ORIGINAL 050890-EI

## EXHIBIT B

## A SUMMARY DESCRIPTION OF WHY FLORIDA POWER & LIGHT COMPANY'S RELIANCE UPON DUN & BRADSTREET REPORTS IN MAKING CREDIT DECISIONS IS MISPLACED, UNWISE AND UNFAIR

Sears, Roebuck & Co. ("Sears") is prepared to present testimony and other probative evidence to support and explain each of the following examples of how reports prepared by Dun & Bradstreet ("D&B"), on which Florida Power & Light Company ("FP&L") has stated it relies, are inaccurate, ill-reasoned, carelessly prepared, irrelevant, and misleading.

- 1. The D&B reports are summary in nature and lack in-depth analysis of the financial or credit position of a customer. D&B reports are superficial and attempt to reduce to a few pages an important, complicated and sophisticated analysis.
- 2. D&B financial and credit scores are assigned based on the median or average performance of a pool of "companies with similar business characteristics." Users of D&B reports rarely know or understand what exactly a company "with similar business characteristics" means. D&B does not provide a description of the industries, sectors and companies included with the subject company for analysis. In the case of D&B's analysis of Sears, a major flaw of the report is that D&B's peer pool, the companies to which Sears is purportedly compared, is analyzed based on data from 2002. There is no explanation or rational presented why three year old data must be employed or whether three year old data continues to be relevant to the analysis.
- 3. Another monumental error in D&B's presentation of Sears' financial statistics is present in the report. D&B's report states that Sears' cash from operations in the year 2002 was a negative \$505 million, when in fact, as D&B could readily ascertain from Sears' 2004 Annual Report on Form 10-K, Sears' true cash flow from operations in 2002 was \$6,882,000,000, a net error detrimental to Sears of more than \$7.3 billion.
- 4. D&B's inclination to merely list negative sounding statistics about a subject company is irresponsible and misleading in the absence of any analysis or explanation of the value of those characteristics in analyzing credit quality. For example, D&B's recitation that Sears was involved in a modest number of lawsuits and had a modest and entirely expected number of liens and security interest filings present "in D&B's database" can be construed as a negative implication on Sears' credit when in fact the statistics are quite common and normal and expected in any business the size of Sears, and in fact may well reflect positively on Sears' financial condition and operations.
- 5. D&B's PAYDEX measure purports to inform the reader of the customer's payment habits. This statistic invites the reader of the report to substitute D&B's selective data for the reader's own real-world credit experience with the customer. In the case of Sears, only one payment, on one individual account, in several years has ever

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been made to FP&L after its due date, an extraordinary record considering the amounts of money involved in the consolidated accounts indicated by the deposit demand.

- 6. D&B gives no weight whatever to the most important statistics of all, in analyzing its subjects' credit. Nowhere in the D&B report on Sears, will you find reported the amount of cash, cash equivalents and available credit lines upon which Sears is able to draw to pay its creditors including FP&L. If D&B had included cash and credit statistics it would have reported, from Sears' most recent Form 10-K that Sears had on hand at January 30, 2005 a total of \$4,165,000,000 in cash and had available to it in the form of lines of credit an additional \$2 billion for a total of \$6,165,000,000, sufficient, giving no credit to positive cash flow after December 31, 2005, more than one thousand times its annual payments to FP&L.
- 7. D&B report on Sears states: "D&B has been unable to obtain sufficient financial information from this company...Our check of additional outside sources also found no information available on its financial performance". This statement either illustrates a lack of expertise or analytical negligence in the preparation of the report. Considerable detailed information about both Sears and its sister company, Kmart, is available to a knowledgeable researcher in the securities fillings of Sears Holdings Corporation ("SHC"), specifically, for example, in the footnotes to the financial statements contained in SHC's second quarter 2005 form 10Q report.