



August 19, 2025

Cindy Mulkey, Deputy Director
Office of Siting Coordination
Department of Environmental Protection
2600 Blair Stone Road, MS 5500
Tallahassee, Florida 32399-2400

Re: Florida Power & Light Company (FPL)
Okeechobee Clean Energy Center (OCEC), PA 15-58B
Request for Post Certification Amendment
Potable Water (PW) System Staffing Reduction Request

Dear Ms. Mulkey,

Florida Power & Light Company (FPL) respectfully submits this request for a post-certification amendment to the OCEC Site Certification (PA15-58B), pursuant to Section 403.5113, Florida Statutes, and Rule 62-17.2015(1), Florida Administrative Code. The purpose of this amendment is to request a variance from the requirements outlined in Rule 62-699(2)(e), Florida Administrative Code, which relate to staffing requirements for the onsite PW system

Due to the OCEC site's low water consumption and the minimal number of operational days per week, FPL is requesting that the staffing frequency for the site's PW system be reduced to once per week. The plant will operate one day each week for the purpose of filling the ground storage and/or hydro tanks. During each visit, the lead operator will perform the following tasks: initiate the skid, fill the tanks, conduct system checks, record all activities in the logbook, shut down the skid, and place the reverse osmosis membranes in layup mode.

The system is supported by a 7,500-gallon ground storage tank and a 3,000-gallon pressure tank, which together provide adequate capacity to meet the site's weekly water demand. With the plant producing approximately 60 gallons per minute (GPM), we anticipate that weekly operation will require an average of 2.5 hours to complete all necessary tasks.

To ensure continuous monitoring, an online chlorine residual analyzer will be installed at the end of the distribution system. This analyzer will provide 24/7 chlorine residual monitoring with remote telemetry and alarms, all of which will be overseen by plant operators. This technology serves as a substitute for manual residual checks and aligns with the regulatory intent while reducing the frequency of required on-site visits. The proposed variance would significantly reduce operation and maintenance costs for the new system without compromising water quality or regulatory compliance.

In response to Mr. Ronald McCulley's comment in his June 3 email regarding flow rate considerations, FPL acknowledges the importance of accounting for the highest average daily flow rate, even when it significantly exceeds the annual average. For example, March 2022 recorded an average daily flow rate of 12,586 GPD, compared to the annual average of 4,927 GPD. However, FPL would like to clarify that these elevated flow rates do not reflect typical operating conditions. During the 2020 timeframe, FPL's existing system, consisting of mixed media filtration and chlorination, raised compliance concerns related to disinfection byproduct (DBP) levels exceeding the Maximum Contaminant Level (MCL). In response, and under the guidance of a compliance assurance letter from the Department's district office, FPL began routine flushing of a remote location within

the distribution system. This action was necessary to maintain compliance during the system upgrade process but resulted in artificially inflated average and maximum flow rates.

FPL believes that flow data collected since 2020 does not accurately represent the site's standard operating conditions or actual water demand. The site serves approximately 23 to 25 individuals, with water usage limited to restroom facilities and a single kitchen sink.

We respectfully request your review and favorable consideration of this amendment and variance request. Please let us know if additional documentation or clarification is needed.

Thank you for your consideration of FPL's request to amend OCEC's Site Certification No. PA 15-58B. If you have any questions regarding this submittal, please do not hesitate to contact me at 561-691-3074 or meghna.pandya@fpl.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'Meghna Pandya', with a stylized, cursive script.

Meghna Pandya
Principal Environmental Specialist
FPL Environmental Services

CC: Nate Senn, FDEP
Ken Proctor, FPL
Daniel Lambert, FPL
David Reed, FPL OCEC