MW, 2.5-hour duration facilities, located adjacent to the Echo River and Sunshine Gateway Solar Energy Centers in Suwannee and Columbia Counties, respectively.

Currently, FPL is constructing an additional 522 MW of 3-hour duration battery storage facilities at seven separate locations in Northwest Florida. These utility-scale battery storage facilities will enhance system reliability in Northwest Florida and provide additional firm capacity to meet growing demand.

FPL's comprehensive experience in designing and constructing both solar and battery storage projects underlines its commitment to providing cost-effective and reliable energy solutions to its customers. Exhibit TO-3 provides a diagram depicting the basic layout of major equipment components for solar energy centers, and Exhibit TO-5 provides a diagram depicting the basic layout of major equipment components for battery storage projects.

The designs and construction of these sites have also proven to be resilient. FPL's solar energy centers have demonstrated their durability in the face of severe weather. As an example, 66 of FPL's 89 existing solar sites, operating at that time, were exposed to storm conditions during Hurricanes Helene and Milton in 2024, but less than 0.07% of solar panels required replacement.

Q. How does FPL's approach to the development of solar and battery storage projects ensure they are cost-effective and reliable for customers?

A. FPL has a strong track record of developing both solar projects and battery storage facilities that provide our customers with cost-effective, fuel-free generation, as well as reliable firm capacity options.

For solar projects, FPL has completed 108 solar projects in 32 different counties across Florida. The development process begins with early site identification and due diligence, leveraging FPL's expertise alongside assistance from local planners and other land experts to determine site suitability for future solar construction. This proactive approach, which includes addressing concerns and working with local stakeholders in advance, helps streamline the permitting and construction process. FPL also collaborates closely with national, state, and local organizations from the early stages of design and development through the operational life of the plant to ensure the compatibility of prospective solar sites with the surrounding area.

Similarly, for battery storage facilities, FPL has developed 13 operational battery storage facilities ranging in size from 0.35 MW to 409 MW, with an additional 522 MW currently being built at seven new solar energy centers. The battery storage development process also begins with early site identification and due diligence to support system needs. FPL leverages the expertise of its internal team, local planners, and expert consultants to assess site suitability for deploying batteries while considering local stakeholder interests. By proactively engaging with stakeholders and

identifying opportunities for improvement early in the process, FPL can streamline the permitting and construction process, leading to effective project execution.

Both solar and battery storage projects benefit from early-stage development, thorough site evaluation and stakeholder involvement, ensuring cost-effectiveness, regulatory compliance, and minimized impacts, ultimately enhancing the value and reliability of energy services for FPL's customers.

Q. Please describe how FPL's integrated approach to monitoring and optimizing solar and battery storage performance benefits customers.

A. FPL has developed and continually enhances advanced monitoring technology and performance analysis tools for its solar energy centers, battery storage fleet, and fossil generation fleet. These tools optimize plant operations, drive process efficiencies, and facilitate the deployment of technical skills as demand for services grows, as discussed in the testimony of FPL witness Broad.

For example, FPL's Renewable Operations Control Center ("ROCC"), established in 2016, serves as the centralized remote operations center for all renewable generation and storage facilities. The ROCC efficiently manages daily work activities and ensures effective deployment of best operating practices at all of FPL's renewable energy centers. The FPL team has leveraged these capabilities along with its extensive experience to develop robust operating plans that deliver high levels of reliability and availability at some of the lowest costs in the industry.

FPL has also implemented real-time operational monitoring technologies at the Fleet Control Center ("FCC") for the fossil fleet, which detect issues before failure, allowing for timely and cost-effective corrective actions to maintain high reliability. The FCC enables remote operation of over 20,000 MW of fossil installed assets.

III. 2026 AND 2027 SOLAR AND BATTERY ADDITIONS

Q. Please describe the solar and battery storage projects that FPL plans to install through its four-year rate plan.

A. In 2026, the Company plans to install 894 MW_{AC} of solar energy, consisting of 12 new solar energy centers, and 1,419.5 MW of battery storage, at 13 battery storage sites. In 2027, FPL plans to install an additional 1,192 MW_{AC} of solar energy, consisting of 16 additional solar centers, and an additional 819.5 MW of battery storage, at 11 battery storage sites. The batteries installed in 2026 and 2027 will be 4-hour duration batteries.

Details on each of the solar energy centers planned for 2026 and 2027 are included in Exhibit TO-2. These planned combinations of solar energy and battery storage reflect FPL's commitment to enhancing grid reliability and providing cost-effective energy solutions to its customers**.** FPL witness Whitley provides details on the cost effectiveness and system benefits of these planned additions. The revenue requirement associated with the planned solar generation additions in 2026 and 2027 are discussed by FPL witness Laney.

Q. What are the proposed commercial operation dates for the 2026 and 2027 solar energy centers and battery storage projects?

A. The commercial operation dates for the solar energy centers are detailed in Exhibit TO-2 to my testimony. For 2026, the solar energy centers are divided into two tranches, with eight sites planned to reach commercial operation in January 2026 and four sites in April 2026. The 2026 battery storage projects are organized into three separate tranches with in-service dates staggered over the calendar year. Seven sites totaling 521.5 MW are scheduled to reach commercial operation in July 2026, one site totaling 400 MW in October 2026, and five additional sites totaling 498 MW in November 2026. These tranches include 11 hybrid and two standalone battery storage projects. Hybrid batteries are located adjacent to solar centers, interconnected with both the solar site and the grid, while standalone batteries have their own grid interconnection.

For 2027, the solar energy centers will follow a quarterly schedule, with four sites planned to reach commercial operation in each quarter: January, April, July, and October 2027. The 2027 battery storage projects will also follow a staggered approach. In-service dates include six sites totaling 447 MW planned to reach commercial operation by April 2027 and an additional five sites totaling 372.5 MW by July 2027. All 2027 battery storage sites are hybrid sites. Details for the proposed battery storage sites are detailed in Exhibit TO-4.

These proposed projects reflect FPL's strategic approach to scaling up its solar energy and storage capacity efficiently over the next few years.

Q. What is FPL's estimated cost for the 2026 and 2027 solar energy centers and battery storage projects?

A. FPL estimates that the total cost for the 2026 solar energy centers (12 sites) will be $1,435 million, at an average cost of $1,605/kW$_{AC}$. For the 2027 solar energy centers (16 sites), the projected cost is $1,836 million, at an average price of $1,540/kW$_{AC}$.

For the 2026 battery storage projects, the estimated total cost is $2,049 million, at an average price of $1,443/kW. The 2027 battery storage sites are projected to cost $1,188 million, at an average price of $1,449/kW. As discussed by FPL witness Laney, the 2026 and 2027 battery storage projects are anticipated to generate $587 million and $364 million in ITCs, respectively.

As detailed in FPL witness Whitley's testimony, the combination of FPL's planned 2026 and 2027 solar and battery storage additions result in $1,942 million cumulative present value revenue requirements ("CPVRR") savings for FPL's customers, as compared to an alternative plan that excludes the additions. This analysis demonstrates that the facilities provide substantial savings for FPL's customers while addressing FPL's identified reliability needs.

Q. Please describe the solar generation and battery storage technology that FPL plans to use for the 2026 and 2027 projects.

A. For the 2026 and 2027 solar projects, FPL plans to develop 12 and 16 solar energy centers, respectively, each with a nameplate capacity of 74.5 MW$_{AC}$. These centers will

utilize crystalline silicon PV panels with single-axis tracking systems, which follow the sun's movement from east to west, maximizing energy production.

The panels will be grouped and connected to inverters that convert direct current ("DC") electricity into alternating current ("AC") electricity. The inverters, paired with medium voltage transformers, form Power Conversion Units ("PCUs"). Each center will have between 19 and 23 PCUs, with the AC voltage increased by transformers to match transmission interconnection voltage. FPL uses baseline designs for cost and performance projections, continually optimizing site configurations and component selection for the highest output, reliability, and customer benefit. Exhibit TO-3 provides a block diagram of major equipment components.

For the battery storage projects, FPL will deploy 11 hybrid and two standalone facilities in 2026, totaling 1,419.5 MW. In 2027, FPL plans to add 11 hybrid sites totaling 819.5 MW.

The 2026 and 2027 battery projects will use lithium-ion batteries, recognized for their efficiency and scalability. Battery containers will house lithium-ion cells assembled into modules and racks, interconnected to achieve the necessary voltage and current. These containers will be grouped and connected to inverters that convert DC to AC electricity, with transformers increasing the voltage to match transmission requirements. FPL uses baseline designs for cost and performance projections, continuously optimizing for cost efficiency, reliability, and customer benefit. Design

adjustments will only be made if they offer greater benefits for customers. Exhibit TO-5 depicts a diagram of major equipment components for battery storage.

Q. Are the cost estimates for equipment, engineering, and construction for the proposed solar generation and battery storage projects reasonable?

A. Yes.

Q. What is the basis for your conclusion regarding the 2026 and 2027 solar and battery storage projects cost?

A. The selected solar and battery storage sites for the 2026 and 2027 build out are well into development and permitting and have undergone extensive diligence. Thus, the Company has confidence that it will be able to construct them on budget. Further, the cost for surveying, engineering, equipment, materials, and construction services necessary to complete the 2026 solar energy centers have been established through a competitive bidding process and the method for establishing costs for the 2027 solar energy centers will be identical.

The 22 hybrid sites to be built over the 2026-2027 time period will be located adjacent to existing FPL solar energy centers, and the two standalone projects will be sited on FPL property that previously hosted fossil generation. Further, the cost for surveying, engineering, equipment, materials, and construction services necessary to complete the 2026 battery storage sites have been or will be established through a competitive bidding process. The 2027 battery projects will follow the same process, ensuring that 100% of the project costs for procurement are subject to competitive solicitation.

This comprehensive, diligent approach ensures optimized cost efficiency, reliability, and high customer benefit for both solar and battery storage projects.

Q. Please describe the competitive solicitations associated with the 2026 and 2027 solar energy centers and battery storage projects.

A. For both the 2026 solar energy centers and battery storage projects, FPL has followed a thorough, competitive procurement process to ensure the selection of cost-competitive, high-quality suppliers and contractors. For the 2027 solar energy centers and battery storage projects, FPL will follow a similar process for competitive procurement.

For the 2026 solar energy centers, FPL solicited proposals from industry-leading suppliers for the procurement of PV panels, PCUs, step-up transformers, and the engineering, procurement, and construction ("EPC") services required to complete the projects. Proposals for PV panels were solicited from 20 large suppliers through multiple requests for proposals ("RFPs"), with eight suppliers submitting conforming bids. The four selected suppliers offered the lowest costs, high efficiencies, and demonstrated high product quality and strong financial performance security. FPL also evaluated risks associated with supply chains and contract terms.

Proposals from six PCU suppliers were solicited, with all proposals meeting the RFP requirements. The supply contract was awarded to a single supplier. Similarly, six manufacturers of step-up power transformers were solicited, and two suppliers were selected to procure the transformers. EPC service proposals were solicited from 14

industry-recognized contractors, with two contractors submitting bids. FPL finalized contracts with those submitting the best proposals, which included the supply of the balance of equipment and materials. Proposals for the construction of the substation and interconnection facilities will be solicited and evaluated similarly. FPL will follow the same competitive procurement process for the 2027 solar energy centers.

The 2026 battery storage projects followed a similar procurement process. Proposals were solicited from industry-leading suppliers for battery containers and PCUs, as well as the other supplies, equipment procurement, and construction services required for the projects. Five suppliers were solicited for battery containers, with three submitting bids that satisfied the RFP requirements. The selected supplier offered the lowest costs, high efficiency, high product quality, and strong financial performance security. Risks associated with supply chains and contract terms were also evaluated.

Seven PCU suppliers were solicited, and FPL awarded the supply contract to two of the most cost-competitive and technically preferred suppliers. Procurement and construction service proposals will be solicited from a minimum of three industry-recognized contractors to ensure cost competitive bidding. The best bidder will be selected based on the requirements of the proposal. FPL will use a similar competitive procurement process for the 2027 battery storage projects.

This rigorous competitive procurement process ensures that the 2026 and 2027 solar energy centers and battery storage projects are completed with the highest quality standards to deliver maximum customer benefit.

Q. Are there other benefits associated with the 2026 and 2027 solar energy centers and battery storage projects?

A. Yes, there are several benefits associated with these projects. For the solar energy centers, approximately 200 individuals will be employed at each center at the height of construction. This will create about 2,400 jobs for the 2026 projects and approximately 3,200 jobs for the 2027 projects. The contractors building the solar energy centers are required to use reasonable efforts to employ local labor and resources, providing a secondary benefit to the communities that host these projects by supporting the local economy and businesses. Additionally, communities will benefit from increased property tax revenues following the completion of the solar energy centers. Prior FPL solar projects resulted in $114 million in property taxes paid from 2021 to 2024. Solar energy also helps FPL diversify how it generates electricity and not rely on any single source, making the Company's system more efficient, more resilient and increasingly shielded from fuel price volatility.

The construction of these utility-scale battery sites will also generate economic benefits for local communities through the creation of construction jobs and tax revenue. FPL expects each hybrid battery site to require approximately 25-40 workers during construction. Each hybrid battery site is expected to generate approximately

$300 thousand in additional property taxes each year as compared to a standalone solar site.

Q. Are the costs of interconnection facilities and network integration for each of the proposed solar energy centers and battery storage projects included in the total cost estimate?

A. Yes. The estimated capital construction cost for each project includes the projected cost for its unique interconnection configuration. For the solar energy centers and standalone battery storage projects, the interconnection facilities cost includes two components: direct assignment facilities and system upgrades for network integration. These components are identified during the interconnection study process and are factored into the total cost estimate for each project. This ensures that both the interconnection facilities and necessary network integration costs are accounted for in the overall financial planning. The hybrid battery storage sites will utilize existing transmission infrastructure from the adjacent solar energy centers to deliver stored energy to the grid. In either case, all transmission interconnection costs are included in the overall project costs.

IV. SOBRA MECHANISM

Q. Does FPL project an increasing total reliability need between 2028 and 2030?

A. Yes. FPL witness Whitley's resource plans have identified an increasing total reliability need for additional firm capacity between 2028 and 2030 based on current planning assumptions. FPL witness Whitley's assessment also identified a combination of solar and battery storage as the most cost-effective resources to meet these demands.

Specifically, the plan points to adding 1,490 MW_{AC} of new solar energy with 596 MW of battery storage in 2028 and adding 1,788 MW_{AC} of solar energy with 596 MW of battery storage in 2029.

In this proceeding, however, FPL is not requesting cost recovery associated with 2028 and 2029 resource additions. Instead, as discussed by FPL witness Bores and detailed in Exhibit SRB-7, FPL requests approval of a SoBRA mechanism. Like similar mechanisms previously approved by the Commission in Order Nos. PSC-16-0560-AS-EI and PSC-2021-0446-S-EI, the proposed SoBRA will address the criteria and process by which FPL may request and obtain cost recovery for solar generation and battery storage facilities constructed in 2028 and 2029.

Q. How does the Company propose that the SoBRA mechanism for the years 2028 and 2029 will operate?

A. The proposed SoBRA consists of two principal cost components: (1) cost recovery for the solar generation and battery storage facilities that will enter service in 2028 and 2029 and (2) the impacts of ITCs associated with battery storage facilities. The proposed SoBRA mechanism will authorize FPL to recover costs associated with solar and battery projects constructed in 2028 and 2029 if FPL satisfies specified conditions.

As it has done in multiple dockets, FPL will file its SoBRA request for cost recovery at the time of its final true-up filing in the Fuel and Purchased Power Cost Recovery Clause docket the year before the new solar and battery storage projects are anticipated to enter service. In that proceeding, the Commission will determine whether FPL has

demonstrated an economic need or a resource need for the projects, based on the criteria in Exhibit SRB-7. The Commission also will determine whether FPL appropriately calculated the revenue requirements, and the resulting rate adjustment associated with the 2028 and 2029 installations. Base rates then would be adjusted consistent with the Commission's approval of that amount upon commercial operation of the respective projects. Exhibit SRB-7 provides additional details regarding the SoBRA.

Q. Does FPL propose limits on the solar and battery capacity that can be recovered through the 2028 and 2029 SoBRA?

A. Yes. For solar and battery projects that demonstrate an economic need, FPL proposes that SoBRA recovery will be limited to construction of 1,490 MW_{AC} and 1,788 MW_{AC} of solar in 2028 and 2029, respectively, and 596 MW of battery storage projects in a single year, provided that surplus capacity not constructed in 2028 can be carried over to 2029 if FPL demonstrates an economic need in both years.

Q. Does FPL plan to follow a competitive procurement process for the 2028 and 2029 solar and battery projects?

A. Yes. FPL will continue to pursue the comprehensive procurement process that has worked well for all the preceding solar and battery projects, which have resulted in competitive costs and served customers well for many years.

V. NATURAL GAS AND NUCLEAR DEVELOPMENT

Q. Outside of solar generation development and the inclusion of battery storage, is FPL looking at other forms of power generation to supplement its generation mix?

A. Yes.

Q. Does FPL evaluate future new gas generation as part of its plan?

A. Yes. As described by FPL witness Whitley, FPL's resource planning process assesses all potential generation options and ultimately selects the most cost-effective, reliable, and timely system generation additions to ensure sufficient capacity and energy are available to serve all FPL customers. The result of that analysis identified the proposed additions of solar and battery storage systems that I discussed earlier in my testimony. In addition, FPL continues to monitor other generation options. For example, gas-fired generation options currently have a longer lead time to develop as compared to solar and battery storage. Current challenges to building natural gas generation are two-fold: the lack of available gas transportation capacity and supply chain issues. Gas pipeline expansions are complex and require upfront investment, currently taking approximately three to four years to complete. In addition, new gas-fired generation faces supply chain issues for necessary equipment and materials to construct these facilities, extending their total lead times to five to six years to achieve commercial operation. While natural gas generation development remains part of FPL's energy strategy, prioritizing solar and battery storage investments allows the Company to cost-effectively and efficiently meet FPL's immediate energy needs and support a reliable energy grid to serve customers.

FPL continues to study the feasibility of new gas units in the event of potential higher load growth or other external factors that could result in natural gas becoming an economic generation resource in the future. FPL's proposed 2025 Ten Year Site Plan

("TYSP"), to be filed April 1, 2025, includes evaluation of potential new gas-fired units that could be constructed in the 2032 timeframe.

Q. Is FPL taking other efforts to increase gas supply to help mitigate some of the near-term challenges with new natural gas generation that you discussed?

A. Yes, in addition to our traditional efforts to ensure adequate gas supply for our existing and future units, FPL is also taking an innovative approach to utilize waste landfill gas for use in its combustion turbine and combined cycle fleet. Specifically, when Gulf Power was merged with FPL in 2021, it also acquired the Perdido Landfill Gas contract, existing between Gulf Power and Escambia County. Currently, FPL takes landfill gas in its unfiltered form and burns it in gas turbine generating engines to produce power.

The landfill gas is currently being consumed by two aging gas turbine generating engines located adjacent to the county's landfill. These units will reach the end of their useful lives and will be retired by 2029. Therefore, FPL has analyzed the landfill gas currently being burned in these aging assets and evaluated options that could improve the landfill gas to pipeline-quality natural gas that can be used in FPL's natural gas generating fleet. FPL has determined that investing in new biogas upgrading technology to convert landfill gas into pipeline-quality natural gas, which can subsequently be burned in existing combustion turbines at the Gulf Clean Energy Center units, will provide a CPVRR benefit of $41 million to FPL's customers and enhance FPL's gas supply. This project is expected to be operational in 2028.

Q. Is FPL evaluating adding new nuclear to its generation fleet?

A. Yes. As indicated earlier, FPL continues to monitor opportunities for any future nuclear additions. FPL is one of the few U.S. utilities with a completed Combined Construction and Operating License required to construct and operate a nuclear power plant, for two large Westinghouse AP-1000 units at the Turkey Point site for Units 6 and 7. FPL is also continuing to monitor advanced nuclear power options such as small modular reactors ("SMRs"). FPL is planning to begin the initial stages of Early Site Permitting in 2026-2027 timeframe, available under Nuclear Regulatory Commission ("NRC") rules, for a potential SMR at a site that is adjacent to an existing nuclear power plant. This strategic move is aimed at minimizing risks, allowing emerging technologies to mature, and ensuring that robust regulatory frameworks are well-developed prior to deployment, while remaining cognizant of the current high costs of nuclear and SMR development and taking a stepwise approach. FPL is closely monitoring current initiatives at both the Department of Energy and the NRC. By taking these steps early on, FPL aims to be well-positioned to benefit from potential state and federal incentives for future nuclear deployment.

Also, FPL, as part of the Florida Electric Power Coordinating Group on power generation, recently provided an update to the Commission in September 2024 on the status of advanced nuclear power technologies. Importantly, FPL will continue to safely operate its current nuclear generation both at the Turkey Point and St. Lucie generation sites.

VI. PROPERTY HELD FOR FUTURE USE

Q. Can you please describe what property the Company is holding to develop solar and other generation projects in the future?

A. Yes. Exhibit TO-6 shows property that the Company owns in fee as of December 31, 2024, to support future solar and other generation project development, which totals $988.5 million.

Q. Did the Company reasonably and prudently acquire these sites for future generation facility development?

A. Yes. Exhibit TO-6 provides details on each site held for future use. Some properties listed on Exhibit TO-6 are currently being utilized for FPL solar energy centers with in-service dates in 2025. Others will be used for construction of the 2026 and 2027 solar and battery storage projects, while additional properties will be evaluated for use with the 2028 and 2029 solar and battery storage projects that I discussed earlier in my testimony. The remaining properties can also be utilized for potential solar, battery storage, and natural gas generation projects.

Q. Please describe the process FPL undertakes when acquiring property for solar projects.

A. FPL identifies areas that could be suitable for solar energy projects and considers and monitors market conditions and their cost impacts to ensure new projects maximize value for our customers. FPL screens candidate parcels by using criteria including each property's proximity to a transmission system interconnection point, as well as availability of transmission capacity, and FPL assesses whether the property provides sufficient acreage to accommodate the expected permitting requirements and the

construction of the solar energy centers. FPL evaluates the features of each property as a whole for various factors, such as the presence of wetlands and flood plains, environmental constraints, and cultural restrictions, and FPL develops designs that optimize the land use for each parcel. As such, in addition to evaluating the suitability of the land, FPL's decision to acquire the land also undergoes a thorough market and financial review. FPL also reviews its land portfolio to ensure that the site development timelines align with expected in-service dates for the solar projects.

Q. Please explain the land acquisition process for solar sites and how the acreage and value of property available for solar fluctuates during each year.

A. FPL's preferred approach is to enter into purchase option agreements with landowners, minimizing upfront costs and allowing flexibility to better align land purchases with the development timeline of generation sites. However, if landowners are unwilling to agree to an option, FPL evaluates the site benefits before deciding whether to purchase the land outright.

Throughout this process, FPL exercises financial discipline to ensure the Company is making prudent decisions for its customers. The Company will carefully assess the market and comparable parcels on a cost-per-acre basis to secure a reasonable price, ensuring value and cost-effectiveness for customers.

FPL has taken this approach to support cost-effective site development and construction. Each year, FPL acquires properties after completing due diligence and the contractual option period, adding their value to the PHFU balance. Simultaneously,

as FPL develops and constructs solar sites, properties are removed from PHFU upon commercial operation and placed in service reducing the PHFU balance.

Q. Does the property that FPL is holding align with the Company's future resource needs?

A. Yes. FPL's current land portfolio is adequate to support the 72 additional solar sites planned through 2029 and support a combination of solar, battery storage, and natural gas sites through 2034, consistent with FPL's TYSP planning horizon. Given anticipated load growth, FPL expects to continue to add significant amounts of new generation and is opportunistically acquiring land to meet future resource needs. In Florida, the challenges associated with land development and competing land-use pressures, combined with a data-driven analytical approach, make it prudent for FPL to secure land now to cost-effectively address future resource planning requirements. The combined effects of state conservation efforts (*e.g.*, Florida Forever), ongoing residential and commercial development, and investments by other entities will continue to make identifying and securing suitable land for future generation sites increasingly challenging and costly.

Additionally, land designated for long-term agricultural uses (*e.g.*, sugar cane, dairy, crops, and citrus), which often occupies thousands of acres, may be retained by institutional landowners or families indefinitely, thereby reducing the overall availability of suitable land in Florida.

Considering these factors, it is prudent to identify, acquire, and secure the necessary land and permits for future generation sites. FPL's past and future successes in solar and battery storage development hinge on the timely execution of a land acquisition program that takes into account the macroeconomic conditions and development constraints outlined above.

Q. What attributes does FPL seek when acquiring property to support solar development?

A. Suitable land has very specific locational and environmental attributes, including factors such as: (1) non-residential, preferably vacant land; (2) proximity to existing FPL transmission lines; (3) presence of minimal wetlands, species, and other environmental impacts; (4) large tracts with one owner (if possible); and (5) geographic dispersal throughout FPL's service area. FPL purchases land that includes wetlands, conservation and access easements, and property setbacks. The site design and layout are developed around these restrictions. FPL also evaluates each solar site for its unique environmental attributes and develops a tailored stewardship plan to support or enhance them.

Q. How does FPL manage properties it owns that are not immediately used for the construction of new solar generation?

A. As FPL's land holdings have increased, FPL has recognized the need to take active steps to ensure the proper care and stewardship of these properties. FPL seeks to license or lease property to local farmers and others for a variety of uses. This allows the continued productive use of the land for agricultural activities prior to any FPL development or construction activities. Today, FPL has over 50 land license

agreements with local commercial and agricultural entities, including working with ranchers and farmers across our service area, allowing for multiple uses such as cattle, citrus, and nursery projects. FPL continuously explores additional ways to work with the communities where the Company develops solar projects to expand this list of land uses with a focus on responsible land use, ecological enhancements, and ongoing efforts to co-exist with local agricultural communities. On property that is not leased or licensed, FPL performs inspection and maintenance to ensure that the properties are in good condition prior to the start of any type of development activities.

When FPL is able to lease properties, the revenue generated from leasing these properties helps offset operational costs and compliance expenses associated with maintaining large tracts of land. The savings accrued from these smart financial strategies are then passed on to customers.

Q. Does FPL's land ownership provide any other conservational value?

A. Yes. The Company commits to environmental stewardship by evaluating solar sites and implementing tailored plans. To date, these efforts have preserved over 7,500 acres of wetlands, planted 35,000 pounds of native wildflower seeds, and installed over 600,000 native live plants at operational solar sites. Additionally, when feasible, wildlife-friendly fencing is installed to allow continuous wildlife use. During the operational life of a solar project, land remains fallow, restoring the soil's natural nutrient balance and helping maintain agricultural designation. FPL's solar energy centers reduce potential pollution, avoiding the use of insecticides, fungicides, and fertilizers, thereby preserving groundwater and adjacent wetlands. These initiatives

demonstrate FPL's commitment to the enhancement of local ecosystems through thoughtful land management and innovative practices.

VII. PILOT PROJECT PROGRAM

Q. What proposed pilot projects are you sponsoring for which the Company is seeking approval?

A. I am sponsoring a new pilot program for a long duration battery storage project within the FPL service area. My testimony demonstrates that the investment is reasonable and will provide benefits for FPL's customers.

Q. Please describe the proposed pilot project for a new long duration battery storage pilot.

A. FPL is at the forefront of integrating advanced technologies to diversify and enhance energy solutions for customers. The long duration battery storage pilot represents FPL's commitment to innovation and the future of energy storage.

Beginning in 2016, FPL deployed approximately 4 MW of smaller distribution-connected battery pilots to learn how to integrate lithium-ion battery technology into its system. Early deployment of utility-scale battery storage provided valuable experience in designing and building battery storage facilities, positioning FPL as a leader in the U.S. energy storage market.

Long duration battery storage can dispatch stored energy over extended periods, increasing capacity, lowering dispatch costs, and enhancing grid reliability and

resilience. As utility-scale solar and storage adoption grows, integrating diverse capacity and energy solutions is becoming increasingly important. Technological advancements have improved manufacturing techniques, and economies of scale will likely reduce costs significantly over the next decade. By adopting long duration energy storage systems early, FPL aims to gather insights for cost-effective large-scale deployment to benefit its customers.

The long duration energy storage pilot will test alternative storage technologies beyond lithium-ion batteries. FPL is exploring solutions such as sodium ion, nickel hydride, and iron flow batteries, focusing on components that are widely available and manufactured in the U.S. This pilot seeks to expand and diversify FPL's supply chain, reducing costs while increasing grid reliability and resilience.

The pilot project will deploy two long-duration battery storage systems, each capable of dispatching up to 10 MW of power and storing a total of 100 megawatt-hours of energy. Expected learnings from this pilot include (1) validating the performance and grid reliability of long-duration energy systems, (2) evaluating alternative storage technologies as complements to conventional lithium-ion batteries, (3) developing criteria for vendors regarding safety and delivery schedules, (4) optimizing charging operations to leverage low-cost solar energy during periods of reduced load, and (5) optimizing discharging operations to complement conventional batteries during extended periods of high load.

Q. When would this long duration battery storage pilot be placed into service and what is the estimated project cost?

A. If approved in this case, FPL estimates that the pilot project can be put in service in 2027 at an estimated cost of approximately $78 million. The capital cost of the project is partially offset by ITC credits, thereby significantly reducing the net impact to customers.

Q. Is this long duration battery storage pilot a reasonable and prudent investment that will benefit FPL customers?

A. Yes. FPL is committed to designing innovative solutions that ensure reliable and cost-effective energy delivery to our customers. This pilot program will allow FPL to gain valuable experience with advanced battery storage technologies, enabling the Company to continue to diversify its energy mix, enhance the grid, and create additional value for customers through future large-scale deployments.

By sourcing materials domestically, FPL is committed to supporting U.S. manufacturing and diversifying our supply chain. This approach not only supports domestic industry, but also contributes to cost-effectiveness and reliability to serve customers.

Overall, this pilot represents a prudent and forward-looking investment that promises to yield valuable insights and guide FPL's future energy strategies, ultimately benefiting customers through improved energy solutions.

VIII. PREVIOUSLY APPROVED PILOT PROJECT PROGRAMS AND TARIFFS

Q. Can you provide an overview of the EV charging pilot tariffs approved by the Commission?

A. Yes. In June 2020, FPL submitted a petition to approve three voluntary EV public charging pilot tariffs, which became effective in January 2021 for a five-year period. The first tariff, Utility-Owned Public Charging (rate schedule UEV or "UEV Tariff"), sets a rate for fast-charging stations owned by the utility. The second and third tariffs, Electric Vehicle Charging Infrastructure Riders, include the General Service Demand ("GSD-1EV") and General Service Large Demand ("GSLD-1EV") tariffs, are aimed at enabling third-party investment in public charging stations. These tariffs are designed to mitigate the demand costs billed to the charging stations and to stimulate infrastructure investment in the early days of electric vehicle adoption, with the demand charges increasing as utilization of the charging station increases. The tariffs were approved for a period of five years pursuant to Order No. PSC-2020-0512-TRF-EI ("Order 0512") issued on December 21, 2020.

FPL's UEV Tariff allows FPL to collect fees from drivers charging electric vehicles at FPL-owned public fast charging stations. Fast charging stations provide electricity at high voltage (the UEV Tariff requires power to be delivered at 50 kilowatts or greater), which results in a charging time of approximately 30 minutes depending on a variety of factors, including the vehicle's initial state-of-charge. Under the UEV Tariff, participating customers pay $0.30 per kWh plus applicable taxes and fees. Because local utility taxes and fees vary by location, the effective after-tax rate in 2024 under

the UEV Tariff ranged from $0.33 per kWh to $0.39 per kWh, averaging $0.37 per kWh. Fees collected from drivers, who are not necessarily FPL customers and include visitors to FPL's service area, put downward pressure on rates for the general body of customers. Details are outlined in FPL's 2024 Public Electric Vehicle (EV) Optional Pilot Tariffs Report and EVolution Pilot Program Summary ("FPL 2024 EV Annual Report") filed on January 30, 2025, in Docket No. 20200170-EI (Document 00576-2025).

The GSD-1EV and GSLD-1EV demand limiter voluntary tariffs are an innovative approach designed to support both existing and new EV charging stations. This initiative supports EV adoption by FPL's customers, stimulates economic development and supports the installation of third-party EV chargers. By providing a lower initial electric rate, customers who install public EV chargers can significantly reduce their electricity bills during the critical early stages of their operations. As of December 31, 2024, there are 42 customers enrolled in the GSD-1EV and GSDL-1EV tariffs. Since the introduction of these tariffs in 2021, 34 out of the total 76 customers (45%) who initially signed up have successfully transitioned to regular rates, demonstrating success as utilization grows.

Q. What is the current Public EV charging pilot program?

A. FPL's Public EV charging program is one of several pilot programs approved by the Commission as part of the 2021 Settlement Agreement and consists of Level 2 (requires 240 volt AC connection with power delivered between 6 and 19 kilowatts, which results in 4-6 hours to full charge) and DC Fast Charging Level 3 (requires power to be

delivered at 50 kilowatts or greater, which results in a charging time of approximately 30 minutes) infrastructure. As of December 31, 2024, the Company has installed over 321 fast charging ports and 910 Level 2 charging ports in workplaces, tourist destinations, and other public spaces throughout the territory and on Florida's main highways, Interstate 95 and Florida Turnpike, with additional focus on underserved areas, less traveled east-west routes across the state, and hurricane evacuation routes. During hurricane events in 2024, network-wide utilization increased 27% during evacuation, demonstrating the reliability and resilience of FPL's infrastructure in critical times. Over the four-year period from 2022 to 2025, this program forecasts an investment of approximately $100 million and expects to install 585 fast charging ports in total by 2025. Based on current utilization trends, FPL expects that over their life, the cost of the chargers will be fully offset by revenue.

Q. What is the Company proposing for the UEV charging program and the GSD-1EV and GSLD-1EV demand limiter tariffs?

A. The Company is requesting to make the UEV Tariff permanent and increase the market-based charging fee from $0.30 to $0.35 per kWh. The Company asserts that the proposed $0.35 per kWh (~$0.43 per kWh effective rate) is market-based and comparable to the EV pricing options offered by non-utility providers. This pricing aims to balance affordability for consumers with the financial viability of charging infrastructure investments. FPL designed the market-based pricing to allow for recoverability of all costs and expenses over the life of the assets.

The Company is also seeking approval to make permanent the GSD-1EV and GSLD-1EV demand limiter optional pilot tariffs as permanent tariffs. The tariffs would be available to qualifying customers that operate public fast charging stations and serve to appropriately set demand charges based on utilization. Details for UEV and GSD-1EV and GSLD-1EV rates are outlined in the FPL 2024 EV Annual Report.

Q. What is the current EV residential pilot program?

A. Also part of the 2021 Settlement Agreement EVolution Pilot expansion, FPL's Residential EV Charging Services Rider Pilot (the "EV Home Program") offers a voluntary tariff ("RS-1EV") for residential customers, providing them with EV charging services at a fixed monthly rate. This includes the installation of a Level 2 EV charger that is owned, operated, and maintained by FPL and includes unlimited off-peak charging. Customers have the flexibility to charge their EVs during on-peak periods if needed, at the effective on-peak rate determined by the time-of-use ("TOU") rate schedule. FPL offers both full installation and equipment-only installation options to meet diverse customer needs. By partnering with customers to encourage off-peak charging, residential EV charging does not significantly contribute to peak demand. FPL's experience with this pilot has demonstrated a willingness by its customers to delay charging until the overnight, weekend, and holiday hours, a convenience FPL made easier with our FPL EVolution app that automatically programs charging hours to fit off-peak profiles. With this pilot shifting energy consumption from peak hours to off-peak hours, the Company has seen a clear pattern: customers are willing to participate in managed charging programs that charge their electric vehicles later in the day, effectively decreasing peak demand. See FPL 2024 EV Annual Report.

As of December 2024, the Company has installed 9,007 EV home chargers and expects to install an additional approximately 5,000 by the end of 2025. The pilot phase of the EV Home Program has provided valuable insights into various aspects of electric vehicle adoption. It allowed the Company to better understand customer adoption rates, the existing rate structure, equipment performance, and user charging patterns. Additionally, the pilot revealed the importance of procuring the most efficient and cost-effective chargers available. FPL customers expect that EV charging will be offered in the same reliable, efficient manner that the Company delivers energy to their homes. This pilot has allowed FPL to deliver on that expectation, benefiting the grid and customers.

Based on insights gained from analyzing customer behavior and usage during the initial EV Home pilot, FPL discovered that customers charged more than estimated when the pilot rate was designed. This is detailed in FPL's 2024 EV Annual Report.

Q. What is the Company proposing for the EV Home Program?

A. The Company is seeking approval to leverage the learnings of the pilot by aligning pricing with customer usage patterns, meeting current customer demands, promoting efficient energy use, and providing exceptional EV residential charging solutions. The Company is proposing a new EV Home Program pricing structure that aligns costs with customer usage patterns to ensure compliance with legal requirements that require the program is not subsidized by the general body of customers. This approach allows FPL to provide a voluntary charging service for residential EV customers, providing learnings about charging behaviors and load control potential, while maintaining

CPVRR neutrality. FPL's goal is to offer energy solutions that benefit both the customers and the overall grid, preparing the Company for future EV adoption and growth.

As noted above, one of the key findings was that residential customers charged their EVs more frequently than anticipated, which increased the program's costs. To better align program costs with revenues, FPL is requesting approval of an update to the current EV Home Program RS-1EV pricing and approval for a new program and associated pricing structure ("RS-2EV Program"). For the current RS-1EV Program, FPL is proposing a multi-year transition of existing customers to the new proposed RS-2EV Program with a gradual annual price increase over four years ($7 increase to the monthly charge in 2026, followed by a $5 increase to the monthly charge in each year from 2027 to 2029, totaling $22). This phased approach is designed to soften the immediate impact on participating customer bills. The annual increases for the current program will commence on January 1, 2026, with a planned termination of the pilot on December 31, 2029, at which time all RS-1EV Program customers will be required to transition to the RS-2EV Program if they desire to remain an FPL residential EV charging customer. Prior to December 31, 2029, RS-1EV Program customers may voluntarily elect to transition to the RS-2EV Program at any time following its approval by the Commission or cancel the RS-1EV service subject to the tariff's requirements.

Starting in 2026, the new RS-2EV program price model will feature a fixed program cost coupled with energy charges based on TOU rates, with grid control and a price

based on the learnings from the EV Home pilot. The new RS-2EV Program pricing was established via a formula-based rate to allow for customer pricing designed to recover all costs and expenses over the life of the assets and be CPVRR neutral to the general body of customers over the applicable service contract term. The new program continues to offer grid benefits by offering off-peak pricing to incentivize customers to charge during off-peak hours. Additionally, EV chargers may be utilized as part of future load control efforts. Also, this program offers further insights into grid impacts for future EV charging and EV adoption and growth, allowing the Company to better prepare for potential increases in load.

Q. What is the current Commercial EV charging program?

A. Approved as part of the 2021 Settlement Agreement, the Commercial EV Charging Services Pilot is a voluntary tariff designed for commercial customers who intend to electrify fleet vehicles and require EV charging services. This pilot involves the installation of FPL-owned, operated, and maintained EV supply equipment on customer premises. This commercial EV charging tariff structure ("CEVCS-1") ensures that customers pay a fixed monthly charge, calculated to recover all costs and expenses over the asset's lifespan and carries no cost impact to FPL's general body of customers over the term of the service agreement.

Q. What is the Company proposing for the Commercial EV charging program?

A. The Company is seeking approval to make this rate permanent and expand the tariff offering beyond the "fleet," broadening access for commercial users.

Q. Please explain the investments made for education and technology and software.

A. Since 2022, FPL has provided education to customers about EVs. The Company's EV resources website (www.FPL.com/EV) offers information for common customer questions, including a total cost of ownership calculator. The Company also hosts "ride-and-drive" events to further educate customers about EVs through a hands-on experience. The Company actively supports STEM education through the Electrathon America program, assisting 10 public high schools in the 2023 through the 2024 academic year with plans to support 15 more in the 2024 through the 2025 academic year. By participating in events across FPL's service area, the Company has engaged over 1.3 million event participants. In addition, the FPL EVolution app was developed to help navigate drivers to public charging stations and allow residential EV Home customers to control their Level 2 charger.

Q. What investments for EV programs is the Company seeking approval for?

A. The Company is requesting approval of $5 million annually to invest in technology and software and $1 million annually for continued education. By investing in EV education, along with improved technology and software, the Company will provide Floridians with knowledge and keep FPL at the forefront of helping its customers understand technological advancements. Additionally, by focusing on load management strategies and the most cost-effective integration of EV charging with the grid, the Company will offer customer benefits and support grid stability. These strategic investments demonstrate FPL's commitment to its customers and the integration of electric vehicles into its existing infrastructure.

Q. Are there any other pilot programs the Company is requesting to make permanent?

A. Yes. The Company is requesting approval to continue and make permanent its voluntary Solar Power Facilities Pilot program, subsequently named FPL SolarVantage.

Q. Please discuss the voluntary Solar Power Facilities Pilot program.

A. FPL's 2021 Rate Settlement offered a four-year new, voluntary Solar Power Facilities Pilot program. The program is offered to commercial and industrial customers who elect to have FPL install and maintain a solar facility on their site for a monthly tariff charge. Participating customers can select from a variety of options including ground mounted solar, rooftop solar applications, solar canopies, solar trees, and solar benches. As designed, customers pay a fixed monthly charge, calculated to recover all project costs and expenses over the asset's lifespan and carries no cost impact to FPL's general body of customers. As of December 31, 2024, one commercial/industrial customer has signed up.

Q. What is the Company proposing for the Solar Power Facilities Pilot program?

A. The Company is seeking approval to make this program permanent and continue to offer on-site solar solutions for commercial and industrial customers who elect to participate. In addition, the Company proposes minor modifications to the existing tariff and service agreement to improve the program's operation and efficiency to meet customer needs.

Q. Does this conclude your direct testimony?

A. Yes.

Florida Power & Light Company

MFRs CO-SPONSORED BY TIM OLIVER

MFR	Period	Title
CO-SPONSOR:		
B-12	2025 Prior Year 2026 Projected Test Year 2027 Projected Test Year	PRODUCTION PLANT ADDITIONS
B-15	2025 Prior Year 2026 Projected Test Year 2027 Projected Test Year	PROPERTY HELD FOR FUTURE USE - 13 MONTH AVERAGE
C-15	2024 Historic Year 2026 Projected Test Year 2027 Projected Test Year	INDUSTRY ASSOCIATION DUES

2026 and 2027 Solar Project Details

2026

	BIG BROOK	BOARDWALK	FLATFORD	GOLDENROD	MALLARD	MARE BRANCH
Commercial Operation Date	1/31/2026	1/31/2026	1/31/2026	1/31/2026	1/31/2026	1/31/2026
Capital Cost						
PV Array Costs[1]	$93,526,413	$93,398,313	$91,477,325	$91,981,530	$86,886,478	$88,919,253
Transmission Interconnection and Integration[2]	$14,330,888	$16,859,824	$14,634,247	$11,707,159	$11,292,597	$34,173,960
Land and Easements	$2,983,551	$6,486,867	$7,410,121	$5,611,531	$4,206,962	$4,330,473
AFUDC	$7,287,659	$7,103,913	$7,488,313	$6,825,983	$6,993,796	$8,237,119
Total	**$118,128,511**	**$123,848,917**	**$121,010,006**	**$116,126,203**	**$109,379,833**	**$135,660,805**
$/kWac	$1,586	$1,662	$1,624	$1,559	$1,468	$1,821
$/kWdc	$1,133	$1,187	$1,160	$1,113	$1,049	$1,301

	PRICE CREEK	SWAMP CABBAGE	CLOVER	NORTH ORANGE	SAND PINE	SEA GRAPE
Commercial Operation Date	1/31/2026	1/31/2026	4/30/2026	4/30/2026	4/30/2026	4/30/2026
Capital Cost						
PV Array Costs[1]	$88,873,966	$93,076,646	$86,635,437	$90,552,790	$93,844,563	$94,548,341
Transmission Interconnection and Integration[2]	$14,214,942	$14,250,308	$12,917,260	$20,052,460	$15,083,058	$19,144,744
Land and Easements	$3,495,648	$4,024,640	$3,221,737	$7,105,361	$3,452,307	$7,223,366
AFUDC	$6,887,009	$7,695,079	$5,516,355	$6,438,110	$5,707,552	$6,992,972
Total	**$113,471,565**	**$119,046,674**	**$108,290,789**	**$124,148,721**	**$118,087,480**	**$127,909,424**
$/kWac	$1,523	$1,598	$1,454	$1,666	$1,585	$1,717
$/kWdc	$1,088	$1,141	$1,038	$1,190	$1,132	$1,226

[1] PV Array includes: Panels, Racking & Posts, Collection Cables, EPC Contractor, and Development & Project Management Expenses.
[2] Transmission Interconnection & Integration includes: Generator Step-up Transformers and Substation materials and contractor scope.

2026 and 2027 Solar Project Details

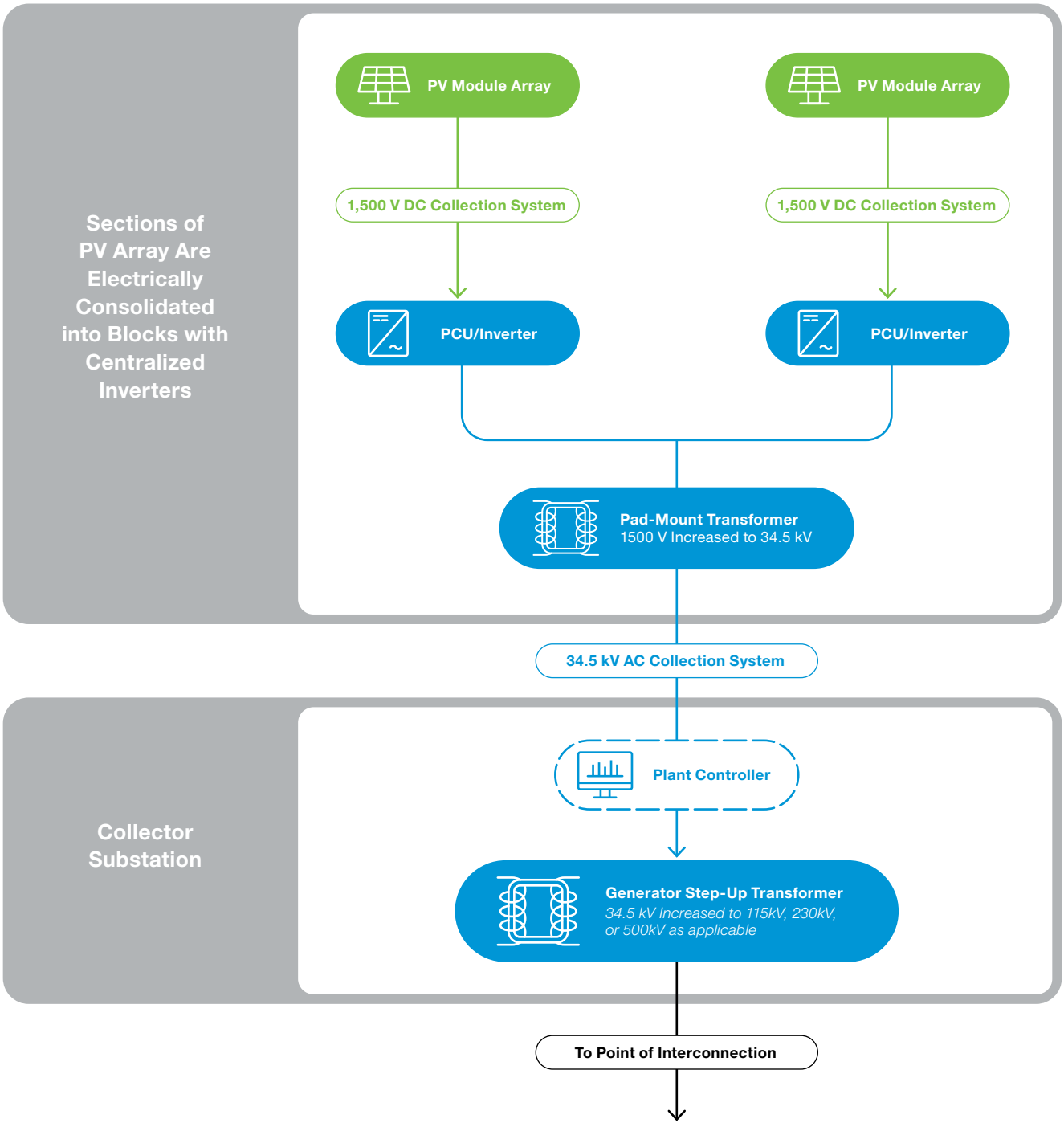
2027

	HENDRY	INDRIO	TANGELO	WOOD STORK	AMBERSWEET	COUNTY LINE	MIDDLE LAKE	SADDLE
Commercial Operation Date	1/31/2027	1/31/2027	1/31/2027	1/31/2027	4/30/2027	4/30/2027	4/30/2027	4/30/2027
Capital Cost								
PV Array Costs[1]	$98,038,258	$85,649,476	$89,890,567	$92,781,834	$93,700,424	$93,458,162	$90,488,416	$93,314,564
Transmission Interconnection and Integration[2]	$11,645,344	$25,552,374	$10,650,144	$10,185,199	$14,177,832	$11,177,669	$8,217,096	$9,367,849
Land and Easements	$5,139,493	$3,000,419	$5,166,066	$5,060,725	$3,367,439	$4,382,957	$2,373,386	$4,021,543
AFUDC	$5,983,512	$6,087,070	$5,735,725	$5,823,102	$5,241,418	$5,594,130	$4,612,421	$5,224,833
Total	**$120,806,606**	**$120,289,339**	**$111,442,502**	**$113,850,861**	**$116,487,114**	**$114,612,918**	**$105,691,320**	**$111,928,789**
$/kWac	$1,622	$1,615	$1,496	$1,528	$1,564	$1,538	$1,419	$1,502
$/kWdc	$1,126	$1,153	$1,032	$1,054	$1,078	$1,099	$1,013	$1,073

	CATFISH	COCOPLUM	HARDWOOD HAMMOCK	MAPLE TRAIL	JOSHUA CREEK	PINECONE	SPANISH MOSS	VERNIA
Commercial Operation Date	7/31/2027	7/31/2027	7/31/2027	7/31/2027	10/31/2027	10/31/2027	10/31/2027	10/31/2027
Capital Cost								
PV Array Costs[1]	$93,221,225	$92,964,208	$97,224,508	$91,067,140	$89,336,827	$89,336,827	$89,336,827	$89,336,827
Transmission Interconnection and Integration[2]	$8,977,343	$9,696,237	$7,793,525	$11,410,326	$15,713,787	$15,713,763	$15,713,750	$15,713,750
Land and Easements	$8,593,922	$4,208,172	$5,737,293	$6,874,737	$4,102,589	$8,585,491	$5,669,582	$2,610,173
AFUDC	$4,755,869	$4,882,569	$4,918,872	$5,373,439	$5,504,557	$5,504,559	$5,504,557	$5,504,557
Total	**$115,548,360**	**$111,751,186**	**$115,674,198**	**$114,725,642**	**$114,657,759**	**$119,140,640**	**$116,224,715**	**$113,165,306**
$/kWac	$1,551	$1,500	$1,553	$1,540	$1,539	$1,599	$1,560	$1,519
$/kWdc	$1,070	$1,034	$1,109	$1,100	$1,099	$1,142	$1,114	$1,109

[1] PV Array includes: Panels, Racking & Posts, Collection Cables, EPC Contractor, and Development & Project Management Expenses.
[2] Transmission Interconnection & Integration includes: Generator Step-up Transformers and Substation materials and contractor scope.

Typical Solar Energy Center Block Diagram



2026 and 2027 Battery Storage Project Details

2026

	SITE #1	SITE #2	SITE #3	SITE #4	SITE #5	SITE #6
Commercial Operation Date	7/31/2026	7/31/2026	7/31/2026	7/31/2026	7/31/2026	7/31/2026
Size (MW)	74.5	74.5	74.5	74.5	74.5	74.5
Capital Cost						
Battery Materials [1]	$102,552,097	$102,552,098	$102,552,098	$102,552,098	$102,552,098	$102,552,097
Transmission Interconnection and Integration [2]	$1,000,099	$1,000,000	$1,000,000	$1,000,000	$1,000,000	$1,000,000
Land and Easements	n/a	n/a	n/a	n/a	n/a	n/a
AFUDC	$4,635,370	$4,649,318	$4,649,318	$4,649,318	$4,649,318	$4,635,358
Total	**$108,187,565**	**$108,201,416**	**$108,201,416**	**$108,201,416**	**$108,201,416**	**$108,187,455**
$/kW	$1,452	$1,452	$1,452	$1,452	$1,452	$1,452

	SITE #7	SITE #8	SITE #9	SITE #10	SITE #11	SITE #12	SITE #13
Commercial Operation Date	7/31/2026	10/31/2026	11/30/2026	11/30/2026	11/30/2026	11/30/2026	11/30/2026
Size (MW)	74.5	400	74.5	74.5	74.5	200	74.5
Capital Cost							
Battery Materials [1]	$102,552,097	$506,406,347	$101,180,507	$101,180,507	$101,180,507	$273,335,300	$101,180,507
Transmission Interconnection and Integration [2]	$1,000,000	$41,852,496	$1,000,000	$1,000,000	$1,000,000	$1,000,000	$1,000,000
Land and Easements	n/a	n/a	n/a	n/a	n/a	n/a	n/a
AFUDC	$4,635,358	$26,518,613	$5,334,022	$5,334,022	$5,334,022	$12,172,541	$5,334,022
Total	**$108,187,455**	**$574,777,456**	**$107,514,528**	**$107,514,528**	**$107,514,528**	**$286,507,841**	**$107,514,528**
$/kW	$1,452	$1,437	$1,443	$1,443	$1,443	$1,433	$1,443

[1] *Battery Materials category includes: Batteries, Inverters, Collection Cables, EPC Contractor, Development, and Project Management Expenses*

[2] *Transmission Interconnection & Integration category includes: Generator Step-Up Transformers, Substation Materials, Transmission Line Connections, and Contractor Scopes.*

2026 and 2027 Battery Storage Project Details

2027

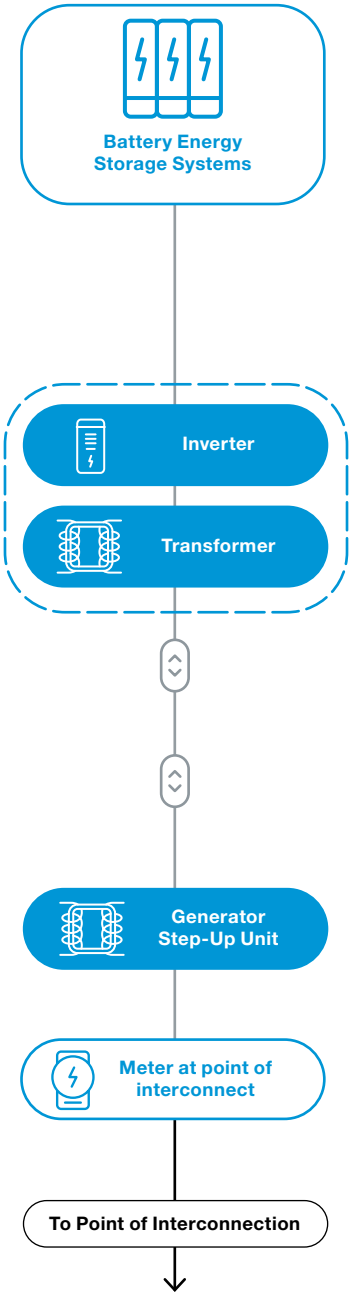
	SITE #1	SITE #2	SITE #3	SITE #4	SITE #5
Commercial Operation Date	4/30/2027	4/30/2027	4/30/2027	4/30/2027	4/30/2027
Size (MW)	74.5	74.5	74.5	74.5	74.5
Capital Cost					
Battery Materials [1]	$102,209,032	$102,209,032	$102,209,032	$102,209,032	$102,209,032
Transmission Interconnection and Integration [2]	$1,000,000	$1,000,000	$1,000,000	$1,000,000	$1,000,000
Land and Easements	n/a	n/a	n/a	n/a	n/a
AFUDC	$4,711,316	$4,711,316	$4,711,316	$4,711,316	$4,711,316
Total	**$107,920,348**	**$107,920,348**	**$107,920,348**	**$107,920,348**	**$107,920,348**
$/kW	$1,449	$1,449	$1,449	$1,449	$1,449

	SITE #6	SITE #7	SITE #8	SITE #9	SITE #10	SITE #11
Commercial Operation Date	4/30/2027	7/31/2027	7/31/2027	7/31/2027	7/31/2027	7/31/2027
Size (MW)	74.5	74.5	74.5	74.5	74.5	74.5
Capital Cost						
Battery Materials [1]	$102,209,032	$102,209,312	$102,209,312	$102,209,312	$102,209,312	$102,209,312
Transmission Interconnection and Integration [2]	$1,000,000	$1,000,000	$1,000,000	$1,000,000	$1,000,000	$1,000,000
Land and Easements	n/a	n/a	n/a	n/a	n/a	n/a
AFUDC	$4,711,316	$4,847,516	$4,847,516	$4,847,516	$4,847,516	$4,847,516
Total	**$107,920,348**	**$108,056,828**	**$108,056,828**	**$108,056,828**	**$108,056,828**	**$108,056,828**
$/kW	$1,449	$1,450	$1,450	$1,450	$1,450	$1,450

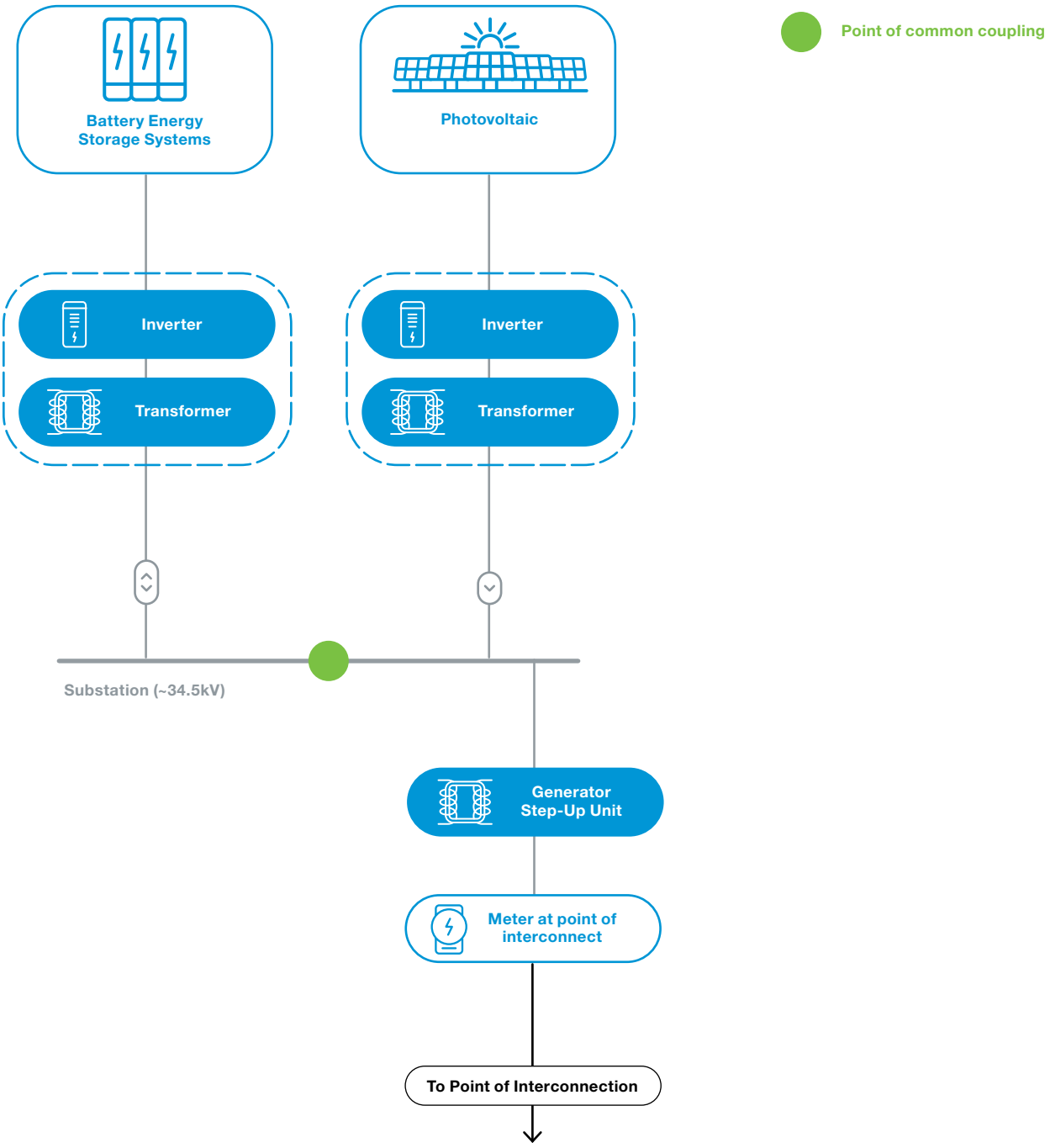
[1] *Battery Materials category includes: Batteries, Inverters, Collection Cables, EPC Contractor, Development, and Project Management Expenses*

[2] *Transmission Interconnection & Integration category includes: Generator Step-Up Transformers, Substation Materials, Transmission Line Connections, and Contractor Scopes.*

Typical Standalone Battery Storage



Typical Hybrid Battery Storage



Property Held for Future Use

Data provided as of December 2024

TYPE	PROJECT NAME	COUNTY	COST $	ACRES	TARGET COD
Solar	Big Water Solar Energy Center	OKEECHOBEE	$5,827,454	702	Jan-25
Hybrid Solar & Battery	Fawn Solar Energy Center	MARTIN	$8,591,927	663	Jan-25
Solar	Fox Trail Solar Energy Center	BREVARD	$4,431,708	673	Jan-25
Hybrid Solar & Battery	Green Pasture Solar Energy Center	CHARLOTTE	$4,477,416	624	Jan-25
Solar	Hog Bay Solar Energy Center	DESOTO	$3,684,480	739	Jan-25
Solar	Holopaw Solar Energy Center	PALM BEACH	$13,444,654	802	Jan-25
Hybrid Solar & Battery	Long Creek Solar Energy Center	MANATEE	$5,488,336	781	Jan-25
Solar	Redlands Solar Energy Center	MIAMI-DADE	$9,763,025	245	Jan-25
Solar	Speckled Perch Solar Energy Center	OKEECHOBEE	$6,326,897	683	Jan-25
Solar	Swallowtail Solar Energy Center	WALTON	$6,181,116	904	Jan-25
Solar	Tenmile Creek Solar Energy Center	CALHOUN	$4,053,174	700	Jan-25
Solar	Thomas Creek Solar Energy Center	NASSAU	$7,531,035	639	Jan-25
Hybrid Solar & Battery	Big Brook Solar Energy Center	CALHOUN	$2,983,551	842	Jan-26
Solar	Boardwalk Solar Energy Center	COLLIER	$6,486,867	706	Jan-26
Hybrid Solar & Battery	Flatford Solar Energy Center	MANATEE	$7,410,121	925	Jan-26
Solar	Goldenrod Solar Energy Center	COLLIER	$5,611,531	610	Jan-26
Solar	Mallard Solar Energy Center	BREVARD	$4,206,962	607	Jan-26
Solar	Mare Branch Solar Energy Center	DESOTO	$4,330,473	665	Jan-26
Hybrid Solar & Battery	Price Creek Solar Energy Center	COLUMBIA	$3,495,648	793	Jan-26
Hybrid Solar & Battery	Clover Solar Energy Center	ST. LUCIE	$3,221,737	423	Apr-26
Hybrid Solar & Battery	North Orange Solar Energy Center	ST. LUCIE	$7,105,361	737	Apr-26
Hybrid Solar & Battery	Sand Pine Solar Energy Center	CALHOUN	$3,452,307	705	Apr-26
Hybrid Solar & Battery	Sea Grape Solar Energy Center	ST. LUCIE	$7,223,366	561	Apr-26
Solar	Hendry Solar Energy Center	HENDRY	$5,139,493	512	Jan-27
Hybrid Solar & Battery	Indrio Solar Energy Center	ST. LUCIE	$3,000,419	415	Jan-27
Solar	Tangelo Solar Energy Center	OKEECHOBEE	$5,166,066	761	Jan-27
Solar	Wood Stork Solar Energy Center	ST. LUCIE	$5,060,725	635	Jan-27
Solar	Ambersweet Solar Energy Center	INDIAN RIVER	$3,367,439	518	Apr-27
Solar	County Line Solar Energy Center	CHARLOTTE,DESOTO	$4,382,957	644	Apr-27
Hybrid Solar & Battery	Middle Lake Solar Energy Center	MADISON	$2,373,386	519	Apr-27
Solar	Saddle Solar Energy Center	DESOTO	$4,021,543	647	Apr-27
Solar	Catfish Solar Energy Center	OKEECHOBEE	$8,593,922	837	Jul-27
Solar	Cocoplum Solar Energy Center	HENDRY	$4,208,172	604	Jul-27
Solar	Hardwood Hammock Solar Energy Center	WALTON	$5,737,293	784	Jul-27
Solar	Maple Trail Solar Energy Center	BAKER	$6,874,737	930	Jul-27
Solar	Joshua Creek Solar Energy Center	DESOTO	$4,102,589	624	Oct-27
Solar	Pinecone Solar Energy Center	CALHOUN	$8,585,491	1,220	Oct-27
Solar	Spanish Moss Solar Energy Center	ST. LUCIE	$5,669,582	485	Oct-27
Solar	Vernia Solar Energy Center	INDIAN RIVER	$2,610,173	402	Oct-27
Solar	Beachland Solar Energy Center	INDIAN RIVER	$5,181,378	818	TBD
Solar	Bromeliad Solar Energy Center	COLLIER	$4,203,729	738	TBD

Property Held for Future Use

Data provided as of December 2024

TYPE	PROJECT NAME	COUNTY	COST $	ACRES	TARGET COD
Solar	Honeybee Solar Energy Center	COLLIER	$6,073,151	456	TBD
Solar	Inlet Solar Energy Center	INDIAN RIVER	$3,331,097	461	TBD
Solar	Myakka Solar Energy Center	MANATEE	$2,911,034	945	TBD
Solar	Sand Gully Solar Energy Center	DESOTO	$4,102,590	647	TBD
Solar	Shores Solar Energy Center	INDIAN RIVER	$3,482,103	435	TBD
Solar	Treefrog Solar Energy Center	COLLIER	$6,096,735	663	TBD
Solar	Wabasso Solar Energy Center	INDIAN RIVER	$2,645,882	433	TBD
Solar	Waveland Solar Energy Center	ST. LUCIE	$3,359,935	465	TBD
Solar	Bayside Solar Energy Center	BREVARD	$5,402,933	735	TBD
Solar	Cardinal Solar Energy Center	BREVARD	$3,869,844	591	TBD
Solar	LaBelle Solar Energy Center	HENDRY	$3,619,153	458	TBD
Solar	Lutterloh Pond Solar Energy Center	LEON	$4,975,731	615	TBD
Solar	New River Solar Energy Center	UNION	$4,053,327	1,145	TBD
Solar	Pine Lily Solar Energy Center	ST. LUCIE	$4,742,195	595	TBD
Solar	Sawdust Solar Energy Center	GADSDEN	$5,916,925	990	TBD
Solar	Shepherd Branch Solar Energy Center	LEON	$4,975,732	702	TBD
Solar	Wild Lime Solar Energy Center	ST. LUCIE	$3,678,275	462	TBD
Solar	Blanketflower Solar Energy Center	DESOTO	$4,586,095	484	TBD
Solar	Carlton Solar Energy Center	ST. LUCIE	$4,249,977	499	TBD
Solar	Harbortown Solar Energy Center	ST. LUCIE	$5,324,956	737	TBD
Solar	Hook Point Solar Energy Center	ST. LUCIE	$3,566,498	493	TBD
Solar	Horseback Solar Energy Center	ST. LUCIE	$4,045,611	560	TBD
Solar	Hurston Solar Energy Center	ST. LUCIE	$3,665,693	594	TBD
Solar	Ladybug Solar Energy Center	DESOTO	$3,879,988	410	TBD
Solar	Leafcutter Solar Energy Center	DESOTO	$3,889,935	411	TBD
Solar	Limpkin Solar Energy Center	COLLIER	$5,377,663	472	TBD
Solar	Shell Creek Solar Energy Center	CHARLOTTE,DESOTO	$4,580,399	644	TBD
Solar	Spoonbill Solar Energy Center	COLLIER	$6,748,181	771	TBD
Solar	Spruce Bluff Solar Energy Center	ST. LUCIE	$3,949,846	547	TBD
Solar	Caladium Solar Energy Center	HIGHLANDS	$4,580,579	607	TBD
Solar	Catamaran Solar Energy Center	ST. LUCIE	$6,594,110	912	TBD
Solar	Coconut Solar Energy Center	ST. LUCIE	$4,891,593	677	TBD
Hybrid Solar & Battery	Hummingbird Solar Energy Center	MARTIN	$6,291,188	517	TBD
Solar	Lancewood Solar Energy Center	MARTIN	$5,480,660	421	TBD
Solar	Owen Branch Solar Energy Center	MANATEE	$7,065,547	635	TBD
Solar	Savannas Solar Energy Center	ST. LUCIE	$4,036,648	559	TBD
Solar	Wax Myrtle Solar Energy Center	MARTIN	$5,050,330	769	TBD
Solar	Edentown Property	Charlotte	$20,022,494	2,592	TBD
Solar	Good Grove Investments Property	MANATEE	$30,074,938	3,396	TBD
Solar	Watermelon Solar Energy Center	DESOTO	$5,191,497	607	TBD
Solar	Williams Farms - 6300 Property	CHARLOTTE	$32,202,242	6,297	TBD

Property Held for Future Use

Data provided as of December 2024

TYPE	PROJECT NAME	COUNTY	COST $	ACRES	TARGET COD
Solar	Tesoro Groves Property	MARTIN	$76,776,951	6,414	TBD
Solar	Cowbone Creek Solar Energy Center	ST. LUCIE	$3,584,366	450	TBD
Solar	Dove Solar Energy Center	DESOTO	$4,965,082	618	TBD
Solar	IFC - SE Groves (Me & Yu) Property	INDIAN RIVER	$4,202,239	646	TBD
Solar	Lupine Solar Energy Center	HENDRY	$3,399,408	430	TBD
Solar	Northfork Solar Energy Center	CLAY	$5,771,403	876	TBD
Solar	US Sugar Corp Property	HENDRY	$25,217,520	1,958	TBD
Solar	Martin Solar Energy Center	MARTIN	$216,844	515	TBD
Solar	Callahan Solar Energy Center	NASSAU	$6,022,380	1,016	TBD
Solar	Sunbreak Farms Property	ST. LUCIE	$29,900,513	4,094	TBD
Solar	Blackberry Solar Energy Center	BAKER	$6,873,189	806	TBD
Solar	IFC - SE Groves (Valencia) Property	DESOTO	$24,179,189	2,552	TBD
Solar	Meadowlark Solar Energy Center	ST. LUCIE	$4,813,038	564	TBD
Solar	IFC - SE Groves (Anchor) Property	INDIAN RIVER	$1,514,670	253	TBD
Solar	IFC - SE Groves (Vero224) Property	INDIAN RIVER	$1,516,894	223	TBD
Solar	Gopher Ridge Property	COLLIER	$33,138,816	5,509	TBD
Solar	El Maximo Ranch Holdings Property	OSCEOLA	$212,142,522	39,826	TBD
Future Gen	Hendry Clean Energy Center	HENDRY	$36,424,958	3,611	TBD
Battery	Indiantown (Co-Gen) Property	MARTIN	$8,500,000	250	TBD
Solar	Phillips Forest Property	COLUMBIA	$12,686,852	2,876	TBD
Solar	Scrubjay Solar Energy Center	CHARLOTTE	$4,496,471	628	TBD
		Total Cost	**$988,534,855**	**137,347**	