

**Ruth Nettles**

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**From:** Rhonda Dulgar [rdulgar@yvlaw.net]  
**Sent:** Thursday, October 16, 2008 4:03 PM  
**To:** John Butler; Ken Hoffman; R. Wade Litchfield; Erik Saylor; Filings@psc.state.fl.us; Ralph Jaeger; Schef Wright  
**Subject:** Electronic Filing - Docket 080522-EI  
**Attachments:** MUUC.NoticeOfDepo.FPL.10-16-08.pdf

a. Person responsible for this electronic filing:

Robert Scheffel Wright  
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b. 080522-EI

In Re: Petition and Complaint of the Municipal Underground Utilities Consortium for Relief from Unfair Charges and Practices of Florida Power & Light Company.

c. Document being filed on behalf of the Municipal Underground Utilities Consortium, the Town of Palm Beach, the Town of Jupiter Inlet Colony, and the City of Coconut Creek.

d. There are a total of 29 pages.

e. The document attached for electronic filing is Notice of Taking Deposition of Florida Power & Light Company.

(see attached file: MUUC.NoticeOfDepo.FPL.10-16-08.pdf)

Thank you for your attention and assistance in this matter.

Rhonda Dulgar  
Secretary to Schef Wright  
Phone: 850-222-7206  
FAX: 850-561-6834

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In Re: Petition and Complaint of the )  
Municipal Underground Utilities )  
Consortium for Relief from Unfair ) DOCKET NO. 080522-EI  
Charges and Practices of Florida )  
Power & Light Company ) FILED: OCTOBER 16, 2008  
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**NOTICE OF TAKING DEPOSITION OF FLORIDA POWER & LIGHT COMPANY**

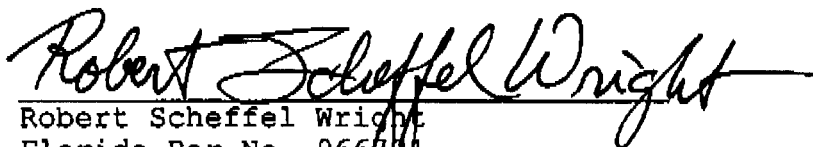
The Municipal Underground Utilities Consortium (the "MUUC"), the Town of Palm Beach ("Palm Beach"), the City of Coconut Creek ("Coconut Creek"), and the Town of Jupiter Inlet Colony ("Jupiter Inlet Colony"), collectively referred to herein as the "Petitioners," pursuant to Uniform Rule 28-106.206, Florida Administrative Code, and Rules 1.310(a) and 1.310(b)(6), Florida Rules of Civil Procedure, hereby give notice of taking the deposition of Florida Power & Light Company ("FPL"), beginning at 9:00 a.m. on Tuesday, October 28, 2008, at FPL's offices located at 9250 West Flagler Street, Miami, Florida, or at another mutually agreeable time and place in the State of Florida designated by FPL. As required by Rule 1.310(b)(6), the subject matter of the deposition is set forth with reasonable particularity on Attachment A to this Notice. FPL is requested to designate its corporate representative or representatives most knowledgeable and best able to testify with respect to the indicated subject matter. This deposition is being taken for purposes of discovery, for use at

trial, or for any other purpose allowed under the Florida Rules of Civil Procedure, the Rules of the Florida Public Service Commission, and the Florida Uniform Rules of Procedure.

To the extent reasonably practicable, each deponent is requested to bring with him or her copies of all documents known to the deponent that relate to the subject matter of the deposition and to FPL's responses to Interrogatories Nos. 1-25 propounded by the MUUC and answered by FPL on September 22, 2008.

Please govern yourself accordingly.

Dated this 16th day of October, 2008.



Robert Scheffel Wright  
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Attorneys for the Petitioners

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished to the following, by electronic and U.S. Mail, on this 16th day of October, 2008.

Florida Power & Light Company  
Mr. Wade Litchfield, Esquire  
215 South Monroe Street, Suite 810  
Tallahassee, FL 32301-1859

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Attorney

**ATTACHMENT A**

**PSC DOCKET NO. 080522-EI,  
SUBJECT MATTER FOR FPL CORPORATE REPRESENTATIVE DEPOSITION**

By agreement of counsel, the Petitioners are posing the following questions to be addressed in the corporate representative deposition. These questions are the same as the Petitioners' interrogatories originally propounded to FPL. The questions fall into two main groups: a "General" group relating to FPL's experience, practices, and costs relating to UG conversion projects, and a group of interrogatories relating to the worksheet provided to representatives of the Petitioners by FPL titled "Direct Engineering, Supervision & Support - Adjustment for Assumed Customer-Performed Work," which is abbreviated below as the "DESS Worksheet."

**I. General Interrogatories (Not Related to DESS Worksheet)**

1. a. Please identify all UG conversion projects performed by FPL, or by FPL and a Local Government Applicant, since January 1, 2006. (Examples of which the MUUC is aware include the Paloma Lakes conversion project in Coconut Creek, the conversion of OH facilities on Wiles Road and Lyons Road adjacent to the Promenade commercial development in Coconut Creek, the pilot project in the Town of Jupiter Island, Jupiter Island's Phase A project, and a project in South Daytona Beach.)

b. Please identify the linear distance of the facilities converted in each of these projects.

c. Please identify the FPL engineering personnel who actually worked on each project identified in response to the previous question.

d. Please identify any other FPL personnel (i.e., other than engineering personnel) who actually worked on each project identified in response to the question above.

e. Please identify contractors, construction companies, and installation companies that performed part or all of the work on the identified UG conversion projects.

2. a. Please identify the FPL engineering personnel who are presently assigned to work on UG conversion projects for Local Government Applicants and other Applicants, including personnel responsible for preparing ballpark cost estimates, preparing binding cost estimates, and working directly on actual UG

conversion projects.

b. Please state the date on which each person identified in response to 2.a above was assigned to work on UG conversion projects.

c. Please state the total number of FPL engineering personnel who were assigned to work directly on UG conversion projects as of January 1, 2005 and as of the date of FPL's responses to these interrogatories.

3. a. Please identify any other FPL personnel (i.e., other than engineering personnel) who are presently assigned to work on UG conversion projects for Local Government Applicants and other Applicants, including personnel responsible for preparing ballpark cost estimates, preparing binding cost estimates, and working directly on actual UG conversion projects.

b. Please state the date on which each person identified in response to 3.a above was assigned to work on UG conversion projects.

c. Please state the total number of FPL personnel other than engineering personnel who were assigned to work directly on UG conversion projects as of January 1, 2005 and as of the date of FPL's responses to these interrogatories.

4. a. Please describe FPL's standard practices for allocating or assigning "direct engineering, supervision and support" costs (i.e., those costs shown under the major categories "Operations Centers" and "Operations Support" on the DESS Worksheet) to FPL-performed UG conversion work.

b. Please describe FPL's standard practices for allocating or assigning "direct engineering, supervision and support" costs (i.e., those costs shown under the major categories "Operations Centers" and "Operations Support" on the DESS Worksheet) to FPL-performed OH installation work.

c. Please identify any documents describing or relating to these practices.

5. a. Please describe FPL's standard practices for allocating or assigning corporate overhead costs (i.e., those costs included in the "Corporate" category on the DESS Worksheet) to FPL-performed UG conversion work.

b. Please describe FPL's standard practices for allocating or assigning corporate overhead costs (i.e., those costs included in the "Corporate" category on the DESS Worksheet) to FPL-performed OH conversion work.

c. Please identify any documents describing or relating to these practices.

6. FPL has represented to Petitioners' representatives that its "engineering deposit" charge (pursuant to Section 12.2.3 of FPL's Tariff) for the Binding Cost Estimate does not cover all of the engineering costs that FPL actually incurs in connection with a UG conversion project, regardless whether FPL performs the UG conversion work or the Local Government Applicant performs the work.

a. Please explain what costs, and what percentage of such costs, the engineering deposit charge does cover in an instance where a potential Applicant pays for the engineering deposit but does not undertake the project.

b. Please explain what costs FPL believes are not recovered through the engineering deposit charge imposed by FPL, in cases where the Applicant undertakes the project and in cases where the Applicant does not undertake the project.

7. Please provide the most updated information available to FPL regarding Local Government Applicants that have requested ballpark cost estimates for undergrounding projects, including the same information that FPL provided in the spreadsheet titled "Local Government Requests for Underground Conversions," which was furnished in response to data requests in Docket No. 060150-EI. This information includes the identity of the requesting Local Government Applicant, the Status of the request, the value of the Ballpark Cost Estimate given by FPL (if any), whether the Applicant has paid any Engineering Deposit, the amount of any Binding Cost Estimate furnished by FPL, and whether the Applicant has paid such estimate. A copy of the earlier spreadsheet is attached to these Interrogatories as Attachment A.

8. FPL has represented to Petitioners' representatives that its "current applicable hourly rate" for "engineering personnel" who perform the review and inspection function referenced in Section 12.2.11.d) of FPL's tariff (Sheet No. 6.330) is \$70 per person-hour.

a. Please confirm that this is accurate.

b. Typically, what is the job or position title for FPL "engineering personnel" who performs this work? If such work is performed by persons with various titles (e.g., engineer in training, junior engineer, senior engineer, professional engineer), please identify all such titles.

c. (i) What costs are included in the \$70 per hour rate?

(ii) Does this value include health insurance, other insurance benefits, other benefits, secretarial and other administrative support, telephone costs, office space costs, etc.?

(iii) Does it include any allocated costs associated with the personnel who manage the FPL engineering personnel who perform the review and inspection work?

(iv) Does it include any allocated "corporate overhead" costs?

d. (i) How does FPL charge for the review and inspection function?

(ii) Is this function or service charged for on an "actual time and materials" basis?

(iii) Is it charged for within the DESS costs?

(iv) Is it charged for in a combination of these two ways, or in some other way?

9. Would FPL be willing to charge on an "actual time and materials" basis for FPL's actual engineering, supervision, and support expenses incurred and efforts expended in connection with a UG conversion project where the Local Government Applicant (or other Applicant) performs part or all of the construction and installation work?

10. Once FPL prepares the binding cost estimate and basic engineering drawings, if an Applicant undertakes to construct and install the UG facilities, but does not undertake the removal work:

a. What, if any, additional engineering labor effort and other engineering costs must FPL expend and incur in connection



with such a project?

b. What, if any, supervision of an Applicant's labor forces, or of an Applicant's contractors or those contractors' labor forces, does FPL provide where the Applicant or its contractors perform the construction and installation of the UG facilities?

c. What, if any, support of an Applicant's labor forces, or of an Applicant's contractors or those contractors' labor forces, does FPL provide where the Applicant or its contractors perform the construction and installation of the UG facilities?

d. What, if any, other actual, direct costs (i.e., other than engineering, supervision, and support costs) does FPL incur where the Applicant or its contractors perform the construction and installation of UG facilities?

e. What, if any, direct or indirect costs does FPL believe are not incurred where the Applicant or its contractors perform the construction and installation of the UG system? Please identify any analyses that FPL has completed to discern these costs.

## **II. Interrogatories Relating to DESS Worksheet**

The following questions refer to the worksheet provided to MUUC representatives by FPL titled "Direct Engineering, Supervision & Support - Adjustment for Assumed Customer-Performed Work," which is abbreviated below as the "DESS Worksheet." A copy of the DESS Worksheet is provided as Attachment B to these interrogatories for your reference.

Note A: We believe or assume that FPL labor rates are calculated using a consistent methodology that includes the respective employee's salary, benefits, and other support costs. If this is the case, please explain the methodology once and refer to it as appropriate in responses to the questions below that relate to labor rates. If this is not the case, then please answer each question regarding labor rates specifically.

Note B: As used in these requests, "supporting documentation" means written, printed, or electronic documents of any type, workpapers, supporting memoranda, supporting spreadsheets, notes, correspondence, and any other documents of any type or nature.

Note C: For the sake of brevity and because FPL's tariff Section 12.2.11.d) refers to "Applicants," the questions below refer to Applicants; this term should be understood to include Local Government Applicants and any other Applicants.

General - DESS Worksheet

11. Please identify the individuals who prepared the DESS Worksheet.

12. Please identify the individuals who reviewed and approved the DESS Worksheet before it was furnished to the MUUC's and Petitioners' representatives.

13. How are the labor rates calculated for inclusion in the cost estimates in each of the categories shown on the DESS Worksheet?

(See Note A above.)

Labor/Vehicle Costs

14. a. Please explain in detail how labor costs, as presented in the DESS Worksheet, are calculated, including any costs other than direct salaries and wages.

b. Please identify any documents that show, describe, or relate to the calculation of labor costs as presented in the DESS Worksheet.

15. a. Please explain in detail how vehicle costs, as presented in the DESS Worksheet, are calculated.

b. Please identify any documents that show, describe, or relate to the calculation of vehicle costs as presented in the DESS Worksheet.

Materials Costs

16. a. Please explain how materials costs are calculated for inclusion in the CIAC and Applicant cost calculations.

b. Please identify any documents that show, describe, or relate to the calculation of materials costs as presented in the DESS Worksheet.

17. a. Are the materials costs shown in the worksheet calculated in the same way that FPL calculates and shows materials costs in

its "customer cost sheets" furnished to Applicants as part of FPL's Binding Cost Estimates?

b. If not, please explain how the calculations are different.

18. a. Do the materials costs shown in the worksheet (and in customer cost sheets) include costs other than the raw cost of the materials?

b. If so, please state and explain exactly what costs or cost components (e.g., without limitation, corporate overheads, warehousing costs, handling costs, and costs associated with creating materials records or property records) are included in the materials cost values.

19. On the DESS Worksheet, where FPL calculates the "percentage of Customer-performed work" to be 65.5% of the total job cost, FPL appears to treat the costs of materials as "FPL-performed work." Please explain how FPL believes that materials costs are "work."

20. Please explain how, if at all, the costs in each of the sub-categories shown in the DESS Worksheet relate to or vary with the level of materials cost incurred in a UG conversion project.

#### Construction Man-Hours ("CMH")

21. The following interrogatories relate to the value of (2,740) construction man-hours shown in explanatory note (1) on the DESS Worksheet.

a. What is the meaning of the 2,740 construction man-hours ("CMH") value shown on the spreadsheet?

b. Please explain and describe what labor effort is represented by this value.

c. How if at all does this 2,740 CMH value relate to customer-performed work?

d. How if at all does this value relate to FPL-performed work?

22. The following interrogatories relate to the value of 144,000

construction man-hours shown in explanatory note (1) on the DESS Worksheet.

a. What is the meaning of the 144,000 CMH value shown on the spreadsheet?

b. Please explain and describe what labor effort is represented by this value.

c. How if at all does this 144,000 CMH value relate to customer-performed work?

d. How if at all does this value relate to FPL-performed work?

23. What does the calculation that 2,740 CMH divided by 144,000 CMH show?

24. The DESS Worksheet relates to FPL's estimated costs for the first phase (beyond the pilot phase) of the Town of Jupiter Island's UG conversion project.

a. Please explain how, if at all, the 2,740 CMH value relates to that project.

b. Please explain how, if at all, the 144,000 CMH value relate to that project.

25. Please identify any documents that show or relate to construction man-hours calculations or allocations relating to the Town of Jupiter Island's UG conversion project.

### **Main Heading - Operations Centers**

#### **Subheading - Engineering**

26. Please describe the work performed by FPL personnel that is included within the "Engineering" category under the heading "Operations Centers" in cases where:

a. FPL performs all of the work associated with the UG conversion project;

b. the Applicant performs all of the construction and installation work, excepting the removal work, associated with the

UG conversion project; and

c. the Applicant is responsible for concrete and conduit work associated with its UG conversion project.

27. What are the position titles or job titles of the personnel who perform this work?

28. Is there any difference in the job titles or position titles if (a) FPL performs the work or (b) the Applicant performs the work?

29. What is the range of labor rates for each position title or job title for the personnel who work in this cost category?

30. How are the labor rates for these personnel calculated?

(See Note A above.)

31. a. Are there costs other than labor costs included in the "Engineering" category?

b. If so, please identify and describe any such other costs and state the approximate amounts of any such other costs as a percentage of the total costs included in the "Engineering" category.

32. How if at all do these "Engineering" efforts or functions relate to materials costs?

33. Please identify any documents relative to FPL's responses to the foregoing questions regarding the "Engineering" cost category within the "Operations Centers" major category.

Subheading - CCRs (Contract Crew Oversight)

34. Please describe the work performed by FPL personnel that is included within the "CCRs (Contract Crew Oversight)" category under the heading "Operations Centers" in cases where:

a. FPL performs all of the work associated with the UG

conversion project;

b. the Applicant performs all of the construction and installation work, excepting the removal work, associated with the UG conversion project; and

c. the Applicant is responsible for concrete and conduit work associated with its UG conversion project.

35. Does the Contract Crew Oversight function include part or all of the costs for FPL engineering personnel to review and inspect the Applicant's work done, as contemplated in Section 12.2.11.d) of FPL's Tariff Sheet No. 6.330?

36. If the Contract Crew Oversight function does not include all costs for FPL engineering personnel to review and inspect the Applicant's work done, in what other cost categories are those costs included, and what are the amounts in each such category?

37. What are the position titles or job titles of the personnel who perform this work?

38. What is the range of labor rates for each position title or job title for the personnel who work in this cost category?

39. How are the labor rates for these personnel calculated?

(See Note A above.)

40. Are there costs other than labor costs included in the "CCRs (Contract Crew Oversight)" category?

41. If so, please identify and describe any such other costs and state the approximate amounts of any such other costs as a percentage of the total costs included in the "CCRs (Contract Crew Oversight)" category.

42. How if at all do these "CCRs (Contract Crew Oversight)" efforts or functions relate to materials costs?

43. Please identify any documents relative to FPL's responses to the foregoing questions regarding the "CCRs (Contract Crew Oversight)" cost category within the "Operations Centers" major category.

Subheading - Service Center Support

44. Please describe the work performed by FPL personnel that is included within the "Service Center Support" category under the heading "Operations Centers" in cases where:

a. FPL performs all of the work associated with the UG conversion project;

b. the Applicant performs all of the construction and installation work, excepting the removal work, associated with the UG conversion project; and

c. the Applicant is responsible for concrete and conduit work associated with its UG conversion project.

45. What types of "support" are provided by the FPL labor efforts that are included in this cost category:

a. to FPL labor forces (including FPL-hired contractors and their labor forces) where FPL is responsible for performing all the work?

b. to an Applicant or to the Applicant's labor forces (whether directly employed by the Applicant or employed by FPL-approved contractors engaged by the Applicant) where the Applicant is responsible for all construction and installation except removal work?

c. to an Applicant where the Applicant is responsible for the conduit and concrete work associated with a UG conversion project?

46. What are the position titles or job titles of the personnel who perform this work?

47. What is the range of labor rates for each position title or job title for the personnel who work in this cost category?

48. How are the labor rates for these personnel calculated?

(See Note A above.)

49. Are there costs other than labor costs included in the "Service Center Support" category?

50. If so, please identify and describe any such other costs and state the approximate amounts of any such other costs as a percentage of the total costs included in the "Service Center Support" category.

51. How if at all do these "Service Center Support" efforts or functions relate to materials costs?

52. Please identify any documents relative to FPL's responses to the foregoing questions regarding the "Service Center Support" cost category within the "Operations Centers" major category.

Subheading - Operations Supervisors.

53. Please describe the work performed by FPL personnel that is included within the "Operations Supervisors" category under the heading "Operations Centers" in cases where:

a. FPL performs all of the work associated with the UG conversion project;

b. the Applicant performs all of the construction and installation work, excepting the removal work, associated with the UG conversion project; and

c. the Applicant is responsible for concrete and conduit work associated with its UG conversion project.

54. a. Where the Applicant does the construction and installation work, what is the nature of any supervision performed by "Operations Supervisors"?

b. Who do they supervise?

55. What are the position titles or job titles of the personnel who perform this work?



56. What is the range of labor rates for each position title or job title for the personnel who work in this cost category?

57. How are the labor rates for these personnel calculated?

(See Note A above.)

58. Are there costs other than labor costs included in the "Operations Supervisors" category?

59. If so, please identify and describe any such other costs and state the approximate amounts of any such other costs as a percentage of the total costs included in the "Operations Supervisors" category.

60. How if at all do these "Operations Supervisors" efforts or functions relate to materials costs?

61. Please identify any documents relative to FPL's responses to the foregoing questions regarding the "Operations Supervisors" cost category within the "Operations Centers" major category.

Subheading - Restoration Coverage

62. Please describe the work performed by FPL personnel that is included within the "Restoration Coverage" category under the heading "Operations Centers" in cases where:

a. FPL performs all of the work associated with the UG conversion project;

b. the Applicant performs all of the construction and installation work, excepting the removal work, associated with the UG conversion project; and

c. the Applicant is responsible for concrete and conduit work associated with its UG conversion project.

63. Does FPL believe that FPL personnel would actually be performing restoration work in the scenario where an Applicant was performing all of the construction and installation work?

64. If so, specifically what restoration work does FPL believe that FPL personnel would be performing?

65. What are the position titles or job titles of the personnel who perform this work?

66. What is the range of labor rates for each position title or job title for the personnel who work in this cost category?

67. How are the labor rates for these personnel calculated?

(See Note A above.)

68. Are there costs other than labor costs included in the "Restoration Coverage" category?

69. If so, please identify and describe any such other costs and state the approximate amounts of any such other costs as a percentage of the total costs included in the "Restoration Coverage" category.

70. How if at all do these "Restoration Coverage" efforts or functions relate to materials costs?

71. Please identify any documents relative to FPL's responses to the foregoing questions regarding the "Restoration Coverage" cost category within the "Operations Centers" major category.

Subheading - Other Service Center

72. Please describe the work performed by FPL personnel that is included within the "Other Service Center" category under the heading "Operations Centers" in cases where:

a. FPL performs all of the work associated with the UG conversion project;

b. the Applicant performs all of the construction and installation work, excepting the removal work, associated with the

UG conversion project; and

c. the Applicant is responsible for concrete and conduit work associated with its UG conversion project.

73. What are the position titles or job titles of the personnel who perform this work?

74. What is the range of labor rates for each position title or job title for the personnel who work in this cost category?

75. How are the labor rates for these personnel calculated?

(See Note A above.)

76. Are there costs other than labor costs included in the "Other Service Center" category?

77. If so, please identify and describe any such other costs and state the approximate amounts of any such other costs as a percentage of the total costs included in the "Other Service Center" category.

78. How if at all do these "Other Service Center" efforts or functions relate to materials costs?

79. Please identify any documents relative to FPL's responses to the foregoing questions regarding the "Other Service Center" cost category within the "Operations Centers" major category.

**Main Heading - Operations Support**

**Subheading - Drafting**

80. Please describe the work performed by FPL personnel that is included within the "Drafting" category under the heading "Operations Support" in cases where:

a. FPL performs all of the work associated with the UG conversion project;

b. the Applicant performs all of the construction and installation work, excepting the removal work, associated with the UG conversion project; and

c. the Applicant is responsible for concrete and conduit work associated with its UG conversion project.

81. What if any types of "support" are provided by the FPL labor efforts that are included in this cost category?

82. a. If FPL believes that it incurs the same amount of "Drafting" costs whether FPL performs all of the construction and installation work or whether the Applicant performs the work, please explain why.

b. If FPL believes that all actual FPL Drafting efforts and costs are expended and incurred by the time the binding cost estimate is completed, please so state.

83. a. Does FPL recognize that, in some projects, engineering and drafting personnel engaged by an Applicant perform drafting work, e.g., drawing and revising plans for UG installations after FPL has prepared the design drawings in conjunction with preparing a binding cost estimate?

b. Does FPL agree that where an Applicant's forces or an Applicant's contractors perform such work, FPL engineering personnel typically do not have to perform it?

c. Are such additional or modified plans then reviewed by FPL drafting or engineering personnel?

84. a. Does FPL agree that where an Applicant's forces or contractors perform additional design work, such as additional detailed design or modifications during the course of construction, FPL experiences a net reduction in labor effort required of FPL engineering personnel?

b. If not, please explain why not.

85. What are the position titles or job titles of the personnel who perform this work?

86. What is the range of labor rates for each position title or job title for the personnel who work in this cost category?

87. How are the labor rates for these personnel calculated?

(See Note A above.)

88. Are there costs other than labor costs included in the "Drafting" category?

89. If so, please identify and describe any such other costs and state the approximate amounts of any such other costs as a percentage of the total costs included in the "Drafting" category.

90. How if at all do the "Drafting" efforts or functions relate to materials costs?

91. Please identify any documents relative to FPL's responses to the foregoing questions regarding the "Drafting" cost category within the "Operations Support" major category.

Subheading - CCR Support

92. Please describe the work performed by FPL personnel that is included within the "CCR Support" category under the heading "Operations Support" in cases where:

a. FPL performs all of the work associated with the UG conversion project;

b. the Applicant performs all of the construction and installation work, excepting the removal work, associated with the UG conversion project; and

c. the Applicant is responsible for concrete and conduit work associated with its UG conversion project.

93. What types of "support" are provided by the FPL labor efforts that are included in this cost category:

a. to FPL labor forces (including FPL-hired contractors and

their labor forces) where FPL is responsible for performing all the work?

b. to an Applicant or to the Applicant's labor forces (whether directly employed by the Applicant or employed by FPL-approved contractors engaged by the Applicant) where the Applicant is responsible for all construction and installation except removal work?

c. to an Applicant where the Applicant is responsible for the conduit and concrete work associated with a UG conversion project?

94. If FPL believes that it incurs the same amount of "CCR Support" costs whether FPL performs the UG construction and installation work or whether the Applicant performs the work, please explain why.

95. What are the position titles or job titles of the personnel who perform this work?

96. What is the range of labor rates for each position title or job title for the personnel who work in this cost category?

97. How are the labor rates for these personnel calculated?

(See Note A above.)

98. Are there costs other than labor costs included in the "CCR Support" category?

99. If so, please identify and describe any such other costs and state the approximate amounts of any such other costs as a percentage of the total costs included in the "CCR Support" category.

100. How if at all do the "CCR support" efforts or functions relate to materials costs?

101. Please identify any documents relative to FPL's responses to the foregoing questions regarding the "CCR Support" cost category within the "Operations Support" major category.

Subheading - Engineering Staff

102. Please describe the work performed by FPL personnel that is included within the "Engineering Staff" category under the heading "Operations Support" in cases where:

- a. FPL performs all of the work associated with the UG conversion project;
- b. the Applicant performs all of the construction and installation work, excepting the removal work, associated with the UG conversion project; and
- c. the Applicant is responsible for concrete and conduit work associated with its UG conversion project.

103. What if any types of "support" are provided by the FPL labor efforts that are included in this cost category:

- a. to FPL labor forces (including FPL-hired contractors and their labor forces) where FPL is responsible for performing all the work?
- b. to an Applicant or to the Applicant's labor forces (whether directly employed by the Applicant or employed by FPL-approved contractors engaged by the Applicant) where the Applicant is responsible for all construction and installation except removal work?
- c. to an Applicant where the Applicant is responsible for the conduit and concrete work associated with a UG conversion project?

104. What are the position titles or job titles of the personnel who perform this work?

105. What is the range of labor rates for each position title or job title for the personnel who work in this cost category?

106. How are the labor rates for these personnel calculated?

(See Note A above.)

107. Are there costs other than labor costs included in the "Engineering Staff" category?

108. If so, please identify and describe any such other costs and state the approximate amounts of any such other costs as a percentage of the total costs included in the "Engineering Staff" category.

109. How if at all do the "Engineering Staff" efforts or functions relate to materials costs?

110. Please identify any documents relative to FPL's responses to the foregoing questions regarding the "Engineering Staff" cost category within the "Operations Support" major category.

Subheading - Distribution Business Services

111. Please describe the work performed by FPL personnel that is included within the "Distribution Business Services" category under the heading "Operations Support" in cases where:

a. FPL performs all of the work associated with the UG conversion project;

b. the Applicant performs all of the construction and installation work, excepting the removal work, associated with the UG conversion project; and

c. the Applicant is responsible for concrete and conduit work associated with its UG conversion project.

112. What types of service, support, or effort does FPL provide in or through its Distribution Business Services activity:

a. to FPL labor forces (including FPL-hired contractors and their labor forces) where FPL is responsible for performing all the work?

b. to an Applicant or to the Applicant's labor forces (whether directly employed by the Applicant or employed by FPL-approved contractors engaged by the Applicant) where the Applicant is responsible for all construction and installation except removal work?



c. to an Applicant where the Applicant is responsible for the conduit and concrete work associated with a UG conversion project?

113. How if at all do these "Distribution Business Services" efforts or functions relate to materials costs?

114. What are the position titles or job titles of the personnel who perform this work?

115. What is the range of labor rates for each position title or job title for the personnel who work in this cost category?

116. How are the labor rates for these personnel calculated?

(See Note A above.)

117. Are there costs other than labor costs included in the "Distribution Business Services" category?

118. If so, please identify and describe any such other costs and state the approximate amounts of any such other costs as a percentage of the total costs included in the "Distribution Business Services" category.

119. Please identify any documents relative to FPL's responses to the foregoing questions regarding the "Distribution Business Services" cost category within the "Operations Support" major category.

#### Subheading - Technology Support

Note: The DESS Worksheet indicates that the percentage of DESS Costs represented by the Technology Support category is 0%, but there is a non-zero adjustment shown for this category; it appears that the 0% value may be due to rounding. If FPL assigns zero costs from this category to UG conversion work, please so state and no further answers to the interrogatories in this subsection need be provided.

120. Please describe the work performed by FPL personnel that is

included within the "Technology Support" category under the heading "Operations Support" in cases where:

a. FPL performs all of the work associated with the UG conversion project;

b. the Applicant performs all of the construction and installation work, excepting the removal work, associated with the UG conversion project; and

c. the Applicant is responsible for concrete and conduit work associated with its UG conversion project.

121. What types of "support" are provided by the FPL labor efforts that are included in this cost category:

a. to FPL labor forces (including FPL-hired contractors and their labor forces) where FPL is responsible for performing all the work?

b. to an Applicant or to the Applicant's labor forces (whether directly employed by the Applicant or employed by FPL-approved contractors engaged by the Applicant) where the Applicant is responsible for all construction and installation except removal work?

c. to an Applicant where the Applicant is responsible for the conduit and concrete work associated with a UG conversion project?

122. How if at all do these "Technology Support" efforts or functions relate to materials costs?

123. What are the position titles or job titles of the personnel who perform this work?

124. What is the range of labor rates for each position title or job title for the personnel who work in this cost category?

125. How are the labor rates for these personnel calculated?

(See Note A above.)

126. Are there costs other than labor costs included in the "Technology Support" category?

127. If so, please identify and describe any such other costs and state the approximate amounts of any such other costs as a percentage of the total costs included in the "Technology Support" category.

128. Please identify any documents relative to FPL's responses to the foregoing questions regarding the "Technology Support" cost category within the "Operations Support" major category.

Subheading - Other Support

129. Please describe the work performed by FPL personnel that is included within the "Other Support" category under the heading "Operations Support" in cases where:

a. FPL performs all of the work associated with the UG conversion project;

b. the Applicant performs all of the construction and installation work, excepting the removal work, associated with the UG conversion project; and

c. the Applicant is responsible for concrete and conduit work associated with its UG conversion project.

130. How if at all do these "Other Support" efforts or functions relate to materials costs?

131. What types of "support" are provided by the FPL labor efforts that are included in this "Other Support" cost category:

a. to FPL labor forces (including FPL-hired contractors and their labor forces) where FPL is responsible for performing all the work?

b. to an Applicant or to the Applicant's labor forces (whether directly employed by the Applicant or employed by FPL-approved contractors engaged by the Applicant) where the Applicant is responsible for all construction and installation except removal work?

c. to an Applicant where the Applicant is responsible for the conduit and concrete work associated with a UG conversion project?

132. What are the position titles or job titles of the personnel who perform this work?

133. What is the range of labor rates for each position title or job title for the personnel who work in this cost category?

134. How are the labor rates for these personnel calculated?

(See Note A above.)

135. Are there costs other than labor costs included in the "Other Support" category?

136. If so, please identify and describe any such other costs and state the approximate amounts of any such other costs as a percentage of the total costs included in the "Other Support" category.

137. Please identify any documents relative to FPL's responses to the foregoing questions regarding the "Other Support" cost category within the "Operations Support" major category.

**Main Heading - Corporate**

138. Regarding the values shown in the row titled "Corporate," please:

a. describe the cost components that are included in this category;

b. explain why FPL believes that it is appropriate to reduce the adjustment (i.e., to reduce the credit to a Local Government Applicant) by the percentage that materials represent of total job cost.

139. a. Does FPL agree that these are overhead-type costs, i.e., costs that are general to FPL's operations and that are not actually and directly incurred in relation to specific projects?

b. If not, please explain how FPL characterizes the Corporate costs in the DESS Worksheet.

140. Does FPL believe that there are any costs in the Corporate category other than corporate overhead type costs? If so, please identify and describe any such other costs.

141. a. Does FPL assert that there are any costs in the Corporate category that are actually and directly incurred because an Applicant undertakes to construct and install part or all of its desired UG facilities?

b. If so, please explain with specificity exactly what costs FPL asserts it actually and directly incurs because the Applicant performs such construction and installation work.

142. Does FPL assert that its Corporate overhead costs vary according to whether FPL provides the materials for a UG conversion project performed by a Local Government Applicant? If so, please:

a. explain why and how FPL believes this to be the case;

b. identify any analyses of FPL corporate overhead costs and how, if at all, they vary whether FPL provides the materials.

143. Does FPL assert that its corporate overhead costs vary whether FPL or a Local Government Applicant performs any part of the work associated with a UG conversion project? If so, please:

a. explain why and how FPL believes that its corporate overhead costs vary according to whether FPL or the Local Government Applicant performs part or all of the work for a UG conversion project

b. identify and explain with specificity which corporate overhead costs vary according to whether FPL or the Local Government Applicant performs part or all of the work.

c. identify any studies, analyses, or other supporting documentation that FPL believes support its assertion.

144. Does FPL believe that if a Local Government Applicant furnished its own materials, no corporate overhead costs would be

assigned or charged to the project?