

**BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS**

In the Matter of the Application of	)	
NextEra Energy Transmission Southwest,	)	22-NETE-419-COC
LLC for a Limited Certificate of	)	Docket No. 22-____-____-COC
Public Convenience and Necessity to	)	
Transact the Business of Public Utility	)	
in the State of Kansas	)	

**DIRECT TESTIMONY OF LAMARGO SWEEZER-FISCHER  
SENIOR DIRECTOR, OPERATIONS  
NEXTERA ENERGY TRANSMISSION, LLC**

**ON BEHALF OF**

**NEXTERA ENERGY TRANSMISSION SOUTHWEST, LLC**

**Docket No. 22-\_\_\_\_-\_\_\_\_-COC**

**FEBRUARY 28, 2022**

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1       **I.       INTRODUCTION**

2       **Q.       PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

3       A.       My name is LaMargo Sweezer-Fischer. My business address is 15430 Endeavor Drive,  
4               Jupiter, Florida 33478.

5       **Q.       BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

6       A.       I am employed by NextEra Energy Transmission, LLC (“NEET”) as Senior Director,  
7               Operations. NEET is an indirect, wholly-owned subsidiary of NextEra Energy, Inc.  
8               (“NextEra Energy”).

9               As the Senior Director, Operations for NEET, I am responsible for directing the  
10              safe, reliable, and cost-effective operations of NEET’s operating transmission facilities  
11              across North America, including those owned by NEET’s subsidiaries, to ensure  
12              operational excellence via the comprehensive application of processes, procedures, and  
13              standards for transmission operations. In this capacity, I have responsibility for control  
14              center operations, transmission line and substation field asset operations, installation, and  
15              maintenance for current NEET assets, including those of New Hampshire Transmission,  
16              LLC (“NHT”), Lone Star Transmission, LLC (“Lone Star”) in Texas, Trans Bay Cable  
17              LLC (“Trans Bay Cable”) and Horizon West Transmission, LLC (“Horizon West”) in  
18              California, GridLiance High Plains LLC (“GridLiance HP”) in Kansas, Oklahoma, and  
19              Missouri, and NextEra Energy Transmission New York, LLC (“NEETNY”).

20       **Q.       ON WHOSE BEHALF ARE YOU TESTIFYING?**

21       A.       I am submitting testimony on behalf of NextEra Energy Transmission Southwest, LLC  
22               (“NEET Southwest”), a direct, wholly-owned subsidiary of NEET.

1 **Q. WHAT IS YOUR EDUCATIONAL AND PROFESSIONAL BACKGROUND?**

2 A. In 1999, I started my career at Florida Power & Light Company (“FPL”) in substation  
3 engineering and have held various positions at FPL and affiliated companies. Since July  
4 of 2020, I have held my current position of Senior Director of Operations for NEET. I  
5 earned a Master of Business Administration from Florida Atlantic University in 2003 and  
6 a bachelor’s degree in electrical engineering graduating summa cum laude from Tuskegee  
7 University in 1999. I am also a graduate of the Harvard Business School Advanced  
8 Management Program.

9 **Q. HAS THIS DIRECT TESTIMONY BEEN PREPARED BY YOU OR UNDER**  
10 **YOUR DIRECT SUPERVISION?**

11 A. Yes, it has.

12 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE KANSAS**  
13 **CORPORATION COMMISSION (“COMMISSION”) OR ANY OTHER UTILITY**  
14 **REGULATORY COMMISSION?**

15 A. Yes, I previously provided testimony before the Commission in Docket No. 21-GLPE-160-  
16 ACQ, *In the Matter of the Joint Application of GridLiance High Plains LLC, GridLiance*  
17 *GP, LLC and GridLiance Holdco, LP (“GridLiance”), NextEra Energy Transmission*  
18 *Investments, LLC and NextEra Energy Transmission, LLC (“NextEra Entities”) for*  
19 *Approval of the Acquisition of GridLiance by the NextEra Entities.* I have not provided  
20 testimony to any other utility regulatory agency.

21 **Q. ARE YOU SPONSORING ANY EXHIBITS WITH YOUR DIRECT TESTIMONY?**

22 A. Yes, I sponsor Exhibit MSF-1, which was prepared under my direct supervision and  
23 control.

1 **Q. WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY?**

2 A. The purpose of my testimony is to: (1) provide background and overview information on  
3 the technical and operational capabilities of NEET Southwest, as well as its parent and  
4 affiliate companies; (2) describe, in general, the development of the Wolf Creek-  
5 Blackberry 345 kilovolt (“kV”) transmission line project (“Wolf Creek-Blackberry  
6 Project” or the “Project”); (3) describe NEET Southwest’s plan for operating and  
7 maintaining the Project; (4) explain why NEET Southwest has the technical and  
8 operational capability to operate and maintain the Project; and (5) address several of the  
9 Commission’s Merger Standards in reference to the Project.

10 **II. NEET SOUTHWEST’S OPERATIONAL AND TECHNICAL CAPABILITIES**

11 **Q. PLEASE GENERALLY DESCRIBE NEET SOUTHWEST.**

12 A. As NEET Southwest witness Becky Walding describes in her Direct Testimony in this  
13 matter, NEET Southwest is a direct, wholly-owned subsidiary of NEET. NEET was  
14 formed in 2007 to leverage NextEra Energy experience and resources in developing,  
15 designing, constructing, owning, operating, and maintaining transmission facilities. NEET  
16 Southwest was formed to develop, design, construct, own, operate, and maintain  
17 transmission facilities in the Southwest Power Pool, Inc. (“SPP”) region. NEET’s and  
18 NEET Southwest’s indirect parent, NextEra Energy, is the world’s largest electric utility  
19 by market capitalization. NextEra Energy’s principal businesses are FPL, Florida’s largest  
20 electric utility serving approximately 5.7 million customer accounts, and NextEra Energy  
21 Resources, LLC (“NEER”), the largest generator of renewable energy from the wind and  
22 sun in North America. NEET Southwest, through its immediate parent company, NEET,  
23 leverages the experience, expertise, and resources of NextEra Energy.

1 **Q. DOES NEET SOUTHWEST OR ANY OF ITS PARENT OR AFFILIATE**  
2 **COMPANIES OWN AND OPERATE ANY TRANSMISSION ASSETS?**

3 A. While the Project will be NEET Southwest's first transmission asset, the NextEra Energy  
4 companies collectively own and operate approximately 11,800 miles of transmission lines  
5 and over 1,000 substations across North America, making NextEra Energy one of the  
6 industry's largest and most experienced transmission utilities. For example, in Texas, the  
7 NextEra Energy team has designed, permitted, constructed, operated, and maintained Lone  
8 Star's approximately 347 miles of 345 kV transmission lines similar to the Project.  
9 Additionally, other NEET subsidiaries are active in every regional transmission  
10 organization ("RTO") and independent system operator ("ISO") in the U.S. These entities  
11 were among the first non-incumbents to be awarded transmission construction projects by  
12 system operators and utility commissions in California, New York, Ontario, and Texas.

13 **Q. PLEASE DESCRIBE NEET SOUTHWEST'S TECHNICAL AND OPERATIONAL**  
14 **EXPERTISE.**

15 A. As a subsidiary of NextEra Energy, NEET Southwest is fully supported by the Operations  
16 teams that work for FPL, NEER, and various NEET subsidiaries, including Lone Star and  
17 Trans Bay Cable. The NextEra Energy companies operate under a support services model,  
18 which enables the overall organization to apply a best practices philosophy, a highly skilled  
19 workforce, and economies of scale across all of its companies, including NEET Southwest.  
20 Through this model, NextEra Energy employs experienced operation and support service  
21 personnel assigned to the Project. This organization at NextEra Energy is called "Power  
22 Delivery" and is responsible for all assets which deliver electricity to customers. The  
23 Power Delivery group employs over 3,200 highly experienced operations and maintenance  
24 professionals with an industry-leading track record in safety and reliability. The NextEra  
25 Energy companies offer vast experience in building, operating, and maintaining

1 transmission infrastructure throughout the U.S. and Canada and a proven ability to do so  
2 with industry-leading safety, reliability, and cost-effectiveness.

3 **Q. HOW DO NEET SOUTHWEST AND ITS PARENT AND AFFILIATE**  
4 **COMPANIES VIEW SAFETY AND RELIABILITY OF SERVICE?**

5 A. Safety is a core value and a cornerstone of our commitment to the health and well-being of  
6 our customers, our employees, and the community. It is of utmost importance to NextEra  
7 Energy that our employees and the public remain injury-free each and every day. At  
8 NextEra Energy, we have embraced a ZeroToday! safety culture supported by Human  
9 Performance Excellence tools and the Voluntary Protection Program of the Occupational  
10 Safety and Health Administration.

11 NextEra Energy and its subsidiaries also place a strong emphasis on reliability of  
12 service. For example, System Average Interruption Duration Index (“SAIDI”) is a well-  
13 known and widely used measure in the utility industry, representing the average time that  
14 a customer is out of service in a year due to outages of a non-major event. SAIDI is the  
15 best overall indicator for reliability since it encompasses two other standard industry-  
16 recognized reliability metrics: System Average Interruption Frequency Index and  
17 Customer Average Interruption Duration Index. For more than a decade, FPL has attained  
18 the best overall transmission and distribution system reliability among all Florida investor-  
19 owned utilities, as measured by SAIDI. In 2020, FPL’s SAIDI was approximately 66  
20 percent better than other Florida investor-owned utilities and approximately 61 percent  
21 better than the 2020 EEI national average. Relative to 2009, FPL’s SAIDI improved by  
22 approximately 41 percent in 2020.

1           In fact, FPL has been named one of the most reliable utilities in the industry year  
2 over year and maintains top decile reliability metrics. In 2021, PA Consulting recognized  
3 FPL with the Outstanding Reliability Performance Award for the Southeast metropolitan  
4 region for the eighth straight year, the Outstanding Technology & Innovation Award for  
5 the fifth time in eight years, and the Outstanding System Resiliency Award for the first  
6 time ever, as well as with the National Reliability Excellence Award for the sixth time in  
7 the last seven years.

8 **Q. WHAT IS NEET SOUTHWEST'S AND ITS PARENT AND AFFILIATE**  
9 **COMPANIES' APPROACH TO CYBERSECURITY?**

10 A. NextEra Energy is committed to protecting its employees, business partners, customers,  
11 and clients from malicious cyber acts. Decisive and prescriptive measures are used to  
12 safeguard information collected, processed, stored, and transmitted while maintaining the  
13 confidentiality, integrity, and availability of information and technology systems necessary  
14 for the company's daily operations.

15           The NextEra Energy cybersecurity program strategically aligns cybersecurity with  
16 our business goal, to reduce risk, to build a culture that is aware of cybersecurity, and to  
17 increase confidence with our internal and external stakeholders. In addition to having  
18 strong internal cybersecurity controls, we perform regular external assessments of our  
19 cybersecurity program maturity using industry-recognized frameworks. The results of this  
20 assessment are used to define the strategic direction of the program to address gaps or risk  
21 items identified. We also perform external testing across nearly all technology systems in  
22 the company to search for signs of malicious compromise. This engagement lasts for  
23 several weeks and is performed by recognized industry experts. Lastly, due to the scale of  
24 NextEra Energy's programs, we work closely with industry peers, trade associations,



1 Department of Energy programs, and the National Labs to benchmark program capabilities  
2 and share cyber threat information. We continue to make significant investments to reduce  
3 our risk of a successful cybersecurity attack and are recognized across the sector as a leader  
4 in this space.

5 **III. NEET SOUTHWEST’S OPERATION AND MAINTENANCE OF THE WOLF**  
6 **CREEK-BLACKBERRY PROJECT**

7 **Q. WHAT IS THE WOLF CREEK-BLACKBERRY PROJECT?**

8 A. The Wolf Creek-Blackberry Project is a 345 kV transmission line that will interconnect  
9 two existing substations – the Wolf Creek Substation, which is owned by Evergy Kansas  
10 Central, Inc. (“Evergy”), and the Blackberry Substation, which is owned by Associated  
11 Electric Cooperative, Inc. (“AECI”). The Project route is anticipated to traverse five  
12 counties in the State of Kansas and two counties in the State of Missouri. As NEET  
13 Southwest’s other witnesses testify, the Project will provide economic benefits to  
14 ratepayers and transmission customers by facilitating the transfer of lower cost generation  
15 from west to east while relieving congestion.

16 **Q. WHAT IS NEET SOUTHWEST’S OPERATIONS AND MAINTENANCE PLAN**  
17 **FOR THE PROJECT?**

18 A. As I have discussed, NEET Southwest will draw on a wide range of resources from within  
19 NextEra Energy to ensure its success in constructing, operating, and maintaining the  
20 Project. The Project will be directly serviced by a Kansas and Missouri Field Operations  
21 team, which will include two new dedicated local staff members supported by existing  
22 NextEra Energy transmission and substations staff members and will manage day-to-day  
23 activities of operating, maintaining and ensuring the safe operation of the Project. The  
24 team will be trained for local storm response efforts and specifically, restoration and  
25 maintenance of the 345 kV spun-concrete monopole structures utilized in the Project. The

1 team also will provide 24/7 on call responsibility and manage event response and  
2 troubleshooting of unplanned outages. Field Operations will be performed by two local  
3 and dedicated staff and supported by an additional seven HV Field Technicians, as well as  
4 a team of 70 technical staff of NextEra Energy affiliates based in two locations near the  
5 Project. The main location will be a new office which NEET Southwest currently expects  
6 to locate in the Pittsburg, Kansas area, within a 30-minute drive from the Project mid-point.  
7 An additional location for backup field operations will be an existing NEER facility near  
8 Soldier Creek, Kansas, a 1.5-hour drive to the Project. The NEER Soldier Creek facility  
9 is connected to Evergy by 76 miles of 345 kV transmission line similar to the Project.

10 Additionally, the Project will be operated and monitored on a 24/7 basis by NEET  
11 Southwest's affiliate, Lone Star, from its primary and backup control centers located in  
12 Austin, Texas. Further technical support will be provided by NextEra Energy's Power  
13 Delivery team subject matter experts in Florida and specialized support vendors in the  
14 region.

15 **Q. HOW WILL NEET SOUTHWEST UTILIZE THE LONE STAR TRANSMISSION**  
16 **CONTROL CENTERS TO MONITOR THE PROJECT?**

17 A. NEET Southwest has entered into an affiliate support services agreement with Lone Star  
18 in order for Lone Star's control center operations personnel to perform the 24/7 operational  
19 coordination and the system operations function for the Project. Lone Star employs five  
20 North American Electric Reliability Corporation ("NERC")-certified transmission  
21 operators who continuously staff the state-of-the-art control centers around-the-clock to  
22 monitor and operate transmission lines for a number of NEET subsidiaries across the  
23 country.

1 **Q. WHY IS IT APPROPRIATE FOR THE LONE STAR CONTROL CENTER TO**  
2 **MONITOR THE PROJECT?**

3 A. Lone Star is highly qualified to monitor the Project and will provide continuous monitoring  
4 and operations of the Project. Lone Star was included on the NERC Compliance Registry  
5 as a Transmission Owner and Transmission Planner on October 14, 2010 and was certified  
6 by NERC and the Texas Reliability Entity as a Transmission Operator for Lone Star's 345  
7 kV transmission facilities in 2012. Lone Star's transmission line is of similar design to the  
8 Project as it utilizes spun-concrete monopole structures with the same conductor type that  
9 will be utilized for the Project. Additionally, the Lone Star Transmission Control Center  
10 operates and monitors assets in the California Independent System Operator ("CAISO")  
11 and the PJM Interconnection ("PJM") for NEET subsidiary transmission projects.

12 **Q. PLEASE DESCRIBE THE TECHNICAL CAPABILITY OF THE LONE STAR**  
13 **CONTROL CENTER IN MORE DETAIL.**

14 A. The existing control center operating team members are NERC-certified Transmission  
15 Operators and are or will be NERC-certified Reliability Coordinators by September 2022.  
16 They are required to be experts with analysis and problem solving, compliance,  
17 process/project management, communications, and leadership. The team operates  
18 transmission assets in three ISO/RTO regions: the Electric Reliability Council of Texas  
19 ("ERCOT"), the CAISO, and PJM. System operators are responsible for monitoring and  
20 controlling the reliable transfer of power on the transmission facilities including reactive  
21 dispatch and supervision of all activities within the Lone Star Control Center. The System  
22 Operators complete restoration plan training or training with program objectives based on  
23 NERC and Regional Reliability Organization standards, ISO operating procedures, and  
24 applicable regulatory requirements.

1       **IV.    NEET SOUTHWEST SATISFIES THE COMMISSION’S REQUIREMENTS**  
2       **FOR ISSUING A CCN**

3       **Q.    ARE YOU FAMILIAR WITH THE COMMISSION’S REQUIREMENTS FOR**  
4       **ISSUING A CCN?**

5       A.    Yes. As discussed in more detail in the testimonies of NEET Southwest’s other witnesses,  
6       the Commission requires applicants seeking a CCN to demonstrate that they have the  
7       necessary technical, managerial, and financial capability to conduct the business of a public  
8       utility. In reviewing CCN applications, the Commission also examines the Merger  
9       Standards originally adopted in Docket Nos. 172,745-U and 174,155-U.<sup>1</sup>

10      **Q.    WHICH OF THE COMMISSION’S REQUIREMENTS DO YOU ADDRESS IN**  
11      **YOUR DIRECT TESTIMONY?**

12      A.    NEET Southwest satisfies the following of the Commission’s applicable requirements:

- 13           • What impact, if any, the transaction has on public safety; and
- 14           • Whether NEET Southwest has the technical and managerial capability to build and  
15           operate the Project.

16           **A.    NEET SOUTHWEST, ITS PARENT, AND ITS AFFILIATES WILL**  
17           **MANAGE AND OPERATE THE PROJECT SAFELY.**

18      **Q.    WILL THE PROJECT NEGATIVELY IMPACT PUBLIC SAFETY?**

19      A.    No, as stated in detail above, safety is a core value and a cornerstone of our commitment  
20      to the health and well-being of our customers, our employees, and the community. The  
21      NextEra Energy companies offer vast experience in building, operating, and maintaining  
22      transmission infrastructure throughout the U.S. and Canada and a proven ability to do so  
23      with industry-leading safety, reliability, and cost-effectiveness, as exemplified in each of  
24      the operations listed on Exhibit MSF-1.

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<sup>1</sup> Consolidated Docket Nos. 172,745-U and 174,155-U, Order at pp. 34-35 (Nov. 4, 1991);  
*see also*, Docket No.08-ITCE-936-COC *et al.*, Order at ¶ 52 (Dec. 18, 2008).

1                   **B. NEET SOUTHWEST HAS THE TECHNICAL EXPERTISE TO BUILD**  
2                   **AND OPERATE THE PROJECT.**

3 **Q. DOES NEET SOUTHWEST HAVE THE TECHNICAL AND MANAGERIAL**  
4 **EXPERTISE TO BUILD AND OPERATE THE PROJECT?**

5 A. Absolutely. As stated in more detail above, NEET Southwest will draw upon the resources  
6 of the NextEra Energy organization to ensure its successful execution of the Project.  
7 NextEra Energy, and the affiliates and contractors who will participate in the Project meet  
8 and exceed the qualifications to build and operate the Project safely, efficiently, and  
9 economically. This Project will bring together experts from a variety of fields, each of  
10 whom has years of special expertise in their field as it relates to the construction and/or  
11 operation of transmission lines.

12                   Along with the resources discussed more specifically throughout my testimony,  
13 NEET Southwest will have access to the following affiliate resources for this Project:

- 14                   • Engineering and Construction Organization – consisting of over 100  
15                   engineers and construction project managers with substantial experience in  
16                   large-scale energy infrastructure projects;
- 17  
18                   • Integrated Supply Chain – consisting of over 400 sourcing and procurement  
19                   specialists that leverage NextEra Energy’s significant purchasing power and  
20                   relationships with strategic industry vendors; this team procured \$16 billion  
21                   in materials and services in 2021 alone;
- 22  
23                   • Environmental Services – consisting of over 100 environmental subject  
24                   matter experts, specialized in minimizing project impact to the  
25                   environment, as well as reducing permitting and schedule risk to projects;
- 26  
27                   • Power Delivery – consisting of over 3,200 highly experienced operations  
28                   and maintenance team members with an industry-leading track record in  
29                   safety and reliability;
- 30  
31                   • Regulatory and Legal – consisting of over 100 attorneys and regulatory  
32                   specialists, with particular expertise in federal, state, and local regulatory  
33                   proceedings for the energy sector.

1                   In sum, NEET Southwest and its family of affiliates and contractors building and  
2                   operating this Project meet the necessary technical and managerial qualifications to manage  
3                   this Project successfully.

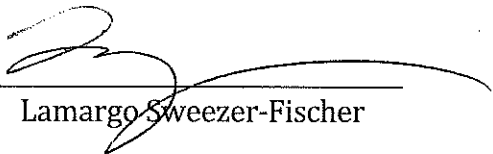
4   **Q.    DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

5   **A.    Yes, it does.**

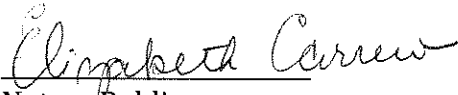
**VERIFICATION**

STATE OF FLORIDA            )  
  ) ss.  
COUNTY OF PALM BEACH    )

I, Lamargo Sweezer-Fischer, being duly sworn, on oath state that I am Senior Director, Operations of NextEra Energy Transmission, LLC, and that I have read the foregoing pleading and know the contents thereof, and that the facts set forth therein are true and correct to the best of my knowledge and belief.

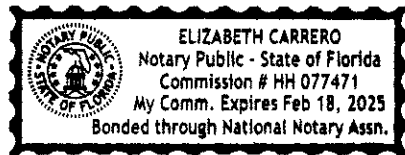
By:   
Lamargo Sweezer-Fischer

The foregoing pleading was subscribed and sworn to before me this 23<sup>rd</sup> day of February, 2022. *Personally known to me* ←

  
Notary Public

My Commission Expires:

\_\_\_\_\_



# **Exhibit MSF-1**



## **Transmission and Interconnection Operations Experience of NEET Southwest and NextEra Energy Companies**

### **Overview**

NextEra Energy, Inc. (“NextEra”) companies operate over 11,800 circuit miles of high voltage transmission lines and over 1,000 substations across the United States. The following summary addresses the operations experience of NextEra Energy Transmission Southwest, LLC (NEET Southwest) and other NextEra companies, including nuclear power interconnection, safety expertise and operational compliance, maintenance and spares, and line inspection experience relevant to the Wolf Creek-Blackberry 345 kV Transmission Project (“Project”). This summary also provides a history of NextEra’s storm restoration efforts across the country over the past 8 years.

The Project will be integrated into NextEra’s organization, including operations, maintenance, and compliance management groups with formal affiliate services agreements among NEET Southwest and NextEra, Lone Star Transmission, LLC (“Lone Star”), NextEra Energy Transmission, LLC (“NEET”), NextEra Energy Resources, LLC (“NEER”), and Florida Power & Light Company (“FPL”). System operations coordination is provided by Lone Star Transmission control center staff, local field operations will be provided by new NEET Southwest locally based team supported by an emergency maintenance response vendor Brink Constructors, Inc. (Brink).

### **Nuclear Power Interconnection Expertise**

NextEra is one of the largest generators of nuclear power in the U.S., and it owns and operates four nuclear sites in Florida, New Hampshire, and Wisconsin, with a total of seven reactor operating units. Each site employs approximately 500 full-time, highly trained employees during regular operations and adds around 1,000 skilled contractors during scheduled refueling outages, which take place every 18-24 months. These sites operate a strong nuclear safety program that includes:

- Robust plant design and construction
- Highly experienced and well-trained personnel
- Stringent plant security
- Comprehensive safety planning
- A commitment to meet or exceed all federal, state, and local regulations

NextEra also owns and operates transmission systems connecting to nuclear generator site switchyards. The NEET Southwest team and its NextEra nuclear affiliates have strong transmission system capabilities associated with the management, controls, and oversight of nuclear switchyards and their lines at 230 kV, 345 kV, and 500 kV.

## Field Operations and Safety Record

NEET Southwest affiliate Lone Star will provide control center and coordination services to the Project. NEET Southwest's dedicated field operations team and its NextEra affiliates will provide in-field supervision, first responder and safety assessments, and vegetation management services to the Project. This team leverages NextEra processes, procedures, safety rules, expertise, and resources.

The Project's emergency support contractor Brink excels in the processes required for transmission and substation facility construction and maintenance, including similar 345 kV transmission lines. It has demonstrated that ability with successful projects completed throughout the United States and Canada and more than 75 years of electric construction experience. Brink will have a crew based local to the Project region to facilitate the Project's electrical needs.

## Interconnection and Operational Compliance

Through its affiliates, NEET Southwest has experience in the Project area integrating and operating projects in accordance with Southwest Power Pool ("SPP") and Evergy protocols, operating orders, duty of care, outage, return to service, and written report processes (see table below) since 2001. NextEra subsidiaries operate and maintain wind projects in Kansas and Missouri (see table below). Of these nine generation facilities, five interconnect with Evergy (the Wolf Creek nuclear generation facility and substation owner) at 345 kV. These projects have 156 miles of line segments with the majority operating at 345 kV. For example, the NEER's Soldier Creek wind generation facility, which commenced commercial operations in 2020, connects to Evergy by a 76-mile 345 kV line similar to the Project.

All NextEra Kansas and Missouri projects are registered as North American Electric Reliability Corporation ("NERC") generator owners and generator operators and coordinate with each facility's responsible NERC transmission owner ("TO"), transmission operator ("TOP"), and Transmission Planner (*e.g.*, Evergy) and the responsible NERC Balancing Authority, Reliability Coordinator ("RC"), and Planning Coordinator, which is SPP. NEET Southwest affiliates are registered in all NERC RC regions. For the Project, NEET Southwest will execute separate Interconnection Agreements with Evergy and AECI and register with the Midwest Reliability Organization ("MRO"), the NERC Regional Entity for the SPP region, as a NERC TO. The Lone Star control center that will operate and monitor the Project is certified as a TOP with the Texas Reliability Entity. NEET Southwest affiliates are registered in almost all NERC functions in every NERC region.

## Project Spares

NEET Southwest has developed a detailed capital spares approach for the Project. To determine Project spares needs, NEET Southwest performed a series of failure containment studies, reviewed the line configuration data, and evaluated the sag/tension criteria for all sag sections. Study results showed a single event failure mode could impact 11-13 structures (cascade). An acceptable damage level was recommended to be approximately 1.5 miles to prepare for restoration efforts. NEET Southwest transmission line spares strategy includes separating the storage location of its line spares from the Project locations. This reduces the risk of both locations being impacted by

the same severe event.

**Line Inspection and Maintenance**

NEET Southwest, with support from its affiliates, has a wealth of experience in transmission operations and maintenance – including a substantial amount of experience for Extra High Voltage (EHV) transmission and substation projects. NextEra companies operate over 11,800 circuit miles of high voltage transmission lines and over 1,000 substations across the U.S. The restoration performance of the Lone Star 345 kV transmission system following recovery from severe weather events (tornadoes) has been 99.99%+.

The table below details NEET Southwest’s affiliates’ experience with lines in Kansas and Missouri for facilities up to 345 kV. It provides the reliability performance for each line that connects NEER renewable generation projects relating to maintenance and operations for similar projects over the last five years. Experience for projects shown in the region is broken down by:

1. Project name
2. State: Kansas or Missouri
3. Project line voltage (kV)
4. Length of line in miles
5. Year first line energized
6. Reliability performance from line maintenance is provided as an availability percentage
7. Project NERC registrations
8. NERC responsible Reliability Entity
9. System ISO / RTO
10. Interconnecting entity

**NextEra Subsidiary 345 kV Lines in Kansas and Missouri**

(1) Project Name	(2) State	(3) kV	(4) Line Length miles	(5) Year	(6) Performance Availability % / year	(7) NERC GO/ GOP	(8) NERC RE	(9) ISO /RTO	(10) Connects to
Soldier Creek	KS, USA	345	76	2020	99.99+	Yes	MRO	SPP	Evergy
Pratt Wind	KS, USA	345	15	2018	99.99+	Yes	MRO	SPP	Westar Energy

(1) Project Name	(2) State	(3) kV	(4) Line Length miles	(5) Year	(6) Performance Availability % / year	(7) NERC GO/ GOP	(8) NERC RE	(9) ISO /RTO	(10) Connects to
Kingman	KS, USA	345	2	2016	99.99+	Yes	MRO	SPP	Westar Energy
Ninnescah	KS, USA	345	61	2016	99.99+	Yes	MRO	SPP	Westar Energy
Osborn	MO, USA	345	2	2016	99.99+	Yes	MRO	SPP	KCP&L
Cedar Bluff	KS, USA	230	38	2015	99.99+	Yes	MRO	SPP	Midwest Energy
Ensign	KS, USA	115	13	2012	99.90	Yes	MRO	SPP	Sunflower Electric
Cimarron	KS, USA	345	-	2012	-	Yes	MRO	SPP	Sunflower Electric
Gray County	KS, USA	115	-	2001	-	Yes	MRO	SPP	Sunflower Electric

## Severe Weather Event Restoration Experience

NextEra subsidiaries operate transmission facilities across the United States in severe weather environments, including tornadoes in Kansas and Texas, and own several thousand miles of transmission lines in Florida, which has the most hurricanes with significant land impacts in the country. As a company, NextEra has amassed a vast skill set from operating and maintaining these assets, including component end-of-life estimating and logistical response to the impact from severe weather events, such as tropical storms, hurricanes, tornados, and fires. NextEra continuously works to improve its response plans to catastrophic events by bolstering guidelines and regularly training staff. NextEra undertakes a full week of mock storm drill exercises once each year. The following is a list of major storm response efforts:

### 2020

- The 2020 hurricane season was the most active season on record, impacting FPL's Florida service areas on three separate occasions. The NextEra restoration and logistics teams once again demonstrated their willingness and selflessness to leave family and friends behind for an extended period to support their fellow Americans during their time of need – often with little notice. The Edison Electric Institute (EEI) recognized NextEra's efforts during this historic hurricane season by awarding it the EEI Emergency Assistance and Recovery

Awards.

- NextEra received the EEI Emergency Assistance Award for the mutual assistance provided following Hurricanes Isaias, Laura, Sally and Delta. NextEra crews traveled to New Jersey, Louisiana, Texas, the Florida Panhandle, and again to Louisiana respectively.
- In total, NextEra crews were called upon to provide mutual assistance five times during the 2020 unprecedented hurricane season, including Hurricane Zeta, while continuing to provide safe and reliable service to its own customers during and after hurricanes Isaias and Eta.
- NextEra also received the EEI Emergency Recovery Award for efforts in restoring power to approximately 285,000 customers following Hurricane Sally in late September 2020. Sally was expected to make landfall in Louisiana, but this Category 2 hurricane made a sudden, overnight turn to the east with the eye wall striking the Pensacola area with 105 mph winds.
- NextEra also received the EEI Emergency Assistance Award for 2020 Mutual Assistance. The company sent storm restoration teams to assist other utilities on several occasions in 2020, including Alabama in April following severe storms and two trips to Louisiana following Hurricanes Laura and Delta, and then sent a team to New Jersey when that same hurricane hit the Northeast.

## 2019 -2018

- FPL's service territory in Florida was spared any severe weather impacts during the 2018-19 season, but its crews were active in supporting hurricane impacts throughout the Southeast and elsewhere. NextEra was called upon to assist other energy companies after natural disasters due to the preparation the company's crews go through in advance of storm season and their response to past storms, including Hurricane Irma. NextEra participates in mutual assistance programs with other energy companies from across the nation, through which participating utilities send crews to assist other utilities during major storms. In 2018-2019, NextEra crews assisted in restoring power to:
  - Residents of Puerto Rico, still reeling from the effects of 2017's Hurricane Maria
  - The Carolinas after Hurricane Florence
  - Parts of Florida's Panhandle and southern Georgia after Hurricane Michael
  - Northern California in the aftermath of the Camp Fire
- In 2018, EEI presented FPL with an EEI Emergency Response Award, and Tom Kuhn, president of EEI, stated, "during last year's storm 2017 season, the hard work of FPL's crews to quickly and safely restore service to customers served as a terrific example of the company's strong commitment to customer service."
- In June 2018, EEI presented FPL with the association's special "2018 Emergency Assistance Award for Puerto Rico Power Restoration" for its contributions to the

unprecedented emergency power restoration mission in Puerto Rico following Hurricane Maria in 2017.

## 2017

- In response to Hurricane Irma, an extremely powerful Category 5 hurricane in 2017, NextEra assembled an army of restoration workers, and approximately 28,000 personnel were activated. The response included more than 9,000 FPL and embedded contractors, as well as approximately 19,000 external resources from more than 190 other utilities and external companies from 30 states plus Canada provided assistance and 29 staging/operations sites. Despite the fact that Irma was a much stronger storm than Hurricane Wilma in 2005 and impacted more FPL customers across the entire service area, the restoration was much faster because of the investments made to strengthen the system and make it smarter.
- In 2017-2018, more than 400 men and women worked for nearly 200 days, restoring power to approximately 30,000 homes in the aftermath of Hurricane Maria. NextEra's support of the restoration effort began even before the company completed its own restoration of Hurricane Irma. The NextEra Energy storm logistics team coordinated the delivery of power poles and other electric equipment to the island by barge from Florida and managed the restoration logistics program on the Island. FPL was instrumental in helping set up the Incident Management Team to coordinate the restoration effort. By May 2018, 99 percent of electric customers had been restored.
- Also, in early 2017, NextEra response teams mobilized to support storm restoration efforts in the Northeast.

## 2016

- During Hurricane Matthew in October 2016, NextEra restored 99 percent of FPL customers affected by the end of two full days of restoration following the hurricane's exit from its service area. No transmission poles and hardened main power line poles failed due to high winds.
- During Hurricane Hermine in September 2016, NextEra worked safely and quickly to restore service to 100 percent of its customers impacted by the storm within 24 hours of Hermine's passing, and impacted customers experienced an average outage duration of less than three hours.

## 2015

In 2015, NextEra responded to several line circuit outages caused by ice, fire, and wind. Prepared response plans enabled power to be restored as safely and as quickly as possible. During the first half of 2015, approximately 60 structures were replaced in addition to several circuit miles of conductor, all with zero injuries. In each case, the NextEra restoration teams focused on ensuring

safety of the crews and the public and were able to complete the restoration in an expedited manner, frequently within a matter of days. The reasons for the successful restorations include NextEra's safety culture, a focus on plan execution, collaboration with other business units, and the ability to quickly assemble and utilize the necessary resources. Most materials – from poles to conductor wire – were prepositioned at storage facilities within a close distance to damaged sites. Specific material kits were ready for delivery at a moment's notice. Support was also provided from FPL's Field Operations and Engineering, Integrated Supply Chain, Power Generation Division's site team, and suppliers and contractors who are well-versed in the NextEra safety culture, restoration focus, and quality standards.

The events included:

- January – An unprecedented ice storm in Texas resulted in several structures damaged at four wind farms.
- March – A landowner brush fire burned out of control, destroying a 30-square-mile area along with 26 of NEER's structures connecting a NEER wind farm in Oklahoma to the electric grid.
- May – Two tornadoes touched down within one week, the first near the Blue Summit Wind Energy Center in Texas and the second at the Ensign Wind Energy Center in Kansas resulting in 28 structure failures and the loss of a transformer. Lightning, heavy rains, and knee-deep mud created significant challenges for employees and contractors responding to the damage created by the tornadoes.
- May – A tornado damaged the Lone Star 345 kV line near Cisco, TX in Eastland County. Lone Star Transmission Operations dispatched a first responder who discovered poles were down and immediately began mobilizing an emergency response. Six poles and insulators on multiple structures required replacement. Lone Star worked quickly to assess damage, engage contractors, utilize inventory from Lone Star's spare equipment storage facility, and engage vendors to procure items not already in inventory.

## 2012

In 2012, NextEra deployed nearly 1,000 employees, consisting of FPL linemen and FPL contracted linemen, vegetation contractors, and NextEra logistics teams, along with bucket trucks, tankers, fuel pumper trucks, and other equipment, to assist 11 utilities in Virginia, New York, Connecticut, and New Jersey to restore power and rebuild their electric systems following Superstorm Sandy.