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September 25, 2008

Katherine E. Fleming, Esquire Office of the General Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

> RE: STAFF DATA REQUEST Docket No. 070626-EI Review of Florida Power & Light's Sunshine Energy Program Revised Response to Staff's Request No. 2 from September 12, 2008

Dear Ms. Fleming:

Green Mountain Energy Company ("Green Mountain") provides the following <u>revised</u> response to the second question in the Public Service Commission Staff's Second Data Request dated September 12, 2008. This response is provided voluntarily.

1

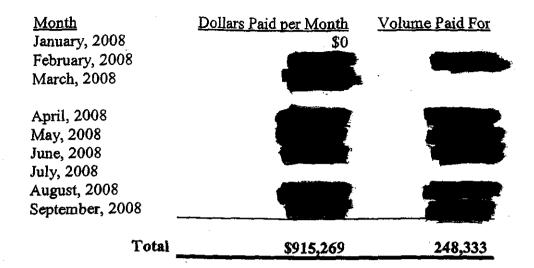
COM	2.	Please provide a monthly analysis showing the number and dollar amounts associated with TREC purchases for the Sunshine Energy® Program for the period from January 2008
ECR		through July 2008.
GCL		
OPC		MEC ANSWER: Below is a monthly analysis showing the dollar amounts spent to date for the month during the period from January 2008 through July 2008 to purchase 'renewable
RCP SSC		ributes' or 'renewable energy credits' (RECs) for the Sunshine Energy® Program for 2008,
SGA	alo	ng with number of MWhs purchased.
ADM		
CLK		

Exhibit B

DOCUMENT NUMBER-DATE

09056 SEP 25 8

FPSC-COMMISSION CLERK



Consistent with normal industry practice in REC markets, Green Mountain generally does not receive delivery of RECs on a monthly basis, but rather Green Mountain typically receives delivery of RECs on a rolling quarterly basis, and sometimes on a semi-annual basis. REC producers and suppliers generally deliver RECs on a quarterly basis, and sometimes on a semi-annual basis. Given the time and expense of negotiating purchase contracts and providing paperwork for RECs transfers, monthly deliveries are uncommon. (We note that Green-e form attestations call for generation to be disclosed on a quarterly basis, consistent with this industry practice.)

Consistent with normal industry practice, Green Mountain does not pay for delivery of RECs on a month-by-month basis concurrent with delivery. Green Mountain pays for RECs delivered either before or after delivery of the RECs, by varying numbers of days, depending on the terms negotiated with the selling counterparty. In other words, the month in which RECs are paid for may be during, prior to, or after the month in which RECs are delivered, depending on the deal struck with a counterparty.

Green Mountain's obligation under the Services Agreement with FPL is to provide RECs to FPL in an amount sufficient to match customer load on a calendar year basis in accordance with Green-e timeline standards. The Green-e standards provide that a product may only contain RECs generated in the applicable calendar year for the product, in the first three months of the following calendar year, or in the last six months of the prior calendar year. In other words, the time period in which the RECs were generated will not exactly match customer purchases on a month-bymonth basis. The time period in which the RECs were generated will also not match the month in which the RECs were paid for.

For these reasons, the information provided in the table above may be of limited usefulness.

For the period January 1, 2008 through July 31, 2008, Green Mountain has purchased 248,333 RECs for the Sunshine Energy® Program at a cost of \$915,269. (Here, we update our prior response, which stated that Green Mountain purchased 241,368 RECs for the Sunshine Energy® Program at a cost of \$915,269, for the period January 1, 2008 through July 31, 2008. Our original numbers were preliminary and did not reflect all allocations of RECs to the Sunshine Energy® Program to date.)

The numbers presented above may be subject to further adjustment based on settlement adjustments for actual generation reported by one or more counterparties for the applicable time period and/or based on actual customer load numbers reported by FPL for July 2008. We have purchased RECs to match customer load reported by FPL for the January through June 2008 period. However, FPL did not send Green Mountain a monthly Customer Load report for July 2008, as required under the Services Agreement. Therefore, Green Mountain has purchased RECs to match Green Mountain's best estimate of the customer load for July, based on the average number of customers enrolled in the Sunshine Energy® Program during that month.

Green Mountain appreciates the Commission Staff's interest in understanding Green Mountain's efforts in support of the Sunshine Energy® Program. If you have additional questions, please call or write me any time.

Cordially yours,

Robert Scheffel Wright | YOUNG VAN ASSEMBERP, P.A.

Attorneys for Green Mountain Energy Company