# 42

FPL's Responses to Staff's Fifth Set of Interrogatories (Nos. 170, 173, 175, 177, 178, 180, 182, and 184-187) Fiorida Power & Light Company Docket No. 120015-El Staff's Fifth Set of Interrogatories Interrogatory No. 170 Page 1 of 1

0.

For questions 170-172, please refer to witness Reed's testimony, beginning on page 23, regarding the SAIDI, SAIFI, and CAIDI metrics.

Please state whether good or mild weather patterns contribute to apparent improvements in these metrics compared to rainy and windy weather patterns.

#### A.

While the effects of weather, both good and bad, have an impact on reliability metrics, Witness Reed did not conduct any such analysis. Because the analysis includes all Investor-owned utilities in Florida, all of these Florida utilities' service territories are impacted by similar non-excludable weather patterns/events over time.

Florida Power & Light Company Docket No. 120015-El Staff's Fifth Set of Interrogatories Interrogatory No. 173 Page 1 of 1

Q. For questions 173-175, please refer to witness Hardy's direct testimony on page 11, lines 10 through 21.

What is the definition of "superior level of reliability?"

#### A.

FPL's use of the phrase "superior level of reliability" is associated with comparing its historical SAIDI performance to other electric utilities' (e.g., other Florida IOUs or the 31 utilities in the Davies' Benchmarking study) SAIDI performance. These comparisons indicate FPL's SAIDI performance is "of higher rank" and "better" than the other utilities – both words/phrases that are contained in standard dictionary definitions of superior.

Florida Power & Light Company Docket No. 120015-El Staff's Fifth Set of Interrogatories Interrogatory No. 175 Page 1 of 1

Q. For questions 173-175, please refer to witness Hardy's direct testimony on page 11, lines 10 through 21.

Was there an independent third party verification of the results of the Davies Consulting, Inc., benchmarking study, and if so, who was the third party?

A. No. Fiorida Power & Light Company Docket No. 120015-El Staff's Fifth Set of Interrogatories Interrogatory No. 177 Page 1 of 1

Q. Distribution Reliability: Please refer to witness Hardy's direct testimony on page 13, lines 12 through 15. Please explain in detail the analysis FPL uses in identifying and targeting feeders for review. In your response, please state what criteria determines whether a feeder is selected for "corrective measures?"

A. See page 95, Item No. 18, of FPL's Annual March 1 "Status Report/Update" filing dated March 1, 2012.

## THREE PERCENT FEEDER LIST

17. Identify whether any feeders appear on the 3% listing more than once within a consecutive five-year period and any actions implemented to improve feeder performance.

Nine of the 85 feeders on the 3% Feeder List have appeared more than once within a five year period.

See FPL's responses to Distribution Reliability Question numbers 16 and 18 for actions that FPL has taken to address these feeders.

18. The process used to identify and select the actions to improve the performance of feeders in the 3% feeder list, if any.

FPL evaluates feeder performance on a daily basis and has addressed feeders on this list through its "Priority Feeder" program and one or more of its reliability programs.

FPL's Priority Feeder program addresses feeders based on a 12 MOE list of feeders ranked by performance based on feeder interruptions, momentaries, number of customers served and causes of interruptions. Once the Priority Feeders are identified, a reliability analysis, planning infrastructure review, and field condition assessment will take place, all in collaboration with the many operations and centralized support groups.

19. 2012 activities and budget levels directed at improving feeder performance.

See response to Distribution Reliability Item No. 16.

Fiorida Power & Light Company Docket No. 120015-El Staff's Fifth Set of Interrogatories Interrogatory No. 178 Page 1 of 1

Q. For questions 178-181, referring to witness Reed's direct testimony on page 23, lines 1 through 23, please answer the following questions:

What are the benchmarks used by FPL to determine adequate service in regards to SAIFI, CAIDI and SAIDI?

#### Α.

FPL does not have clearly established delineations or benchmarks for determining "adequate" or "superior" service in regards to SAIDI, SAIFI and CAIDI. However, as stated in testimony, FPL believes its SAIDI results (the best overall reliability indicator since it encompasses SAIFI and CAIDI), compare very favorably to others – either in Florida or nationally.

Florida Power & Light Company Docket No. 120015-El Staff's Fifth Set of Interrogatories Interrogatory No. 180 Page 1 of 1

Q. For questions 178-181, referring to witness Reed's direct testimony on page 23, lines 1 through 23, please answer the following questions:

Do FPL's benchmarks match or exceed the industry benchmarks for SAIFI, CAIDI and SAIDI? Please provide a reference for the industry benchmarks.

A. Please see Exhibit JJR-5 Pages 8-10.

Florida Power & Light Company Docket No. 120015-El Staff's Fifth Set of Interrogatories Interrogatory No. 182 Page 1 of 1

Q. For questions 182-185, witness Dewhurst's direct testimony on page 47, lines 10 through 23, suggests the Commission create an incentive of an additional 25 basis points to the authorized ROE for utilities regulated by the FPSC that achieve "superior customer value."

Please explain how the Commission would objectively assess the "<u>sustainability</u> of performance in order to avoid providing an incentive for temporary but unsustainable performance."

#### A.

For each attribute of customer value (or "performance metric") that the Commission chooses to include in its overall consideration of customer value the Commission should examine multiple years of history and should consider how consistent the performance has been relative to one or more appropriate benchmarks. Multiple years of consistently outperforming multiple relevant benchmarks, as FPL has done, should provide strong support for the authorization of a performance adder. To be clear, Mr. Dewhurst is not proposing a formulaic approach, he is proposing that the Commission exercise its judgment. But that judgment should be based on objective factors (measures of performance that have clear linkage to customer value), applied consistently from case to case, and incorporating a multi-year perspective. How many years to consider must depend on the particular circumstances, as must the deterioration of consistency. In addition, an isolated or unusual event with regard to a particular metric, or a metric in which FPL has not sustained consistently strong performance, should be considered in the context of an overall level of performance across many factors. Finally, because the Commission would only be granting the 25 bps to the extent that FPL's typical residential bill remains the lowest in Florida, sustainability (or the lack thereof) would be self-defining insofar as whether the Company continued to receive the performance award.

Florida Power & Light Company Docket No. 120015-El Staff's Fifth Set of Interrogatories Interrogatory No. 184 Page 1 of 1

Ο.

For questions 182-185, witness Dewhurst's direct testimony on page 47, lines 10 through 23, suggests the Commission create an incentive of an additional 25 basis points to the authorized ROE for utilities regulated by the FPSC that achieve "superior customer value."

Is the "superior customer value" determinant a yearly calculation, and who performs the calculation?

#### A.

As indicated in Witness Dewhurst's testimony, FPL is proposing that the ROE performance factor be authorized based on the superior customer value delivered but made contingent on FPL maintaining the lowest typical bill in the state which takes into account the importance of using a mechanism that can be readily administered and easily understood by customers.

In the event that the ROE adder is awarded to FPL, then the mechanics of measuring that calculation are outlined in Witness Deaton's testimony (page 23, line 14 – page 24, line 3) as follows:

"Each September, in conjunction with FPL's annual fuel filing, FPL will prepare and submit to the Commission a comparison of its typical residential bill to the other Florida utilities for the prior 12 months. The comparison will be based on publicly available data from the Commission web site, the FMEA bill survey, the JEA bill survey, and the Reedy Creek Improvement district web site.

If the comparison shows that FPL's typical residential bill is not the lowest on average over the past 12 months, FPL will propose to reduce rates by 0.040¢ per kWh effective January 1 of the following year. If, in subsequent years, FPL's typical residential bill is again the lowest on average for the prior 12 months, FPL would propose to reinstate the ROE Performance adder and increase rates by 0.040¢ per kWh effective January 1 of the following year."

Thus, in the event that FPL is awarded the 25 bps adder, an annual measurement calculation is made in order to determine if the Adder may remain in place.

Fiorida Power & Light Company Docket No. 120015-El Staff's Fifth Set of Interrogatories Interrogatory No. 185 Page 1 of 1

O.

For questions 182-185, witness Dewhurst's direct testimony on page 47, lines 10 through 23, suggests the Commission create an incentive of an additional 25 basis points to the authorized ROE for utilities regulated by the FPSC that achieve "superior customer value."

What happens when a utility fails to meet the "superior customer value" for one year, for two years, for three years and for additional years?

A.

In this specific instance, because FPL has proposed the maintenance of the performance award so long as FPL maintains the lowest bill in the state, the implementation is straightforward. See FPL's response to Staff's Fifth Set of Interrogatories No. 184.

Florida Power & Light Company Docket No. 120015-El Staff's Fifth Set of Interrogatories Interrogatory No. 186 Page 1 of 1

O.

Please refer to MFR B-8, page 4, line 9, WCEC Unit 3. The monthly plant balance increases from \$814,458,000 in December 2012 to \$823,056,000 in September 2013. In October 2013 the monthly plant balance decreases to \$810,332,000 and continues to decrease to \$770,248,000 (November 2013) and increases slightly to \$771,204,000 in December 2013. Please explain the causes of the decrease in plant that begins in October 2013. In your response, please explain with specificity whether FPL expects the level of plant to remain at the December 2013 level going forward (2014 and beyond).

A.

During a power plant's scheduled routine maintenance to sustain the reliability and availability of the plant, some parts are removed from service (retired), refurbished, and placed back into service at a later date. This process can take a few weeks or several months to complete. The plant balance is projected to be reduced for WCEC Unit 3 in October 2013 and November 2013 due to scheduled retirements related to parts to be refurbished. The refurbished parts are projected to be placed back into service in April and May 2014 which will cause the plant balance to increase above the December 2013 level. This type of activity reoccurs in the future according to the maintenance schedule.

Fiorida Power & Light Company Docket No. 120015-Ei Staff's Fifth Set of Interrogatories Interrogatory No. 187 Page 1 of 1

Q.

Please refer to MFR B-10, page 4, line 12, WCEC Unit 3. The accumulated depreciation balance increases from \$31,851,000 in December 2012 to \$52,166,000 in September 2013. In October 2013 the accumulated depreciation balance decreases to \$46,173,000 and continues to decrease to \$23,779,000 (November 2013) and increases slightly to \$25,899,000 in December 2013. Please explain the causes of the decrease in accumulated depreciation balance that begins in October 2013. In your response, please explain with specificity whether FPL expects the level of accumulated depreciation to remain at the December 2013 level going forward (2014 and beyond).

A.

As also stated in FPL's response to Staff Fifth Set of Interrogatories No. 186, during a power plant's scheduled routine maintenance to sustain the reliability and availability of the plant, some parts are removed from service (retired), refurbished, and placed back into service at a later date. This process can take a few weeks or several months to complete. The decrease in accumulated depreciation for WCEC Unit 3 in October and November 2013 is due to scheduled retirements related to parts to be refurbished, offset with normal depreciation activity of plant balances. The gross plant in service balance, offset by salvage value, is debited to accumulated depreciation upon retirement of these parts. FPL expects the level of accumulated depreciation to increase from the December 2013 level due to normal depreciation activity, except in cases similar to this example where parts to be refurbished are retired.

Sponsor:

Nicholas Vlisides

State of Florida

County of Palm Beach

I hereby certify that on this day of Mu, 2012, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared Nicholas Vlisides, who is personally known to me, and he acknowledged before me that he sponsored the answer(s) to Interrogatory No. 182, 183, 184 and 185 from Staff's Fifth Set of Interrogatories to Florida Power & Light Company in Docket No. 120015-EI, and that the response(s) is/are true and correct based on his/her personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this day of \_\_\_\_\_\_, 2012.

Notary Public, State of Florida



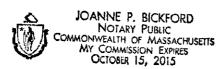
Commonwealth of Massachusetts)

County of Middlesex)

I hereby certify that on this \( \frac{1}{2} \) day of \( \frac{M\_{\text{Out}}}{2} \), 2012, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared \( \frac{J\_0hn J. Reed}{2} \), who is personally known to me, and he/she acknowledged before me that he/she sponsored the answer(s) to Interrogatory No(s). \( \frac{166}{2} \) and \( \frac{172}{2} \) and \( \frac{178}{2} \) - \( \frac{181}{2} \) from \( \frac{Florida Public Service Commission Staff's Fifth \) Set of Interrogatories to Florida Power & Light Company in Docket No. 120015-EI, and that the response(s) is/are true and correct based on his/her personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this 21 st day of \_\_\_\_\_\_, 2012.

Notary Public, Commonwealth of Massachusetts





Robert & Banest & (Robert E. Barrett, Jr.)

State of Florida

County of Palm Beach)

)

I hereby certify that on this Aday of May, 2012, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared Robert E. Barrett, Jr., who is personally known to me, and he/she acknowledged before me that he/she sponsored the answer(s) to Interrogatory No(s). 186 and 187 from Staff's Fifth Set of Interrogatories to Florida Power & Light Company in Docket No. 120015-EI, and that the response(s) is/are true and correct based on his/her personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this 22nd day of May, 2012.

Notary Public, State of Florida

David T. Bromley

State of Florida )
County of Broward )

I hereby certify that on this 16th day of May, 2012, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared David T. Bromley, who is personally known to me, and he acknowledged before me that he sponsored the answers to Interrogatories 173-177 from the Florida Public Service Commission Staff's Fifth Set of Interrogatories to Florida Power & Light Company in Docket No. 120015-EI, and that the responses are true and correct based on his personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this 16th day of May, 2012.

Notary Public, State of Florida

Notary Stamp:

ANNA V. TUPITSYNA

AY COMMISSION # EE 139649

EXPIRES: February 20, 2016

3 onded Thru Notary Public Underwriters

Pamela L. Metz

State of Florida )

County of Palm Beach

)

I hereby certify that on this 2/5 day of 1, 2012, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared Pamela L. Metz, who is personally known to me, and he/she acknowledged before me that he/she sponsored the answer(s) to Interrogatory No(s). 158-165 from Staff's 5th Set of Interrogatories to Florida Power & Light Company in Docket No. 120015-EI, and that the response(s) is/are true and correct based on his/her personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County

aforesaid as of this 2/3 day of

, 2012

No My

Notary Public - State of Florida My Comm. Expires Mar 8, 2014 Commission # DD 948300

# 43

FPL's Responses to Staff's Sixth Set of Interrogatories (Nos. 188-202, 211, 213-228, 232-236, and 239) Florida Power & Light Company Docket No. 120015-EI Staff's Sixth Set of Interrogatories Interrogatory No. 188 Page 1 of 1

#### Q.

Please indicate the total amounts expensed annually for pole inspections from 2005 through 2011, and 2012 and the projected expense for the 2013 test year.

### A.

Since implementing FPL's currently approved 8-year pole inspection program in May 2006, annual actual/projected expense for the years 2006-2013 associated with pole inspections (including associated remediation/replacements) are (in millions): 2006 - \$3.9; 2007 - \$8.6; 2008 - \$12.7; 2009 - \$10.9; 2010 - \$10.7; 2011 - \$17.5; 2012 - \$14.6; and 2013 - \$14.0.

Florida Power & Light Company Docket No. 120015-El Staff's Sixth Set of Interrogatories Interrogatory No. 189 Page 1 of 1

Q. Please identify the total number of poles failing inspection, by year, from 2005 through 2011.

A. Since implementing its currently approved 8-year pole inspection in May 2006, the total number of poles (wood and other) failing inspection by year are: 2006 - 8,785; 2007 - 9,801; 2008 - 10,040; 2009 - 15,243; 2010 - 15,636; and 2011 - 16,585.

Florida Power & Light Company Docket No. 120015-EI Staff's Sixth Set of Interrogatories Interrogatory No. 190 Page 1 of 1

#### Q.

For questions 190-195, please refer to the Review of Florida Investor-Owned Electric Utilities 2010 Service Reliability Reports, dated November 2011 by the Florida Public Service Commission.

Please refer to page 9, Table 1-1 entitled 2010 Wooden Pole Inspection Summary. Please explain why FPL did not complete the total number of pole inspections that were planned for 2010.

#### A.

FPL established an aggressive target for 2010 that, ultimately, it was unable to achieve. However, in 2010, FPL still inspected approximately one eighth of its poles.

Florida Power & Light Company Docket No. 120015-El Staff's Sixth Set of Interrogatories Interrogatory No. 191 Page 1 of 1

Q.

For questions 190-195, please refer to the Review of Florida Investor-Owned Electric Utilities 2010 Service Reliability Reports, dated November 2011 by the Florida Public Service Commission.

Please state whether FPL is on target to complete its 8-year inspection cycle for wooden poles. If FPL is not on target with an 8-year inspection cycle for wooden poles, please explain what steps FPL is taking to rectify the situation.

A.

FPL is on target to complete its first 8-year inspection cycle for wooden poles.

Fiorida Power & Light Company Docket No. 120015-EI Staff's Sixth Set of Interrogatories Interrogatory No. 192 Page 1 of 1

Q. For questions 190-195, please refer to the Review of Florida Investor-Owned Electric Utilities 2010 Service Reliability Reports, dated November 2011 by the Florida Public Service Commission.

Please indicate the percentage of poles that failed inspections for each year from 2005 through 2011.

A. Since implementing FPL's currently approved 8-year pole inspection in May 2006, the percentage of all poles failing inspection by year are: 2006 - 8%; 2007 - 7%; 2008 - 7%; 2009 - 11%; 2010 - 11%; and 2011 - 12%.

Fiorida Power & Light Company Docket No. 120015-El Staff's Sixth Set of Interrogatories Interrogatory No. 193 Page 1 of 1

Q.

For questions 190-195, please refer to the Review of Florida Investor-Owned Electric Utilities 2010 Service Reliability Reports, dated November 2011 by the Florida Public Service Commission.

Please indicate the total amounts expensed annually for tree trimming from 2005 through 2011, and for 2012 and the projected expense for the 2013 test year.

A.

Since implementing FPL's approved vegetation management plan, Storm Preparedness Initiative No. 1, in 2007, actual expenses for vegetation management for 2007-2011 and YTD April 2012 were (in millions): 2007 - \$65.2; 2008 - \$57.9; 2009 - \$52.6; 2010 - \$57.6; 2011 - \$60.6; and YTD April 2012 - \$20.9. Projected vegetation management expenses for 2013 are \$68.7 million.

Fiorida Power & Light Company Docket No. 120015-EI Staff's Sixth Set of Interrogatories Interrogatory No. 194 Page 1 of 1

#### Q.

For questions 190-195, please refer to the Review of Florida Investor-Owned Electric Utilities 2010 Service Reliability Reports, dated November 2011 by the Florida Public Service Commission.

Please indicate the total lateral miles trimmed annually from 2005 through 2011, and the projected miles for the 2012 and the 2013 test year.

#### A.

FPL's actual annual lateral miles trimmed, resulting from implementing FPL's approved vegetation management plan, Storm Preparedness Initiative No. 1, for 2007-2011 were: 2007 - 2,215; 2008 - 2,078; 2009 - 2,768; 2010 - 2,741; and 2011 - 3,367. Projected lateral miles to be trimmed for 2012 and 2013 are 3,700.

Florida Power & Light Company Docket No. 120015-El Staff's Sixth Set of Interrogatories Interrogatory No. 195 Page 1 of 1

O.

For questions 190-195, please refer to the Review of Florida Investor-Owned Electric Utilities 2010 Service Reliability Reports, dated November 2011 by the Florida Public Service Commission.

Please indicate the total feeder miles trimmed annually from 2005 through 2011, and the projected miles for 2012 and the 2013 test year.

#### A.

FPL's annual feeder miles trimmed, resulting from implementing FPL's approved vegetation management plan, Storm Preparedness Initiative No. 1, in 2007, for 2007-2011 were: 2007 - 4,454; 2008 - 4,262; 2009 - 4,151; 2010 - 5,222; and 2011 - 4,337. Projected feeders miles trimmed for 2012 and 2013 are 4,300 and 4,800, respectively.

Florida Power & Light Company Docket No. 120015-El Staff's Sixth Set of Interrogatories Interrogatory No. 196 Page 1 of 1

Q.

For questions 196-198, please refer to the Review of Florida Investor-Owned Electric Utilities 2010 Service Reliability Reports, dated November 2011 by the Florida Public Service Commission.

Please refer to page 11, Table 1-3, Vegetation Clearing From Feeder Circuits. This table shows that FPL completed its three-year feeder cycle at 101 percent. Please explain in detail if FPL is on schedule with its second three-year cycle. If the answer is no, please explain why not.

Α.

Yes, FPL's three-year average trim cycle for feeders is on schedule.

Florida Power & Light Company Docket No. 120015-El Staff's Sixth Set of Interrogatories Interrogatory No. 197 Page 1 of 1

Q.

For questions 196-198, please refer to the Review of Florida Investor-Owned Electric Utilities 2010 Service Reliability Reports, dated November 2011 by the Florida Public Service Commission.

Please explain in detail how FPL determines which feeders are to be trimmed each year. For example, are feeder miles trimmed by region, by customer class, or by vegetation growth?

A.

A feeder may be trimmed as a result of multiple initiatives, e.g., preventive maintenance (planned trimming primarily utilizing "last trim" dates to identify feeders to be trimmed in a given year), corrective maintenance (primarily customer trim requests and mid-cycle trimming), restoration (trimming to restore service) and support for system improvement/expansion projects (trimming to address vegetation impacting new or upgraded overhead distribution facilities).

Fiorida Power & Light Company Docket No. 120015-El Staff's Sixth Set of Interrogatories Interrogatory No. 198 Page 1 of 1

Q.
For questions 196-198, please refer to the Review of Florida Investor-Owned Electric Utilities 2010 Service Reliability Reports, dated November 2011 by the Florida Public Service Commission.

Please indicate the total number of feeder miles that FPL maintains. Please state whether any feeder miles maintained by FPL are not trimmed due to the geographic area or for any other reason. If the answer to is yes, please explain why.

# **A.** FPL currently has approximately 13,600 miles of overhead feeders that it maintains. No, all overhead maintained feeder miles are capable of being trimmed in accordance with FPL's vegetation management plan.

Florida Power & Light Company Docket No. 120015-El Staff's Sixth Set of Interrogatories Interrogatory No. 199 Page 1 of 1

Q.

For questions 199-202, please refer to the Review of Florida Investor-Owned Electric Utilities 2010 Service Reliability Reports, dated November 2011 by the Florida Public Service Commission.

Please refer to page 11, Table 1-4, Vegetation Clearing From Lateral Circuits. This table shows that FPL has trimmed 43.7 percent of the total lateral miles as of 2010. Please indicate the percentage of lateral miles trimmed as of 2011, and to date.

A.

In 2011, an additional 3,367 lateral miles were trimmed, increasing the total cumulative percentage of laterals trimmed/total laterals to 59%, since FPL initiated its approved 6-year average lateral trim cycle in 2007. As of April 2012, this cumulative percentage has increased to 64%.

Florida Power & Light Company Docket No. 120015-El Staff's Sixth Set of Interrogatories Interrogatory No. 200 Page 1 of 1

Q. For questions 199-202, please refer to the Review of Florida Investor-Owned Electric Utilities 2010 Service Reliability Reports, dated November 2011 by the Florida Public Service Commission.

Please explain in detail whether FPL is on schedule to meet a 2012 completion date for trimmed lateral miles. If the answer is no, please explain why FPL is not on schedule.

#### A.

Yes. FPL is on schedule to meet its approved plan to achieve a six-year lateral trim cycle by the beginning of 2013. FPL's planned/actual lateral trim miles for 2007-2012 is consistent with FPL's approved plan for Storm Preparedness Initiative No. 1 which was approved in 2007 (see Order No. PSC -07-0468-FOF-EI, Docket No. 060198-EI, dated May 30, 2007 and FPL Witness Manuel B. Miranda's testimony submitted in that proceeding). FPL's approved plan includes achieving a 6-year average lateral trim cycle by "gradually increasing the tree trimming workforce in order to diminish contractor overtime and premium startup costs. This approved plan allows FPL to achieve a 6-year average lateral trim cycle beginning in 2013" (see lines 1-5, page 13 of FPL Witness Manuel B. Miranda's testimony). On page 12 of that same testimony, FPL included a schedule that provided the number of lateral miles it planned to trim, by year, for the years 2007-2012. In that schedule, by the end of 2012, FPL was completing 1/6 of its lateral miles. Below are the planned miles to be trimmed, per FPL's testimony, and the actual miles trimmed for 2007-2011 along with the original and current plan for 2012:

	<u>Miles</u>	
	Approved Plan	<u>Actual</u>
2007	1,900	2,215
2008	2,000	2,078
2009	2,700	2,768
2010	3,100	2,741
2011	3,300	<u>3,367</u>
Subtotal	13,000	13,169
2012	3,700	3,700 (Plan)

Florida Power & Light Company Docket No. 120015-El Staff's Sixth Set of Interrogatories Interrogatory No. 201 Page 1 of 1

Q. For questions 199-202, please refer to the Review of Florida Investor-Owned Electric Utilities 2010 Service Reliability Reports, dated November 2011 by the Florida Public Service Commission.

Please state how many lateral miles FPL maintains.

**A.** Currently, there are approximately 22,700 overhead lateral miles that FPL maintains.

Florida Power & Light Company Docket No. 120015-EI Staff's Sixth Set of Interrogatories Interrogatory No. 202 Page 1 of 1

Q.

For questions 199-202, please refer to the Review of Florida Investor-Owned Electric Utilities 2010 Service Reliability Reports, dated November 2011 by the Florida Public Service Commission.

Please state whether any lateral miles that are maintained by FPL were not trimmed due to geographic location or any other reason. If the answer is yes, please explain in detail why these lateral miles were not trimmed.

A.

No. All lateral miles are maintained. However, FPL notes that, consistent with its approved plan, not all laterals have been trimmed yet.

Fiorida Power & Light Company Docket No. 120015-EI Staff's Sixth Set of Interrogatories Interrogatory No. 211 Page 1 of 1

#### Q.

For questions 211-221, please refer to Witness George K. Hardy's direct testimony.

Refer to page 5, lines 7 through 12. Please explain how SAIDI is measured. In your response explain what SAIDI range is considered superior, excellent, average, poor, etc.

#### A.

The calculation for determining SAIDI is provided on page 1 of the FPSC's Review of Florida Investor-Owned Electric Utilities 2010 Service Reliability Reports, dated November 2011. FPL does not have clearly established delineations for determining SAIDI results that are superior vs. excellent vs. poor, etc. However, as stated in testimony, FPL believes its SAIDI results, when compared to others – either in Florida or nationally – compare very favorably and are, therefore, superior or excellent. See also FPL's response to Staff's Fifth Set of Interrogatories No. 173.

Florida Power & Light Company Docket No. 120015-El Staff's Sixth Set of Interrogatories Interrogatory No. 213 Page 1 of 1

Q. For questions 211-221, please refer to Witness George K. Hardy's direct testimony.

Please refer to page 8, lines 4 through 10. Identify how many poles FPL has inspected in each year from 2005 through 2011.

**A.** Since implementing its currently approved pole inspection plan in 2006, FPL has inspected the following poles/year: 2006 - 96,090; 2007 - 141,332; 2008 - 143,319; 2009 - 138,970; 2010 - 141,423; 2011 - 137,315.

Fiorida Power & Light Company Docket No. 120015-El Staff's Sixth Set of Interrogatories Interrogatory No. 214 Page 1 of 1

Q. For questions 211-221, please refer to Witness George K. Hardy's direct testimony.

Please state how many poles FPL plans to inspect for 2012 and the projected 2013 test year.

A. FPL projects to inspect 137,430 poles annually in 2012 and 2013.

Florida Power & Light Company Docket No. 120015-EI Staff's Sixth Set of Interrogatories Interrogatory No. 215 Page 1 of 1

# Q.

For questions 211-221, please refer to Witness George K. Hardy's direct testimony.

Please refer to page 8, lines 12 through 20. Is there a need for FPL to increase its trimming miles for laterals in 2012 in order to complete the six-year cycle?

### A.

Yes. As stated on page 37 of FPL's Annual March Filing, dated March 1, 2012, FPL's plan is to trim 3,700 lateral miles in 2012. This is consistent with FPL's approved plan to achieve a six-year average cycle by the beginning of 2013. See also FPL's response to Staff's Sixth Set of Interrogatories No. 199.

Florida Power & Light Company Docket No. 120015-EI Staff's Sixth Set of Interrogatories Interrogatory No. 216 Page 1 of 1

Q. For questions 211-221, please refer to Witness George K. Hardy's direct testimony.

Please refer to page 9, lines 1 through 2. FPL's updated hardening plans are due in 2013. Does FPL plan to change or modify any of its hardening plans in its 2013 filing? If so, please describe what changes are being considered and why.

A. Currently, FPL does not have any plans to change or modify any of the key components (e.g., FPL's 3-prong hardening approach) contained in its currently approved hardening plans.

Florida Power & Light Company Docket No. 120015-El Staff's Sixth Set of Interrogatories Interrogatory No. 217 Page 1 of 1

Q. For questions 211-221, please refer to Witness George K. Hardy's direct testimony.

Refer to page 9, lines 14 through 19. Please state the cumulative percentage of feeders that have been hardened to EWL as of 2011.

A. Through 2011, approximately 9% (238/2700) of FPL's overhead feeders have been hardened to EWL.

Florida Power & Light Company Docket No. 120015-El Staff's Sixth Set of Interrogatories Interrogatory No. 218 Page 1 of 1

Q. For questions 211-221, please refer to Witness George K. Hardy's direct testimony. Refer to page 9, lines 14 through 19. Please state the cumulative percentage of feeders that have been hardened to EWL as of 2011.

A. Since implementing its approved hardening plan in 2007, FPL has hardened, by year, the following number of Critical Infrastructure Facilities (e.g., hospitals and 911 centers) to EWL: 2006-13 (pilot projects); 2007-38; 2008-52; 2009-69; 2010-38; 2011-28; YTD April 2012-3 (on target to complete 2012 plan of 27).

Florida Power & Light Company Docket No. 120015-El Staff's Sixth Set of Interrogatories Interrogatory No. 219 Page 1 of 1

Q. For questions 211-221, please refer to Witness George K. Hardy's direct testimony. Please refer to page 12, lines 3 through 11. Prior to the implementation of Initiative 1, did FPL have in place a distribution facility trim schedule? If yes, please describe the plan that was previously in place.

A.
Yes. Prior to implementing its currently approved 3-year average trim cycle for feeders and 6-year average trim cycle for laterals, FPL's vegetation management program consisted of a 3-year average trim cycle for feeders and a lateral trim program that was reliability-based.

Florida Power & Light Company Docket No. 120015-El Staff's Sixth Set of Interrogatories Interrogatory No. 220 Page 1 of 1

Q. For questions 211-221, please refer to Witness George K. Hardy's direct testimony. Has the implementation of Initiative 1 resulted in a reduction in the number of vegetation-related distribution complaints?

A.

No, total vegetation-related complaints have increased since FPL began to implement its 6-year average trim cycle for laterals - lines that are more prevalent throughout customers neighborhoods (as compared to feeders, which are more prevalent on major thoroughfares). This is not inconsistent with FPL's experience which indicates that, generally, customers prefer less vs. more trimming of their trees.

Fiorida Power & Light Company Docket No. 120015-EI Staff's Sixth Set of Interrogatories Interrogatory No. 221 Page 1 of 1

Q. For questions 211-221, please refer to Witness George K. Hardy's direct testimony. Please refer to page 13, line 12. Does FPL have in place a priority lateral program similar to its priority feeder program? If yes, please describe the program. If no, please explain why FPL only focuses on feeders.

A. No. Currently, FPL does not have a priority lateral program in place. FPL's focus, to date, has been on feeders since, on average, a feeder serves over 40 times more customers than a lateral (1,450 vs. 35) and, historically, approximately 70% of all customers interrupted (CI) result from feeder interruptions.

Florida Power & Light Company Docket No. 120015-El Staff's Sixth Set of interrogatories Interrogatory No. 222 Page 1 of 1

Q. Refer to MFR Schedule B-6, Jurisdictional Separation Factors-Rate Base for the "Projected Test Year 12/31/13." Referring to page 9 of 13, Column 3, line 22- Other Regulatory Assets- Other. Please identify the regulatory assets included in this account totaling \$217,480,000.

A. The Other Regulatory Assets- Other total of \$217,480,000 on MFR B-6, page 9 of 13, line 22, column 2 represents primarily regulatory assets relating to federal income taxes accounted for under Financial Accounting Standard (FAS) 109 of approximately \$201,173,000. The remaining balance of approximately \$16,307,000 represents various other smaller regulatory assets.

Florida Power & Light Company Docket No. 120015-El Staff's Sixth Set of Interrogatories Interrogatory No. 223 Page 1 of 1

Q.

Refer to page 9 of 13, Column 3, line 24-Other Regulatory Assets-Underrecovered Franchise Fee. Please provide a detailed explanation as to why the franchise fee underrecovery in the amount of \$2,545,000 is included in the projected test year.

# A.

The Other Regulatory Assets-Underrecovered Franchise Fee forecasted balance of \$2,545,000 is included in the projected test year and is appropriately not excluded from rate base as interest is not charged to the municipalities. Since the under recovered franchise fees balance of \$2,545,000 in FERC account 182.306, and the over recovered franchise fees balance of (\$5,456,000) in FERC account 254.307 do not receive a separate return, the working capital balances simply reflect timing differences between what FPL has collected and what FPL should have collected and should remain in rate base. FPL does not project the over or under recovery activity of franchise fees, but rather projects the last historical balance forward to future periods. Therefore, FPL has projected a net over recovered Franchise Fee liability balance of (\$2,911,000) in the test year 2013 reducing rate base and revenue requirements.

Please see FPL's response to Staff's Seventh Request for Production of Documents No. 43 for the monthly balances and 13 month average calculation of the under and over recovered franchise fees included in the test year 2013.

Florida Power & Light Company Docket No. 120015-El Staff's Sixth Set of Interrogatories Interrogatory No. 224 Page 1 of 1

Q. Refer to MFR Schedules B-2 and B-6, page 3 of 9, line 8 and page 10 of 13, line 7, respectively. For Schedule B-2, on page 3 of 9, line 8, the total adjustment amount for Net Underrecovered Fuel, Capacity, ECCR, and ECRC is \$90,508,000. Please explain why the \$596,000 of underrecovered ECRC costs as shown on page 10 of 13, line 7 of Schedule B-6 is not included in the \$90,508,000 adjustment to rate base.

A. Only net clause underrecovery balances are adjusted from rate base working capital. The environmental clause has a net clause overrecovery balance of -\$1,890,000 consisting of the \$596,000 on page 10, line 7 and -\$2,486,000 on page 13, line 15 on MFR B-6 for the 2013 Test Year. Therefore, it is not included in the \$90,508,000 net underrecovered clause adjustment reflected on MFR B-2, page 3 of 9, line 8.

Fiorida Power & Light Company Docket No. 120015-EI Staff's Sixth Set of Interrogatories Interrogatory No. 225 Page 1 of 1

Q. With respect to the Canaveral Step increase discussed by Witness Deaton on page 22 of her prefiled direct testimony, please explain why the step increase is allocated to the base energy charge only for all rate classes, as opposed to the energy and demand charges.

A. Please see FPL's response to SFHHA's First Set of Interrogatories No. 56. Applying the step increase to energy charges rather than demand charges is administratively efficient, matches the cost with the benefit in fuel savings, and helps to mitigate the bill impacts to low load factor customers.

Fiorida Power & Light Company Docket No. 120015-EI Staff's Sixth Set of Interrogatories Interrogatory No. 226 Page 1 of 1

Q.

With respect to the CDR administrative adder discussed in Witness Deaton's testimony, Exhibit RDB-6, please explain the decrease in the adder.

### A.

The CDR adder was updated for current costs, which are less than the costs at the time the rate was established. The CDR adder is cost based. As explained in RBD-6 14:22 - 15:2, the CDR adder is calculated by taking the difference in the applicable CILC customer charge and the CDR customer's applicable tariff customer charge.

For GSD(T)-1 class, the adder = CILC1G customer charge of 100 - GSD(T)-1 customer charge of 25.00 = 75

For GSLD(T)-1 class, the adder = CILC1D customer charge of \$150 - GSLD(T)-1\$ customer charge of <math>\$25.00 = \$125

For GSLD(T)-2 class, the adder = CILC1D customer charge of 150 - GSLD(T)-2 customer charge of 100.00 = 50

For GSLD(T)-3 class, the adder = CILC1T customer charge of \$1975 - GSLD(T)-3 customer charge of \$1500.00 = \$475

Florida Power & Light Company Docket No. 120015-El Staff's Sixth Set of Interrogatories Interrogatory No. 227 Page 1 of 1

# Q.

Please explain in detail the methodology FPL used to calculate the proposed Transformation Rider credit as shown in MFR No. E-14, Attachment 2, page 27. In your response, please state whether the credit is cost based.

#### A.

The Transformation Rider rate credit (the credit), which is cost based, is calculated by dividing the revenue requirements for Distribution - Secondary Transformers by the estimated connected transformer rating divided by 12 months/year = (\$212,882k / 63,726 MVA / 12 = \$0.28/kW per month).

Note that the revenue requirements used in the calculation on MFR No. E-14, Attachment No. 2, page 27 was from a draft of MFR E-6b and does not match the final amount shown in MFR E-6b exactly (see MFR E-6b, Attachment No. 2 of 2, page 1 of 12, line 17). However, the resulting credit is not impacted. Also note that FPL inadvertently used the 2012 estimated transformer MVA rating rather than the 2013 estimate (65,617). Use of the 2013 estimate would lower the credit to \$0.27, however FPL does not propose to modify the credit as filed.

Florida Power & Light Company Docket No. 120015-El Staff's Sixth Set of Interrogatories Interrogatory No. 228 Page 1 of 1

# Q.

Please discuss and show the methodology FPL used to calculate the temporary construction service charges shown on tariff sheet No. 4.030.

# A.

See pages 5 and 6 of 8 of MFR E-7 for explanations and calculations of the charges. This same methodology has been utilized for the last several FPL rate cases.

Florida Power & Light Company Docket No. 120015-El Staff's Sixth Set of Interrogatories Interrogatory No. 232 Page 1 of 1

Q.

Distribution Reliability: Various witnesses stated FPL provides "superior", "excellent" and "reliable" service in their March 19, 2012, direct testimony. [examples include Avera p. 5; Dewhurst p. 43; Hardy p. 12; Reed p. 34; Ousdahl p. 26, 33; Santos p. 4] However, staff's review of the testimony did not discover a clear definition or guidance of what is or is not superior, excellent, or reliable service. The "Review of Florida's Investor-Owned Electric Utilities 2010 Service Reliability Report", dated November 2011, depicts FPL's historical distribution performance in Figures 3-1 through 3-8, for purposes of seeking clarification of FPL's policies, practices, and definitions as reflected in the all of the witnesses direct testimony please respond to the following:

Using the definition of "superior", as used by FPL's witnesses, please provide a listing for each of the performance metrics that states each respective metric value that, above which, would indicate FPL was not providing "superior" service in the years included in the Commission's report identified above.

A.

As stated in FPL's response to Staff's Sixth Set of Interrogatories No. 211, FPL's use of the phrase "superior level of reliability" is associated with comparing its historical SAIDI performance to other electric utilities' (e.g., other Florida IOUs or the 31 utilities in the Davies' Benchmarking study) SAIDI performance. These comparisons indicate FPL's SAIDI performance is "of higher rank," and "better" than the other utilities - both words/phrases that are contained in standard dictionary definitions of "superior." FPL's claim to providing superior reliability is based upon its SAIDI performance, a useful standard industry measure of how much time customers are out of service, and the best overall indicator of reliability since it is the product of two other standard industry metrics, SAIFI and CAIDI. On pages 65-73 of the FPSC's Review of Florida's Investor-Owned Electric Utilities 2010 Service Reliability Report", dated November 2011, inter-utility comparisons for various reliability performance and reliability-related complaint metrics are provided. These comparisons show that FPL's reliability and complaint performance results compare very favorably to the other Florida IOU's, especially for 2010, the most recent year for reported comparative data. The only metric on which FPL does not compare favorably vs. the other Florida IOUs is L-Bar. This consistent strong performance, especially with respect to SAIDI - the best overall indicator of reliability - clearly qualifies FPL's reliability as "superior."

Florida Power & Light Company Docket No. 120015-El Staff's Sixth Set of Interrogatories Interrogatory No. 233 Page 1 of 1

# Q.

Using the definition of "excellent", as used by FPL's witnesses, please provide a listing for each of the performance metrics that states each respective metric value that, above which, would indicate FPL was not providing "excellent" service in the years included in the Commission's report identified above.

### A.

FPL uses "excellent" as a synonym for superior. See FPL's response to Staff's Sixth Set of Interrogatories No. 232.

Florida Power & Light Company Docket No. 120015-El Staff's Sixth Set of Interrogatories Interrogatory No. 234 Page 1 of 1

# Q.

Using the definition of "reliable", as used by FPL's witnesses, please provide a listing for each of the performance metrics that states each respective metric value that, above which, would indicate FPL was not providing "reliable" service in the years included in the Commission's report identified above.

### A.

See FPL's response to Staff's Sixth Set of Interrogatories No. 232. By providing superior reliability, FPL clearly meets the test of providing "reliable" service. Moreover, FPL's 2007-2011 SAIDI average of 75 minutes means that, on average, FPL customers have power available to them for approximately 99.99% of the time. This is a further indication that FPL's electric service is "reliable".

Florida Power & Light Company Docket No. 120015-EI Staff's Sixth Set of Interrogatories Interrogatory No. 235 Page 1 of 1

Q. Please provide a listing describing specific FPL actions taken between 2008 and year-end 2010, if any, specifically directed at achieving the trends shown in Figures 3-1 through 3-8. Include in your response the annual budgeted and actual program expense levels.

# All of FPL's reliability initiatives are implemented to achieve improved reliability performance, irrespective of a reliability or complaint metric's trend (positive or negative). Below is the list of the reliability initiatives provided and described in Exhibit GKH-2, along with associated budget/actual expenses for 2008-2010. Each of the programs listed below would have an impact on the final results/trends shown in Figures 3-1 through 3-8.

	<u>2008 \$</u>		<u>2009 \$</u>		<u>2010 \$</u>	
<u>Program</u>	<u>Actual</u>	<u>Budget</u>	<u>Actual</u>	<u>Budget</u>	<u>Actual</u>	<u>Budget</u>
Hardening Plan *	5,178,354	6,248,950	6,560,934	6,892,427	2,888,114	3,660,858
Pole Inspections *	12,654,048	14,417,530	10,896,010	13,023,779	10,662,172	15,063,872
Vegetation Management *	57,936,677	63,400,000	52,650,362	68,300,000	57,600,257	61,489,010
Feeder/Lateral Cable	1,498,387	1,552,200	1,088,246	1,407,291	2,210,231	1,762,391
Priority Feeders	2,403,385	1,543,556	1,360,064	944,027	1,229,333	2,176,652
Overhead Line Inspections	1,443,495	2,652,326	732,436	1,073,546	1,624,333	3,379,593
Vault Inspections	892,515	1,273,754	665,460	1,119,777	1,280,230	1,908,992
Submarine Cable			2,327	111,205	4,999	
VAR Management	496,598	1,139,486	389,188	1,462,239	215,008	350,105
Switch Cabinets	25,840	63,084	10,223	98,099	16,828	
Handhole Inspections	3,050,431	1,262,591	2,905,849	4,373,580	2,900,077	2,818,997
Small Wire Replacement	9,515		219		527	
Cathodic Protection	33,369	227,400		201,044	167,778	57,100
System Expansion	1,098,237	2,389,395	412,676	1,749,711	235,976	188,735

<sup>\*</sup> Hardening/Storm Preparedness programs which also provide day-to-day reliability benefits

Florida Power & Light Company Docket No. 120015-El Staff's Sixth Set of Interrogatories Interrogatory No. 236 Page 1 of 1

Q.

Please provide a listing describing specific FPL actions taken between 2008 and year-end 2010, if any, specifically directed at reversing any negative trends shown in Figures 3-1 through 3-8. Include in your response the annual budgeted and actual program expense levels.

A.

See FPL's response to Staff's Sixth Set of Interrogatories No. 235.

Florida Power & Light Company Docket No. 120015-EI Staff's Sixth Set of Interrogatories Interrogatory No. 239 Page 1 of 1

# Q.

Please refer to witness Reed, at page 34, line 12. Witness Reed states "FPL has done an exceptional job of controlling costs . . ." Please provide a listing of the documents witness Reed relies on to make this statement.

# A.

This statement is based on a review of economic trends in terms of the cost of labor and materials as published by the Bureau of Labor Statistics, as well as a review of recent revenue growth as shown in FERC Form 1 filings. These two factors have put enormous pressure on FPL to control its cost of doing business. Even under these increased pressures, an analysis of non-fuel operational and maintenance expenses, which is the best indicator of a company's ability to control costs, shows that FPL outperformed its peers consistently over the past 10 years.

Renae B. Deaton

State of Florida

County of Palm Beach

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this 17th day of 1012.

Maci D. Joldwire
Notary Public, State of Florida



David T. Bromley

State of Florida )
County of Broward )

I hereby certify that on this 16th day of May, 2012, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared David T. Bromley, who is personally known to me, and he acknowledged before me that he sponsored the answers to Interrogatories 188-221, 228 and 232-237 from the Florida Public Service Commission Staff's Sixth Set of Interrogatories to Florida Power & Light Company in Docket No. 120015-EI, and that the responses are true and correct based on his personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this 16th day of May, 2012.

Notary Public, State of Florida



John Reed

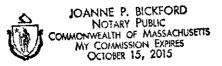
Commonwealth of Massachusetts)

County of Middlesex

I hereby certify that on this 21 day of May, 2012, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared \_\_\_\_\_\_\_ John J. Reed\_\_\_\_\_, who is personally known to me, and he/she acknowledged before me that he/she sponsored the answer(s) to Interrogatory No(s). 238 -239 from \_\_\_\_\_ Florida Public Service Commission Staff's Sixth \_\_\_\_ Set of Interrogatories to Florida Power & Light Company in Docket No. 120015-EI, and that the response(s) is/are true and correct based on his/her personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this Alay of May, 2012.

Notary Public, Commonwealth of Massachusetts





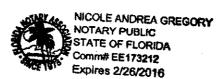
Kim Ousdahl

State of Florida				
County of Palm Beach	)			

I hereby certify that on this <u>21</u> day of <u>May</u>, 2012, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared Kim Ousdahl, who is personally known to me, and she acknowledged before me that she sponsored the answers to Interrogatory Nos. 224 and 229-231 from Staff's 6<sup>th</sup> Set of Interrogatories to Florida Power & Light Company in Docket No. 120015-EI, and that the responses are true and correct based on her personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this 2 day of 7/2, 2012.

Otary Public, State of Florida



# <u>AFFIDAVIT</u>

Robert E. Barrett, Jr.)

State of Florida

County of Palm Beach)

)

I hereby certify that on this <u>w</u>day of <u>Hay</u>, 2012, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared <u>Robert E. Barrett, Jr.</u>, who is personally known to me, and he/she acknowledged before me that he/she sponsored the answer(s) to Interrogatory No(s). <u>222</u> and <u>223</u> from <u>Staff's Sixth</u> Set of Interrogatories to Florida Power & Light Company in Docket No. 120015-EI, and that the response(s) is/are true and correct based on his/her personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this 22 day of \_\_\_\_\_\_\_\_, 2012.

Notary Stamp:

Notery Public State of Florida
Jannifer A Reklinski
My Commission DD944536
Expires 02/27/2014

# 44

FPL's Responses to Staff's Seventh Set of Interrogatories (Nos. 240, 241, 242 (CONFIDENTIAL), 243-249, 260-274, 277-279, and 284-293) Florida Power & Light Company Docket No. 120015-El Staff's Seventh Set of Interrogatories Interrogatory No. 240 Page 1 of 1

# Q.

For questions 240-249, please refer to FPL's response to SFHHA's First Set of Interrogatories, Interrogatory No. 129, Attachment No. 2, pages 1 and 2.

The Company stated that the Fort Drum Plant was purchased to construct a power facility in future periods. Please explain in detail what plans FPL has made for the construction of the power facility, such as, proposed date of construction and determination of need.

### A.

Please see Attachment No. 1 to FPL's response to Staff's Seventh Set of Interrogatories No. 249 for a discussion of FPL's plans for the Fort Drum site. As discussed in that response, FPL does not currently have a specific expected in-service date for generation facilities at this site. Rather, FPL acquired the site in order to have definite, secure access to a desirable location to support future generation expansion. As such, FPL does not currently have a proposed date of construction or determination of need.

Florida Power & Light Company Docket No. 120015-El Staff's Seventh Set of Interrogatories Interrogatory No. 241 Page 1 of 1

# O.

For questions 240-249, please refer to FPL's response to SFHHA's First Set of Interrogatories, Interrogatory No. 129, Attachment No. 2, pages 1 and 2.

Please provide a listing of the additional lands included in the Hendry County land purchase, the number of acres, amount paid, and date(s) purchased.

### A.

Please see FPL's response to Staff's Third Set of Interrogatories No. 57. FPL expects to purchase the Hendry County land (Parcels A-B) during 2012 and 2013 for a total cost of approximately \$70 million.

Florida Power & Light Company Docket No. 120015-El Staff's Seventh Set of Interrogatories Interrogatory No. 242 Page 1 of 1

# Q.

For questions 240-249, please refer to FPL's response to SFHHA's First Set of Interrogatories, Interrogatory No. 129, Attachment No. 2, pages 1 and 2.

Please explain in detail why it is necessary to have water rights for the McDaniel site. In your response, identify the cost of the water rights, if any.

### A.

See Attachment No. 1.

The attachment responsive to this interrogatory is confidential and will be made available to Staff for inspection at FPL's Tallahassee Office at 215 South Monroe Street, Suite 810, Tallahassee, Florida, during regular business hours, 8 a.m. to 5 p.m., Monday through Friday, upon reasonable notice to FPL's counsel.

Florida Power & Light Company Docket No. 120015-EI Staff's Seventh Set of Interrogatories Interrogatory No. 243 Page 1 of 1

# Q.

For questions 240-249, please refer to FPL's response to SFHHA's First Set of Interrogatories, Interrogatory No. 129, Attachment No. 2, pages 1 and 2.

Please explain in detail how much of the Hendry County land is needed for the McDaniel site outside of the 3,200 acres provided for the site's future generation facility. In your response, please state what the Company's plans are for any remaining acreage.

### A.

The 3,126 acre McDaniel site provides the necessary land for the power generation facilities as well as mitigation for wetlands and endangered species for future combined cycle facilities. FPL identified a strategy to purchase adjacent lands for water access as the most optimal cost solution for customers. FPL's plans for purchasing adjacent properties for access to water are as follows:

- PARCEL A In 2012, FPL has a contract to purchase approximately 4,742 acres east of the site at a cost of \$7,381/acre to provide the water supply required for the first combined cycle unit.
- PARCEL B In 2013, FPL has an option to purchase an additional 4,667 adjacent acres north of the site at a cost of \$7,499/acre for the additional water rights needed for a second combined cycle unit.
- PARCEL C In 2016, FPL has an option to purchase acreage northeast of the site for additional water rights that may be needed for a third combined cycle unit. The amount of land required and contract price have not yet been determined.

See further discussion regarding the water rights associated with adjacent lands at FPL's response to Staff's Seventh Set of Interrogatories No. 242.

Florida Power & Light Company Docket No. 120015-El Staff's Seventh Set of Interrogatories Interrogatory No. 244 Page 1 of 1

# Q.

For questions 240-249, please refer to FPL's response to SFHHA's First Set of Interrogatories, Interrogatory No. 129, Attachment No. 2, pages 1 and 2.

The Company's explanation for the purchase of the PGA Blvd property was for "future growth and business continuity purposes." Please explain in detail what the Company means by the statement "business continuity purposes."

### A.

In this instance, business continuity was meant to capture space availability in future periods to house personnel/operations from various geographic locations in FPL's service territory. Additionally, the PGA Blvd. property, which is located off the barrier island and outside of hurricane evacuation zones, would serve as an alternate location in the event that FPL's headquarters in Juno Beach was temporarily inaccessible due to a hurricane or other significant event.

Florida Power & Light Company Docket No. 120015-El Staff's Seventh Set of Interrogatories Interrogatory No. 245 Page 1 of 1

# Q.

For questions 240-249, please refer to FPL's response to SFHHA's First Set of Interrogatories, Interrogatory No. 129, Attachment No. 2, pages 1 and 2.

Please provide a detailed explanation as to what is included in the Company's planning processes for the PGA Blvd. property as it relates to "future growth and business continuity purposes."

### A.

FPL continually evaluates its operations to determine the right facilities and personnel to best serve customers. The PGA property presented an opportunity for Company to secure, at a greatly discounted price, additional FPL-owned corporate office space to accommodate expected long-term growth. The purchase also provides a centralized location off the barrier island to house personnel and operations in the event that FPL's Headquarters in Juno Beach becomes temporarily inaccessible due to a hurricane or other significant event.

Florida Power & Light Company Docket No. 120015-El Staff's Seventh Set of Interrogatories Interrogatory No. 246 Page 1 of 1

Q. For questions 240-249, please refer to FPL's response to SFHHA's First Set of Interrogatories, Interrogatory No. 129, Attachment No. 2, pages 1 and 2.

Please describe whether the PGA Blvd. property was purchased for use by a specific business unit. If so, please specify which business unit, and why it was purchased by that particular unit.

A.

The PGA Blvd. property was not purchased for use by a specific business unit.

Florida Power & Light Company Docket No. 120015-El Staff's Seventh Set of Interrogatories Interrogatory No. 247 Page 1 of 1

# Q.

For questions 240-249, please refer to FPL's response to SFHHA's First Set of Interrogatories, Interrogatory No. 129, Attachment No. 2, pages 1 and 2.

For the remaining transmission, distribution, and general plant/property held for future use, please state the number of acres purchased for each site.

# A.

Please see Attachment No. 1 to FPL's response to Staff's Seventh Set of Interrogatories No. 249.

Florida Power & Light Company Docket No. 120015-El Staff's Seventh Set of Interrogatories Interrogatory No. 248 Page 1 of 1

# O.

For questions 240-249, please refer to FPL's response to SFHHA's First Set of Interrogatories, Interrogatory No. 129, Attachment No. 2, pages 1 and 2.

Please explain in detail why the Company's plans for the McDaniel site and the additional Hendry County land were not included in the 2012 Ten Year Site Plan.

### A.

The Hendry County site (i.e. the 3,126 acre McDaniels Site) is included in FPL's 2012 Ten Year Site Plan (pages 153-154) as a Potential Site under the description of "Hendry County." At this time, the need for additional generation beyond the 2016 Port Everglades Modernization is outside of the ten year planning horizon. However, load forecasting is a dynamic process that changes annually based on many factors, some of which are unpredictable in nature. FPL must be prepared to respond to factors such as changing demands for power supply, changes in the availability of generation from other planned resources, or changes in the required reserve margin. For example, there are at least two considerations that could accelerate FPL's need to add generation resources before the end of the ten year planning horizon. First, if the in-service dates for FPL's planned new nuclear units (Turkey Point units 6 and 7) were to be delayed beyond the current projection of 2022-2023, FPL would likely find it beneficial for customers to build a combined cycle unit in 2021 rather than making a short-term power purchase that year. Second, it may become appropriate for FPL to add generation resources in 2020 or earlier beyond those identified in the 2012 Ten Year Site Plan, in order to maintain a sufficient percentage of its reserve margin from generation as opposed to demand site management (DSM).

It is becoming increasingly difficult to acquire large parcels of contiguous land in FPL's service territory that are suitable for power plant siting (e.g. near FPL's load and proximate to transmission). Due to the time frame needed to site, purchase, obtain required licenses, permits and approvals, and construct power generation facilities, FPL needs to begin the planning process for siting new generation facilities many years in advance. The Hendry site remains an excellent option for FPL's future power generation needs due to its close proximity to FPL's load center and existing transmission corridor.

Florida Power & Light Company Docket No. 120015-El Staff's Seventh Set of Interrogatories Interrogatory No. 249 Page 1 of 1

### Q.

For questions 240-249, please refer to FPL's response to SFHHA's First Set of Interrogatories, Interrogatory No. 129, Attachment No. 2, pages 1 and 2.

For each of the parcels of land held for transmission, production, distribution and general future use, please provide a listing of the assessed value for each parcel owned and held in property held for future use since Order No. PSC-10-0153-FOF-EI issued on March 17, 2010.

### A.

Please see Attachment No. 1.

Note: Information provided in Columns A, D-K was previously provided by FPL in response to OPC's Sixth Set of Interrogatories No. 124.

		2011		Prior Year 2012	Test Year 2013	Purchase	Expected in Service			
Property Name	Parcel ID #s	Assessed Value	Cost	13 mo avg.	13 mo avg.		Date	Capacity	Planning	Description
NUCLEAR FUTURE USE (transferred to Other Production 12/11):										
DESCITO (PRICE PURCHASE)			154,272	154.272	154,272	Dec. 1974	Note	Note 1	Note 1	Approximately 30 Acres in The Ne 1/4 Of Section 27, T365, R25E, Deaoto County.
CEOCIO (PRICE PURCHAGE)			26,595	28,595	26,595	Aug. 1975	Note	Note 1	Note 1	Approximately 120 Agres In The Se 1/4 Of Section 29, T365, R25E, And The Sw 1/4 Of Section 28, T365, R25E, Desoto County
DESOTO PLANT SITE	SEE TAB 'DESOTO PLANT' Total Taxable Value does not include the solar	3,100,377	9,135,401	9,135,401	9,135,401	Dec. 1974	Note 1	Note	Note 1	Approximately 13,305 Acres Northeast Of Arcadia in Desoto County.
	plant property									
total Nuclear Future Use (transferred to Other Production 12/11):		3,100,377	9,316,280	9,316,268	9,316,268					
OTHER PRODUCTION FUTURE USE:										
Fot Drum	1-01-33-35-0A00-0001-0000, 1-02-33-35-0A00-0001-0000, 1-11-33-75-0A00-0000; 1-13-0A00-0000; 1-13-33-35-0A00-0001-0000; 1-33-35-0A00-0001-0000	913,445	17,754,918	17,754,918	17,754,918	June 2011	Note 2	Potential for up to 3 combined cycle (1,200 MWs) units burning	Note 2	Approximately 2,632 area of land in Okeephobee County Section 1,2 (1,12 & 12: Township 335; Range 35E
MC Daniel Site	1-91-47-00-A00-0009 (-91-47-04-A00-	200 101	14.00	700	22 222		╀-	SEG IR THE		
Henric Py I and	502; 1-33-472-00-002; 1-33-472-77-000; 1-33-472-77-000; 1-33-472-00-002; 1-33-472-77-00-002; 1-33-47-28-00-002; 1-33-47-28-00-002; 1-33-47-38-00-001; 1-33-47-38-00-001; 1-33-47-38-00-000; 1-33-47-38-000; 1-33-47-78-000; 1-33-47-78-000; 1-33-47-78-0000	494,880	41,975,443	39,881 1552	39,981,552	June 2011		Potential for up to 3 combined cycle (1,200 MWs) units burning natural gas	No.	Approximately 3,126 Acres of fand in Hendry County for Mc Daniel Site - Sections 20,21, 22, 27, 28, 29, 33 & 34, Township 475, Range 33 E
Hendry Cly Land		9	70,000,000	32,342,908	51 214 773	Note 2	Note 2	Note 2	Note 2	Approximately 9,426 acres of land in Hendry County, adjacent to the McDaniels Site.
Total Other Production Future Use		1,378,105	129,730,361	90,079,378	108,951,243			j		
TRANSMISSION FUTURE USE:						!				
BOB WHITE SUBSTATION: BOBWHITE SUBSTATION - ACQUIRÉ SITE	0208-01-0001	215 132	A 114 A 253	4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4	4 4 7 4 7 6 7		3		1	
DOD WALTE LANGTER JOANS TOANS I NE		£10, tox		4, 104,000	4, 134,353	JBD. 2007	D#G 2073	5	Note 3	Approximately 39.02 acres of land for the Bobwhite Transmission Substation in Sarasota County, FL
DOD WITH IT MANY IEE ZONY KANS LINE		-	2,831,410	653,402		June 2011	Dec 2014	NA A	Note 3	Sartisota County, FL
Total Bob White Substation		215,132	6,965,763	4,787,755	4,134,353			1		
GACO: Gaco Site Prep			3,498,325	3,498,325	3,498,325	Nov. 2010	Dec. 2021	\$	Note 3	She preparation for new ACCO substation in Volusia County El
GACO TRANS SWITCHING STATION - ACQ SITE	7114-00-00-0160	350030	100 500	103	100 500	+				Site preparation for new bacco substation in volusia county, FL
GALD I KANS SWITCHING STATON - ACQ SITE	7114-00-00-0160	259,038	4,103,599	4,103,589	4,103,599	Oct. 2007	Dec. 2020	Š	Note 3	Section 23 & 26, Township 175, Range 31E, Volusia County, FL. Approximately 200 acres for a new 500/22004 CA/CO transmission switching substation. An increase in transmission capability is needed to support load growth in Northeast FL.
		259,038	7,601,924	7.601,924	7,801,924			-		
GREEN:										
GREEN TRANS SWITCHING STATION-ACQ SITE	00 42 43 27 05 067-0112; -0182; -0050; - 0101; -0191; -0201	263,858	9,777,915	9,777,915	9,777,915	Sept. 2006	2020-21	N A	Nota 3	Approximately 60 acres of land for the Green Transmission Substation in Section 24 committee 45 Range 41 Parts Beach County, F1 for a 509kV transmission switching station. The purchase was based on the need for additional abortized injection to the southern portion of FPL's system. A new 509kV transmission line is proposed to be constructed from the existing Corbest Substation to this new site.
ST JOHNS-PELLICER-PRINGLE:					; ;					

Property Held for Future Use

ST JOHIS PELLOER PRINCIE ACQUIRE EASIANT  TLEVEL CONSERVATION FOR PROPERTY UNGER SK GONSERVATION FOR STONY LINE  AGREGATE TRANSMISSION PROPERTY UNGER SK GALLOWAY SOUTH MANN LOOP TO S WEST SUB  TO SEWELL SANDPER - ACQUIRE EASEMENTS  PROLO INJECTION  INJE	30-2917-001-0591; 30-2921-001-0290; 30-2917-001-0591; 30-2921-001-0250	32.300	6,808,945 6,8071,738	6,908,946 5,671,738	6,600,945 6,671,738	Dec. 2010 April 1995	Dec 2016  June 2021	N/A N/A	Note 3	Description  St. Johns Policer Pringle Acquire Essenants On Burnell St. Johns Line (83 44 agres)  Approximately 33 Miles Of Right-Of-Way, Typically 200" in Width, For One 500Kv Line Belween Conservation And Leves Substitutes in Broward And Dade Counties (4 parcets 37 16 agres)
15 B 85	.001-0691; 30-2917-001-0940; -001-0691; 30-2921-001-0250	32,300	5.671,738	ŝ.671,738	5.671,738	April 1995	June 2021	N/A	Note 3	Approximately 33 Miles Of Right-On-Way, Typically 200' in Width, For One 500K; Line Between Corresevation And Lavies Substitutes in Broward And Dade Counties (4 parcets 37.15 acres)
2	-001-0591; 30-2921-001-0250	32,300	5,6/1,/38	5,671,738	1	April 1995	June 2021		Note 3	Approximately 33 Miles Of RejN-CD-Way, Typically 200 in Width, For One 500kv Line Belween Conservation And Levies Substitutions in Broward And Dade Counties (4 parcets 37 16 acres)
15 B 8							1	:		:
		+	1,834,050	1,634,050	1,834,050	Oct 2005	TBA	N/S	Note 3	Approximately 1.1 miles of land in S14&23, T54S, R40E, Memi Dade County for the
			1,767,016	767,016	1,767,016	Feb. 2008	June 2017	NA A	Note 3	Galloway-South Miami Loop To Southwest Substation. Section 5, Township 36, Range 41, Martin County (1.99 acres)
			1,636,769	377,716	- 1	June 2011	June 2017	Ä	Note 3	Prior Injection Acquire Standards, A Priorn Off Lot, it, Palmatto Unrecorded Subdivision Located in Section 23, Township 17, South, Range 31 East, Volusia County, Florida (7.69 acres)
	17308.0015.8: 18742.00007: 18759.1070/9: 18921.0010/6: 18685.0010/7	525,741	1,518,475	1,516,475	1,518,475	June 1996	TBA	NIA	Note 3	Approximately 6 Mées Of Right-Ot-Way in Manatee County. Total Acreage Originally Purchased 25 87 Acres On Wo 2510-70-507.
	76 PARCELS - SEE TAB "TP-LEVEE RW" FOR PARCEL IDS	7,658,783	1,444,922	1,444,922	1,444,922	July 1977	2022-2023	N/A	Note 3	Env Right-Of-Way, 330 Feet in Width And Containing 1560 Acres Traversing South And West Dade County.
POSSUM TRANSMISSION SWITCH STATION ACQ HARBOR PUNTA GORDA #2 - ACQ FASEMENTS ARCH CREEK	25 PARCELS IN LEE COUNTY SEE TAB "DESOTO ORG RIV R/W" FOR PARCEL IDS	695,988	900,792	900,792	900,792	July 1978	īBĀ	N/A	Nota 3	Approximately 4.25 Miss Of Various Width Right-Of-Way (250-390 Feet) From Örange River Ehy Substation North To Approximately 2 Miles North Of FI Myers Plant.
HARBOR PUNTA GORDA #2 - ACQ EASEMENTS  ARCH CREEK	30-3921-000-0020	3,670,438	789,030	789,030	789,030	Jan. 1996	2022-2023	N/A	Note 3	Property Plat For Leves Substatton, FPL usins approximately – 85.5 Acres. Expenses Associated With The Expension Of The 500kV Yand (Site Prep Accounts 352 And 353). in 1890, Et (1983-96). For The FILL And Grade For A SOOKY Yand Spansion.
ARCH OREEK	8438-01-00-0970	66,495	751,505	751,505	751,505 h	March 2008	2020-2021	¥.	Note 3	Section 38, Township 18S, Range 34E, Volusia County, Acquire Approximately 23 Acres For Possum Transmission Switching Substation
C. C. C.	=		738,483	738,483	738,483	Sept. 2008	B	Ş	Note 3	Acquire Approx. 2 Miles Of Transmission Right Of Way For The Harbor-Punta Gorda #2 Line Section 6, Township 41, Range 23 And Section 36, Township 40, Range 22
	06-2229-000-0100	1,761,711	682,809	682,809	i	Dec. 1993	TBA	Z,	Note 3	Approximate 1,49 Acres in Section 29, 152, Dade County, North Of The Existing Arch Craek Substation. 35010 - Land 35200 - Structures & Improvements
ANAN SUB & ANAN-YOLUSIA ZSUKY RAY LINE 5165,07 5162,07 Drusia-P Dryser	5107-00-00-000, 5109-00-00-0011; 5108-00-00-000 The substation site value is included in parcels labeled as Eura-Pojnsett RAW, and is not included in this total because it is unknown which properly the substation is located on.	99. 533 36	619,861	519. 851	519, 961	Dec. 1988	TBA	N.	Note 3	Acquire Silve For Proposed Rims 500 Kv Sub (227 4 acres) And Acquire RWF For Six 230 Kv Line (56 acres) From The Proposed Rims Sub To Provide integration into The Existing 230 Kv Transmission System.
	9442-02-00-0400; 8402-01-04-5960; 8402 01-04-5980	24,235	585,186	585,188	585,188	Nov. 1994	2020-2021	N/A	Note 3	Approximately 1.5 Miles Of R/W From The Scottsmoor To The Edgewater Substations in Volume County.
RAVEN - ACQ TRANS SUB (FKA-PRICE TRANS)	12-45-17-08323-003	102,012	568,890	568,890	568,890	May 2008	2020	N.	Note 3	Approximately 21 Acres Of Land in Columbia County. Section 12; Township 4S; Range 17 08373-00Hx.
VOLUSIA-SMYRNA 115KV RAW WILLOW SECT ACQ	8309-00-04-0030	293,246	566,376	566,376	566,376	Mar. 2003	June 2017	NA	Note 3	Section 2 And 11 , Township 16, Range 32, Volusia County/Acquire Two Miles Of Right Of Way.
DUVAL-KINGSLAND-O'NEIL RW-ACQ ESMNT		-	423,982	423,982	423,982	Oct. 2007	2018-2019	Z/A	Note 3	Section 1, Township 3 South, Range 23 East And Section 36, Township 2 South, Range 23 East, Duvat County (2,58 acres)
ENGLEWOOD-PLACIDA-MYAKKA			298,406	298,406	298,406	Dec. 2003	2012-2013	\$	Note 3	Englewood-Plaudia-Mykista. The Rotonda And Goineral Development Corporation Projects In And Actumid The Flateda Area with Acad Additional-Load to This Area. Largi Sciala Land Development Medie II. Mandatory That The Hight-Chiving Fox A. Transmission Line To S. 14 100 Development Medie II. Mandatory That The Hight-Chiving Fox A. Transmission Line To S.
ANGLER INTERCONNECT TRANS, RW - ACQ EAS		!	196,078	196,078	196,078	Mar. 2009	June 2017	N.	Note 3	Approximately 4 miles of line in Coller County for Angler Interconnect Transmission Right of Way, Section 10. Township 48: Rayge 256

Property Held for Future Use

:		2011		Prior Year 2012	Test Year 2013	Purchase	Expected in Service			
Property Name	Parcel ID #a	Assessed Value	Cout	13 mo avg.	13 mo avg.	Date	Date	Capacity	Planning	Description
COMMERCE SUBSTATION TRANS LOOP ACQ ESUIT			179.028	i	179,028	Oct. 2007	Jan. 2018	NA.	Note 3	Approximately 2.58 acres of land in Section 35, Township 535, Range 39E, Manni Dade
CENTER SUB TRANS PULL OFF - ACQ EASMENTS  LINE TO PORTSAID SUB			27 998 27 177	27,998 27,177	27,998 27,177	Aug 2006 Dec 1995	Dec. 2018	¥ ¥:	Note 3	County by the Commerce Substation.  \$17,1736 R 19E. Sarsada County (1,62 ft. x 50 ft.)  Tentanistical Exament (D07704910 Acquired Returned Str 2110 Acquired Returned Str 2110 Acquired Str. 2016 Acquired
BOBWHITE LINDVEST LAND SWAP	0221-01-3313	3,017	5,474	5,474	5.474	Dec. 2010	Dec 2014	N/A	Note 3	Orb 17052, Page 5517 From Cax Trausportation Inc. (11.551 ft.)  BOWNite: Indvast Land Swap of 19.79 acres of land in Sarasota County, Section 22:  Range 36: Township 19. Transaction is an even even. There is no exchange of montes.  (19.8 acres)
Total Aggregate Transmission Under 5%		14,301,202	15,562,309	14,303,256	13,825,540		-	-		
TOTAL TRANSMISSION FUTURE USE		15,071,630	52,383,593	48,951,533	47,920,415					
DISTRIBUTION FUTURE USE BRONCO SUB - ACQ DISTRIBUTION SUBSTATION	0137-01-1822 0137-01-1828	470.570	4 084 145	1.875.759		Jan 2009	hing 2012	Z.		Approximately 144 Area Of I and to December 17 and
ASANTE SUB (FKA HYPERNAP)	2000		7,004,140	1,010,100		<del>-</del>	2012	Š		Approximately 1.44 Acres Of Lerid it Broward County For Brosco Substation (New Substation). Section 15, Township 50; Range 41E.
RAINTREE SUBSTATION - ACQ SITE	0037410, 0037411, 0037412, 0037413, 0037414, 0037415	3,088,540 476,955	3,156,227	3,156,227	3,156,227	June 2004 Dec. 2007	June 2018 June 2016	N/A	Note 4	Approximately 7.8 acres of land in Section 19, T 49, R 42, Broward County.  Approximately 4.82 Acres Of Land in Charlotte County For Raintree Substation. Section 4:
COMMERCE SUBSTATION - ACQ SITE	30-3935-008-0020	881,656	2,739,091	2,739,091		Dec. 2007	June 2016	8	Note 4	2.58 Acres of property for the Commerce Substation in Miami Dade County.
ZEADEN GIG GOOGLAINA	9210-00-0473	1,281,440	2.510,370	2,510,370		Dec. 2002	June 2018	N/A	Note 4	Approximately 3.5 acres of land in Section 10, Township 49, Range 42, Broward County for the Powerfine Substation.
ANGLER SUBSTATION - ACQUIRE SITE	145240000	1,581,230	2,509,723	2,509,723 2,065,469	2,509,723 2,085,469	Aug. 2002 Jan. 2007	June 2019 June 2018	N/A	Note 4	Approximately 4.83 Azas in Broward County for the Ziladen Substation.  Approximately 3.5 acres of land in Section 10, Township 48, Range 25, Collier County for the Ander Substation (Distribution Suh.)
BECADIO DE ALICIN SI E ACC	01-3126-012-0330; -0340; -0350; -0360; 0540	382,636	2,045,637	2,045,637	2,045,637	Dec. 2007	June 2019	N/A	Note 4	Miami Dade County - Sec26; Twp53 S. Range 41E ( 72 acres).
TREELINE SUBSTATION - ACQ SITE	30-3110-001-0010	386,106	1,861,500	1,861,500		Aug. 2008	June 2019	NA.	Note 4	- 1
TIMUCAN SUBSTATION ACQUIRE SITE	2,2000 10000 0000	521,099	1,714,138	1,714,138			June 2019 June 2018	¥ \$	Note 4	5.195 Acres of land for the Treeline Substation (Distribution Sub.) in Lee County. 3.92 acres of land in Manatee County for the Timucan Substation.
MUSTANG - ACO DI SUB	2000-00-00-00-00-00-00-00-00-00-00-00-00	,188,000	1,000,143	1,560,143			Dec. 2019	Š	Note 4	Approximately 2.27 acres of land in Dade County for Pennsucco Substation Expansion. Section 31; Township 525, Range 40E.
PRATE SUBSTATION - ACO SITE	20-43-26-00-00010.0010	164,424	1,524,872	1,524,872		Dec. 2007	June 2018	. ×	Note 4	Approximately 15.1 acres of land in Lee County for the Mustang Substation. Section 26: Township 43; Range 26
NEMBAIR OF TRACTATION AND TRACTATION OF TRAC	B104000	457,386	1,230,042	1,230,042	1,230,042	Sept. 2006	June 2016	N/A	Note 4	Approximately 6.45 Acres of land in Manatee County for the Pirate Substation, Section 7; Township 35; Range 19 - Manatee County
MINTON SI BISTATION , ACC SITE (FKA LENDY)	07790,0240/9	211,888	1,028,785	1,026,785		Jan. 2007	June 2019	Š		Approximately 3.7 acres of land in Section 7, Township 34, Range 18, Manatee County for the Mamphis Substation (Distribution Sub.) in Manatee County.
HARGROVE SUBSTATION - ACQUIRE SITE	18-11-30-0000-01010-0063	239,250	1,000,545 886,415	866,415	866,415	June 2005	June 2018	N N	Note 4	4 Acres In The NW 1/4 Of Section 19, T495, R41E, Brevard County  Secres of land in Section 29, Township 59, Campe 40 in Flagler County located adjacent to the autisting harbon Point. Flave 240 Kv RAV.
ALION SUBSTAION	02-4203-009-7940	918,000	785,284	795,284	795,284	July 2004	June 2018	N.	Note 4	Approximately 0.177 acres of land in S 3, T 54S, R 42E, Miami Dade County for the Atton Sub.
DEERWOOD SUBSTATION - ACQUIRE SITE	100920-0090	1,246,380 363,615	788,112 787,349	788,112 787,349	788,112 787,349	Aug 1974	June 2019	A'N	Note 4	Approximately 22 6 agrae of layd in Sections 28 29 Township 7 Bases 29 St. John
ARIEL SUBSTATION, ACO SITE							1		de	County for the Deerwood Substation.
WOLESON SITE GENERAL MILEDAMAN	8424-00-00-003A	173,621	774,060	774,060		May 2008	Dec 2018	\$	Note A	Approximately 3.65 acres of land in Volusia County - Section 24, Township 18 S. Range 34 for the Ariel Substation
VERNINT STREAM AND LIBER STREAM	30-2220-002-2820 30-2220-002-2930	956,044	759,442	759,442	759,442		June 2019	N/A	Note 4	Approximately 1.81 acres of land in Section 20, Township 52, Range 42, Dade County for the Wolfson Substation
SOUTHWEST SUB-ACQUIRE ADTILL PROPERTY	PARCEL ID 30-4014-005-3500 THIS PROPERTY INCLUDES THE	1,062,480	702,668 627,322	702,688 627,322	627,322	July 2005 Sept 2009	June 2018 June 2018	N N	Note 4	Approximately 4.2 Acres of fand for the Varmont Substation in St. Johns County Approximately .49 acres of land in Miamt Dade County
RINKER	27-2019-001-0630	723,987	801,808	601,808	601,808	Mar 1994	June 2019	NA A	Note 4	Approximately 10 Acres Section 19, T52S, R40E, Dade County.

FPL Property Held for Future Use

2011

Purchase

Property Name	Parcel ID #s	Assessed Value	Cost	13 mo avg.	13 mo avg.	Date	Date	Capacity	Planning	Description
SPEEDWAY SUBSTATION (FORMERLY PELICAN)	6202-00-00-0062	250,000	520,185	- 1		<u> </u>	June 2018	N/A	Note 4	Approximately 5 agree of land Section 2 Township 16 Harris 32 Volusia County by the
V 21 INSTATION EVELLESION						  - !	i			Speedway Substation
CCT SOCSTATION EXTRAOSION	6235 00 1300	972,110	507,856	507,656	507,656	Feb. 2002	June 2019	WA	Note 4	Approximately 2.18 Acres of land in Section 35, Township 48S, Range 42E, Broward County for the apparation of Eu Scheletton
BAUER SUBSTATION - ACQUIRE SITE	30-6932-000-0330	172,970	495,141	495,141	495 141	Dec. 2012	June 2018	¥.	Note 4	2.5 Agres Of Property For The Bauer Substation in Dade County
PETSAID SUBSTATION										the contract of the contract o
PORTOALD GOSTATION	30-2128-020-0510; 30-2128-023-0310; 30-2128-023-0320; 30-2128-023-0330	844,748	487,194	487,194	487,194	Dec. 1995	June 2018	N/A	Note 4	2.76 Acres of land in Dade County, Florida for the Portsaid Substation
OYSTER SUBSTATION	0097249-500010-4	152,565	468,605			Sept	June 2016	N/A	Note 4	Approximately 2.7 Acres of land in Charlotte County for The Cyster Substation.
CHEVIER OCEVIATION	25-2N-28-0000-0002-0320	265,056	374,695		374,695	Feb. 2004	Dec. 2018	NA	Noie 4	Nassau County (5 acres)
COMMITTEE CO.	74-43-43-08-00-004-0050	1,088,645	283,268			Αug	June 2019	N/A	Note 4	2.5 Acres of additional property for the Terminal Substation in Section 9, T435, R43E, Palm Beach County
CHALLENGER (formerly Harrison St Sub)	22 35 09 00 752 1	99,570	251,661	251,661		Nov. 1994	June 2019	N/A	Note 4	2.2 Acres in Section 9, T22S, R35E, Brevard County
GEN TROG	30-4908-001-0010	199,968	232,104	232,104	232,104	Feb 2001	June 2018	N/A	Note 4	Approximately 10 Acres of land for the Green Frog Substation in Dade County South Of Tamiami Trail And West Of Sw 137 Ave. Section 8 Township 445 Banne 395
GARVEY SUBSTATION	29-36-13-KK-00000.0-000E.00	73,440	215,737	215,737	215,737	Feb. 2004	June 2019	N/A	Note 4	Approximately 2.81 acres of land in S13, T29S, R36E, Brevard County for the Garvey
PACETII	278800000	70,822	204,487	204,467	204.467		June 2019	Š	Note A	4.76 Acres in Section 36. Tiss RZBE St. Johns County
RICRI	30-37-07-00-501	5.250	117,956			Oct 1994	Aug. 2019	N/A	Note 4	6.63 Acres in Section 7, 1305, R37E, Brevard County
CENTER SUBSTATION	0428-09-0001	432,900	92,470	92,470			Dec. 2018	¥	Note 4	Approximately 5 Acres of land in Sarasota County for the Purpose Of Center Substation.
OAKFORD (FORMERLY HIHAT)	0548-00-3000	113,900	69.702		89 702	Nav 1990	June 2018	¥	Note 4	Approximately 5-28 Agree Cogated in Section 72 Tags Dans Section County
MANOR SUB(FKA MIDDLE RIVER)PURCHASE LAND	9227-53-0010	464,940	65,543	65,543	-		Dec. 2018	š	Note 4	2.89 acres in Broward County 27-49S-42E
MELALEUCA SUBSTATION	0018-00-0012	11,990	28,495		'		June 2019	N/A		Approximately 18 acres of land located in Broward County
CVH大田大CCX	0480-15-0001	69,200	21,586	21,586			June 2018	N/A	Note 4	Approximately 5.8 acres located in Sec 11, T40S, R19E, Sansota County
RECLANDS SUBSTATION	30-7803-000-0150	80,649	20,135	:	20 135		June 2019	N/A	Note 4	Approximately 7.5 Acres of land in Dade County purchased for the Redlands Substation.
OWNSHIP	28 37 36 00 768	68,040	14,520	14,520	14,520		June 2018	¥	Note 4	Approximately 4 acres in the SE 1/4 of Section 36, T28S, R37E, Brevard County
HICKSON SOBSTATION	30-8029-000-0330	221,922	1,830	1,830	1,830	Feb. 2002	June 2019	A/A	Note 4	Approximately 3 acres of land in Section 29, Township 56, Range 40 in Dade County adjacent to the existing Turkey Point- Davis 240 Kv R/W.
TOTAL DISTRIBUTION UNDER 5%		24,119,598	45,039,864	42,851,468	40, 975, 709					
GENERAL PLANT FUTURE USE:			-							
PGA BLVD CAMPUS	19 PARCELS IN PALM BEACH COUNTY AKA PARCEL 5A SEE TAB "PGA SLVD"	12,934,200	24,285,454	24,285,454	24,285,454	Dec. 2011	Juna 2015	N/A	Note 5	Note 5
NDIAN RIVER SERVICE CENTER - ACQ SITE	333901-00001-0010	1,291,780	5,951,051	5,951,051	5,851,051	Feb. 2006	Aug. 2017	A/N	Note 6	Approximately 39.02 acres of land in Section 9, Township 33S, Range 38E, Indian River County for a new service center median to serve customer crowth
TOTAL GENERAL PLANT FUTURE USE		14,225,580	30,236,505	30,236,605	30,236,605				İ	
TOTAL PROPERTY HELD FOR FUTURE USE		67,695,590	266.711.581	221 435 152	237 400 140			1		

Notes:
(1) The DeSolo Site is listed as a "Potential-Site" in FPL's most recent Ten-Year Site Pian, and it is currently home to a 25 MW photovoltaic (PV) facility, which has been in operation stock 2009. Up to an additional 275 MW of PV generation could be constructed in phases on the remaining undeveloped land. FPL has initiated permitting for the additional PV facilities, and histocorrection dates have been added, do 2014 and 2015 retained to the different phases, assuming that FPL is able to obtain cost recovery approved for the additional PV facilities. See Staff's 3rd Set. INT 59 for further discussion on the DeSolo Site. Also, the assessed value of the DeSolo site currently being held for Future Use accludes three (3) parcets totaling 540 acres which are currently being used for the existing 25 MW photovoltaic (PV) solar facility (phases see tab labeled "DESOTO PLANT" for details).

(2) The Hendry County property (i.e., Hendry Cy, Land and McDaniel Site) and the Okeachobee County property (i.e., Fort Drum) were both acquired for future use as generation sites (most likely, combined cycle gas-freed and/or renewable generation (scales). FPL does not currently have a specific expected in-service date for generation facilities.

In a finese sites. FPL is originately supposed to the combined provides in order to have definite, secure access to destable locations with necessary water (gibts for future generation expected for electricity is growing at the service date for proving at the service date for electricity is growing at the service date for electricity at growing at the service date for electricity is growing at the service date for electricit

Florida Power & Light Company
Docker Na. (12015-E)?
Staff's Seventh Set of Interrogatories
Interrogatory No. 249
Attachment No. 1
Tab i of S

FPL
Property Heid for Future Use

(3) On an annual basis, FPI conducts planning situates to determine what facilities will be needed over the rest on years in order to meet NERC relability standards. Typically, project resulting from these studies require FPI to purchase properly which can require zoning, permitting or relatively somment domein proceedings. Typically, projects studies as studies require FPI to purchase properly which can require zoning, permitting or relatively somment domein proceedings. Typically, projects studies require FPI to purchase properly which can require zoning, permitting or relatively somment domein proceedings. Typically, projects studies require FPI to purchase properly which can require zoning, permitting or relatively somment domein proceedings. Typically, projects studies require FPI to purchase properly which can require zoning, permitting or relatively somment domein proceedings. Typically, projects studies require FPI to purchase properly which can require zoning, permitting or relatively somment domein proceedings. 13 mo avg. 13 mo avg. Capacity

(4) Generably, the need for a distribution substation site is identified based upon a load forecasting/planning honzon of up to tan years. Distribution substation sites needed within a 5-year range require more detailed plans, including design, construction, budgeting and a more definitive in-service dates beyond the current 5-year planning window.

(5) in June 2011. FPL purchased approximately 75 acres tocated 5 miles east of FPL's Headquarters in Juno Beach, FL (the Property) for the purpose of expanding its current headquarters, potentially as early as 2015, to accommodate the expected long-term growth at FPL. The Company has no plant to use the Property for spinos at use the Property for \$10 million less than the appraised value of \$35 million, and it is located of the barrier island and outside of the food and hurricane execution zones.

(6) The in-service date is based on FPL's system planning projections.

Florida Power & Light Company Docket No. 120015-EI Staff's Seventh Set of Interrogatories Interrogatory No. 260 Page 1 of 1

### Q.

Please refer to witness Morley's direct testimony, pages 23 and 27. Lee County's estimated increase in load as stated on Page 23 is 2.17 percent in 2012 and 1.55 percent in 2013 (based on the growth in estimated GWhs), and FPL's forecasted increase in load is 1.4 percent in 2012 and 1.1% in 2013 as stated on page 27. Given their geographic similarity, please explain why it is reasonable to expect that FPL's load will grow more slowly in 2012 and 2013 than Lee County's load during that same time period.

#### A.

The term "Lee County" used in the testimony of witness Morley refers to the not-for-profit electric distribution cooperative serving a five-county area in Southwest Florida which is also known as the Lee County Electric Cooperative. FPL's 2012 and 2013 sales to the Lee County Electric Cooperative are based on two delivery points situated in Lee and Collier counties. These counties are in FPL's Western Division and comprise only 2 of the 35 counties served by FPL. Over the past 5-10 years the Western Division has grown nearly 60% faster than FPL as a whole in terms of customers. Therefore, it is reasonable to expect that the FPL's load will grow more slowly in 2012 and 2013 than will sales to the Lee County Electric Cooperative.

Florida Power & Light Company Docket No. 120015-EI Staff's Seventh Set of Interrogatories Interrogatory No. 261 Page 1 of 1

# Q.

Please refer to witness Morley's direct testimony, Page 9, Lines 12-15. What was the date FPL's load forecast was approved by FPL's executive management?

### A.

FPL's load forecast was approved by FPL's executive management in September 2011.

Florida Power & Light Company Docket No. 120015-El Staff's Seventh Set of Interrogatories Interrogatory No. 262 Page 1 of 1

Q.

Please refer to witness Morley's direct testimony, Page 10, Lines 3-7. What was the percent deviation of FPL's forecasted net energy for load for fiscal year 2010 in the last rate case and the actual net energy for load (not weather-normalized)? Please specify the direction of the deviation – above or below actual net energy for load.

## A.

FPL's forecasted net energy for load for fiscal year 2010 was 0.3% above the actual weather normalized load for the year and 3.9% below the non-weather normalized load for the year. The difference between the actual weather normalized load and the non-weather normalized load was the result of the extreme weather experienced during 2010. The year 2010 saw some of the coldest winter weather on record as well as some of the hottest summer temperatures on record.

Florida Power & Light Company Docket No. 120015-EI Staff's Seventh Set of Interrogatories Interrogatory No. 263 Page 1 of 2

Q.

For questions 263-268, please refer to witness Morley's prefiled direct testimony, pages 22-24:

Please state what municipalities and counties have entered into new, renewed, or modified (specify) power supply arrangements or franchise agreements with FPL since January 2010.

### A.

# Power Supply Arrangements:

- 1) City of Blountstown, FL New agreement executed January 17, 2012
- 2) Florida Keys Electric Cooperative Association, Inc. New agreement executed February 7, 2011
- 3) City of Wauchula, FL New agreement executed July 27, 2011

# Franchise Agreements:

Miami Shores	January 2010-renewal
Lake Clarke Shores	January 2010-renewal
Southwest Ranches	February 2010-renewal
Ormond Beach	February 2010-renewal
Callahan	March 2010-renewal
Biscayne Park	April 2010-renewal
Miami	May 2010-renewal
Sanford	May 2010-renewal
Bunnell	June 2010-renewal
Surfside	July 2010-renewal
Riviera Beach	August 2010-renewal
Cocoa	September 2010-renewal
Live Oak	October 2010-renewal
Sarasota	November 2010-renewal
Hillsboro Beach	November 2010-renewal
Palmetto	February 2011-renewal
Palm Beach	March 2011-renewal
Crescent City	March 2011-renewal
Bradenton	April 2011-renewal
Bay Harbor Islands	June 2011-renewal

Florida Power & Light Company Docket No. 120015-EI Staff's Seventh Set of Interrogatories Interrogatory No. 263 Page 2 of 2

West Palm Beach June 2011-renewal Cape Canaveral August 2011-renewal August 2011-renewal Atlantis Holly Hill September 2011-renewal Penney Farms September 2011-renewal Cocoa September 2011-renewal Cocoa Beach October 2011-renewal Hypoluxo October 2011-renewal Port St. Lucie October 2011-renewal Sweetwater November 2011-renewal Palm Beach Gardens November 2011-renewal December 2011-new Starke Virginia Gardens January 2012-renewal Daytona Beach Shores January 2012-renewal Beverly Beach January 2012-renewal Miami Beach February 2012-renewal Interlachen February 2012-renewal

Florida Power & Light Company Docket No. 120015-El Staff's Seventh Set of Interrogatories Interrogatory No. 264 Page 1 of 1

### 0.

For questions 263-268, please refer to witness Morley's prefiled direct testimony, pages 22-24:

What municipalities and counties does FPL expect it will enter into new, renewed, or modified (specify) power supply arrangements or franchise agreements prior to January 1, 2014?

#### A.

FPL does not expect to enter into a new, renewed, or modified power supply arrangement with a particular municipality or county prior to January 1, 2014. Please refer to FPL's response to Staff's Seventh Set of Interrogatories No. 267 for information related to entities with which FPL is uncertain whether it will establish new or renewed power supply arrangements prior to January 1, 2014.

FPL expects to renew franchise agreements with North Bay Village, Edgewater and Lake Butler, and FPL expects to enter into a new franchise with Palm Coast, prior to January 1, 2014.

Florida Power & Light Company Docket No. 120015-El Staff's Seventh Set of Interrogatories Interrogatory No. 265 Page 1 of 1

#### O.

For questions 263-268, please refer to witness Morley's prefiled direct testimony, pages 22-24:

What municipalities and counties have declined to renew or modify power supply arrangements or franchise agreements since January 2010?

#### A.

No municipalities or counties have declined to renew or modify their power supply arrangements with FPL since January 2010.

However, pursuant to a stipulation between South Daytona and FPL, FPL continues to collect and remit franchise fees under the 1978 franchise and will do so until the conclusion of the litigation between the parties. Collection and remittance of franchise fees would also cease if and when the city completes its acquisition of FPL's assets.

Florida Power & Light Company Docket No. 120015-El Staff's Seventh Set of Interrogatories Interrogatory No. 266 Page 1 of 1

### Q.

For questions 263-268, please refer to witness Morley's prefiled direct testimony, pages 22-24:

What municipalities and counties does FPL expect will decline to renew existing power supply arrangements or franchise agreements prior to January 1, 2014?

### A.

FPL does not expect any municipalities or counties to decline to renew existing power supply arrangements prior to January 1, 2014. However, two existing contracts, with Metropolitan Dade County, Florida and The Utility Board of the City of Key West, Florida, terminate on October 31, 2013 and May 31, 2013, respectively.

With reference to franchises, none other than possibly South Daytona.

Florida Power & Light Company Docket No. 120015-EI Staff's Seventh Set of Interrogatories Interrogatory No. 267 Page 1 of 1

Q. For questions 263-268, please refer to witness Morley's prefiled direct testimony, pages 22-24:

What municipalities and counties is FPL uncertain whether it will establish new or renewed power supply arrangements or franchise agreements prior to January 1, 2014?

### A.

FPL typically responds to Requests For Proposals (RFPs) issued by Florida municipalities, electric municipal cooperatives and investor owned utilities for the purchase of wholesales power. However, FPL cannot predict whether any of these proposals will result in a new power supply arrangement prior to January 1, 2014. Currently, FPL is engaged in RFPs issued by the City of Mount Dora, the City of Lake Worth, and the City of South Daytona. FPL cannot be certain at this time about whether new power supply arrangements will be executed with these entities prior to January 1, 2014. FPL and Vero Beach are in discussions concerning the potential for FPL to purchase the Vero Beach Utility System, and serve its citizens as FPL retail customers. FPL cannot be certain that a transaction will be completed with the city prior to January 1, 2014.

With reference to franchises, FPL is uncertain whether it will renew its franchise with Jupiter Island prior to January 1, 2014.

Florida Power & Light Company Docket No. 120015-EI Staff's Seventh Set of Interrogatories Interrogatory No. 268 Page 1 of 2

Q. For questions 263-268, please refer to witness Morley's prefiled direct testimony, pages 22-24:

For each municipality and county listed in the five prior interrogatories, what adjustments, if any, were made to FPL's forecast of customers, net energy for load per customer, and demand to account for changes in the power supply arrangements and/or franchise agreements and where do those adjustments appear within the MFRs or other filings in this proceeding. If adjustments were not necessary, please explain why.

#### A.

Adjustments to FPL's forecast of net energy for load, summer peak demand and winter peak demand for the Florida Keys Electric Cooperative Association, Inc., City of Wauchula, Metropolitan Dade County, Florida and the Utility Board of the City of Key West are provided in Attachment No. 1. The adjustments for net energy for load, summer peak demand and winter peak demand appear in MFR F-7, Attachments 2, 12, and 13. No adjustments to FPL's forecast of total customers were made for these contracts as their impact on the total number of customers is negligible, i.e. a change of one or two customers out of a total customer population of more than 4.5 million.

No adjustments were made to the load forecast for the City of Blountstown. At the time the load forecast was developed it was not known if or when Blountstown would become a wholesale customer of FPL. The coincident peak load for Blountstown is expected to be about 6 MW, an extremely small amount relative to FPL's system peak.

No adjustments were made to the load forecast were made for City of Mt. Dora or the City of Lake Worth. It is not known if or when either of these entities will become a wholesale customer of FPL.

No adjustments were made to the load forecast were made for the City of South Daytona. Although the City of South Daytona did not renew its franchise agreement in 2008, FPL has continued to provide retail electric service to customers within the City of South Daytona. It is not known if or when FPL's provision of retail electric service to these customers will cease.

Florida Power & Light Company Docket No. 120015-EI Staff's Seventh Set of Interrogatories Interrogatory No. 268 Page 2 of 2

No adjustment to the load forecast were made for the City of Vero Beach because it is not known if or when FPL will provide retail electric service to the residents of this municipality.

No adjustment to the load forecast were made for the anticipated franchise agreement with Palm Coast because FPL's historical load already reflects electric service to retail customers residing in Palm Coast.

No adjustments to the load forecast were made for the other franchise agreements listed in the prior five interrogatories because FPL's historical load already reflects electric service to retail customers residing in those counties and municipalities.

Florida Power & Light Company Docket No. 120015-EI Staff's Seventh Set of Interrogatories Interrogatory No. 268 Attachment No. 1 Page 1 of 1

# Adjustments resulting from changes in power supply agreements

Summer Peak				
(MW)	Key West	Metro Dade	Wauchula	Florida Keys
2012			13.3	34.6
2013	-45	-1	13.3	34.8
Winter Peak				
(MW)	Key West	Metro Dade	Wauchula	Florida Keys
2012			13.3	26.9
2013			13.4	29.4
N-A F				
Net Energy for	17 m 344 m A	Manage David	Manakada	Manka Kara
Load (MWh)	Key West	Metro Dade	Wauchula	Florida Keys
Jan-12			4,753	15,156
Feb-12			4,969	14,619
Mar-12			4,841	16,920
Apr-12			5,097	16,961
May-12			5,954	19,630
Jun-12			6,327	20,078
Jul-12			6,339	21,620
Aug-12			6,410	21,457
Sep-12 Oct-12			6,153	18,903
			5,584	18,212
Nov-12 Dec-12			4,925	14,157
Jan-13			4,812	15,295
Feb-13			4,768	15,247
Mar-13			4,813	14,199
Apr-13			4,856 5.114	17,021
May-13			5,114	17,062
Jun-13	21 640		5,975	19,748
Jul-13	-21,618		6,349 6,361	20,198
	-22,752 22,246		6,361	21,750
Aug-13 Sep-13	-23,346 31,114		6,432 6.174	21,585
Sep-13 Oct-13	-21,114 -20,061		6,174 5,603	19,017
Nov-13	-20,061	-482	5,603 4,943	18,321 14,242
Nov-13 Dec-13	-17,222 -16,731	-482 -598	4,943 4,829	14,242 15,387
DEC-12	-10,/31	-220	4,029	13,387

Florida Power & Light Company Docket No. 120015-El Staff's Seventh Set of Interrogatories Interrogatory No. 269 Page 1 of 1

Q. Please refer to MFR Schedule F-8, Page 11 of 13. How were the assumptions of line losses of 5.88 percent and company usage of 0.11 percent of net energy for load developed?

#### A.

The assumption of 5.88 percent line losses was based on a monthly forecast of total system losses minus company use. The monthly forecast of total system losses was developed based on a weighted average of monthly system losses since 2009 with adjustments for recent forecasting variances and for the decrease in line losses expected as a result of the deployment of smart meters. The assumption of 0.11 percent company usage was based on the average percent of company use over the prior five years.

Florida Power & Light Company Docket No. 120015-EI Staff's Seventh Set of Interrogatories Interrogatory No. 270 Page 1 of 1

# Q.

Please refer to witness Morley's direct testimony, page 31, lines 1-6. What are the efficiency improvements associated with the deployment of smart meters?

# A.

The efficiency improvements associated with the deployment of smart meters that impact the load forecast include replacement of existing defective meters, better theft detection and the ability to remotely disconnect inactive premises.

Fiorida Power & Light Company Docket No. 120015-El Staff's Seventh Set of Interrogatories Interrogatory No. 271 Page 1 of 1

# Q.

Please refer to witness Morley's direct testimony, page 33, lines 10-19. Please explain in detail what adjustments, if any, are made to FPL's sales forecasts by revenue class to account for differences in line losses by class.

### A.

No adjustments were made to FPL's sales forecast by revenue class to account for differences in line losses by class.

Florida Power & Light Company Docket No. 120015-EI Staff's Seventh Set of Interrogatories Interrogatory No. 272 Page 1 of 1

Q.

Please refer to witness Morley's direct testimony, pages 32 and 33. Why is it appropriate to adjust the residential customer forecast for the total difference between the "total customer model" customers and the sum of the "revenue class customer models" customers rather than dispersing the difference across all revenue classes proportionately?

#### A.

There are three reasons why it is appropriate to adjust the residential customer forecast for the total difference between the "total customer model" customers and the sum of the "revenue class customer models" customers rather than dispersing the difference across all revenue classes proportionately. First, forecasts for a number of the non-residential revenue classes are based on customer-specific information. The number of customers in the railroads revenue class is based specifically on the number of stations in Miami-Dade's metrorail system. The forecasted number of wholesale customers is based on contract-specific information while the forecasted number of customers under the other revenue class reflects the fact that no new customers are being added to this class. Second, a number of the non-residential revenue classes consist of so few customers that a proportional adjustment across all revenue class would result in no adjustment to those classes. Third, both the total customer forecast and the residential customer forecast are driven by the same factor, namely the population forecast. By contrast, the non-residential revenue classes do not include population as a driver in their forecasts.

Florida Power & Light Company Docket No. 120015-EI Staff's Seventh Set of Interrogatories Interrogatory No. 273 Page 1 of 1

Q.

Refer to MFR No. F-05, Attachment 2, page 2; MFR F-7, Attachment 8, page 6; and witness Morley's direct testimony, pages 32-33. Please explain in detail why FPL deducted between 9,274 and 12,164 customers (monthly) from its 2013 residential customer forecast as shown in MFR F-7 as an "out of model adjustment for reconciliation to total customers" if the statistical fit of the models representing the vast majority of customers, including the residential and commercial customers, was the same as the statistical fit of the total customers model (adjusted R-square equal to 1.0) as shown in MFR No. F-05.

#### A.

FPL's experience has shown that adjusting the output of the residential customer model for the difference between the sum of the revenue classes and the overall customer forecast results in improved forecasting accuracy. This was true for the forecast of residential customers developed in the last rate case. By adjusting the output of the residential customer model for the difference between the sum of the revenue classes and the overall customer forecast the accuracy of the residential customer forecast for the test year 2010 was improved by 0.3% while the accuracy of the subsequent year customer forecast was improved by 0.5%. Likewise, in the current forecast adjusting the output of the residential customer model for the difference between the sum of the revenue classes and the overal customer forecast improved the accuracy of the 2011 forecast of residential customers by 0.1%. It should also be noted that the Mean Absolute Percentage Error of the total customer model was lower than that of the residential customer model in both the current forecast and the forecast from the last rate case.

Florida Power & Light Company Docket No. 120015-EI Staff's Seventh Set of Interrogatories Interrogatory No. 274 Page 1 of 1

#### Q.

Please refer to witness Morley's direct testimony, Page 26, lines 7-15, and MFR No. F-7 Attachment No. 2, pages 15 and 16. Please explain in detail the procedure FPL used to ensure that its Out of Model Adjustment for Incremental DSM for the years 2012 and 2013 is consistent with Commission Order No. PSC-11-0346-EG.

#### A.

Under Order No. PSC-11-0346-EG the Commission approved a newly modified DSM plan based on DSM programs currently in effect as of the date of the Order. In order to ensure that the Out of Model Adjustment for Incremental DSM for the years 2012 and 2013 is consistent with Commission Order No. PSC-11-0346-EG the Out of Model Adjustment for DSM is based on the same newly modified DSM plan approved in that order. As a result, the Out of Model Adjustment for Incremental DSM is based on the specifc DSM programs already in place at the time of Order No. PSC-11-0346-EG. These existing DSM programs are described in more detail on pages 66 through 69 of the 2012 Ten Year Site Plan.

Florida Power & Light Company Docket No. 120015-EI Staff's Seventh Set of Interrogatories Interrogatory No. 277 Page 1 of 1

### Q.

Please refer to witness Deaton's direct testimony, page 7, lines 2-4. What was the amount and percentage change in each component of FPL's 1,000 kwh residential bill since 2006?

# A.

Please see Attachment No. 1.

Florida Power & Light Company Docket No. 120015-E1 Staff's Seventh Set of Interrogatories Interrogatory No. 277 Attachment No. 1 Page 1 of 1

Jan. 3 2012 43.76 33.43 1.92 1.08 92.25 2.37 94.62	0.23 0.43 0.52 (0.01) (1.68) (1.98)	25 25 25 25 25 25 25 25 25 25 25 25 25 2
<b>60000000000</b>	<b></b>	%5 %5 %6 %6 %6 %6
Sep. 1 2011 2011 5 43 03 5 38 00 5 244 5 140 5 109 5 817 5 8817 5 8654	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	
Jun 2011 2011 2011 2011 2011 2011 2011 201	(1.50) 0.03 0.19 0.01	9% 4 4 % 9 % 9 % 9 % 9 % 9 % 9 % 9 % 9 %
Mar. 1 2015 2016 39.50 244 1.40 1.15 6.51 96.03	0.02 0.03 0.03 0.03 0.03 0.03 0.03 0.03	2,2,3,2,3,2,3,2,3,2,3,2,3,3,3,3,3,3,3,3
Nov. 1 8 2010	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	2 2 2 3 3 3 5 5 5 5 5 5 5 5 5 5 5 5 5 5
		0% 0% 0% 0% 17% 17%
Aug. 1 2010 \$ 43.01 \$ 38.57 \$ 1.79 \$ 1.79 \$ 6.21 \$ 2.38 \$ 85.00 \$ 2.38		_
May 1 2010 2010 5 43.01 5 38.57 5 1.79 5 0.54 5 0.54 6 21 6 21 6 3 92.00 6 3 94.36	\$ (0.08) \$ (0.08) \$ (0.08)	%0 %0 %13 %0 %0 %0 %0
Mar. 1 2010 43.01 38.57 1.88 1.79 0.62 0.62 2.36 94.44	(1.97) (0.96) (0.99)	2% 0% 0% 0% 1,4% 1,4%
Feb. 3 2010 42.00 \$ 38.57 \$ 1.88 \$ 1.88 \$ 1.89 \$ 2.59 \$ 93.04 \$ 2.39 \$	5 44.46 5 5 44.46 5 5 4.44 6 5 5 4.46 5 5 4.56 6 5 5 4.56 6 5 5 5 6 6 6 6 6 6 6 6 6 6 6 6 6 6	755% 0% 0% 0% 0% 91% 91%
Jan. 4" Fr 2010 2 42.00 \$ 42.00 \$ 1.88 \$ 1.79 \$ 1.79 \$ 1.79 \$ 1.79 \$ 1.25 \$ 48.58 \$ 48.58 \$ 48.58 \$ 48.58 \$	\$ (58.12) \$ (0.15) \$ 0.85 \$ \$ (1.95) \$ \$ (1.95) \$ \$ (1.52) \$ \$ (1.52) \$ \$ (60.89) \$ \$ \$ \$ (60.89) \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	0% -7% 90% 0% 24% 55%
0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	***	'
Nov. 2 2008 \$ 42.00 \$ 52.23 \$ 52.23 \$ 1.03 \$ 107.96 \$ 107.72	\$ 128 \$ 2.17 \$ 2.17 \$ 2.17 \$ 2.23	3% 0%% 0%% 0%% 0%% 0%%
Aug. 3 2009 5 40 72 5 53 51 5 0 94 5 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	\$ 9 9 9 9 5 4 5 4 5 5 5 5 5 5 5 5 5 5 5 5
Jun. 1 2009 39.31 53.51 2.03 0.94 0.42 8.16 104.37 104.37	(1.41) (1.44)	% % % % % % <sup>%</sup> % % % % % % % % % % % %
-May 2009 39.31 \$ 54.92 \$ 5.03 \$ 0.94 \$ 0.42 \$ 105.78 \$ 2.71 \$	(1.03) \$ (1.03) \$ (1.03) \$ (1.03) \$ (1.03) \$ (1.04) \$ (1.05) \$ (1.05) \$ (1.05) \$ (1.06) \$ (1.	%0 %2 %1. %0 %2 %1. %1. %1.
	(0.06) \$ 0.58 \$ 0.54 \$	0% -9% 40% (35% -1% -1% -1%
W W W W W W W W W W W W W W W W W W W	***	-
Nov. 1 2008 5 39.37 5 60.21 5 1.45 5 0.40 5 1.45 5 1.63 5 1.15 5 1.112	8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8	92 92 92 92 92 92 92 92 92 92 92 92 92 9
Aug. 4 2008 39.37 60.21 1.45 0.40 1.11 5.46 108.00	7.94 7.94 0.20	2 4 4 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2
1-May 2008 39.37 52.27 1.45 0.40 1.11 5.46 2.57 102.63	0.13 S C C C C C C C C C C C C C C C C C C	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$
Jan 7 1 2008 2 39.37 \$ 52.27 \$ 1.45 \$ 0.40 \$ 5.46 \$ 5.46 \$ 5.60 \$ 5.46 \$	(0.68) \$ (0.24) \$ (0.24) \$ (0.24) \$ (0.24) \$ (0.87) \$ (0.87) \$ (0.89) \$ (0.89) \$ (0.89) \$ \$ (0.89)	57 2 4 1 8 2 8 2 8 2 8 2 8 2 8 2 8 2 8 2 8 2 8
2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	~~~~~~~~	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$
Nov.1 2007 7 \$ 39.37 5 \$ 52.95 8 \$ 10.98 7 \$ 100.80 8 \$ 103.38	· · · · · · · · · · · · · · · · · · ·	
23-May 2007 2007 \$ 39.37 \$ 1.69 \$ 1.02 \$ 1.02 \$ 1.03 \$ 10.84	\$ (0.08)	%
May 2007 2 39 37 \$ 39 37 \$ 52 95 \$ 1.69 \$ 1.10 \$ 5.57 \$ 5.	(1.25)	8 8 8 8 8 8 8
Jan.5 2007 2007 \$ 38.12 \$ 54.20 \$ 1.69 \$ 1.10 \$ 5.57 \$ 5.00.92 \$ 103.51	(421) \$ (027 \$ (0.02) \$ (0.02) \$ (0.05) \$ (0.46) \$ (0.13)	20 % 4 % 4 % 4 % 4 % 4 % 4 % 4 % 4 % 4 %
Jan.5 2006 5 3841 5 5841 5 5 6 7 6 5 6 5 6 6 5 6 6 6 6 6 6 6 6 6	M M M M M M M M	
**************************************	ž	ž
1000 kWh BILI. BASE AMOUNT FUEL ADJ. ECCR ECRC STSS. STSS. CPRC SUBTOTAL TOTAL	& CHANGE BASE AMOUNT FUEL ADJ. ECCR ECCR ECRC SRS CPRC SUBTOTAL GRT	<u>% CHANGE</u> BASE AMOUNT PUEL ADJ ECCR ECCR ECRC SIRS SRS CPRC SUBTOTAL GRT
BASE BASE FUEL, FUEL, FCR FCR FCR SRS CPRC SUBT GRT	38 5 5 5 8 8 5 5 5 5 5 5 5 5 5 5 5 5 5 5	ZA BE SEE SEE SEE SEE SEE SEE SEE SEE SEE

Florida Power & Light Company Docket No. 120015-El Staff's Seventh Set of Interrogatories Interrogatory No. 278 Page 1 of 1

#### Q.

The summation of the residential customer units appearing in MFR Schedule E-13C, pages 4 and 5, column 2 "Units", row 3 "customers", is 48,978,495 (48,976,539 plus 1,956), but this amount does not equal the summation of the 2013 monthly residential customer forecast shown in MFR Schedule F-7, Attachment 8, Page 6 (49,019,763). Please explain in detail why the two schedules do not reconcile.

#### A.

The two schedules in question are reporting different customer metrics. MFR Schedule E-13C is based on customers by rate schedule. MFR Schedule F-7, Attachment No. 8 shows the forecast of customers for the residential revenue class. There is not a one-for-one relationship between the residential rate schedules and the residential revenue class. This is because the residential revenue class also includes some customers under the OL-1 rate schedule. The difference between the summation of customer units on MFR Schedule E-13C, pages 4 and 5 and that shown on MFR F-7, Attachment No. 8, Page 6 is due the the 41,268 customer units under the OL-1 rate schedule and residential revenue class.

Florida Power & Light Company Docket No. 120015-El Staff's Seventh Set of Interrogatories Interrogatory No. 279 Page 1 of 1

#### Q.

The summation of the non-fuel energy units appearing in MFR Schedule E-13C, pages 4 and 5, column 2 "Units", rows 5-7 "non-fuel energy", is 53,023,166,899 kwh, but this amount does not equal the summation of the 2013 residential customer sales forecast shown in MFR Schedule F-7, Attachment 3, Page 3 (53,056,007 mwh). Please explain in detail why the two schedules do not reconcile.

#### A.

The two schedules in question are reporting different sales metrics. MFR Schedule E-13C is based on sales by rate schedule. MFR Schedule F-7, Attachment No. 3 shows the forecast of sales for the residential revenue class. There is not a one-for-one relationship between the residential rate schedules and the residential revenue class. This is because the residential revenue class also includes some customers under the OL-1 rate schedule. The difference between the summation of non-fuel energy units on MFR Schedule E-13C, pages 4 and 5 and that shown on MFR F-7, Attachment No. 3, Page 3 is due the the 32,840 mWh of sales under the OL-1 rate schedule and residential revenue class.

Florida Power & Light Company Docket No. 120015-EI Staff's Seventh Set of Interrogatories Interrogatory No. 284 Page 1 of 2

#### Q.

Please refer to Page 21 of witness Kennedy's prefiled direct testimony. Please provide specific explanations regarding the type of overhaul maintenance to be performed at FPL's Ft. Myers 2, Turkey Point 5, Martin 3, Martin 4, Martin 8, West County 1 and West County 3. In your response, provide line item information regarding the type of scheduled maintenance for each facility, date of scheduled maintenance and cost of maintenance for each facility, whether FPL has performed similar maintenance on its existing fleet, and the maintenance schedules and the frequency of maintenance performed on those units.

#### A.

Page 21 of witness Kennedy's testimony refers to the increase in combined cycle maintenance for the units listed above for FERC Account 553 – Maintenance Generating and Electric Plant from the prior year (2012) to the test year (2013). The table below shows the type of overhaul maintenance to be performed for the units above in the test year and the \$ are the variance between test and prior year.

\$18.5 million of the \$18.7 million increase to Account 553 is related to non-cost recovery clause expenses. The condition based maintenance process has identified a higher level of planned maintenance (overhaul) work for the combined cycle fleet in 2013, increasing planned maintenance costs over 2012 by \$17.4 million. To sustain the reliability, availability and efficiency of this fuel efficient fleet, planned unit maintenance is scheduled based on service hours and cycles to repair, refurbish and overhaul generating and plant equipment. The planned maintenance increase driver is overhaul work on the following combined cycle units:

2013 Outages Start *	2013 Outages End *	Outage Description	Acct 553 \$ Variances in Millions
8/10/13	11/27/13	Turkey Point Unit 5 - Hot gas path inspections and steam turbine generator inspection	\$7.30
10/5/13	12/6/13	Ft Myers Unit 2 - Heat recovery steam generator inspections, steam turbine overhaul and steam turbine generator	<b>\$</b> 5.60
3/2/13	12/20/13	Martin Unit 8 - Combustor inspection and heat recovery steam generator inspections	\$1.50
10/19/13	12/7/13	Martin Unit 3 - Combustor, heat recovery steam generator and hot gas path inspection	\$1.10
2/23/13	4/14/13	Martin Unit 4 - Major, heat recovery steam generator, and generator inspection	\$0.60
3/2/13		West County Unit 1 - Combustor inspections	\$1.40
11/2/13	12/17/13	West County Unit 3 - Hot gas path inspections and steam turbine generator inspection	\$1.00

Subtotal - Combined Cycle Units Highlighted in Witness Kennedy's Testimony	\$18.50
Other Combined Cycle Maintenance Unit Offsets throughout the fleet	\$ (1.10)
Subtotal - PGD FPL Combined Cycle Units Account 553 - Maintenance Generating & Electric Plant	\$ 17.40

<sup>\* 2013</sup> Outage Dates and Outage Descriptions contain multiple unit outages. Dates in (2) and (3) are the date ranges for all work performed in 2013 on the unit
Please refer to pages 5 and 6 of MFR F-8 for detail on individual outages summarized above.

Florida Power & Light Company Docket No. 120015-EI Staff's Seventh Set of Interrogatories Interrogatory No. 284 Page 2 of 2

The outage scheduling description below is a baseline strategy and Original Equipment Manufacturer (OEM) recommendations would apply to all CC units in the fleet. There are additional combined cycle units in the fleet which include: Putnam Units 1 & 2, Manatee Unit 3, West County Unit 2, Lauderdale Units 4 & 5, and Sanford Units 4 & 5. FPL has performed similar types of maintenance in the past.

For CC units, outages are scheduled based primarily on life of the combustion turbine (CT) parts. For example, most of the General Electric 7FA CT units, such as Ft. Myers, Turkey Point and the Martin CC units have 24,000 hour combustion parts. Therefore, a Hot Gas Path (HGP) outage is required in year 3. At every other HGP outage, the HGP work scope is performed in addition to compressor and rotor inspections that become a Major Inspection (MI) in year 6. Heat Recovery Steam Generator (HRSG) maintenance is also performed during the HGP and MI. However, HRSG maintenance is typically needed annually and scheduled during the HGP and MI whenever possible to maximize unit availability. Steam turbine and generator maintenance is also factored into the CT maintenance schedule. Steam turbine valve maintenance and generator rotor-in inspections are scheduled during the HGP and MI outages. A steam turbine majors, generator majors, and/or HRSG major inspections scheduled based on engineering condition assessments that are typically scheduled at greater than 6 year intervals.

Florida Power & Light Company Docket No. 120015-El Staff's Seventh Set of Interrogatories Interrogatory No. 285 Page 1 of 1

#### O.

Please refer to Page 21 of witness Kennedy's prefiled direct testimony. Please provide line item information regarding the seven months of daily maintenance work to be performed at FPL's new Cape Canaveral combined cycle plant which would begin in June 2013. In your response, list the type of scheduled maintenance to be performed and date of said maintenance, along with the cost of maintenance during the first year for the Cape Canaveral combined cycle, and compare the first year costs of Cape Canaveral's combined cycle to those of similar units in FPL's fleet.

#### A.

The first seven months of daily maintenance work to be performed at FPL's new Cape Canaveral combined cycle plant includes all expenses required to operate the plant as well as perform preventative and corrective maintenance that does not require a scheduled overhaul. The primary components of daily maintenance work include but are not limited to: Payroll (including benefits), contractors & services, materials & supplies, chemicals, water and other expenses.

When analyzing the daily maintenance costs of Cape Canaveral for the first 12 months of commercial operation (June 2013 – May 2014) for all operating and maintenance accounts (FERC accounts 546 – 554), as compared to Other Production units in the fleet for 2013, the site's costs are reasonably consistent. On a daily maintenance \$/per kilowatt (kW) basis, the new site performs considerably better than older combined cycle units in the fleet (e.g. Putnam and Lauderdale) and is within 4% of recently installed capacity (e.g. West County Energy Center).

Florida Power & Light Company Docket No. 120015-EI Staff's Seventh Set of Interrogatories Interrogatory No. 286 Page 1 of 1

Q.

Refer to Page 22 of witness Kennedy's prefiled direct testimony. Please provide line item detail as to what items/activities make up the \$62.5 million Other O&M Production expenses above the 2013 benchmark. In your response, please provide each item and its associated cost.

#### A.

As addressed in FPL's response to SFHHA's First Set of Interrogatories No. 175, the cost drivers for the \$62.5 million Production - Other benchmark variance are:

- **\$27.3** million to sustain the reliability, availability and efficiency of this fuel efficient fleet through planned unit maintenance (overhauls) that are scheduled based on service hours and cycles to repair, refurbish and overhaul generating plant equipment on the Production Other fleet of units.
- \$17.4 million of operating and maintenance expenses for two new fuel efficient combustion turbine generating units added to the fossil fleet after 2010 (\$10.5 million for West County Unit 3 and \$6.9 million for Cape Canaveral Unit 3).
- **\$14.4 million** cost allocation shift from the Production Steam function (item 2 above) to the Production Other function, for fossil fleet staff and operations support, due to steam unit retirements and new combustion turbine (Production Other) capacity additions,
- **\$2.5** million increase in non overhaul plant costs (e.g. daily operation and maintenance, structural maintenance) for Production Other units in 2013 vs. 2010,
- \$1.0 million for a PSC credit adjustment to payroll from the 2010 rate case, and
- (\$.1) thousand reduction in support costs from Non PGD Dept. in 2013 vs. 2010

At a portfolio level the 2013 Production - Other benchmark overrun of \$62.5 million, to operate and maintain the new generating units and for planned unit maintenance (overhauls) on the Production - Other fleet, was partially offset by a (\$50.4) million 2013 Production - Steam under run from unit retirements, a lower level of planned unit maintenance (overhauls) on the Production - Steam fleet and material write-offs.

Florida Power & Light Company Docket No. 120015-El Staff's Seventh Set of Interrogatories Interrogatory No. 287 Page 1 of 1

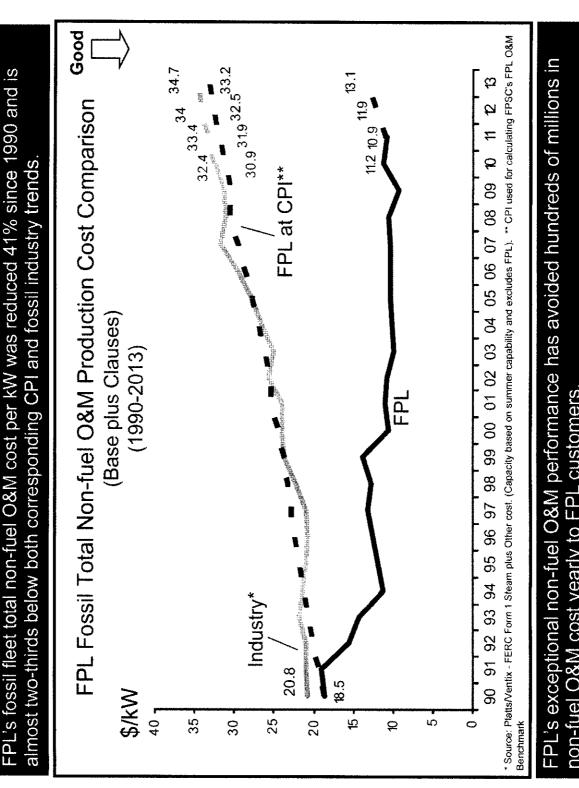
#### O.

On page 4 of Witness Kennedy's prefiled direct testimony, the witness states that during the 2011-2013 timeframe, FPL's fossil Total non-fuel O&M cost in \$/kW is expected to remain more than \$20/kW lower than what the cost would have been if escalated by Consumer Price Index (CPI) since 1990. Please identify the source(s) which assisted the witness to come to this conclusion.

#### A.

This \$20/kW cost gap is referenced on page 24 of Witness Kennedy's testimony and represents the approximate difference during years 2011-2013 between the two FPL-referenced lines plotted on Attachment No. 1, which is Witness Kennedy's Exhibit RRK-7 entitled "FPL Fossil Total Non-fuel O&M Production Cost Comparison." The source of FPL's actual Fossil Non-fuel O&M for the period 1990 to 2011 is FPL's FERC Form 1 pages 320-321 Steam plus Other Production minus Fuel costs. The source of FPL's forecasted Fossil Non-fuel O&M for 2012 to 2013 is FPL's approved budget (base plus clauses) for the period 2012 to 2013. The source of FPL's fossil kW capacity is Total Summer Capacity minus Nuclear from FPL's Ten Year Site Plan Schedules 1 for the period 1990 to 2011, and FPL's MFR C-33 line 23 projected fossil capacity component (plus solar) for the period 2012 to 2013. The source of CPI is the U.S. Department of Labor BLS (Bureau of Labor Statistics) for the period 1990 to 2011 and MFR C-41 CPI projection for 2012 to 2013.





Florida Power & Light Company Docket No. 120015-El Staff's Seventh Set of Interrogatories Interrogatory No. 288 Page 1 of 1

# Q.

On page 25 of witness Kennedy's prefiled direct testimony, the witness states that one of the drivers for the increase in FPL's fossil fleet base capital is investments in CT hot end component upgrades. Please identify the name, age, and cost per upgrade for each unit that FPL plans to perform this type of upgrade, and identify how long the hot end component upgrade would last on the units in which it is performed.

#### A.

The table below outlines the name of each unit, when the unit went commercial (COD) and the initial costs of outages to perform the Hot Gas Path upgrades for the first installation. As documented in FPL's confidential response to OPC's Sixth Request for Production of Documents No. 55 on Bates Stamp Page OPC 300695, the following extensions are expected after each CT upgrade: (1) Hot Gas Path Parts — and (2) Maintenance Inspections Extension —

- 2015)
nit CT Unit DD Upgrades
01 PMG-8A
05 PMG-8C
05 PMG-8D
02 PSN-5A
02 PSN-5D
03 PSN-4B
03 PSN-4A
01 PMG-8B
02 PSN-5C
03 PSN-4D
03 PSN-4C
07 PTF-5B
07 PTF-5D
02 PSN-5B
05 PMT-3C
07 PTF-5A
07 PTF-5C
05 PMT-3D
05 PMT-3A
05 PMT-3B
01 PFM-2E
01 PFM-2F
00 PFM-2A
00 PFM-2B
00 PFM-2C
01 PFM-2D
Ċ

<sup>\*</sup> This is a forecasted value that was the basis for the rate case filling.
The Hot Gas Path Upgrades were approved in the 3rd quarter of 2011.
The project was not part of original 2011 budget.

The redacted information is confidential and will be made available to OPC for inspection at FPL's Tallahassee Office at 215 South Monroe Street, Suite 810, Tallahassee, Florida, during regular business hours, 8 a.m. to 5 p.m., Monday through Friday, upon reasonable notice to FPL's counsel.

Florida Power & Light Company Docket No. 120015-EI Staff's Seventh Set of Interrogatories Interrogatory No. 289 Page 1 of 1

Q.

Please state whether FPL has performed this type of upgrade mention on page 25 of witness Kennedy's prefiled direct testimony. If your response is yes, please provide dates and units in which this type of upgrade was performed and whether the Company has analyzed any other alternatives to hot end components upgrade? If your response is yes, please state what the alternatives were and the results (costs/benefits) of those analyses?

A.

FPL has not performed hot end component upgrades like the type mentioned in witness Kennedy's testimony prior to the current filing.

Florida Power & Light Company Docket No. 120015-EI Staff's Seventh Set of Interrogatories Interrogatory No. 290 Page 1 of 2

Q.

On page 28 of witness Kennedy's prefiled direct testimony, the witness states that the non-fuel O&M expense is reasonably consistent with the cost estimates provided to the Commission in FPL's petition for a determination of need for the Cape Canaveral Project. Please provide a detailed side-by-side line item comparison of the proposed non-fuel O&M expense provided in the Canaveral Modernization Project in Docket No. 080246-EI to the current estimates.

### A.

As explained in FPL's response to SFHHA's First Set of Interrogatories No. 82, the O&M costs provided in Docket No. 080246-EI had approximately \$7.7 million of O&M costs for year 1 while the current proceeding has approximately \$10.5 million of O&M costs for year 1. The primary drivers of the \$2.8 million difference are:

- (1) Startup costs were not included in the needs filing but were included in the modernization filing \$0.8 million;
- (2) The needs filing assumed that anhydrous ammonia rather than aqueous ammonia would be used in the plant \$0.6 million;
- (3) The needs filing pro forma assumed a headcount of 32 plant personnel and the modernization pro forma was increased to 41 plant personnel \$0.6 million;
- (4) The payroll assumption built in to the needs filing pro forma was later updated \$0.8 million.

Startup costs were identified and quantified after the submission of the needs filing and included in the current proceeding.

The primary reasons for the change in the ammonia assumption used in the current proceeding were safety and environmental. An evaluation of the Safety and environmental risks of using anhydrous (gaseous) ammonia was performed after a leak occurred at one of Next Era's non-FPL sites. The recommendations included utilizing aqueous ammonia (dissolved in water) at any new facilities to mitigate the gaseous leak safety and environmental risk exposure.

Reasons for increase in headcount assumptions and salary assumptions used in the current proceeding filing are that the modernized facility utilizes the latest in Combustion Turbine Technology, with leading efficiency and heat rate in the industry. With this advanced technology also comes an added level of automation and complexity. These changes require an increase in the complement of Instrumentation and Controls (I&C) skill sets. The complement of I&C skilled craft labor was increased and an independent I&C coach (exempt level) employee was added to oversee this area rather than sharing the accountability between and Electrical & I&C coach combined.

Florida Power & Light Company Docket No. 120015-EI Staff's Seventh Set of Interrogatories Interrogatory No. 290 Page 2 of 2

The table below summarizes the needs filing versus the current estimates and the variances highlighted above. In two categories, costs were also reduced by a total of about \$293,000 since the needs filing.

Pro Forma Categories	N	leeds Filing	Ra	te Case Filing	Τ	Variance
Payroll (Including Benefits)	\$	3,563,322	\$	4,960,374	\$	1,397,052
9 Additional Personnel @ \$67k/Head					\$	600,000
Payroll Assumptions Update		· · · · · · · · · · · · · · · · · · ·			\$	797,052
Contractors & Services	\$	321,989	\$	449,138	\$	127,149
Other Expenses	\$	206,098	\$	13,151	\$	(192,948)
Fixed Water Treatment Costs	\$	683,543	\$	700,631	\$	17,089
MARSEC Costs	\$	100,000	\$	-	\$	(100,000)
Startup Costs	\$	-	\$	831,000	\$	831,000
Var. O&M (Chemicals, SCR, NH3, CEMS)	\$	281,821	\$	850,162	\$	568,341
Var. O&M (Water Pretreat Costs)	\$	1,107,189	\$	1,159,404	\$	52,216
Overhaul	\$	809,988	\$	888,083	\$	78,095
Subtotals	\$	7,670,474	\$	10,455,002	\$	2,784,529

Florida Power & Light Company Docket No. 120015-El Staff's Seventh Set of Interrogatories Interrogatory No. 291 Page 1 of 1

### Ο.

On page 23 of witness Hardy's prefiled direct testimony, the witness lists the activities and programs included in Distribution's O&M expenses. Please identify the schedule timelines and expenses for each activity.

### A.

Below are the cost categories provided in Witness Hardy's testimony and their associated O&M expenses. The timelines for each of these cost categories are on-going throughout the year (as well as across years, historically and projected). The expenses provided in testimony, as well as below, reflect the projected expenses associated with these activities for the twelve months ended December 31, 2013.

(\$ Millions)

	(4 11	******
Cost Categories	As Filed	<u>Adjusted</u>
Growth	12	11
Dallahiller	"	C #

Growth Reliability 66 65 Hardening 37 36 Restoration 92 81 Customer Response 31 26 Field Support 30 25 Other Business Units 27 51 Total Distribution 295 295

Note: During discovery response preparation, FPL determined that the amounts shown in the cost categories that FPL Witness Hardy uses on page 23 of his testimony to explain the activities and programs included in Distributions O&M expenses need to be adjusted, although the total amount for all categories remains unchanged. Above are the as-filed and adjusted amounts for the O&M cost categories. Prior to the hearing, FPL will file an errata sheet to reflect these adjustments in Witness Hardy's testimony.

Florida Power & Light Company Docket No. 120015-El Staff's Seventh Set of Interrogatories Interrogatory No. 292 Page 1 of 1

### Q.

On page 23 of witness Hardy's testimony, the witness states that FPL will incur costs associated with other FPL business related to distribution O&M in the amount of \$27 million. Please give a line-by-line description of the costs along with the associated schedule timelines.

### A.

As result of an adjustment made to Distribution O&M expenses (see FPL's response to Staff Interrogatory 291), there are \$51 million of FPL other business units O&M expenses that are associated with operating/maintaining the distribution system and charged to distribution O&M expenses. These O&M expenses, primarily from three other FPL business units: Customer Service (\$21.7 million, primarily associated with operating/maintaining: customer meters; Transmission (\$20.8 million, primarily associated with operating/maintaining distribution substations; and Corporate Services (\$7.8 million, primarily associated with maintaining distribution-occupied facilities, e.g., distribution service centers and substations). Below is a further breakdown of these other FPL business unit costs:

	\$ Millions
	O&M Expenses
<u>Customer Service</u>	
Meter Services/Technology	19.1
Energy Conservation*	1.8
Other	0.8_
Total Customer Service	21.7
<u>Transmission</u>	
Distribution Substations	16.9
Environmental*	3.4
Energy Conservation*	<u>0.5</u>
Total Transmission	20.8
Corporate Services	
Distribution-occupied Facilities	7.8 7.8
Total Corporate Services	7.8
Other	
Other Corporate Support (a.g., local, IT)	<u>ለ</u> ጎ
Corporate Support (e.g., legal, IT) Total Other	$\frac{0.2}{0.2}$
i otai Ottiei	0.2
Total Other Business Units	50.5
total delet beatings delice	50.5

<sup>\*</sup> O&M expenses recovered through FPSC adjustment clauses, i.e., ECCR and ECRC.

The timelines for each of these cost categories are on-going throughout the test year (as well as across years, historically and projected).

Florida Power & Light Company Docket No. 120015-E1 Staff's Seventh Set of Interrogatories Interrogatory No. 293 Page 1 of 2

o.

Referring to page 17 of witness Miranda's prefiled direct testimony, please list and explain the major cost drivers for FPL's Transmission capital expenditures. Please use the chart below to provide line-by-line schedules and expenses for the following: Infrastructure replacement and reliability, upcoming projects necessary to meet system requirements, FPSC mandated programs, projects to meet distribution requirements, projects resulting from revisions to FERC/NERC standards, projects related to technology upgrades to FPL's System Control Center, Transmission 500kV system programs and Non-Reimburseable relocations:

Activity	Maintenance Operation   Maintenance Date   Expense	Maintenance Date	Expense
Infrastructure Replacement & Reliability			
Upcoming Projects to Meet System Requirements			
FPSC Mandated Programs			
Projects to Meet Distribution Requirements			
Projects resulting from Revisions to FERCINERC Standards			
Projects Related to Technology Upgrades to FPL's System Control Center			
Transmission 500kV System Programs			
Non-Reimbursable Relocations			

Ą.

Florida Power & Light Company Docket No. 120015-E1 Staff's Seventh Set of Interrogatories Interrogatory No. 293 Page 2 of 2

ACTIVITY	Maintenance Operation	Maintenance Date	Expense
Infrastructure Replacement & Reliability			
	General Plant (tools)	On-guing	9.0
	Facility/System Assessments (DGA, thermovision, doble)	On-going	6.3
	Prevention of Recurrence (Unpleaned, restoration, UG)	On-going	4.4
7	Prevention Through Prediction (Regulators, critical structures, condition assessment, includes reserve equipment)   On-going	On-going	44.9
	Smart Grid Technology (BBOM Auto Restore/Sub Data Equip/Tx on-Line Monitoring)	On-going	2.8
<b>Upcorning Projects to Meet System Requirements</b>	m Requirements		
	Distribution Underbuilt	On-going	6.9
	BW-Manetee	Forecast In-Service 2014	29.3
	Ampacity Upgrades	Forecast In-Service 2013	1.2
The state of the s	Substation Projects	Forecast In-Service 2813	8.0
	Legal Fees	As required	₩.
	Collier Auto Transformer Project #1- Install Cookers	Forecast In-Service 2013	1.1
FPSC Mandated Programs			
	FPSC Commitments (Level 1 and 2 Maintenance)	On-going	26.2
	Storm Hardening	On-going	4.7
<ul> <li>Projects to Meet Distribution System Requir</li> </ul>	ien Requirements		
	Distribution increase Capacity and Feeder projects	Forecast In-Service 2013	22.3
Projects Resulting from Revisions to FERCMERC Standards	s to FERCAIERC Standards		
· AI-	Transmission Regulatory Projects (DFR's, Redundancy Protection, MESC breakers)	Forecast completion 2013	8.8
	NERC Facility Ratings Atent (LidAR)	Forecast completion 2014	9.2
<ul> <li>Projects related to Technology Upg</li> </ul>	. Projects related to Technolgy Upgrades to FPL's System Control Center		
. 10	EMS Upgrades (Squadron replacement, Unit Commitment, Mapboard replacement)	Forecast completion 2014	2
·	SCC DMS Project (Hardware and Domain Controllers replacement)	Forecast completion 2013	0.3
r~	SCC FACE ITY (Cyber Security)	Forecast completion 2014	4.
	Subst Phone Circuit Migration	Forecast completion 2014	2.3
i Transmission 500kV System Programs	Supe at		
•	Insulator, vibration spacer damper system replacement	On-going	4.4
	Structures and structural components	On-going	3.6
Non-Reimbursable Relocations	Various projects	Forecast in-Service 2013	6.4

David T. Bromley

State of Florida )
County of Broward )

I hereby certify that on this 29th day of May, 2012, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared David T. Bromley, who is personally known to me, and he acknowledged before me that he sponsored the answers to Interrogatories 291 and 292 from the Florida Public Service Commission Staff's Seventh Set of Interrogatories to Florida Power & Light Company in Docket No. 120015-EI, and that the responses are true and correct based on his personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this 29th day of May, 2012.

Notary Public, State of Florida

## <u>AFFIDAVIT</u>

State of Florida )

County of Palm Beach

I hereby certify that on this 4 day of 50, 2012, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared Matt Belger, who is personally known to me, and he/she acknowledged before me that he/she sponsored the answer(s) to Interrogatory No(s). 240-243 & 248 and co-sponsored the answer(s) to Interrogatory No(s). 249 from Staff's 7<sup>th</sup> Set of Interrogatories to Florida Power & Light Company in Docket No. 120015-EI,

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this \_\_\_\_\_\_\_, day of \_\_\_\_\_\_\_\_\_\_, 2012.

and that the response(s) is/are true and correct based on his/her personal knowledge.

Notary Public, State of Florida



State of Florida ) Rhode Root
County ofPalm Beach)
I hereby certify that on this _4_ day of _June, 2012, before me, an
officer duly authorized in the State and County aforesaid to take acknowledgments,
personally appeared Rhode Root, who is personally known to me, and he/she
acknowledged before me that he/she sponsored the answer(s) to Interrogatory No(s). 244-
247, and co-sponsored "Attachment #1" provided in response 249, as it relates to acreage
information, from Staff's 7 <sup>th</sup> Set of Interrogatories to Florida Power & Light Company in
Docket No. 120015-EI, and that the response(s) is/are true and correct based on his/her
personal knowledge.
In Witness Whereof, I have hereunto set my hand and seal in the State and County
aforesaid as of this _4 day of
Notary Stamp:
, <b>y</b>

Name of Sponso

State of Florida

County of Palm Beach )

)

I hereby certify that on this <u>4th</u> day of <u>June</u>, 2012, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared <u>Rosemary Morley</u>, who is personally known to me, and she acknowledged before me that she co-sponsored the answer to Interrogatory No. <u>270</u> from <u>Staff's</u> <u>Seventh</u> Set of Interrogatories to Florida Power & Light Company in Docket No. 120015-EI, and that the response is true and correct based on her personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this 4th day of June, 2012.

Notary Public, State of Florida



			Rødolfo Sanchez
State of Florida	)		
County of Miami Da	de	)	

I hereby certify that on this 1st day of Jone, 2012, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared Rodolfo Sanchez, who is personally known to me, and he/she acknowledged before me that he/she sponsored the answer(s) to Interrogatory No(s). 284-290 from Staff's 7th Set of Interrogatories to Florida Power & Light Company in Docket No. 120015-EI, and that the response(s) is/are true and correct based on his/her personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this  $\frac{\sqrt{S^+}}{2}$  day of  $\frac{1}{2}$ , 2012.

Notary Public, State of Florida

nim of



Mike Lannon	
White Lainton	
State of Florida )	
County of Palm Beach )	
I hereby certify that on this day of, 2012, before me, an	
officer duly authorized in the State and County aforesaid to take acknowledgments,	
personally appearedMike Lannon, who is personally known to me, and he	
acknowledged before me that he sponsored the answer to Interrogatory No. 293 and c	0-
sponsored the answer to Interrogatory No. 249, from Staff's 7 <sup>th</sup> Set of Interrogatories	to
Florida Power & Light Company in Docket No. 120015-EI, and that the responses are	<b>;</b>
true and correct based on his personal knowledge.	
In Witness Whereof, I have hereunto set my hand and seal in the State and Coaforesaid as of this, 2012.  Notary Public, State of Florida	unty
Notary Stamp:	
KAREN PEKSA  Notary Public - State of Florida  My Comm. Expires Oct 23, 2015  Commission # EE 140478	

Tom Flowers

State of Florida

County of Palm Beach

I hereby certify that on this 1<sup>st</sup> day of June, 2012, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared <u>Tom Flowers</u> who is personally known to me, and he/she acknowledged before me that he/she co-sponsored the answer(s) to Interrogatory No. 249 from Staff's Seventh Set of Interrogatories to Florida Power & Light Company in Docket No. 120015-EI, and that the response(s) is/are true and correct based on his/her personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this 1<sup>st</sup> day of May, 2012.

Notary Public, State of Florida



Jacqueline Cabrera

State of Florida

County of Miami-Dade

I hereby certify that on this 30 day of May, 2012, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared Jacqueline Cabrera, who is personally known to me, and she acknowledged before me that she co-sponsored interrogatory 270 and provided answers to interrogatories 280 through 283 from Staff's Seventh Set of Interrogatories to Florida Power & Light Company in Docket No. 120015-EI, and that the response is true and correct based on her personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this 30th day of May, 2012.

Notary Public, State of Florida

State of Florida )

County of Palm Beach )

I hereby certify that on this <u>1st</u> day of <u>June</u>, 2012, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared <u>Rosemary Morley</u>, who is personally known to me, and she acknowledged before me that she sponsored the answer to Interrogatory Nos. <u>260</u>, <u>261</u>, <u>262</u>, <u>268</u>, <u>269</u>, <u>270</u>, <u>271</u>, <u>272</u>, <u>273</u>, <u>274</u>, <u>278</u>, <u>and 279</u> from <u>Staff's Seventh Set of Interrogatories</u> to Florida Power & Light Company in Docket No. 120015-EI, and that the strue and correct based on her personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal ir aforesaid as of this 1st day of June, 2012.

Otary Public, State of Florida



Ronae B. Deaton

State of Florida

County of Palm Beach

I hereby certify that on this and County aforesaid to take acknowledgments, officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared Renae B. Deaton, who is personally known to me, and she acknowledged before me that she sponsored the answers to Interrogatory Nos. 275-277 from Staff's Seventh Set of Interrogatories to Florida Power & Light Company in Docket No. 120015-EI, and that the responses are true and correct based on her personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this 3164 day of \_\_\_\_\_\_, 2012.

Magan Saka to Notary Public, State of Florida



Jacqueline Cabrera

State of Florida

County of Miami-Dade

I hereby certify that on this 30 day of May, 2012, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared Jacqueline Cabrera, who is personally known to me, and she acknowledged before me that she co-sponsored interrogatory 270 and provided answers to interrogatories 280 through 283 from Staff's Seventh Set of Interrogatories to Florida Power & Light Company in Docket No. 120015-EI, and that the response is true and correct based on her personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this 3014 day of May, 2012.

Notary Public, State of Florida

Notary Stamp:

DORIS 8. HUGUET

Notary Public - State of Fiorida

My Comm. Expires Jul 29, 2013

Commission # DD 912276

Bonded Through National Notary Assn.

# <u>AFFIDAVIT</u>

Donald Ico Krselewski, Jr.

State of Florida

County of Palm Beach)

)

I hereby certify that on this day of May, 2012, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared Donald Leo Kiselewski, Jr., who is personally known to me, and he acknowledged before me that he co-sponsored the answers to Interrogatory Nos. 263 through 267 from the Staff's Seventh Set of Interrogatories to Florida Power & Light Company in Docket No. 120015-EI, and that the responses are true and correct based on his personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this 25 day of May, 2012.

Notary Public, State of Florida



Frolite William Andrew Dillman	
State of Florida )	
County of Palm Beach )	
I hereby certify that on this 23 day of 404, 2012, before me, an	
officer duly authorized in the State and County aforesaid to take acknowledgments,	
personally appeared, who is personally known to me, and he	
acknowledged before me that he sponsored the answers to Interrogatory Nos. 250	
through 255, and 259; and co-sponsored Interrogatory Nos. 263 through 267, from	
Staff's Seventh Set of Interrogatories to Florida Power & Light Company in Docket No.	
120015-EI, and that the responses are true and correct based on his personal knowledge.	
In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this 23 day of	ይ
Notary Stamp:	
MADITZA MIRANDA-WISE	

Pamela L. Metz

State of Florida )

County of Palm Beach )

I hereby certify that on this <u>29</u> day of <u>May</u>, 2012, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared Pamela L. Metz, who is personally known to me, and he/she acknowledged before me that he/she sponsored the answer(s) to Interrogatory No(s). 256-258 from Staff's 7th Set of Interrogatories to Florida Power & Light Company in Docket No. 120015-EI, and that the response(s) is/are true and correct based on his/her personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this 29 day of May, 2012.

Notary Public State of Florida



# 45

FPL's Responses to Staff's Eighth Set of Interrogatories (Nos. 294 [including attachments 2 and 3], and 295-313) Florida Power & Light Company Docket No. 120015-EI Staff's Eighth Set of Interrogatories Interrogatory No. 294 Page 1 of 1

# Q. Transactions with Affiliated Companies.

For questions 294-296, please refer to page 1, Exhibit KO-10, of witness Ousdahl's direct testimony:

Please identify the NextEra Energy Resources "related affiliates" and provide by type of service the total amount of direct charges allocated to each of the "related affiliates" for the 2011 historical year, the 2012 prior year, and the 2013 test year.

### A.

FPL does not track or analyze the information at the level of detail requested, but FPL can provide the following:

Due to the implementation of SAP in July 2011, FPL is providing the 2011 information in two attachments. For the six months ended June 30, 2011, FPL is providing a report of direct charges to NextEra Energy Resources (NEER) and its affiliates by cost center by affiliate, and a report from the Credit Accounts Receivable Miscellaneous System (CARMS) that includes billings to NEER affiliate entities. These two reports combined represent total direct charges to NEER affiliates for the first six months of 2011 (see Attachment No. 1).

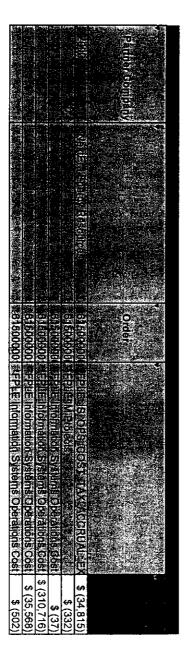
For the six months ended December 31, 2011, FPL is providing a report by cost center, by NEER affiliate, by internal order (see Attachment No. 2).

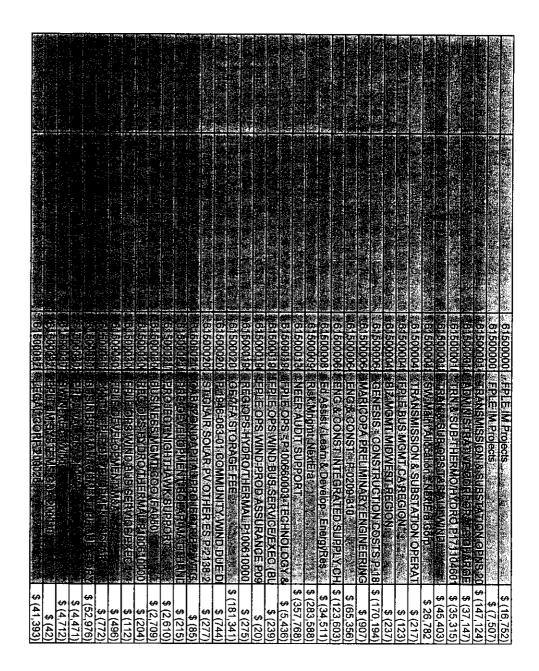
For 2012 and 2013, the budget for direct charges is not broken down below the total NEER level. For these periods, FPL is providing a report of NEER charges by cost center by work breakdown structure (WBS). The NEER affiliate activity is included in these totals (see Attachment No. 3).

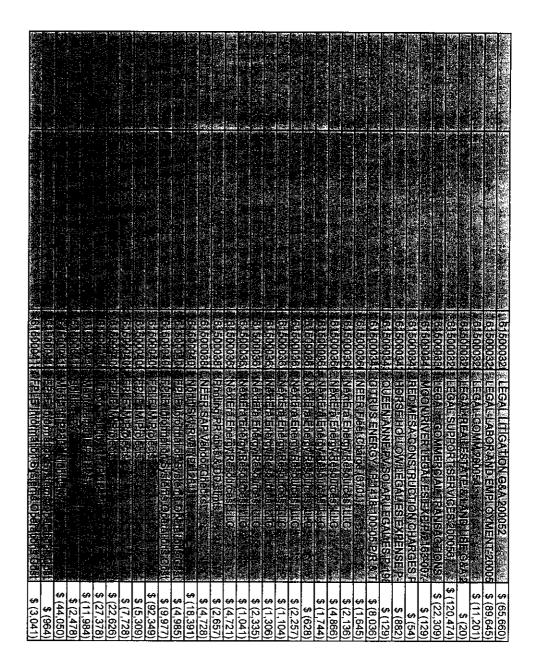
# Summary Transactions: CO (CC/IO/PS) Detail (A) Summary Transactions: CO (CC/IO/PS) Detail (A)

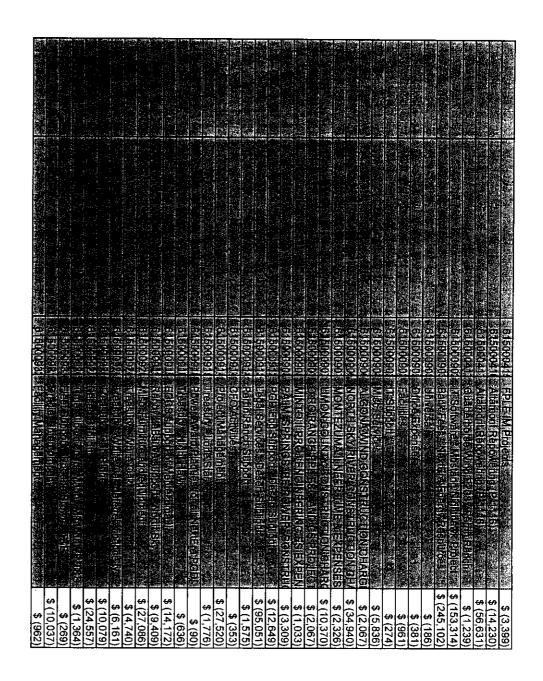
10:31:52	Relevance of Data (Time)	Query Description Summary Transactions: CO (CC/IO/PS) Detail (A) Relevance of Data (Time)	Query Desc
01/31/2012	Relevance of Data (Date)	Query Technical Nan ZZU_M02_Q029	Query Tech
01/31/2012 10:31:52	Status of Data	r ZU_M02	InfoProvider
04/19/2012 17:56:24	Changed At	ed by BXS0JO0	Last Changed by
06/6/2012	Key Date	er JWN0M9Z	Current User
06/6/2012 09:28:20	Last Refreshed	BXS0JO0	Author

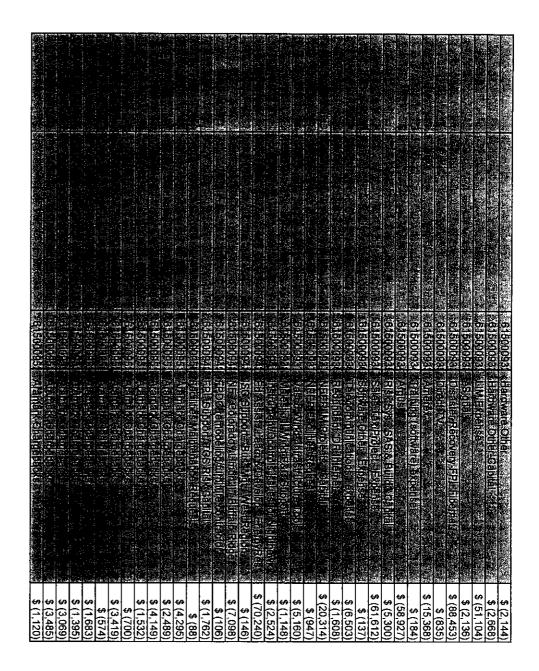
Florida Power & Light Company
Direct Charges to NEER Subsidiaries
July to December 2011
Reconciliation to Exhibit KO - 10 Florida Power & Light Company
Docket No. 120015-EI
Staff's Eighth Set of Interrogatories
Interrogatory No. 294 - Attachment No. 2 Tab I of I

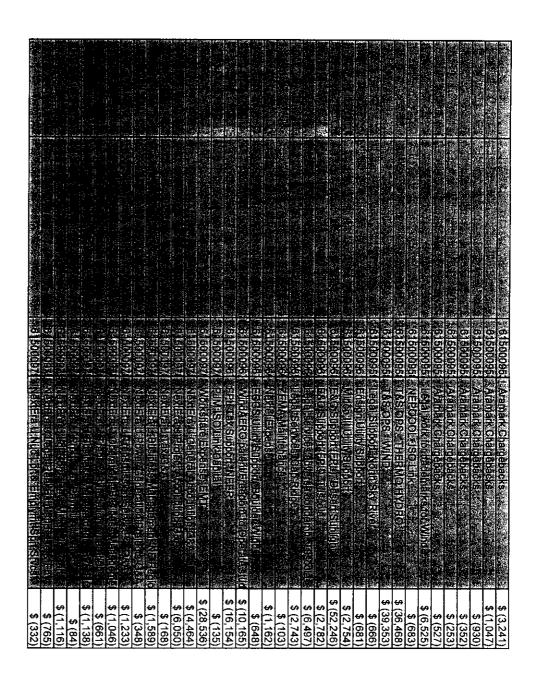


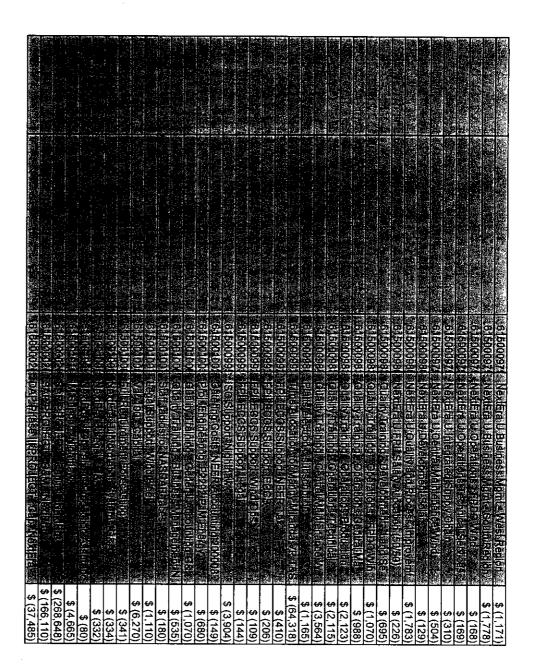


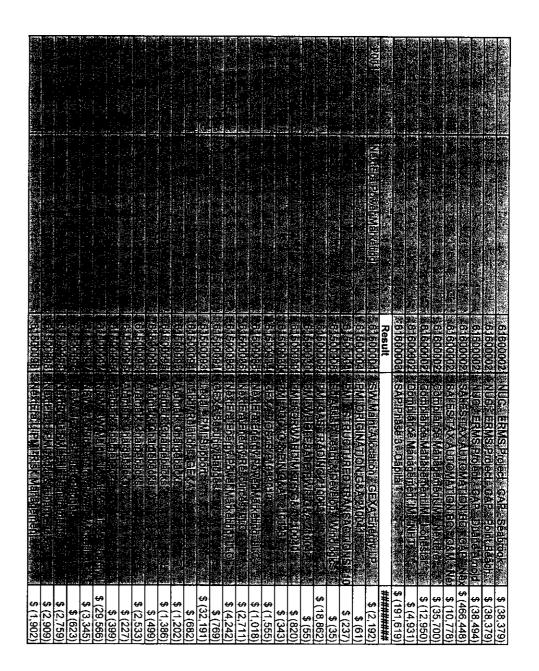


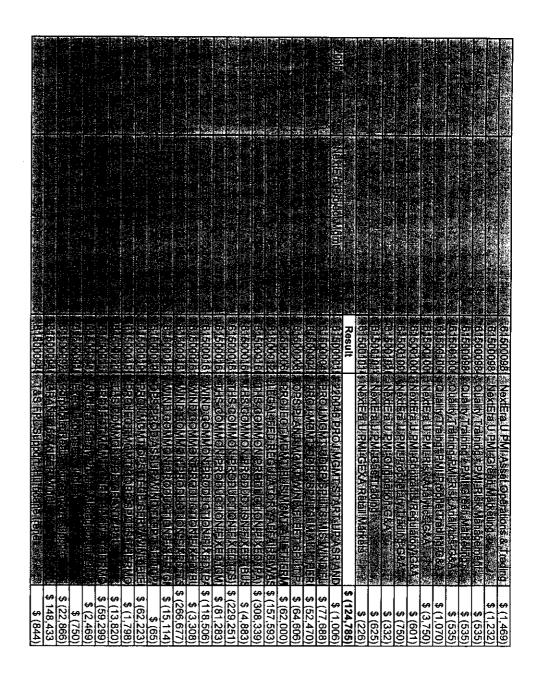


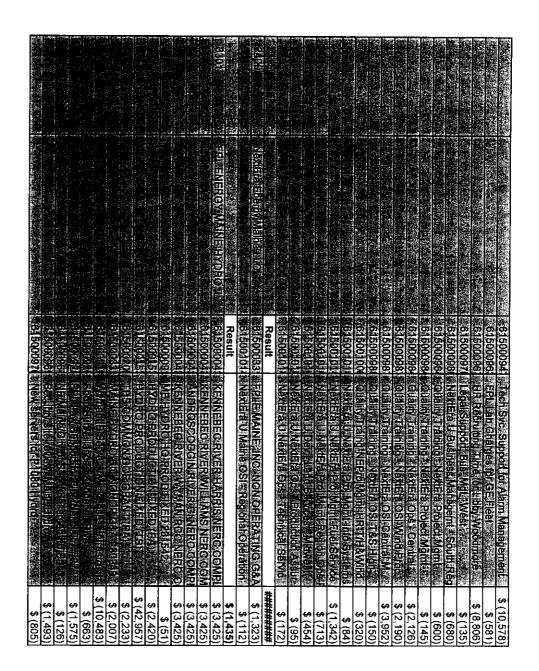


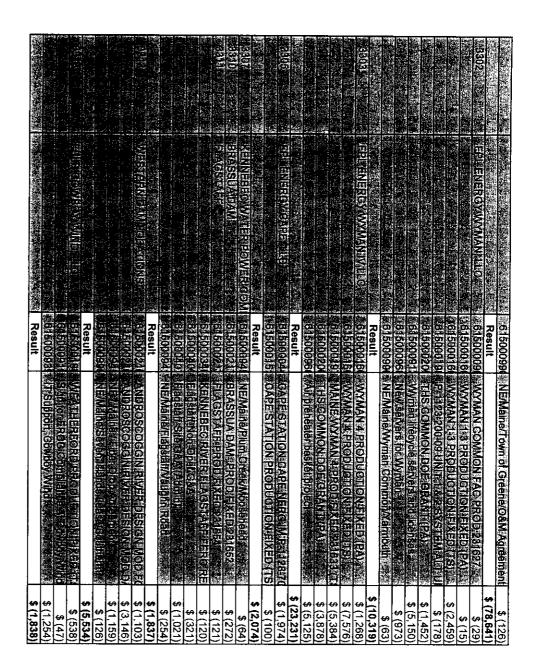


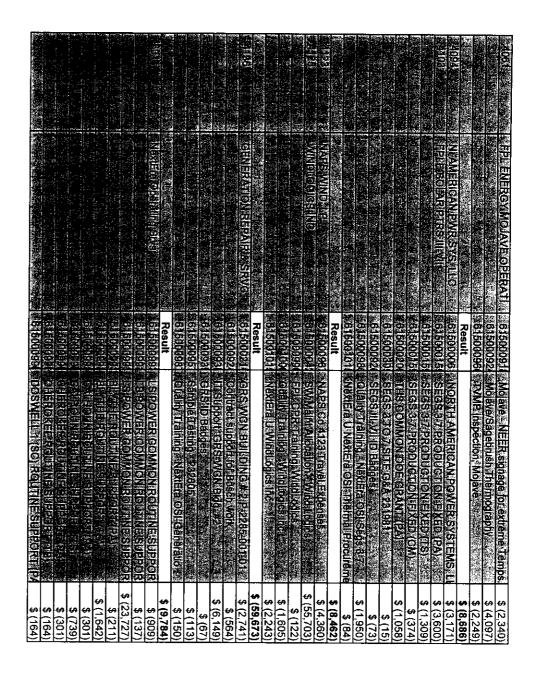


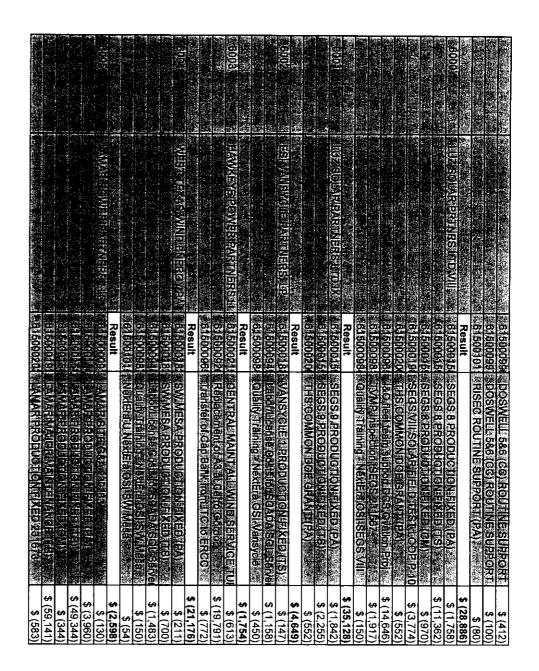


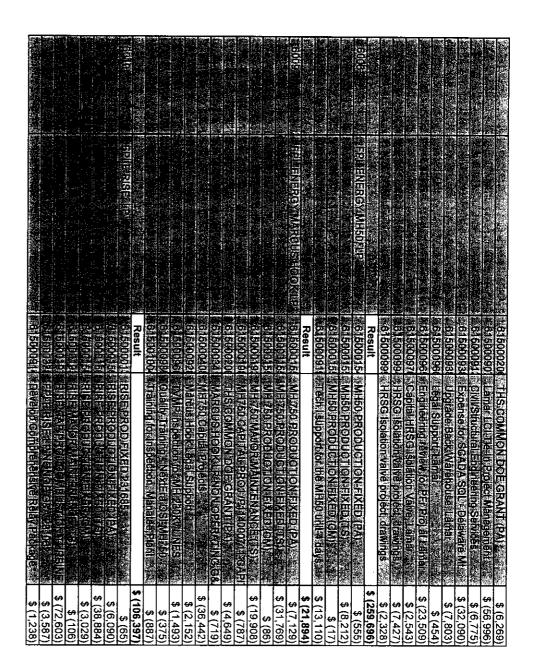


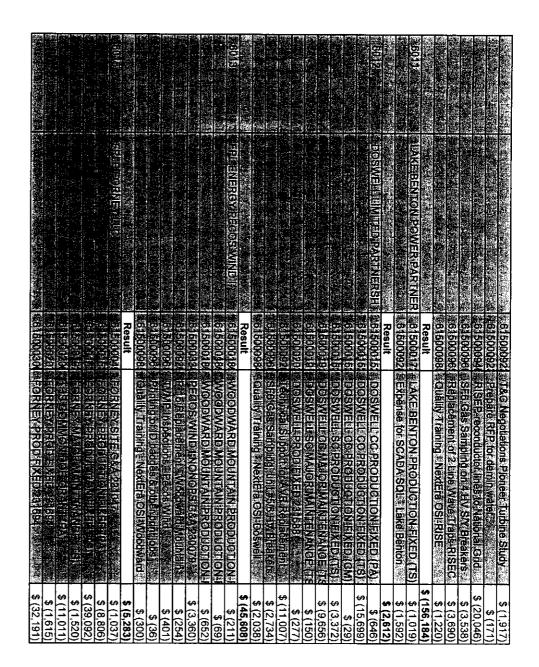


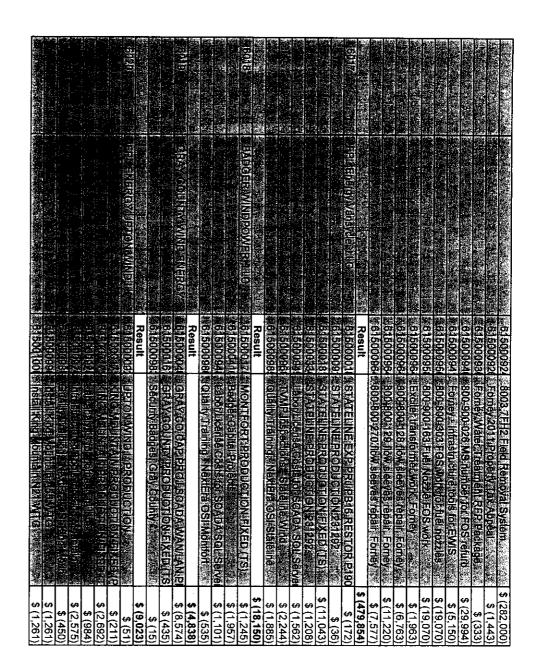










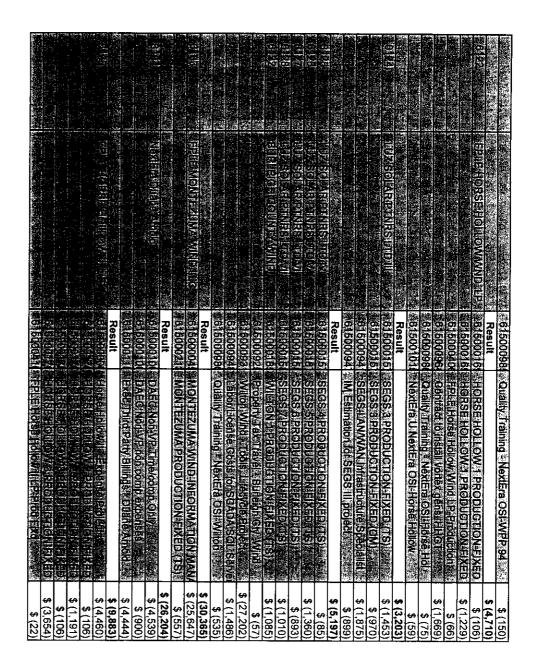


		8024	380,93		8025 Table 1
		SII A Wartebasii e			BAYSWATER
49.45 FRANCES (1912)		NEROWASSOBIAT	WHELEV RESULT		RIPEAKINGIPAGILINY
Result	86499919 94008919 94008919 94008919 94009919	61500092 Result 261500009 261500015	Result Be 386015 Be 370015 Be 340010	161600015 161600020 161600032 161600092 161600092	Result Re
MSCSB BIXENTEBRAN REGIONEN FAREN MENDER FATER	Tretovijenskovnogrodes Letveloges Vybonister 19 states ekstvovobonister 19 istates kontokeonister	Sayreyiletid Badges a Sayreyiletid Badges a Sayreyiletesites sa Bellinghambrodd Bellinghambrodd Bellinghambrodd	ASSISTE IISAI MIDIEDARIONERIA BAYERVILLE ERODUMIONERIA BAYERVILLE BAYERVILLE ERODUMIONERIA BAYERVILLE ERODUMIONERIA BAYERVILLE BAYERVILLE ERODUMIONERIA BAYERVILLE BAY	CALHOUN PRODUCTIONEIXED  GAIHOUNPRODEIXED 81763  CALHOUNPOWER NON OPSIGN  FOS #5692 6781 FOS #5695  5694-245 Combash  Assess Harrier	#BAYSWATER: CAPITAL PRITS NEW GSU #BAYSWATER: PRODUCTION IF JAPAN #BAYSWATER: PRODUCTION IF JAPAN #BAYSWATER: PRODUCTION IF JAPAN #THS: COMMON DOE: GRANT (PA)
1008/84/84/4/88/4/88/8/8/8/8/8/8/8/8/8/8/	UĞTIĞ NƏFXERVIĞIN AMAN BAMANDEĞI AMAS BAĞANDEĞI SERN NAFAN BAŞA	WIIKIDIBAGGAS AMAMIN 230218 AM	IDAIA IDAIA IDAIA I	7100 N = 1X = 15	AUBRUTS-NEWGSU UGTIONIELXEDURA): UGTIONIELXEDURA): GRANITAPA): TIONIELXEDURA):
\$ (61,330) \$ (2,580) \$ (2,795) \$ (675) \$ (1,234) \$ (2,530) \$ (1,027)	\$ (3,270) \$ 3 \$ (3,240) \$ (2,22) \$ (1,771) \$ (2,858)		\$ (118,380) \$ (2,007) \$ (30,274) \$ (6,683) \$ (1,753)	\$ (20,560) \$ (166) \$ (7,531) \$ (38,333) \$ (6,763) \$ (42,495) \$ (42,495)	\$ (9,486) \$ (6,438) \$ (580) \$ (8,588) \$ (15,936) \$ (1,661)

1305		A Comment of the Comm					138 (SP)	はなるは、またま					218 (E.S.)											1. 30 3.			(2) (1) (1) (1) (1)						101037	5083	
	Section of the second section of the section of the second section of the s						HILL TO HERE						Solving Single						50 H3 3 15(c) - 4 (66)e			A STATE OF THE STA		NO NET NO REGISTER				4	I INDIANIMESTAY				THE WAY ARE IN	PER BOWNING PART	
add Kolkika						W. C.	BEING SIMING SERVICES	Re	1.00					R					NODE TO SELECT THE SECOND	P				<b>NEGRENIMENNIATIVI</b>	R	100	6.1		WINDYFARM - SEE ST	R	10		MINTAIN WIND FAME	MSLIC TO SECULIAR	R
Result SB[5000]7] SDAKOTAI	NATIONAL DESCRIPTION					gearain and an anning and a second	BOOD AND WHEE DEKAL	Result	Fig for	1.636	ENEWS SERVICES	6	6	Result	61500098 素通UBITy Train	81500091 SHaficock Wil	PACONET WITH THE PROPERTY AND	BUCUAL SHAU SOOK GO	EXBUSINATION OF THE PROPERTY O	Result	500098 NextEra U N	BOOKSON TO WEST PROPERTY OF THE	近00080 (警BAGKBONE)GAP	#615000174 MOUNTAIN		#64500098  #ROUAlly Train	100	#61500017   <b>#JNDJAN ME</b> S	#61500017 - INDIAN MEX	Result	1500093 - Expense for	\$150001BJ * DELAWARE	B1500091 DMWWPP	615000181 TPG PRODI	Result
S DAKOTA PRODUCTION EXPENSIS						SABOBIL ARONISTABLES	<u>MEDEKANBURKODUK TONIFIKENIPA</u>		Nextera U.Nextera osignavinos ***	area na sancalismonse vocasionistica	A STATE OF THE PROPERTY OF THE	#HIGHWINDSPRODUCTIONEDXECUTS);	WHIGH WINDS PRODUCTION SIXED TO A		MGUBIIIy.Training & Nextera OSI4Hanbock O	cack Wind Cap Bank To Equation	dispalanyoopinen a 🕞 🖃	Sapilar Projects was a second	<b>SHANGOCK COUNTY PRODUCTIONS</b>		NéxiEra U NexiEra OSI-Mountainéen 😪	BAGKBONEMINWINDPOWER NONG	WALMEROUS	MOUNTAINEER PRODUCTION FIXEDY		#Quality Training ≥NextEra OSI Indian Me 🛪	■1,68ting of blown arteston あけられわられる 🌣	WINDIAN MESA PRODUCTION EIXEDITIS)	WINDIAN MESA PRODUCTION FIXED (PA)		861500093 *Expense for SCADA SQL : Delaware Mt.	*DELAWARE MITPRODUCTION-FIXED (ITS	JEXIEMOJIONOGOBARIJES <i>i okadini</i> vinio	TPC PRODUCTION-FIXED (TS): 3.	
\$	\$ (361)	\$ (19,489)	\$ (1,486)	\$ (1,378)	\$ (7,213)	\$ (4,173)	\$ (427)	\$ (3,001)	\$ (108)	<b>36 </b> \$ (1,101)	\$ (1,410)	)囊 \$ (171)		\$ (20,224)	\$ (375)	\$ (6,295)	\$ (6,330)	\$ (591)	<b>XEL</b> \$ (6,633)	\$ (23,384)	\$ (50)	2	<b>8</b> \$ (	S	\$ (4,216)	\$ (300)		<b>S)</b> \$ (3,263)	<b>A.</b> \$ (211)	\$ (2,168)	\$ (1,592)	TS \$ (554)	(EC \$ (22)	\$ (309)	\$ (8,262)

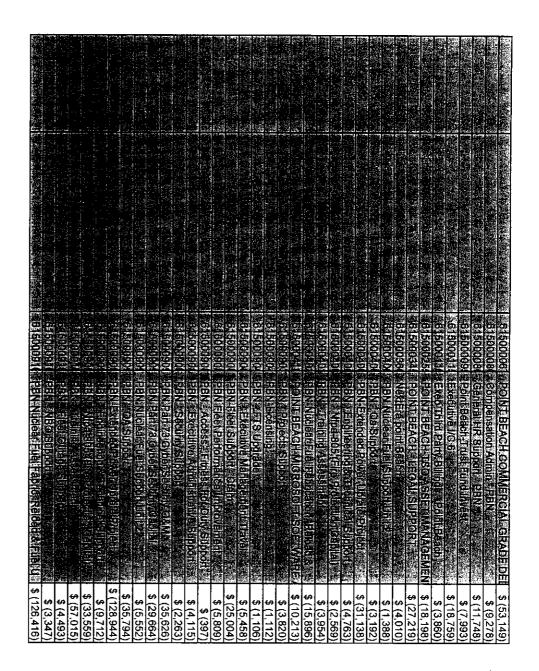
		100		66.1	
		BNG Blacker Bridge Priestrations	23   12   13   13   13   13   13   13	TENTALTURAL	MEDICAL MERCAN
		1/ Stabbask 1/ Stabbask	NIN SEKTIVANES SEE	BEANING FAGIL	IIBABURGAN NORZH DAKOTAW IPBBURGROYAKIAHOMAWINDI IIDA HARDYAKIA MARININI MARINI MARININI MARINI MARINI MARININI MARINI MAR
	\$100,000 (8) (8) (8) (8) (8) (8) (8) (8) (8) (8)	Result 615000111 61500801	Result		615000981 Result 861500937 861500999 8615009999 8616009999999999999999999999999999999999
Reformsemble in the Reformation of the Company of t	BILVITHERRODUGIJONENKERIRA BILVITHERRODUGIJONENKERIANGE BILVITHERADIJONALERIOJE AGKUP BILVITHERADIJONALERIOJE AGKUP BILVITHERADIJANENOJE AGEDAN BILVITHERADIJANENOJE AGEDAN BILVITHERADIJANENI KANTERINAMEN	ESECTING:Party.Billings	BINDER STAMMEN BAYARROUT STRING NEW BY STAND STA	WXXOMING.CAP.PROJEWTO BOXNACE TOUBINT TAINING A NEXTER OSEWYOMING A JAMAICA BAYLEROBUCTION FIXED (FA) BIAMAICA BAYLEROBUCTION FIXED (FS)	GRS ID Badges, South Dakola  NIDAKOTA PRODUCTION FIXED (TS)  OKSpin Security Baddes (S)  Vegatation tree trimming principle in the strain mind of the strain
\$ (1) \$ (1) \$ (1) \$ (2) \$ (3) \$ (4)	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	\$ \$\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\		(GEL \$ 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9	ED (IS) S
\$ (14,784) \$ (1,631) \$ (6,510) \$ (11,707) \$ (9,634) \$ (2,753)		\$ (8,455) (14,617) \$ (1,919) \$ (73)	\$ (10) \$ (337) <b>\$ (4,602)</b> (1,877) (6,578)	(3,376) \$ (225) \$ (225) <b>(9,844)</b> \$ (329) (3,926)	\$ (7) \$ (333) \$ (1,442) \$ (7,254) \$ (6,107) \$ (6,243)

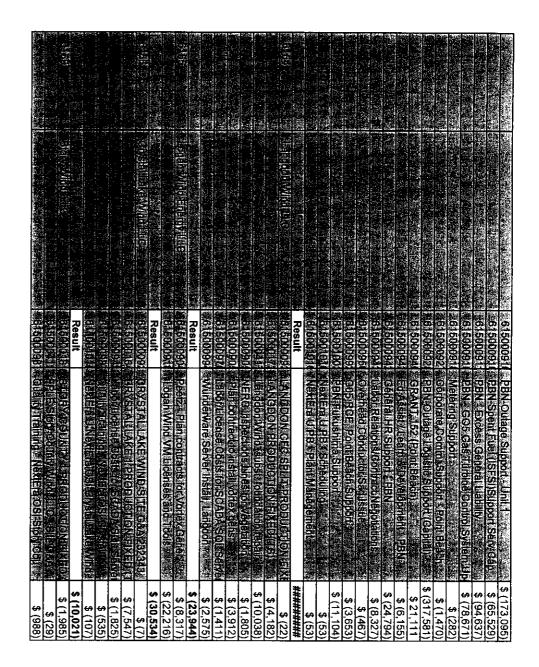
				1910 <u>3</u> 2013	16104,174,27
Prepertity and modelnim.	AND THE STATE OF STAT	SIL KOMINA NOZAYAYO SILGELIK SA BYONWAFING GIVENHED SILGELIK SIL	Vereskastavaravasti en envereskastavasti en envereskastavasti	MISTERONEWIND FARM IN THE WAYNAME WIND FARM INC.	SOMERSET WINDROWER 41
ERSON OF CALLAND WITH THE STATE OF THE STATE		RESTRICTED NO SERVICE NO NI ORSCI RESTRICTED NO NEXTERIO NEXTERIO SE SE RESULT  RESULT  RESU	615001018 WAREFA J. NARIERO RESULT VIGITORY CARDEN VIGITORY CA	Mill But	
Result	BABAZON PRODUCTIONALIZED (LS) 38/3 BABAZON CAPITALIZEO JEGISERHENAGE SUBBOTALCENSE COSIS (BUSCADA SQUESEVE SOBBINATIANING ENERGISEDIADIS MISS BOALBAN PRODUCTION EIXED (PA) 22 BOALBAN PRODUCTION EIXED (PA)	SSKYRIVER NÖN I OBSIGRA ŽANTALIS I SKYRVE ZAVIBILISPEČIKA SKYRVE ZAVIBILISPEČIKA SKYRVE ZAVIBILISPEČIKA SKIRKY RIVE ZAVIBILISPEČIKA SKRATANI POME ZAVIBILISPEČIKA SKRATANI POMBILISPEČIKA SKRATANI POMBILISPECIKA SKRATANI POM	WILLIAM I THINDS AND METALOS IMBY ENDANGER ON THE WEST	Somerset Capital Projects  Mill Run Capital Projects  WAYMART PRODUCTION FIXED (T.S. S. WAYMART PRODUCTION FIXED (T.S. S.	lings at Blythe ission N-FIXED (TS)
\$ (984) \$ (3,941) \$ (1,182) \$ (1,993) \$ (1,993) \$ (1,182) \$ (1,182) \$ (4,560)	\$ (343) \$ (85) \$ (1,592) \$ (2,768) \$ (150) \$ (211) \$ (2,525)	\$ (307) \$ (1,176) \$ (842) \$ (7,365) \$ (748)	\$ (988) \$ (45) \$ (2,625) \$ (343) \$ (4,012) \$ (1,028)	\$ (753) \$ (4,218) \$ (1,034) \$ (1,217) \$ (1,592)	\$ (7,292) \$ (12,189) \$ (135,075) \$ (3,188) \$ (277)

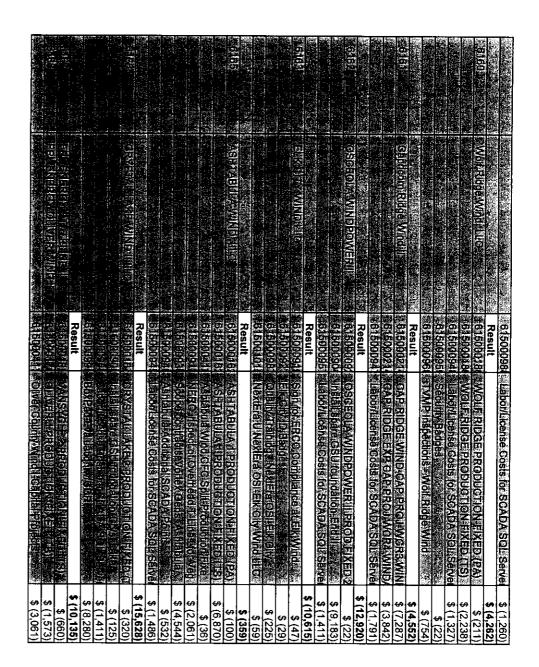


	A																		(3)(4)										7.	T Q			
			A Company of the Comp		11.55.11	S. C. State				A STATE OF BRIDE									The Additional Party and the Additional Party		后 · · · · · · · · · · · · · · · · · · ·					ANIMATS VIEW TO THE			MINISTRUCTURE OF				
	And the second s			TENT TO THE						PHENE ENBREWARD BROKE												GENERAL ENTER		(1) (1) (1) (1) (1) (1) (1) (1) (1) (1)		WINDIEKRIJATE			WAR EUNINVALINDORSE SENSON				
Result		2. A MEGALIA SE UL			Kesuit	99			E 1/1/01/04/11	# # \$ 1500037 B	Result	12 9015001001 TU	18 18 18 18 18 18 18 18 18 18 18 18 18 1		1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		18 18 6 18 19 19 18 18 18 18 18 18 18 18 18 18 18 18 18	e leminoria esta esta		Result	E   500096	a (1988) (1988) 🙀	#   \$60,000,005   ##	Sistone is		#8/800000 E	Result	<b>美国</b> 医0500041; 医		Result			815000411 815000411
RTU Installation	# N8XE 8 UTNEXE BUSING 1881 RINGS		indardike balomat		WEBS153ERO BUGINO MEIXENTE	WNEXTER UNEXISTA OST-PART	<u> Popednstall of Voite Weete</u>	#Pētz Unitrasinieture	SIND BANDING BERRYANDER	<b>SEED ZHERODUGUGURKEDAHA</b>		ábór/License:Gdsts	Yunderware Server	NEW SPRING REE	基Calm Spring ResPower是	Paim Spring Heapwe	AHMSBRINGSIRE	AN CORCONIOSE	AN GORGONIO P			<u>Rēdidānybreistidsji</u>	Plan Sonracus (Balally orley densy	SECULARIAN SECURARIAN	REDICANYON PRO	TONIM ISOB THE		SEPLE Mower County LLC-Prod Fixed	#61500017 LIMOWER PRODUCTION-FIXED ITS		Contract to install vortex gens HH III		uhyyHorse Hollow.II ≅Capital Projects
	SHG (BE) IX IN					SI-Peet Time		lallo,	HONNEWED (FS)			家Labon/License:Goststott80ADA SQL/Serve	Munderware Server Install / Palm/Spling www	PAUM SPRINCEREPOWER HOME OF RIG			PAUNSPRINGSREPOMENINGSBIPROR	SAN CORCONIOUPRODUCTION FIXE IN	<b>EN CORDONIO 280 DI GILI MENERIE</b>		S G THE PUINT 189	#Red (78 North hiras) Tools Tolk hwy Sivie	all warrey dens	SKEDICANYONIPRODUBITORIUS EDITS	615000121 BRED CANYON PRODUCTIONS XED (PA)	SEISOOOO WEPLE POSTWIND LE CERODUCTION FIX		LLC-Prod Fixed	ION-FIXED (TS)		tëx qens HHIII	alinanous promise	Sepual Projects
\$ (1,625) \$ (39,421)	\$ (53)	\$ (988)	\$ (464)	٩ŀ	\$ (28,924)		\$ (3,761)	\$ (22,449)	\$ (85)		\$ (67,386)		illa-se y	\$	\$ (365)	\$ (31,874)	£.0			\$	\$ (189)	\$	A 250 N	es es	S.	,	\$ (1.578)	\$ (7)	\$ (1,571)		\$ (2,579)	\$ (400)	\$ (156)

			W. H.		10 May 10
	Alexandra esta de desentación de la constantación de la constantac	Olm Ilsakuvaeviilo	AREMORPHINA, SIGNEDICE.		CAPRISORN/RIBGE/WINDSL
EBENNOTE ESTROSTE EBENTOTE ESTROSTE EBENTOTE ESTROSTE EBENTOTE EBENTOSTE ESTROSTE	RAMADOJA FONDI RAMADOJA SOOPE RESUIT RAMADOJI RBINI RAMADOJI BENIT		103.500009 100.88 10.1500015 10.18 10.1500086 10.18 10.1500086 10.18 10.1500088 10.18		61500094 Result 1934 81500099 81500016 91500016 181500041
ANOPHOEDNESSER STANDERS AND SALES OF THE SAL	INTERVIOLEM INTERVENTATIONS INTERVENTATIONS INTERVENTATIONS INTERVENTATIONS INTERVENTATIONS INTERVED INTERVENTATIONS INTERVED INT	Lose of Windows Relief Tolers The Amount of The Control of Tolers	ISTROBANDIONIONOPARAGONAMINE IST SENDRATIONIONOPARABINANI SUNDAMINE IST SENDRATIONIONOPARABINANI SUNDAMINE IST SENDRATIONIONO SUNDAMINE ISTANIONI	Matter of Service (1986) Service (19	TVMP Inspection, Peetz Logan  LCAPRICORN BIDGE WIND SPLIT 232510.  CAP RIDGE PRODUCTION FIXED (TS).  CAP RIDGE PRODUCTION FIXED (TS).  Gab RIDGE SIE GAAN Way Spirk 18 12 12 12 12 12 12 12 12 12 12 12 12 12
\$ (2,361) \$ (2,051) \$ (4,670) \$ (11) \$ (40,072) \$ (134,432) \$ (147) \$ (147) \$ (12)	\$ (22,449) \$ (2,314) \$ (2,628) \$ (646) \$ (13,693)	w w w w	<b>5</b> 9	\$ \$ \$	\$ (1.553) \$ (40,974) \$ (27) \$ (27) \$ (211) \$ (8,673) \$ (8,673) \$ (596) \$ (596) \$ (6,339)

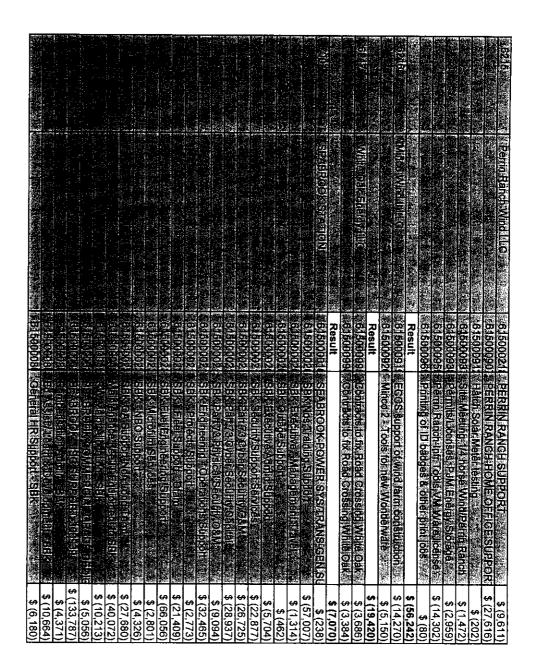


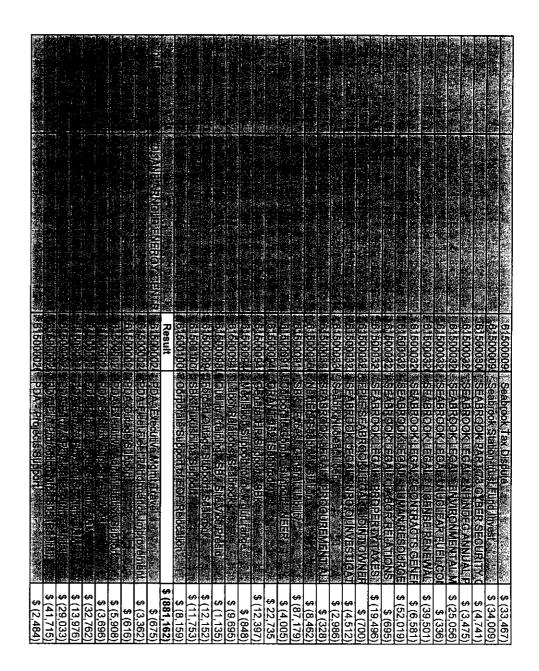


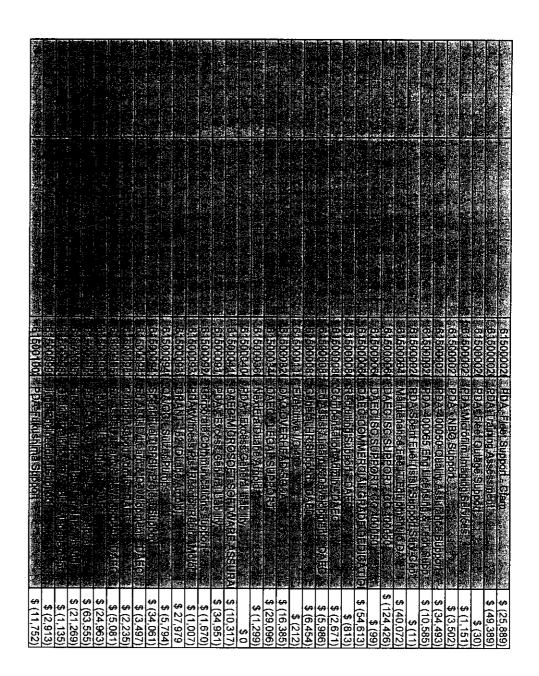


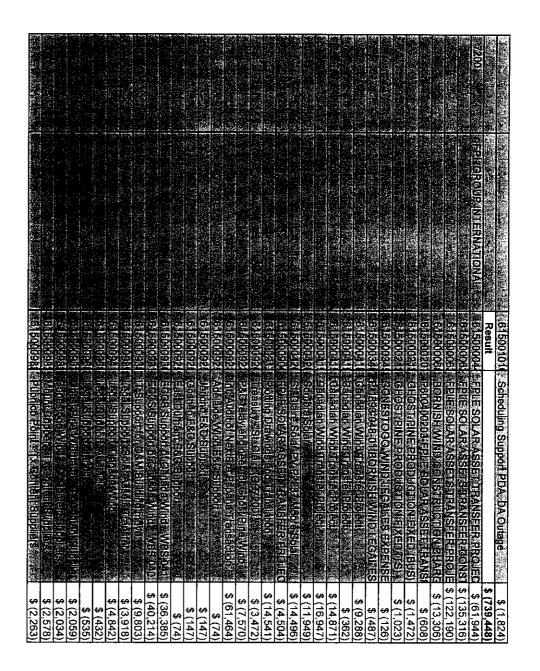
: 11				1197			3/7
enika enga waareray Julia Mekesikawaareray	STANCTON INFORMATION	onualivation is a series of ser	Shibil Kelvina valeta sa	All All AND MAINING STATES		S Paris entito viden in S	SOTING STRUMNING SERVICES OF SERVICES S
Result  ###################################		多語医局	Result Result Result	865		Result  Result  615000777 HORSEHOL  61500077 HORSEHOL  61500075 GHORSEHOL	
ACCARTO BOADARO ASA78	Avresineskornosio: sigoresia kijioola Sasta kirista kasta kantoraka Sasta kirista kasta kantoraka Kasta kasta kasta kasta kantoraka	AGENYSTALBLAKES PRODUSTIONEIXEDIT BUBBOULGAISATOASISIONSGADASGESSEVE BIRBUUBDUDOI TREESSETJATTARIGUIDES BUBB BICDYSBULBKETIUREVENUE METERADDITON	WASHTABULA ZERODUCTION SIXED (BUS	WILTONZ BROOUGIJONIJKEDUS):	#HHOD TELEXPANSA PIBELS *** #HHOD TELESTISSION (CL. 1780) 611 #TYMEJIS PEGION SETONOR (CL. 1780) ***COPETENT OF BERSCHOOL (CL. 1780)	Result   STORY COUNTY 2 PROBUGITION FIXED ( N. GOLORADO PROBUCITION FIXED (IS)	
\$ (2,300) \$ (1,486) \$ (1,794) \$ (3,321)	\$ (7) \$ (7) \$ (143) \$ (664) \$ (1,486)		\$ (2,680) \$ (75) \$ (1,486) \$ (1,561)	\$ (38,828) \$ (1,456) \$ (178) \$ (1,045)	\$ (2,171) \$ (11,093) \$ (896) \$ (4,219)	\$ (1,045) \$ (1,747) \$ (106) \$ (309) \$ (20,035)	۸ آفی∂ المدالسا سامدا

			The same of the sa			3		P. こことと、 一気の海岸														的 一种 经公司的 医										8(01)3(3)		
			The state of the s		Flater Constraint Levy Control	् हिन्दि १३ डिन्डिट जुडरास्ट्राह्मस्थात		· · · · · · · · · · · · · · · · · · ·	The second secon			E SENESIS SOLAR LIKE		The second secon	AND THE CHARLES THE STREET				· · · · · · · · · · · · · · · · · · ·	STATISTICS OF STREET					The Manual Control of the Control of	TEACHWAYIIN THE	ed MantharSted@Ublan31.com					S Wessington Wind Energy and		
Result	THE STATE OF THE S	Result		The state of the s			Result	THE WARD STREET FOR THE WARD WARD TO STREET FROM THE WARD TO STREET FROM THE WARD TO STREET FROM THE WARD THE W	繳		<b>. Ser sisanao≱ (denoratios) e se</b>	<b>3. 3.</b> 1615000901 (Genesis				Result	*61500096 **ORS  D B80ge	া ভাগেগের জন্ম নির্দেশ	超到 600021  曜VIINGの)PRのDI	21/8	Result	A Madisolotool @Project Mgt Services Red Mesano	<b>III AMBARAN SANAN INTERNASIONAN SANASIONAN </b>	SSUSOIT/LOGET = 1960009 top   1960	A SE	SOLUTION TRANSPORT SOLUTION TRAINING ENEXIETATOS	PARADISE SC	Result		■ Seption S	**************************************	** * 61500018 WESSINGTON	Result	26/500098 Labor/License
	Alamone Rational International Control		SEGURITATION OF THE STATE OF TH	STATE STATE OF STATE	The selection of the se	TEARAIDISE PRODUCTION EIXEDIGS STA		nirastructureat ools abenesis soler 🗫 🤫 🔻			3			** Labor License Gosts for SCADA SQL Serve	Sign_for ERCO_Compliance at Elk_City.ill_s_		STATE OF THE SOCIETY OF THE SECONDARY SE	earth of the company	L STATESTATION OF MODERATION OF THE STATES O	MINICEPPROBLEMENTON/FIXED PAYERS		Woes Red Mesanton	elwik em Mésas de la maraja ja ja	PANAS HOS YOYOS JOI SISCO ASUROTHIOGET # 196060919		W. UMPREFISORIER	61500006 PARADISE SOLAR HOME DEFICE SUPPO		SUBSMITCHISE COSES ION SCADA SQL SAIVA	Scope Install of Vortex Gen, Wassington 🛌		WESSINGTON PRODUCTION FIXED (18)		Labor/License Costs for SCADA SQL Server
\$ (7 965)	\$ (3,663)	\$ (46,102)	\$ (150)	\$ (30,656)	\$ (15,296)	\$ (9,000)	\$ (417,140)	\$ (6,578)	\$ (149,500)	\$ (227,937)	\$ (31,772)	\$ (1,353)	\$ (1,533)	\$ (1,486)	\$ (47)	\$ (2,333)	\$ (15)	\$ (1,486)	\$ (617)	\$ (215)	\$ (5,393)	\$ (3,884)		\$ (1,101)	\$ (386)	\$ (988)	\$ (118)	\$ (3,405)	\$ (1,101)	\$ (2,114)	\$ (22)	\$ (168)	\$ (6,321)	\$ (1,055)









				Carlotte Control						A 100 May 100							
				Align Solly Give			II STEPHEN THE REPORT OF THE PROPERTY OF THE P		<b> 後の日本  安小町大田内田市町7/0百円</b> 8日前以中の東海    第615000日24月1SGSSU5D5H1101 MEZITOWERWORK! となった。	Machallassers:					THE REPORT OF THE PARTY OF THE		
	; ;			PARTICIPATION OF THE PARTY OF T	NEXILER AS NER CARESPANA SERVITA BISDODS IN DITION IN A INTERNITARION AND WORKS				Capitalian Mosta					A STATE OF THE SECOND OF THE STATE OF THE ST		SELECTION OF THE PROPERTY OF T	
ent 1 to Q294)	ember	Result	BOX SOUDS AND HE	\$61500094 \$Lat	#101   660009   FOR	Result	<b>©</b>   ∯ 186000919	=61500096  <b>€1</b> €	<b>1</b> 61500092 <b>  多</b>  SG	61500094 Sp	Result	= 61500100  @Le <sub>C</sub>	81500099  <b>8</b> 1. <b>8</b> (		<b>全615000000  数C6</b>	≥615000981 <b>≋</b> Mö	<u> </u>
			dhat Sticke's Rub	of/License Costs to	oe mainisitatice an		Badgas, Mi⊾Miller	la i Support Bluewat	ISUBBOILION MET 1	ain entity board mee		jai Support St Glair	lal Support Ganada	Support Canada V	<b>Pulksiano paisaliu</b> ū	un Miller ⊤x conte	methaven Wind
			R35000934 Hajdihai Sickets Publics Boint	SGADA SQL Serve	l works				wel work!	iting a July 25th		ë Solar	Wind is	100	<u> </u>	nt Supplière 🚜 🚬	615000981 Summerhaven Wind Tx Content Suppliers
#######################################		\$	\$ (93) \$ (750)	\$ (1,101)	\$ (86)	\$ (1,401)	\$ (36)	\$ (855)	\$ (510)	\$ (11,164)	\$ (633,979)		\$ (756)	\$ (2,228)	\$ (21,186)	\$ (2,324)	\$ (5,627)

Florida Power & Light Company Docket No. 120015-E1 Staff's Eighth Set of Interrogatories Interrogatory No. 294 - Attachment No. 3 Tab 1 of 1

			The state of the s		► Infomation Managemen	▶ General Counsel				Human Resources							► FPL Corporate Financ	A CONSTRUCTION OF THE		STATE THE PARTY IN	できる 一般の こうしょう	の ない ない はい	等。 多一次(10)(21)(20)) 10)			4.5.7.7			S (Sumarical parties)	・ Respicostants にも変異なる。
												Cray de la companya d								Services	1000		Petrone and the						Ecological	+ Version.
						31. 30. 10. 10. 10. 10. 10. 10. 10. 10. 10. 1	AT WAS WAS LIGHTING SERVICES	5. 04.0 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1.	The state of the s	- 144 Jag alstellos, Cr. 340	Township to play play is to the state of the	To save dimple religions	TANK ALIVINIAN PROPERTY (SELECTION )	Electrical (September 2011)	Electronidade Station	THE STREET OF THE STREET STREET, STREE			S. 1905 SAFINGSPIRE INDERNA	S. CONDINED GOOD ON PROBLEM S.	For the testing of the second of the second		Salvieral die Sie Sie Sie Sie Sie Sie Sie Sie Sie S	THE PROPERTY OF THE PROPERTY O	THE PROPERTY OF A	THE STREET STREET, STR	1912   1910   1927   1929	THE REPORT OF THE PARTY OF THE	7.5. AURED 0000527(010)	- WBS:Reporting WBS
THE TANDEN BENEFINE STATES OF THE STATES OF	Selection bedue to the		The state of the second of the		CHAIR CONTRACTOR OF THE PROPERTY OF THE PARTY OF THE PART		。	THE PROPERTY OF THE PARTY OF TH	化局面的过去式和过去分词 医多种性	ार्थ क्षित्रज्ञा जैसी सङ्ग्रहात्र समिति है। इस्त्रहरू के	Property (applications)	्राह्म व्यक्तिक स्थापन स्थ स्थापन स्थापन	)。 <b>l</b> ister / Indinite in Lingely のなほかをきませ	Edistro Minima Ballera Santa Santa	Coup has a logical life history and and	Senson of the sense of the sens	The Constitution of the Co		(1)[1] (1)[1] [1] [1] [1] [2] [2] [3] [3] [3] [4] [4] [4] [4] [4] [4] [4] [4] [4] [4	a. 18 10 10 10 10 10 10 10 10 10 10 10 10 10	Teranica entropy Section 7 second	THE CONTRACTOR OF SERVICE SERVICES.	्राज्ञ । यहार महाराज्य के स्टब्स्ट्राज्यका क	AND AND AND ADDRESS OF THE STORY	<b>⋑</b> ਜ਼ਖ਼ਸ਼ਖ਼ਖ਼ਜ਼ਖ਼ਸ਼ਖ਼ਖ਼ਲ਼ਫ਼ਲ਼ਖ਼ਗ਼ਲ਼ਫ਼ਗ਼ਲ਼ਖ਼ਖ਼ਖ਼ਖ਼ਖ਼ਸ਼ਸ਼ਫ਼ਸ਼ਸ਼ਫ਼	War Levice Brown Specific Support THE (B)	MISPLANEGRIPOD SENIOS Agreement THS		* PLENEER PGD Service Agreement THS:	
							Constant Constant			J.														S(TS)	STEST TO	s(PA)	O		PA)	
\$ 586,053	\$ 215,970	\$ 173,202	\$ 1,570,000	\$ 1,000,000	\$ 300,000	\$ 2,408,873		\$ 346,489	\$ 427,336	\$ 229,238				\$ 839,068	1259000	\$ 116,198	\$ 786,219	\$114,785	1,586,803		\$ 489,588	\$ 975,828	\$ 627,504	\$ 1,277,020	\$ 366,840	\$ 70,344	\$ 87,917	\$ 2,465,426	\$ 1,434,602	+ 2012
\$ 759,546		\$ 189,079	\$ 615,000	\$ 1,020,000	\$ 306,000	\$ 2,541,972		\$ 362,829	\$ 447,574	\$ 240,153				\$ 912,441	1283000	\$ 120,888	\$ 823,781	\$116,514	1,967,971		\$ 499,952	\$ 995,913	\$ 641,004	\$ 1,338,147	\$ 374,172	\$ 37,057	\$ 91,357	\$ 2,567,614	\$ 1,501,330	2013

1837 C38 CV3	200 001	
\$7,241,598	\$5,997,506	Rental Revenues
\$1,724,536	\$1,624,688	Add Overheads on Nuclear Direct
\$ 34,896,633	\$ 31,074,906	
\$ 960,143	\$ 960,143	
		A CONTROL OF THE CONT
		Energy Marketing & T T SXX THE PROPERTY OF THE
		Executive Pics 1000 1000 1000 1000 1000 1000 1000 10
\$ 1,577,377	\$1,506,042	Internal Audit
	\$ 340,254	Regulatory & State G P R STATE OF THE STATE
\$ 68,633	\$ 253,807	
\$ 129,055	\$ 123,118	300 00000000 ANNWASIND ANDVASIONS AND
\$ 532,789	\$ 508,383	
\$ 532,789	\$ 508,383	14 JAN 191102240800 1 SAHE SC 201000 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
\$ 532,789	\$ 508,383	13 (13 (14 (14 (14 (14 (14 (14 (14 (14 (14 (14
		THE STATE OF
\$ 803,688	\$ 766,729	
\$ 1,335,378	\$ 1,084,647	
		Engineering Const & Park William Willi
\$ 159,120	\$ 156,000	
\$ 223,000		
\$ 715,000		Security of the second of the
\$ 425,000		
\$ 425,000		10 10 10 10 10 10 10 10 10 10 10 10 10 1
\$ 425,000		E THE THE PERSON AND THE STATE OF THE STATE
\$ 820,000		TO THE PARTY OF THE PROPERTY O
\$ 2,215,000	\$ 1,186,000	
	\$ 255,000	STATE OF THE PROPERTY OF THE P
	\$ 1,135,000	
	\$ 115,000	の情報を表現します。MEUMS10U0028%の第72条形でのmpansatioの不容的が可えてあれますからもいきできます。
\$ 2,025,000	\$ 500,000	English State Control of the Control
\$ 568,000	\$ 786,678	THE DIMINISTRATION OF THE DESCRIPTION OF THE PROPERTY OF THE P
\$ 102,000	\$ 100,000	
\$ 466,576	\$ 427,035	・ Move and Application (Medical Support Sup
000 Z01 &	@ IOO,OOO	

Florida Power & Light Company Docket No. 120015-El Staff's Eighth Set of Interrogatories Interrogatory No. 295 Page 1 of 1

## 0.

# Transactions with Affiliated Companies.

For questions 294-296, please refer to page 1, Exhibit KO-10, of witness Ousdahl's direct testimony:

The note on line 13 reads "includes FPL Readi Power." Please explain in detail FPL's relationship with Readi Power and provide the total amount of direct charges allocated to Readi Power for 2011, 2012, and 2013?

#### A.

FPL Readi-Power is a subsidiary of NextEra Energy Capital Holdings, Inc. and an affiliate of FPL, offering Florida residential customers back-up generator solutions. As shown in MFR C-31 Update, Readi-Power incurred charges from FPL of \$86,515 and \$32,532 for 2011 and January through March 2012 respectively for shared services. These shared services provided by FPL to Readi-Power were primarily for accounting, financial, management and administrative, license fees, and customer services. There are no direct charges forecasted from FPL to FPL Readi-Power for the remainder of 2012 or 2013.

Florida Power & Light Company Docket No. 120015-EI Staff's Eighth Set of Interrogatories Interrogatory No. 296 Page 1 of 1

# **Q.** Transactions with Affiliated Companies.

For questions 294-296, please refer to page 1, Exhibit KO-10, of witness Ousdahl's direct testimony:

The note on line 15 reads "includes NextEra Capital Holdings, Inc. and Alandco." Please explain in detail FPL's relationship with Alandco and provide the total amount of direct charges NextEra Capital Holdings, Inc., and Alandco incurred in 2011, January through March 2012, and are projected to incur in 2013.

#### A.

Alandco is a subsidiary of NextEra Energy Capital Holdings, Inc. (and an affiliate of FPL) engaged in the real estate business. Services provided by FPL to Alandco include accounting, computer services, financial, general management and administrative, legal services and marketing. See below for a summary of total direct charges (actual and forecasted) for Alandco and NextEra Energy Capital Holdings, Inc.

# Actual 2011 Direct Charges Incurred

Alandeo	\$ 1,503
NextEra Energy Capital Holdings, Inc.	\$ 8,182,616

# Actual 2012 Direct Charges – January thru March

Alandeo	3	8,924
NextEra Energy Capital Holdings, Inc.	\$	1,607,689

## Forecasted 2012 Direct Charges

Alandco	\$ 21,000
NextEra Energy Capital Holdings, Inc.	\$ 6.710.984

## Forecast 2013 Direct Charges

Alandco	\$ 22,000
NextEra Energy Capital Holdings Inc	\$ 6.688.508

Florida Power & Light Company Docket No. 120015-El Staff's Eighth Set of Interrogatories Interrogatory No. 297 Page 1 of 1

Q.

For questions 297 and 298, please refer to page 29, line 13 through page 30, line 2 of FPL's witness Ousdahl's direct testimony:

Please explain what is meant by the phrase "costs are fully loaded", and provide information that shows the assumptions and calculations used to load the costs.

#### A.

The phrase "costs are fully loaded" as used in Witness Ousdahl's testimony related to Service Fees refers to the fact that when an employee provides services to an affiliate, there are costs incurred by the Company in addition to the salary dollars paid to the individual. They are payroll-related costs (such as the cost of employee benefits, the cost of payroll taxes, and the cost of workers compensation insurance) and costs the company incurs in support of the individual providing the service (such as the cost of supervision, the cost of facilities used by the employees, and the cost of information technology). Please see page 15 of Exhibit No. KO-9 in Witness Ousdahl's direct testimony for details of the Service Fee loaders. In addition, the information that shows the assumptions and calculations used to load the costs is included in the file provided in FPL's response to OPC's First Request for Production of Documents No. 4, and is further explained in FPL's response to OPC's Eighth Set of Interrogatories No. 153.

Florida Power & Light Company Docket No. 120015-El Staff's Eighth Set of Interrogatories Interrogatory No. 298 Page 1 of 1

Q.

For questions 297 and 298, please refer to page 29, line 13 through page 30, line 2 of FPL's witness Ousdahl's direct testimony:

Please state how the fully loaded costs for the "Service Fees" differ from the affiliate payroll loadings for other costs?

A.

The non-productive portions (holiday pay, vacation pay, sick pay, etc.) of the salaries of service fee employees are included in the payroll dollars allocated to affiliates. This differs from direct charges, where payroll costs charged only include productive time. For direct charge payroll, an additional overhead is added to allocate a portion of the employee's non-productive payroll costs to the affiliate. This additional overhead is calculated as a percentage of the charged payroll dollars.

Florida Power & Light Company Docket No. 120015-EI Staff's Eighth Set of Interrogatories Interrogatory No. 299 Page 1 of 1

## Q.

Refer to Exhibit KO-9, Page 7 of 16, FPL's Cost Allocation Manual and the above cited testimony by witness Ousdahl. If the Nuclear, IM and EMT Service Fees do not receive the non-productive piece of the loader because full salaries are allocated based on relevant drivers to each entity served, please specify the costs addressed in the above cited testimony by witness Ousdahl that are fully loaded.

## A.

Service Fees are fully loaded. The non-productive portions (i.e. holiday pay, vacation pay, sick pay, etc.) of the salaries of service fee employees are included in the payroll dollars allocated to affiliates.

Florida Power & Light Company Docket No. 120015-El Staff's Eighth Set of Interrogatories Interrogatory No. 300 Page 1 of 1

Q.

For questions 300-302, please refer to page 1, Exhibit KO-11, of witness Ousdahl's direct testimony:

Does the \$8,390,350 amount listed on line I for the 2011 historical year represent Nuclear Service Fees that FPL was paid for services FPL provided to an affiliate, or Nuclear Services Fees FPL paid to an affiliate for services an affiliate provided to FPL? In your response, please specify and provide a breakdown of the total amount by month and type of service.

#### A.

The \$8,390,350 amount listed on line 1 for the 2011 historical year represents Nuclear Service Fees FPL received from the affiliate for services provided to the affiliate. See Attachment No. 1 for the breakdown of the total amount by month and type of service.

Florida Power & Light Company Docket No. 120015-E1 Staff's Eighth Set of Interrogatories Interrogatory No. 300 Attachment No. 1 Page 1 of 1 January February March April May June July August September October November December Historical Year Nuclear Service Fee \$ 680,440 \$ 680,440 \$ 680,440 \$ 670,282 \$ 670,282 \$ 670,282 \$ 666,995 \$ 789,888 \$ 732,795 \$ 707.114 \$ 751,620 \$ 689,774 \$ 8,390,350

Exhibit KD-11 line 1, represents amounts paid by the affiliate to FPL for nuclear services provided.

Monthly amounts invoiced are primarily for the following services: fuel, training, business and regulatory support, engineering, assurance and licensing.

Florida Power & Light Company Docket No. 120015-El Staff's Eighth Set of interrogatories Interrogatory No. 301 Page 1 of 1

Q. For questions 300-302, please refer to page 1, Exhibit KO-11, of witness Ousdahl's direct testimony:

Does the \$2,373,407 amount listed on line 2 for the 2011 historical year represent Energy Marketing and Trading Service Fees that FPL was paid for services FPL provided to an affiliate, or Energy Marketing and Trading Services Fees FPL paid to an affiliate for services an affiliate provided to FPL? In your response, please specify and provide a breakdown of the total amount by month and type of service.

## A.

The \$2,373,407 Energy Marketing & Trading Service Fee listed on Exhibit KO-11 for the Historical Year 2011 represents the charge for services FPL provided to an affiliate. The service fee includes costs related to both Risk Management and Systems activities. Detailed information about the service fee components for each month during 2011 can be found in Attachment No. 1. Additional discussion of the service fee, associated modeling, and supporting documents can be found in FPL's response to OPC's Eight Set of Interrogatories No. 143 and OPC's Eighth Request for the Production of Documents No. 75.

Florida Power & Light Company Docket No. 120015-E1 Staff's Eighth Set of Interrogatories Interrogatory No. 301 Attachment No. 1 Page 1 of 1

	Energy Marketing & Trading Service Fee 2011			
	Systems	Risk Management	<u>Total</u>	
January	\$193,714	\$73,911	\$267,625	
February	\$143,583	\$49,274	\$192,857	
March	\$308,666	\$96,395	\$405,061	
April	\$119,113	\$54,958	\$174,071	
May	\$110,637	\$22,530	\$133,167	
June	\$83,898	\$42,284	\$126,182	
July	\$189,120	\$38,685	\$227,804	
August	\$141,609	\$20,969	\$162,578	
September	\$172,588	\$32,531	\$205,119	
October	\$144,084	\$25,532	\$169,615	
November	\$152,780	\$28,649	\$181,429	
December	\$111,541	\$16,357	\$127,898	

Florida Power & Light Company Docket No. 120015-El Staff's Elghth Set of Interrogatories Interrogatory No. 302 Page 1 of 1

### Q.

For questions 300-302, please refer to page 1, Exhibit KO-11, of witness Ousdahl's direct testimony:

Does the \$1,996,037 amount listed on line 3 for the 2011 historical year represent Information Management Service Fees that FPL was paid for services FPL provided to an affiliate, or Information Management Services Fees FPL paid to an affiliate for services an affiliate provided to FPL? In your response, please specify and provide a breakdown of the total amount by month and type of service.

#### A.

The amount listed on line 3 for the 2011 historical year represents Information Management Service Fees that FPL was paid for services FPL provided to our nuclear affiliates. The type of service provided is "nuclear fleet shared systems support," and Attachment No. 1 is the monthly breakdown of the total amount.

Florida Power & Light Company Docket No. 120015-E1 Staff's Eighth Set of Interrogatories Interrogatory No. 302 Attachment No. 1 Page i of i

1000	1.596.027
Overal R	\$ 1.5%
1 DEC 2011	\$ 188.606 \$ 168.226 \$ 154.849 \$ 154.225 \$ 131.820 \$ 175.944 \$ 173.002 \$ 1.596.027
1107 2011	151,552 \$ 175,544 \$ 173,802
007 2011	\$ 131,853
SEP 2011	\$ 194.225
AUG 2011	1188.80e \$ 166.22e \$ 154.849 \$ 194.22E
JUL 2011 AUG 2011	\$ 168,228
JUN 2011	\$ 188,60e
114.7.2011	\$ 128,747
_PR 2011	5 142.719
2011 FEB 2011 MAR 2011 - PR 2011 MAY 2011	\$ 173.856 \$ 160.562 \$ 152.838 \$ 142.718 \$ 128.747
FEB 2011	\$ 150,563
AN 2011	\$ 174.858

Florida Power & Light Company Docket No. 120015-El Staff's Eighth Set of Interrogatories Interrogatory No. 303 Page 1 of 1

# Q.

For questions 303 and 304, please refer to page 29, lines 15-19, of witness Ousdahl's direct testimony:

Please state how often FPL performs a "time study or specific analysis by function" relative to the allocation of costs for the trading and marketing function of FPL's affiliate, NextEra Energy Resources?

#### A.

The time studies for both Risk Management and Systems activities are prepared and implemented on an annual basis. The studies are developed mid-year, typically during June or July, and are effective until the next study is performed the following year. The time studies developed during June 2010, and then implemented during July 2010, were effective until July 2011, when the subsequent time studies were completed.

Fiorida Power & Light Company Docket No. 120015-El Staff's Elghth Set of Interrogatories Interrogatory No. 304 Page 1 of 1

## Q.

For questions 303 and 304, please refer to page 29, lines 15-19, of witness Ousdahl's direct testimony:

Please state the date the last "time study or specific analysis by function" was conducted and explain how this activity is normally accomplished.

#### A.

The last time studies for both Risk Management and Systems activities were conducted in June 2011. The results of those studies were applied to the Energy Marketing & Trading Service Fee, also identified as the Back Office Allocation, from July through the end of the year 2011. As more fully discussed in FPL's response to Staff's Eighth Set of Interrogatories No. 303, each study is developed mid-year, typically during June or July, and is effective until the next study is performed the following year. The prior time studies, completed mid-year 2010 would have been applied to the first part of year 2011.

A separate time study is performed each for Risk Operations, Credit, and Management personnel when developing the Risk Management time study, as these groups are all part of that organization. The functions/employees for each group are identified, along with the daily duties performed. The information is further separated by business unit (FPL or NextEra) and the amount of time associated with performing the various duties. The resulting information is then annualized to determine the number of staff and percentage of payroll that needs to be allocated to the business units to properly reflect the amount of time spent completing the various activities. The Systems time study is completed in similar fashion. The functions/employees providing services to both FPL and NextEra are identified, along with the activities being performed. The amount of time employees spend performing the various duties is then determined. The information is next compiled and a table is developed to summarize the amount of time the different employees spend working on FPL and NextEra activities. The resulting employees/positions and percentages are included in the Back Office Allocation modeling.

Florida Power & Light Company Docket No. 120015-Ei Staff's Eighth Set of Interrogatories Interrogatory No. 305 Page 1 of 1

Q.

For questions 305-307, please refer to page 30, lines 10-12, of witness Ousdahl's direct testimony:

Please state how the "specific factors" that FPL uses to allocate the cost of ongoing services shared jointly to support utility and affiliate operations developed?

#### A.

The process for the determination of Affiliate Management Fee (AMF) services and the selection of the appropriate allocation(s) is a collaborative process between the business unit providing the service and the Cost Measurements and Allocation group in FPL's accounting organization. The factors are reviewed each year during the budget cycle to ensure the continued reasonableness of the measures being used to calculate the allocation percentages. The first step in the process is to identify the service to be provided to the affiliates. Next, a selection of appropriate cost drivers is made. The relevant data is then collected and allocation factors are developed and applied.

Florida Power & Light Company Docket No. 120015-El Staff's Eighth Set of Interrogatories Interrogatory No. 306 Page 1 of 1

O.

For questions 305-307, please refer to page 30, lines 10-12, of witness Ousdahl's direct testimony:

Please state how often the factors are modified or changed, when these factors were last modified or changed, and what were the changes or modifications. If provided previously in MFRs, testimony, or discovery, please provide specific reference cites. Also in your response, please identify the individuals responsible for developing, updating, and approving the factors.

### A.

The factors described on page 30, lines 10 -12 of witness Ousdahl's testimony are updated annually as part of the budget process. The factors were last modified for use in the 2012 budget and have been applied to actual data beginning January 1, 2012. The changes that were made to the allocation percentages between what was applied in 2011 and what was forecasted for 2012 and 2013 were made to update the data underlying the allocation percentages from actual data as of the end of 2011. See Exhibit KO – 12 for the allocation factors applied to 2011 and forecasted for 2012. The Information Management allocation factors are developed by the Manager of Cost and Performance in the Information Management organization. The headcount allocation factors are developed by the Cost and Performance Leader in the Human Resources organization. The information for the square footage allocation factors are obtained from the Corporate Operations Analyst in the Facilities organization. The megawatt allocation factors are developed by the Production Assurance Manager in the Power Generation Division. The Manager of Cost Measurement and Allocations provides the overall review and approval for each of the factors and submits them for inclusion into the master data table.

Florida Power & Light Company Docket No. 120015-Ei Staff's Eighth Set of Interrogatories Interrogatory No. 307 Page 1 of 1

Q.

For questions 305-307, please refer to page 30, lines 10-12, of witness Ousdahl's direct testimony:

When the factors are developed or modified, are they submitted to an outside regulatory body such as the Security Exchange Commission (SEC) or the Florida Public Service Commission for review and/or approval?

#### A.

FPL does not seek annual approval of its allocation factors from its regulators. The Florida Public Service Commission has reviewed the Company's Affiliate Management Fee (AMF) methodology and calculations as part of prior base rate proceedings. As part of FPL's last base rate proceeding (Docket No. 080677-EI), the FPSC found FPL's AMF methodology to be reasonable, as noted on page 155 in Order No. PSC 10-0153-FOF-EI, Docket No. 080677-EI. In addition, affiliate cost allocations are an integral part of FPL's internal controls as memorialized in its Sarbanes-Oxley control procedures and such internal controls are actively reviewed by FPL's external auditors, which are subject to the oversight of the Public Company Accounting Oversight Board (PCAOB).

Florida Power & Light Company Docket No. 120015-EI Staff's Eighth Set of Interrogatories Interrogatory No. 308 Page 1 of 7

Q.

In FPL's Response to OPC's First Set of Interrogatories, No. 12, FPL indicated that "operational costs are determined by cost study". Please state how and when the cost studies are conducted. In your response, please identify the individual(s) responsible for conducting the cost studies and the individual(s) that develops the rates charged to FPLES based on the results of the cost studies.

#### A.

See below for detailed narrative explanations regarding the cost studies referred to in the question above:

# BILLING AND PAYMENTS (Items 1-4 in Matrix of Services from FPL's response to OPC's First Set of Interrgatories No. 12)

# **Developed by: Customer Service Senior Business Analyst**

During the fall of each year, the cost per transaction calculations for printing and payment processing services performed by Customer Billing for the benefit of FPL's affiliated companies are updated with the current costs. Once the calculations are approved by Cost Accounting, the updated cost per transaction is applied during the following year, based on the actual volume of transactions processed.

#### **Printing Services:**

The current cost per transaction calculation for printing services itemizes the volumes and all costs associated with the different document types printed (Bills, Vendor Checks, Payroll Checks, Direct Deposit Statements, etc.) for the affiliated companies. The calculation captures the following costs:

- " Salary costs loaded with an external Pension, Welfare, Taxes and Insurance (PWTI) rate
- " Forms costs (paper and envelopes)
- " Maintenance costs (high speed printers and inserters)
- Supplies costs (toner and developer)
- " Software costs
- Equipment costs (includes Depreciation, Return on Investment, Taxes and Insurance)
- " Building space usage
- " Postage costs (when applicable)

Florida Power & Light Company Docket No. 120015-EI Staff's Eighth Set of Interrogatories Interrogatory No. 308 Page 2 of 7

The aggregate of costs associated with each document type is divided by the previous year's volume to arrive at a cost per transaction. In the case of Affiliated Company Products and Services that appear as line items on the utility bill, a printing and mailing cost per print line is applied according to the number of product/services the customer receives.

# **Payment Processing Services:**

The current cost per transaction calculation for payment processing services itemizes the volumes and all costs associated with the automated and manual processing of payments for the affiliated companies. The calculation captures the following costs:

- " Salary costs loaded with an external PWTI rate
- " Maintenance costs (high speed printers and inserters)
- " Supplies costs
- " Software costs
- " Building space usage

The aggregate of costs associated with the service type is divided by the previous year's volume to arrive at a cost per transaction. In the case of Affiliated Company Products and Services that appear as line items on the utility bill, a payment processing cost per charge line is applied according to the number of product/services the customer receives.

# MISCELLANEOUS CALLS OVERVIEW (Item 5 in Matrix of Services)

#### Developed by: Customer Service Financial & Planning Supervisor

FPL will assist FPLES customers who call FPL with FPLES inquiries and complaints related to the various value-added products and services offered by FPLES. FPL is reimbursed for the time its agents (FPL and outsourcer) spend handling FPLES customer inquiries and complaints. Since the volume of these calls is relatively low, this reimbursement is processed quarterly.

Every quarter, FPL provides data for the calculation of the amount that FPLES will reimburse FPL for handling FPLES customer inquiries and complaints. The calculation contains the following components: monthly cost per call for FPL agent-handled calls (total monthly payroll divided by the number of calls handled by FPL agents), monthly cost per call for outsource agent-handled calls (total monthly outsource expenses divided by the number of calls handled by outsource agents), number of calls handled monthly by FPL and outsource agents, number of FPLES customer inquiry/complaint calls handled monthly by FPL and outsource agents, and percentage of average handle time per transfer relative to overall average handle time for all calls handled by FPL (FPL and outsource agents combined).

# Assumptions:

- Average handle times vary by each value-added product or service call type and are provided by system-generated reports from the Automatic Call Distributor (ACD).
- Total average handle time for all calls is the previous year's year-end average provided by system-generated reports from the ACD.

Florida Power & Light Company Docket No. 120015-EI Staff's Eighth Set of Interrogatories Interrogatory No. 308 Page 3 of 7

#### **Process:**

The following process steps are taken to calculate the appropriate amounts that FPLES reimburses FPL for services:

#### **Determining Call Handling Costs**

Payroll Expenses - Determine regular and overtime payroll expenses for customer care agents and supervision via SAP BW reports that are extracted to capture regular and overtime payroll costs associated with customer care operations.

Outsourcing Expenses - Record outsourcer expenses for call handling, which are determined by either recording monthly invoices or accruals for outsourcing. If accruals are used in the calculation, then adjustments are made in the following month to true-up the difference when the actual invoice is processed.

# <u>Determining Call Volume</u>

- Call volumes are provided by system-generated reports from the Automatic Call Distributor (ACD).
- FPL agent-handled calls are recorded separately from outsourcer agent-handled calls to determine the percentage of work performed by each entity, which affects the distribution of reimbursed expenses (payroll and non-payroll outside services).
- The FPLES calls handled by FPL are recorded and used to determine the reimbursement amounts.

#### Determining Cost per Call

- Calculating FPL and outsourcer costs per call:

FPL cost per call is determined by dividing total payroll costs by the total number of calls handled by FPL agents.

Outsourcer cost per call is determined by dividing total outsourcer expense (invoice or accrual amount) by the total number of calls handled by outsourcer agents.

# **Determining Average Handle Time (AHT)**

- Calculating AHT percentages:

The AHT to handle an FPLES call is divided by the total overall AHT (see assumptions above) to create an AHT percentage that is used in the reimbursement calculation.

#### **Determining Reimbursement Amounts**

- Calculating payroll reimbursements:

Payroll expenses reimbursed by FPLES are calculated by multiplying the following three items together:

Number of FPLES calls handled by FPL agents

Calculated FPL cost per call

Calculated AHT percentage

Florida Power & Light Company Docket No. 120015-EI Staff's Eighth Set of Interrogatories Interrogatory No. 308 Page 4 of 7

- Calculating non-payroll outside services reimbursements:

Non-payroll (outside services) expenses reimbursed by FPLES are calculated by multiplying the following three items together:

Number of FPLES calls handled by outsourcer agents

Calculated outsourcer cost per call

Calculated AHT percentage

# <u>Miscellaneous Calls – FPSC Complaint Handling Related to FPLES (included in Item 5 in Matrix of Services)</u>

# Developed by: Customer Service Financial Analyst II

Throughout the course of the year, FPL's customer advocacy group responds to customer complaints received at the FPSC. Included in these complaints are complaints specific to FPLES products and services.

Once a year, the cost associated with handling complaints specific to FPLES are charged back to FPLES. The costs are calculated by multiplying the average complaint handling cost from the prior year by the number of FPLES complaints handled.

The average cost per complaint is calculated by taking the total prior year budget (actual) for the customer advocacy group responsible for complaint handling and dividing it by the total number of complaints handled. The budget includes:

- · Payroll
- · Telephone Service
- Postage
- · Other costs

The costs are updated on an annual basis.

#### TRANSFER CALLS OVERVIEW (Item 6 in Matrix of Services)

# Developed by: Customer Service Financial & Planning Supervisor

FPL provides service to FPLES by transferring calls to them when customers call to connect or transfer electrical service. FPLES provides customers with opportunities for value-added services (e.g.: home newspaper delivery, phone service, satellite television, etc.) during the call. FPL is reimbursed for the time its agents (FPL and outsourcer) spend transferring calls to FPLES

Florida Power & Light Company Docket No. 120015-EI Staff's Eighth Set of Interrogatories Interrogatory No. 308 Page 5 of 7

Every month, FPL calculates the amount that FPLES will reimburse FPL. The calculation contains the following components: monthly cost per call for FPL agent-handled calls (total monthly payroll divided by the number of calls handled by FPL agents), monthly cost per call for outsource agent-handled calls (total monthly outsourcer expenses divided by the number of calls handled by outsource agents), number of calls handled monthly by FPL and outsource agents, number of calls transferred monthly to FPLES by FPL and outsource agents, and the percentage of average handle time per transfer relative to overall average handle time for all calls handled by FPL (FPL and outsource agents combined).

Note: In March 2012, FPL began notifying customers that they would be transferred to an affiliate and allowed customers to opt-out of being transferred. This process change increased the percentage of average handle time FPL agents spent speaking with customers, which also increased the reimbursement to FPL.

#### **Assumptions:**

- Average handle time to transfer calls to FPLES is 10 seconds
- Total average handle time for all calls is the previous year's year-end average provided by system-generated reports from the Automatic Call Distributor

#### **Process:**

The following process steps are taken to calculate the appropriate amounts that FPLES reimburses FPL for services:

#### **Determining Call Handling Costs**

Payroll Expenses - Determine regular and overtime payroll expenses for customer care agents and supervision via SAP BW reports that are extracted to capture regular and overtime payroll costs associated with customer care operations.

Outsourcing Expenses - Record outsourcer expenses for call handling, which are determined by either recording monthly invoices or accruals for outsourcing. If accruals are used in the calculation, then adjustments are made in the following month to true-up the difference when the actual invoice is processed.

#### **Determining Call Volume**

- Call volumes are provided by system-generated reports from the Automatic Call Distributor (ACD).
- FPL agent-handled calls are recorded separately from outsourcer agent-handled calls to determine the percentage of work performed by each entity, which affects the distribution of reimbursed expenses (payroll and non-payroll outside services).
- Calls transferred to FPLES are also recorded separately and are used to calculate reimbursement amounts.

Florida Power & Light Company Docket No. 120015-EI Staff's Eighth Set of Interrogatories Interrogatory No. 308 Page 6 of 7

# Determining Cost per Call

- Calculating FPL and outsourcer costs per call:

FPL cost per call is determined by dividing total payroll costs by the total number of calls handled by FPL agents.

Outsourcer cost per call is determined by dividing the total outsourcer expense (invoice or accrual amount) by the total number of calls handled by outsourcer agents.

# Determining Average Handle Time (AHT)

- Calculating AHT percentages:

The AHT to transfer a call to FPLES is divided by the total overall AHT (see assumptions above) to create an AHT percentage, which is used in the reimbursement calculation.

# **Determining Reimbursement Amounts**

- Calculating payroll reimbursements:

Payroll expenses reimbursed by FPLES are calculated by multiplying the following three items together:

Number of FPL agent-handled calls transferred to FPLES

Calculated FPL cost per call

Calculated AHT percentage

- Calculating non-payroll outside services reimbursements:

Non-payroll (outside services) expenses reimbursed by FPLES are calculated by multiplying the following three items together:

Number of outsourcer agent-handled calls transferred to FPLES

Calculated outsourcer cost per call

Calculated AHT percentage

# **SPACE CHARGES (Items 7-8 in Matrix of Services)**

Developed by: CRE Cost & Performance Manager and Sr. Corp Real Estate Rep. with inputs from Facilities Management, Finance, Accounting, and External Third Parties Each month, the Corporate Real Estate Department (CRE) performs an analysis of the utilization of space and furniture by affiliates. The utilization, multiplied by the market rate (which is based on an analysis prepared every 5 years), is billed to affiliates on a monthly basis. Please see FPL's

response to OPC Eighth Request for Production of Documents No. 80 for the calculations of

these billings and market study information.

Florida Power & Light Company Docket No. 120015-EI Staff's Eighth Set of Interrogatories Interrogatory No. 308 Page 7 of 7

# EMT SERVICES (Items 9-11 in Matrix of Services)

Developed by: Accounting Manager, EMT; Senior Director, Wholesale Operations; Financial Trading Desk Head; VP, Trading Risk Management

FPL provides a limited amount of front-office trading, mid-office risk management, and back-office accounting services to FPLES. Employee costs are charged directly to FPLES through a fixed payroll distribution from personnel involved with providing services. The payroll distribution percentages are established/reviewed annually by department managers after completing an analysis of the amount of time they expect various personnel to spend performing each FPLES-related activity. The resulting payroll distribution values are also compared to the prior year's actual results/expenses to confirm the reasonableness of established rates.

Once each of the above cost studies are complete, the Manager of Cost Measurement and Allocations provides the overall review and approval for each of the factors and submits them for inclusion into the master data table.

Note: The cost studies described above are filed as attachments to FPL's response to OPC's Eighth Set of Interrogatories No. 159.

Florida Power & Light Company Docket No. 120015-El Staff's Eighth Set of Interrogatories Interrogatory No. 309 Page 1 of 1

Q.

For questions 309 and 310, please refer to FPL's Response to OPC's First Set of Interrogatories, No. 14:

In Interrogatory No. 14, FPL was asked to explain how NEE non-regulated subsidiaries compensate FPL for use of FPL's name, and in the Response FPL indicated that "FPL is compensated for all goods and services it provides to affiliates consistent with Rule 25-6.1351, F.A.C., Cost Allocations and Affiliate Transactions." Please identify any specific processes and procedures that FPL uses to ensure that FPL is compensated consistent with Rule 25-6.1351, F.A.C., Cost Allocations and Affiliate Transactions.

#### A.

Please see sections of Witness Ousdahl's testimony below for a description of the specific processes and procedures that FPL uses to ensure that FPL is compensated consistent with Rule 25-6.1351. In addition to these controls, the affiliate billing process is subject to periodic review by FPL's Internal Audit Department.

Page 31, line 19 through Page 32, line 17 describes the Cost Allocation Manual (CAM), the Company's Sarbanes-Oxley (SOX) processes to ensure the appropriate charging of payroll to affiliates, and the role of the Cost Measurements and Allocation Department as the primary control and oversight organization, whose mission is to ensure that FPL complies with Rule 25-6.1351. The CAM has been filed as Exhibit KO-9.

Page 32, line 19 through Page 33, line 2 describes affiliate reporting and transparency and indicates that FPL complies with strict affiliate accounting and reporting requirements as mandated by the Commission.

Page 33, line 4 through Page 33, line 13 describes how the affiliate billing process is included in the Company's process of internal control review for SOX 404 compliance and outlines the objectives of that review to ensure that adequate controls are in place. See FPL's Response to Staff's Fourth Set of Interrogatories No. 136 for SOX 404 compliance controls.

Florida Power & Light Company Docket No. 120015-El Staff's Eighth Set of Interrogatories Interrogatory No. 310 Page 1 of 1

O.

For questions 309 and 310, please refer to FPL's Response to OPC's First Set of Interrogatories, No. 14:

Please identify and describe any benefits that FPL or its ratepayers receive from NEE's non-regulated subsidiaries as a result of the goods and services FPL provides to affiliates consistent with Rule 25-6.1351, F.A. C., Cost Allocations and Affiliate Transactions.

#### A.

As is discussed in the testimony of Witness Ousdahl, FPL and its customers benefit from services provided to NEE's subsidiaries in the following ways:

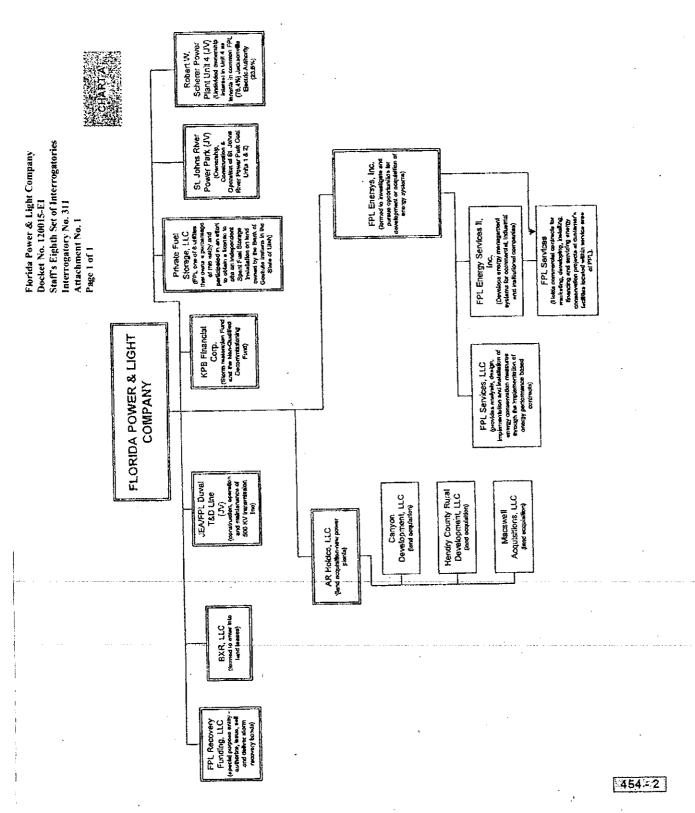
- Charging a portion of support services to its affiliates has allowed FPL to reduce its share of
  these necessary fixed costs for the benefit of its retail customers. By spreading the cost of
  required activities over a broader base, the customers' cost responsibility is reduced below
  what they would have otherwise incurred.
- The special skills and talents of all of NEE's employees can be leveraged over the largest organizational reach. The opportunity to manage the construction and operation of the fleet of assets brings scale, breadth, and depth of knowledge and experience that could not be achieved by FPL on a stand-alone basis.
- The enhanced purchasing power of the larger enterprise allows FPL to achieve greater economies of scale and bargaining power in purchasing than would be the case on a stand-alone basis.

Florida Power & Light Company Docket No. 120015-Ei Staff's Eighth Set of Interrogatories Interrogatory No. 311 Page 1 of 1

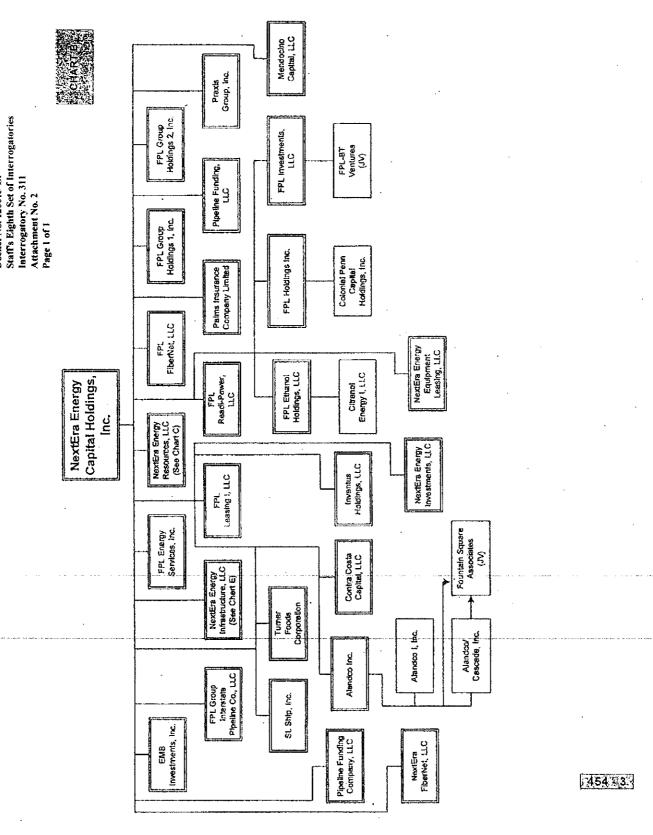
Q. Refer to FPL's Responses to OPC Interrogatories Nos. 14-16. Please identify NEE's non-regulated subsidiaries, and FPL's subsidiaries that are "consolidated as part of FPL's financials", and state which of these subsidiaries FPL's Response to OPC Interrogatory No. 14 addresses, if any.

#### A.

Attachment Nos. 1 and 2 are taken from the Company's 2011 Diversification Report. See Attachment No. 1 for the FPL Organization Chart for identification of FPL Consolidated Subsidiaries. See Attachment No. 2 for the NEE Organization Chart for identification of NEE's non-regulated subsidiaries. The statement in FPL's response to OPC's First Set of Interrogatories No. 14 applies to all FPL affiliates.



120015 Hearing Exhibits - 00898



Florida Power & Light Company Docket No. 120015-E1

LP = Limited Partnership GP = General Partnership JV = Joint Venture LLC = Limited Liability Company

Fiorida Power & Light Company Docket No. 120015-El Staff's Eighth Set of Interrogatories Interrogatory No. 312 Page 1 of 1

Q. Refer to FPL's Response to OPC's Interrogatory No. 18. Please explain how FPL and its ratepayers benefit from vendor contracts and relationships that FPL establishes for affiliates.

#### A.

When vendor relationships are leveraged across the enterprise, FPL and its customers benefit from supplier terms and responsiveness that reflect the higher volumes of transactions with those vendors.

Florida Power & Light Company Docket No. 120015-El Staff's Eighth Set of Interrogatories Interrogatory No. 313 Page 1 of 1

Q.

Refer to Exhibit KO-11 and Attachment No. 2, Tab 1of 1, of FPL's Response to OPC's Interrogatory No. 7, Schedule of FPL Service Fees. Please explain, and reconcile if necessary, the differences in the amounts listed for Nuclear, Energy Marketing and Trading, and Information Management for 2010, 2011, 2012, and 2013 in these two documents.

#### A.

There are no differences between Exhibit KO-11 and Attachment No. 2 of FPL's response to OPC's First Set of Interrogatories No. 7 in the amounts listed for Nuclear, Energy Marketing and Trading, and Information Management for 2011, 2012, and 2013. Note that OPC's First Set of Interrogatories No. 7 requested information for 2010 Service Fee data, which was not included in Exhibit KO-11.

Pamela Lhuk
Pamela Metz

State of Florida )
County of Palm Beach

I hereby certify that on this day of fune, 2012, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared Pamela L. Metz, who is personally known to me, and he/she acknowledged before me that he/she sponsored the answer(s) to Interrogatory No(s). 300 from Staff's 8th Set of Interrogatories to Florida Power & Light Company in Docket No. 120015-EI, and that the response(s) is/are true and correct based on his/her personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this day of 2012.

JO RETHA FORBES Notary Public - State of Florida My Comm. Expires Mar 8, 2014 Commission # DD 948300

rigitary rubile, state of r

Ku	_
Kimberly Herron	`

State of Florida )

County of Palm Beach

I hereby certify that on this day of June, 2012, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared Kimberly Herron, who is personally known to me, and he/she acknowledged before me that he/she cosponsored the answer(s) to Interrogatory No(s).

312 from Staff's 8th Set of Interrogatories to Florida Power & Light Company in Docket No. 120015-EI, and that the response(s) is/are true and correct based on his/her personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this 7th day of June, 2012.

Notary Public, State of Florida



State of Florida	)	
County of Palm Beach	)	
I hereby o	certify that on this 13	day of June, 2012, before me, an
officer duly authorized is	n the State and Count	y aforesaid to take acknowledgments,
personally appeared	Andrew Dillman	_, who is personally known to me, and he
acknowledged before me	e that he sponsored th	e answers to Interrogatory Nos. 301, 303,
and 304; and co-sponse	ored Interrogatory N	o. 308, from Staff's Eighth Set of
Interrogatories to Florid	a Power & Light Com	pany in Docket No. 120015-EI, and that
the responses are true ar	d correct based on his	s personal knowledge.
In Witness When aforesaid as of this 18		set my hand and seal in the State and County
atoresaid as of this 10	day of Ova Co	Magan Sabato Notary Public, State of Florida
Notary Stamp:		

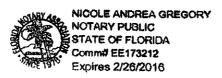
MORGAN A. SABATO Notary Public - State of Florida My Comm. Expires Oct 23; 2015 Commission # EE 140489

		h Older	
		Kim Ousdahl	
State of Florida	)		
County of Palm Beac	h )		

I hereby certify that on this <u>13</u> day of <u>June</u>, 2012, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared Kim Ousdahl, who is personally known to me, and she acknowledged before me that she sponsored the answers to Interrogatory Nos. 294-299, 305-307, 309-311, and 313 from Staff's 8<sup>th</sup> Set of Interrogatories to Florida Power & Light Company in Docket No. 120015-EI, and that the responses are true and correct based on her personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this \_\_\_\_\_\_\_\_, 2012.

Notary Public State of Florida



li	berdahl
Kin	n Ousdahl

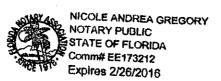
State of Florida )

County of Palm Beach )

I hereby certify that on this <u>13</u> day of <u>Jane</u>, 2012, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared Kim Ousdahl, who is personally known to me, and she acknowledged before me that she co-sponsored the answers to Interrogatory Nos. 308 and 312 from Staff's 8<sup>th</sup> Set of Interrogatories to Florida Power & Light Company in Docket No. 120015-EI, and that the response is true and correct based on her personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this \_\_\_\_\_\_\_, 2012.

Notary Jubije, State of Florida



Rhode Root

State of Florida )

County of Palm Beach

I hereby certify that on this 13 day of 2012, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared Rhode Root, who is personally known to me, and he/she acknowledged before me that he/she cosponsored the answer(s) to Interrogatory No(s).

308 from Staff's 8th Set of Interrogatories to Florida Power & Light Company in Docket No. 120015-EI, and that the response(s) is/are true and correct based on his/her personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this /3 day of 5000, 2012.

Notary Public, State of Florida



(Fabian Tejedor - Information Management)

State of Florida

I hereby certify that on this 13th day of June, 2012, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared Fabian Tejedor, who is personally known to me, and he/she acknowledged before me that he/she co-sponsored the answer(s) to Interrogatory No. 302 from Staff's 8th Set of Interrogatories to Florida Power & Light Company in Docket No. 120015-EI, and that the response(s) is/are true and correct based on his/her personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County

aforesaid as of this  $\frac{19}{100}$  day of  $\frac{1}{100}$ , 2012.

Notary Public, State of Florida

Jacqueline Cabrera

State of Florida

County of Miami-Dade

I hereby certify that on this 14 day of June, 2012, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared Jacqueline Cabrera, who is personally known to me, and she acknowledged before me that she co-sponsored the answer to interrogatory number 308 from Staff's 8th Set of Interrogatories to Florida Power & Light Company in Docket No. 120015-EI, and that the response is true and correct based on her personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this Hand and of June, 2012.

Notary Public, State of Florida

