

City of Wilton Manors

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October 26, 2016

The Honorable Julie Imanuel Brown, Chair
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Gary Resnick
Mayor

RE: Rate Increase (FPL base rate case, Docket No. 160021-EI Consolidated)

Scott Newton
Vice Mayor

Dear Chair Brown:

Julie A. Carson
Commissioner

On behalf of the City of Wilton Manors ("City"), please accept this objection to the rate increase filed by Florida Power and Light ("FPL"). Dockets Nos. 160061-EI, Storm Harding Plan, 160088-EI, Incentive Mechanism, and 160062-EI, Depreciation and Dismantlement, have been consolidated with the FPL base rate case, Docket No. 160021-EI.

Tom Green
Commissioner

1. The Public Service Commission's ("PSC") duty is to fix "just, reasonable, and compensatory rates." Section 366.041, F.S. It is also the PSC's duty to protect the public and the customers of FPL from rate increases that "are unjust, unreasonable, unjustly discriminatory, or in violation of law." Section 366.06, F.S. To fulfill its duties in this docket, the PSC should consider several statutory criteria, including:

Justin S. Flippen
Commissioner

Leigh Ann Henderson
City Manager

- a) "the value of [FPL's proposed] service to the public," including the residents and businesses located within the City;

Kerry Ezrol
City Attorney

- b) FPL's use of "alternative energy resources," "conservation," and "efficiency;"
and

- c) FPL's "ability to improve its services and facilities." Id.

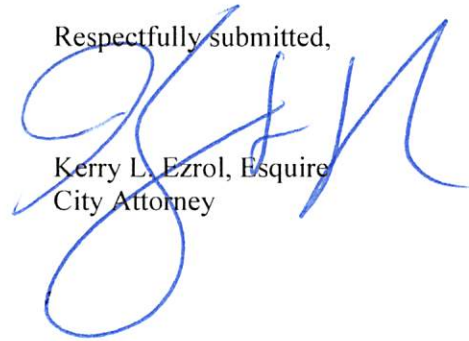
2. The City joins in the Prehearing Statements filed by: the Office of Public Counsel ("OPC") on August 5, 2016 (Document No. 05942-16); the Sierra Club on August 5, 2016 (Document No. 05950-16); the South Florida Hospital and Healthcare Association on August 5, 2016 (Document No. 05943-16); and the AARP on August 5, 2016 (Document No. 05913-16).

3. FPL's request for a rate increase is excessive. The City questions FPL's stated bases for its requested increases, particularly when FPL is spending millions of dollars to support a Constitutional Amendment 1 on the November 8, ballot. As amended, FPL's request seeks an approximately \$826 million base rate increase in 2017. On top of this request, FPL is asking for an additional \$270 million in 2018, plus another \$209 million increase in mid-2019 for the Okeechobee Clean Energy Center (Okeechobee).

Wilton Manors is a Community Wildlife Habitat

4. The City joins in the conclusion of OPC that a rate decrease of \$807 million is appropriate for 2017, and that no rate increases are needed for 2018 or for the Okeechobee limited scope adjustment in 2019. In addition to the significant impact FPL's requested increase would have on our residents and businesses, the increase would have a significant impact on the City, which currently spends approximately \$300,000 per year on FPL charges.
5. The City also supports Resolution No 16-02 adopted by the South Florida Regional Planning Council and urges the PSC to deny FPL the ability to recover costs for remediating environmental impacts from the Turkey Point Power Plant at additional cost to ratepayers.

Respectfully submitted,



Kerry L. Ezrol, Esquire
City Attorney

cc: Mayor Gary Resnick
Members of the City Commission
Leigh Ann Henderson, City Manager
Florida League of Cities
Broward County League of Cities

Florida Public Service Commissioner, Lisa Polak Edgar
Florida Public Service Commissioner, Art Graham
Florida Public Service Commissioner, Ronald A. Brisè
Florida Public Service Commissioner, Jimmy Patronis

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