

REDACTED

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Florida Power & Light Company
Docket No. 100077
Staff's First Set of Interrogatories
Interrogatory No. 9
Page 1 of 1

1 Q.
2 For the years 2008 and 2009 how many FPLES customers were also FPL customers?

3 A.
4 See response to Staff Interrogatory No. 10, which identifies the FPLES program participants
5 that were billed using FPL bills for years 2008 and 2009. These FPLES program participants
6 are also FPL customers.

7 Participants in FPLES' Connect Services offerings are FPL customers. For 2008,
8 approximately [REDACTED] FPL customers purchased Connect Services products, while
9 approximately [REDACTED] FPL customers purchased products in 2009. There may be overlap
10 between customers billed using FPL bills and customers purchasing connect services
11 products.

12 Some participants in other FPLES' programs, such as Retail Natural Gas, may also be FPL
13 customers. FPLES does not track this information.

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Florida Power & Light
Docket No. 100077
Staff's 1st Set of Interrogatories
Interrogatory No. 10
Page 1 of 1

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Q. For the years 2008 and 2009, how many FPLES customers were billed using FPL's bills?

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A. During 2008, approximately [REDACTED] FPLES program participants were billed using FPL bills on average per month. During 2009, approximately [REDACTED] FPLES program participants were billed using FPL bills on average per month.

Q. How much revenue did each of FPLES' energy-related products and services generate in 2008 and 2009? In responding, list the revenue source and the revenue amount by year.

A. Please see the attached.

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FPLES Revenues - Interrogatory #11
Years 2008 - 2009

Product Revenue	2008	2009
Natural Gas		
Insurance, Service & Warranty		
Power Quality		
Total Revenue		

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Florida Power & Light
Docket No. 100077
Staff's 1st Set of Interrogatories
Interrogatory No. 17
Page 1 of 1

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- Q. In 2008, how many claims for damage recovery were filed under FPLES's SurgeShield program? How many of these claims were denied?
- A. In 2008, there were [REDACTED] claims filed under the Surgeshield Program. Of those claims, [REDACTED] were denied.

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Florida Power & Light Company
Docket No. 100077
Staff's First Set of Interrogatories
Interrogatory No. 10
Page 1 of 1

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Q. In 2009, how many claims for damage recovery were filed under FPLES's SurgeShield program? How many of these claims were denied?

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A. In 2009, there were [REDACTED] claims filed under the Surgeshield Program. Of those claims, [REDACTED] were denied.

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Florida Power & Light
Docket No. 100077
Staff's 1st Set of Interrogatories
Interrogatory No. 19
Page 1 of 1

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Q. In 2008, how many claims for damage recovery were filed under FPLES's ApplianceGard program? How many of these claims were denied?

A. "Damage recovery" is not defined under the terms and conditions included with customer enrollments on this program. In 2008, FPLES' vendor, Assurant, states that it dispatched technicians and made payments to technicians and/or customers in response to [REDACTED] service requests relating to the ApplianceGard program. Assurant estimates that no more than [REDACTED] of the [REDACTED] service requests constituted "denials".

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Florida Power & Light
Docket No. 100077
Staff's 1st Set of Interrogatories
Interrogatory No. 20
Page 1 of 1

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Q. In 2009, how many claims for damage recovery were filed under FPLES's ApplianceGard program? How many of these claims were denied?

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A. "Damage recovery" is not defined under the terms and conditions included with customer enrollments on this program. In 2009, FPLES vendor, Assurant states that it dispatched technicians and made payments to technicians and/or customers in response to [REDACTED] service requests relating to the ApplianceGard program. Assurant estimates that no more than [REDACTED] of the [REDACTED] service requests constituted "denials".

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Florida Power & Light
Docket No. 100077
Staff's 1st Set of Interrogatories
Interrogatory No. 21
Page 1 of 1

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Q. In 2008, how many claims for damage recovery were filed under FPLES's UtilityGard program? How many of these claims were denied?

A. "Damage recovery" is not defined under the terms and conditions included with customer enrollments on this program. In 2008, FPLES vendor, Assurant states that it dispatched technicians and made payments to technicians and/or customers in response to [redacted] service requests relating to the UtilityGard program. Assurant estimates that no more than [redacted] of the [redacted] service requests constituted "denials".

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Florida Power & Light
Docket No. 100077
Staff's 1st Set of Interrogatories
Interrogatory No. 22
Page 1 of 1

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Q. In 2009, how many claims for damage recovery were filed under FPLES's UtilityGard program? How many of these claims were denied?

A. "Damage recovery" is not defined under the terms and conditions included with customer enrollments on this program. In 2009, FPLES vendor, Assurant states that it dispatched technicians and made payments to technicians and/or customers in response to [redacted] service requests relating to the UtilityGard program. Assurant estimates that no more than [redacted] of the [redacted] service requests constituted "denials".

Q.

In 2008, how many claims for damage recovery were filed under FPLES's Power Surge Protection program? How many of these claims were denied?

A.

In 2008, FPLES' vendor Assurant indicates it paid 1,313 Power Surge claims and denied 26 in accordance with the published terms and conditions. "Damage recovery" is not defined under the terms and conditions included with customer enrollments on this program.

Q.

In 2009, how many claims for damage recovery were filed under FPLES's Power Surge Protection program? How many of these claims were denied?

A.

In 2009, FPLES' vendor Assurant indicates it paid Power Surge 1,541 insurance claims and denied 47 in accordance with the published terms and conditions. "Damage recovery" is not defined under the terms and conditions included with customer enrollments on this program.

Florida Power & Light Company
Docket No. 100077
Staff's First Set of Interrogatories
Interrogatory No. 25
Page 1 of 1

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Q. In 2008, how many claims for damage recovery were filed related to FPLES-supplied plug-in surge protector devices? How many of these claims were denied?

A. FPLES does not directly supply plug-in surge protection devices. FPLES has an arrangement with a vendor, APC by Schneider Electric ("APC"), under which APC supplies plug-in surge protection devices through the FPLES website.

APC's total sales of plug-in surge protection devices through the FPLES website in 2008 were [REDACTED] units generating several thousand dollars in revenues relative to many billions in total sales by APC in 2008. Because the sales through the FPLES website are such a small percentage of its total sales, APC does not maintain information on claims for damage recovery or denials related to plug-in surge protection devices sold in that manner.

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Florida Power & Light Company
Docket No. 100077
Staff's First Set of Interrogatories
Interrogatory No. 26
Page 1 of 1

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Q. In 2009, how many claims for damage recovery were filed related to FPLES-supplied plug-in surge protector devices? How many of these claims were denied?

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A. Please see response to Staff's First Set of Interrogatories No. 25.

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In 2009, APC's total sales of plug-in surge protection devices, originating from the FPLES website, were ■ units generating several thousand dollars in revenues to APC.