

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Fuel and Purchase Power Cost)
Recovery Clause and Generating)
Performance Incentive Factor)
_____)

Docket No. 100001-EI
Filed: September 1, 2010

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PETITION OF FLORIDA POWER & LIGHT COMPANY FOR APPROVAL OF ITS GENERATING PERFORMANCE INCENTIVE FACTOR (GPIF) TARGETS FOR JANUARY 2011 THROUGH DECEMBER 2011, REVISED GPIF TARGETS FOR JANUARY 2010 THROUGH DECEMBER 2010 AND REVISED GPIF REWARD FOR JANUARY 2009 THROUGH DECEMBER 2009

Florida Power & Light Company ("FPL"), pursuant to Order No. 9273 in Docket No. 74680-CI, Order No. 10093 in Docket No. 810001-EU, and Commission Directives of April 24 and April 30, 1980, hereby petitions the Commission to approve the proposed Generation Performance Incentive Factor ("GPIF") Targets for the period January 2011 through December 2011 of 81.1% for the weighted system average equivalent availability and 8,541 Btu/kWh for the average net operating heat rate. In addition, FPL requests that the Commission approve revised GPIF targets for combined cycle units in the period January 2010 through December 2010 and a revised GPIF reward for January 2009 through December 2009. In support of this Petition, FPL incorporates herein the prepared written testimony and exhibits of FPL witness Carmine A. Priore III and states as follows:

1. At the inception of the GPIF, FPL's fossil system generation was primarily fueled

by oil. Accordingly, FPL applied a gas adjustment factor (GAF) to adjust the heat rates for units that are potentially dual-fuel (oil and gas) fired. Over time, however, the system-level GAF ECR 4 outlived its usefulness because it is not required for FPL's newer combined cycle units that are RAD 1 fired almost exclusively with gas, and that now are the primary fossil-fueled GPIF units. While SSC _____

COM _____
APA _____
ECR 4
GCL _____
RAD 1
SSC _____
ADM _____
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CLK _____

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the GAF has been applied consistently to both targets and actual results over the years, FPL believes it is proper and in the customers' interest to remove the effects of the GAF from the calculation of GPIF targets and rewards/penalties with respect to the newer, gas-fired combined cycle units. Thus, the 2011 GPIF targets that FPL is now presenting for Commission approval have been calculated without utilizing the GAF. In addition, FPL proposes to revise the 2010 GPIF targets that were approved in Docket No. 090001-EI to remove the effects of the GAF with respect to combined cycle units, and to credit customers for the net reduction in GPIF rewards, plus interest, that results from removing the GAF from the reward/penalty calculations over the period from October 1994 (when the first of the newer, gas-fired combined cycle units became part of the GPIF) through December 2009. The GAF and FPL's proposal to remove its effects from the GPIF calculation for the newer, gas-fired combined cycle units are addressed in more detail in Mr. Priore's testimony and exhibits.

2. The GPIF targets for the period January 2011 through December 2011 are calculated in accordance with the methodology contained in the Generating Performance Incentive Factor Implementation Manual adopted by Order No. 10168 in Docket No. 810001-EU, as revised by Order No. 10912 in Docket No. 820001-EU. The 2011 GPIF targets are presented in Mr. Priore's Exhibit CP-2.

3. In Order No. PSC-09-0795-FOF-EI, the Commission approved the following 2010 GPIF ANOHR targets (in Btu/kWh) for the five newer, gas-fired combined cycle units: Ft. Myers 2 (6,952), Sanford 4 (6,968), Sanford 5 (6,969), Manatee 3 (6,750), and Martin 8 (6,826). In each instance, the GAF was applied in calculating those targets. With the effect of the GAF removed, the 2010 GPIF ANOHR target values slightly increase, as follows: Ft. Myers 2 (7,230), Sanford 4 (7,247), Sanford 5 (7,247), Manatee 3 (7,020), and Martin 8 (7,099). Exhibit

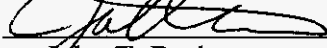
CP-3 to Mr. Priore's testimony supports the development of the revised 2010 GPIF ANOHR targets for combined cycle units.

4. For the affected timeframe of October 1994 through December 2009, FPL has calculated that removing the effect of the GAF results in a net credit to customers in the amount of \$694,824, excluding interest. FPL has calculated interest for each year during the period 1994-2009 in which customers receive a credit as a result of removing the effect of the GAF (there are two periods in which FPL under-recovered as a result of the GAF, and FPL did not calculate interest for those periods). As shown on Mr. Priore's Exhibit CP-4, this results in total interest of \$137,771. Adding this interest to the net credit of \$694,824 results in a total amount to be refunded to customers of \$832,595. FPL proposes to refund the full amount of the \$832,595 credit as a reduction to the 2009 GPIF reward, from the \$8,948,495 for which FPL sought approval in its April 1, 2010 GPIF filing to a revised 2009 reward of \$8,115,900.

WHEREFORE, FPL respectfully requests this Commission to approve the proposed GPIF Targets for the period January 2011 through December 2011 of 81.1 % for the weighted system average equivalent availability and 8,541 Btu/kWh for the average net operating heat rate; the revised 2010 GPIF ANOHR targets for combined cycle units as shown on Exhibit CP-3 to the testimony of FPL witness Priore; and a revised 2009 GPIF reward of \$8,115,900, reflecting a credit to customers of \$832,595 as a result of removing the effects of the GAF for the period from October 1994 through December 2009.

Respectfully submitted,

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By: 

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Fla. Bar No. 283479

CERTIFICATE OF SERVICE
Docket No. 100001-EI

I HEREBY CERTIFY that a true and correct copy of Florida Power & Light Company's Petition for Approval of its Generating Performance Incentive Factor(GPIF) Targets for the January through December 2011, Revised GPIF Targets for January 2010 through December 2010 and revised GPIF Reward for January 2009 through December 2009 has been hand furnished by hand delivery (*) or U.S Mail on September 1, 2010 to the following:

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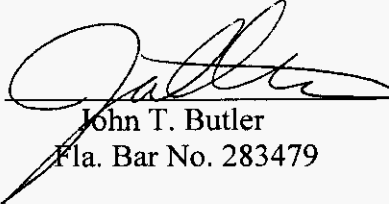
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