

JAMES E. "JIM" KING, JR.
President

JOHNNIE BYRD
Speaker



STATE OF FLORIDA
OFFICE OF PUBLIC COUNSEL

ORIGINAL

c/o THE FLORIDA LEGISLATURE
111 WEST MADISON ST.
ROOM 812
TALLAHASSEE, FLORIDA 32399-1400
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Harold McLean
Public Counsel

November 16, 2004

Ms. Blanca S. Bayó, Director
Division of the Commission Clerk
and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0870

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NOV 16 PM 3:19
COMMISSION CLERK

RE: Docket No. 041291-EI, In Re: Florida Power & Light Company's petition for authority to recover prudently incurred storm restoration costs related to 2004 storm season that exceed storm reserve balance, by Florida Power & Light Company.

Dear Ms. Bayó:

Enclosed for filing in the above-referenced docket are the original and fifteen (15) copies of the Office of Public Counsel's First set of Interrogatories to Florida Power & Light (Nos. 1-11) for filing in the above referenced docket.

Please indicate the time and date of receipt on the enclosed duplicate of this letter and return it to our office.

Sincerely,

Patricia A. Christensen
Associate Public Counsel

- CMP _____
- COM _____
- CTR _____
- ECR _____
- GCL _____ PC/pwd
- OPC _____ Enclosures
- MMS _____
- RCA _____
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DOCUMENT NUMBER-DATE
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FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for authority to recover prudently
incurred storm restoration costs related to
2004 storm season that exceed storm
reserve balance, by Florida Power &
Light Company

Docket No. 041291-EI

Filed: November 16, 2004

OFFICE OF PUBLIC COUNSEL'S FIRST SET OF INTERROGATORIES TO
FLORIDA POWER & LIGHT (Nos. 1-11)

Please take notice that the Citizens served the original and one copy of interrogatories (Nos. 1- 11) to Florida Power & Light on November 16, 2004. The interrogatories are to be answered under oath by FP&L and the answers are to be given in writing immediately following the question to which it responds. Please provide the name, address, and relationship to FP&L of those persons giving the answers to each of the interrogatories.

Thereafter, the original of the interrogatories, together with the answers, is to be served on the Citizens at the Office of Public Counsel, c/o the Florida Legislature, 111 West Madison Street, Claude Pepper Building, Room 812, Tallahassee, Florida 32399-1400. Copies are to be served on all parties in accordance with applicable Rules of Civil Procedure.

INTERROGATORIES

1. Please provide a description of the various categories for expenses that FP&L expects to recover through special storm recovery for 2004.

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

2. Please provide a description of the process used by FP&L to develop the storm recovery amounts requested in the docket.
3. In the calculation of special storm recovery expenses, please discuss your handling of the normal budgeted expenses for 2004 operations that are part of base rates.
4. Are the storm expenses identified for special recovery by the company, only those expenses that have been incurred by the company that exceed normal operational budgets? If so, please explain.
5. Please provide a list of all work orders and projects exceeding \$20,000 that are incomplete as of November 1, 2004 that the company intends to recover through special storm recovery.
6. Please provide a monthly breakdown of all expenditures of capital and expenses stated separately that have been charged to the 2004 storm account to date and the monthly forecast of future capital and expenses that the company expects to apply to storm recovery.
7. In terms of uncompleted projects, does the company intend to complete these projects within existing budgeting guidelines with existing personnel? If not, please describe the company's plans to complete such projects and the personnel it will use to complete them.
8. Please provide a descriptive list of all storm related projects that the company does not expect to complete by December 30, 2004, and provide a list of all such projects that exceed \$20,000.
9. Please discuss the potential for recovery of storm related damages through insurance claims.

10. Please state the amount of the company's storm recovery fund on an annual basis since January 1, 1990, to date and provide all annual additions and subtractions from that fund.

11. Please state the impact and describe the expected impact that 2004 storm recovery will have on the 2004 end of year annual depreciation report.

Respectfully submitted,



Patricia A. Christensen
Florida Bar No. 0989789
Associate Public Counsel
Office of Public Counsel
c/o The Florida Legislature
Room 812, 111 W. Madison Street
Tallahassee, Florida, 32399-1400
(850) 488-9330

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail on this 16th day of November, 2004, to the following:

Florida Power & Light Company
Mr. Bill Walker, Esquire
215 S. Monroe Street, Suite 810
Tallahassee, FL 32301-1859

Florida Power & Light
Mr. R. Wade Litchfield, Esquire
700 Universe Blvd.
Juno Beach, FL 33408

Florida Public Service Commission
Cochran Keating, Esquire
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850



Patricia A. Christensen
Associate Public Counsel