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March 11, 2019

-VIA ELECTRONIC FILING-

Mr. Adam Teitzman, Commission Clerk
Division of the Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 20190048-EI – Florida Power & Light Company’s Petition for Approval to Amend its Street Lighting, Outdoor Lighting and LED Lighting Pilot Tariffs

Dear Mr. Teitzman:

Enclosed for filing please find Florida Power & Light Company’s responses to Staff’s First Data Request Nos. 1 through 9 in the above-referenced docket.

If you should have any questions regarding this transmittal, please contact me at (561) 691-2512.

Respectfully submitted,

/s/ Kenneth M. Rubin
Kenneth M. Rubin
Fla. Bar No. 349038

Enclosures
cc: Counsel for Parties of Record (w/encl.)

QUESTION:

Paragraph 4 of the petition refers to 30 percent of lights previously served by City of Vero Beach (COVB) as non-standard lighting. Please state how many fixtures and how many poles are included in the 30 percent.

RESPONSE:

The 30 percent of the lights that are considered non-standard lighting are comprised of 1,150 lights and 477 poles.

QUESTION:

Please discuss what types of customers currently take service under the 30 percent non-standard lighting and what charges are they being billed now (since the Vero Beach transaction has been completed and the instant petition has not received Commission approval yet).

RESPONSE:

The customer types currently served by non-standard lighting are made up of one governmental customer, eighty-one commercial customers and one residential customer. The proposed FPL rates for non-standard lighting described and identified in FPL's Petition and attached exhibits are being applied to the bills of former customers of City of Vero Beach with non-standard lighting who are now customers of FPL, subject to refund or recovery of the difference pending the outcome of this proceeding.

QUESTION:

Please state the number of customers that currently take service under the 30 percent non-standard lighting. Additionally, please discuss in detail what the customer bill impacts would be if the Commission approves the instant petition.

RESPONSE:

There are 83 customers that are served by non-standard lighting. If the Commission approves the instant petition, we estimate that 63 customers will see their lighting bill decrease and 20 customers will see their bill increase.

For the customers that will see a decrease in their lighting bill, the amount of the decrease ranges from \$0.39 to \$326.61. The primary reasons for the decreases are:

For the customers who will see an increase in their lighting bill, the amount of the increase ranges from \$1.32 to \$786.48. All former COVB non-standard lighting customers whose lighting bill was projected to increase by more than \$8 were contacted by FPL via phone call or in-person visit. The primary reasons for the increases are:

- FPL's proposed rates for non-standard lighting are lower than the rates City of Vero Beach (COVB) customers were paying under the single COVB lighting rate.
- FPL identified fewer lights on the field survey than COVB was charging for, and thus FPL is charging the customer for the correct number of lights.

For the customers that will see an increase in their lighting bill, the amount of the increase ranges from \$1.32 to \$786.48. The primary reasons for the increases are:

- For the top 3 bills that saw an increase, COVB had been charging for one type of fixture, when COVB should have been charging for the significantly higher cost fixture that was actually in the field. FPL has corrected this error from the COVB billing and is charging based on the actual fixture in the field.
- For the other COVB customers who were being billed under the single COVB lighting rate, they now properly being billed under the FPL OL-1 tariff.

QUESTION:

Please discuss what happens if a non-standard fixture fails and cannot be repaired.

RESPONSE:

At the time that FPL acquired the City of Vero Beach (COVB) electric utility, FPL received the electric utility inventory and equipment that COVB still possessed, including non-standard lighting fixtures and equipment. FPL is currently using this equipment to repair street light fixture failures for non-standard fixtures. Once all of the non-standard equipment has been used, FPL will use a standard fixture to replace failed non-standard fixtures. FPL has begun a campaign to notify these customers of this policy. In addition, we will be reaching out to these customers to discuss options to replace these High Pressure Sodium Vapor and Metal Halide lights with FPL's new LED products.

QUESTION:

Please clarify if the proposed Special Provision only applies to the non-standard lights that were previously served by COVB, or could any customer at some point request a fixture or pole that is not included in FPL's existing lighting tariffs and be billed under the Special Provision?

RESPONSE:

The proposed Special Provision applies to all customers who request a fixture or pole that is not included in FPL's existing lighting tariffs.

QUESTION:

Please explain footnote 4 on page 3 of the petition as it relates to the proposed true up of customer bills. Does the true-up refer only to the classification of the lights or could a customer be assessed additional charges?

RESPONSE:

FPL has three different tariffs with rates for lighting (SL-1, OL-1 and LT-1) while the City of Vero Beach (COVB) had only one tariff with rates for all of the outdoor lighting accounts they served. As outlined in footnote 4 on page 3 of FPL's Petition, this means that former COVB customers were charged for lights FPL classifies as either Outdoor Lighting or Street Lighting under the rates included on a single tariff. By performing field surveys of the lights, reviewing various forms of technology such as Google Maps, and reviewing COVB lighting agreements (if available), FPL will be able to identify all COVB standard lighting as either fitting within the SL-1 tariff or the OL-1 tariff.

This review will correct the classification of the lights from the perspective of the FPL tariffs. Since the rates are different between the OL-1 and SL-1 tariffs, this may cause the customer's rate to decrease or increase based on the classification identified.

QUESTION:

Have the former COVB non-standard lighting customers been notified of any impacts to their lighting bills if the Commission approves the instant petition? If not, please discuss how and when FPL will inform the customers.

RESPONSE:

All former COVB non-standard lighting customers whose lighting bill was projected to increase by more than \$8 were contacted by FPL via phone call or in-person visit. If a customer's bill decreased, FPL did not attempt to contact the customer.

QUESTION:

FPL's current lighting tariffs include a minimum initial term. Will the former COVB lighting customers be required to enter into a lighting agreement with FPL that starts at the beginning of the term, i.e., year 1? Or will FPL include the years COVB already served the lighting customers when determining how long the customers have received lighting service?

RESPONSE:

FPL will require lighting agreements with former COVB customers, consistent with the manner in which all other FPL customers are required to execute streetlight agreements. The effective date of the lighting agreements for former COVB lighting customers will be December 17, 2018, the day that FPL formally acquired the COVB electric utility.

QUESTION:

Please refer to tariff sheets 8.716, 8.726, and 8.737 in regards to the Special Provision for the following questions.

- a) What is considered the “Company’s average installed cost” (since COVB purchased the facilities originally)? Does FPL know what COVB’s average installed costs were at the time the lighting customer requested service from COVB?
- b) Does FPL know when COVB purchased the non-standard lights and does FPL know how depreciated the lights are now?
- c) Does the proposed Facilities Charge of 1.63 percent include maintenance cost?

RESPONSE:

- a) FPL does not know the average installed costs for the former COVB lighting as COVB did not have records sufficient to support any such calculations. The average installed cost FPL used is based on the current estimated value of the lighting by using COVB’s tariff rates at the time the COVB electric utility was acquired by FPL. The average installed costs used by FPL are identified in the chart below as follows:

Average Install Cost for Vero Beach non-standard lighting

175W HPS Salem	\$707.63
100W MH Salem	\$323.00
175W MH Salem	\$457.48
100W HPS Acorn	\$791.95
150W HPS Acorn	\$792.08
100W MH Acorn	\$828.27
175W MH Acorn	\$961.53
100W HPS Ancestra	\$896.39
150W HPS Ancestra	\$896.39
100W MH Ancestra	\$931.97
175W MH Ancestra	\$1,065.88
100W HPS Candela	\$1,297.93
175W MH Candela	\$1,466.50
175W MH Domus	\$1,466.50
52W Salem LED	\$297.44
48W Area LED	\$127.50
250W HPS Flood	\$314.82
250W MH Flood	\$540.22
400W MH Flood	\$411.45

- b) FPL does not know when COVB purchased the non-standard lights. FPL does not know the depreciated value of these lights.
- c) No.