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February 10, 2012

## VIA HAND DELIVERY

Kathryn G.W. Cowdery, Senior Attorney Office of General Counsel Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850

> Re: FPL Post-Workshop Comments on Docket No. 110313- PU Initiation of Rulemaking to Repeal Rule 25-6.019, and to Amend Rules 25-6.0345, 25-6.060, 25-7.059, 25-7.060, 25-7.061, 25-7.062, 25-7.064, 25-7.065, 25-7.066, 25-7.070, 25-7.071, 25-7.084, 25-12.005, 25-12.008, 25-12.027, 25-12.052, and 25-12.082, F.A.C.

Dear Ms. Cowdery:

Florida Power & Light Company ("FPL" or the "Company") has reviewed the Notice of Development of Rulemaking distributed by Florida Public Service Commission ("PSC" or "Commission") staff on November 8, 2011 along with the changes suggested by Tampa Electric Company ("TECO") in its letter of January 13, 2012. The Company appreciates the opportunity to submit post-workshop comments relative to the rules and items discussed at the January 19, 2012 staff workshop.

In general, FPL does not take issue with staff's proposed changes and appreciates the efforts to streamline and refine the rules. Similarly, FPL does not oppose TECO's proposed changes and believes many of the clarifications are helpful. Specifically, FPL supports the edits proposed by TECO to Rule 25-6.060 having to do with meter test refereed disputes. In particular, the preservation of the word "refereed" within the title of the rule preserves an important distinction between Rule 25-6.059, which outlines a process for customer requested meter tests, and Rule 25-6.060, which allows for PSC oversight of such tests.

FPL has also reviewed TECO's post-workshop comments and believes their summary of how Rules 25-6.059 and 25-5.060 would operate with TECO's proposed edits is accurate. Ultimately, the cost responsibility framework for additional meter tests requested by

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customers within 12 months of a previous test should be consistent in Rule 25-6.059 and Rule 25-6.060.

Again, FPL appreciates the opportunity to provide input on staff's draft revisions to the rules as outlined in the Notice of Development of Rulemaking Rules, dated November 8, 2011. Should you or any other member of staff have any questions, please do not hesitate to contact me.

Sincerely,

Jordan A. White, Senior Attorney Florida Power & Light Company

(561) 304-5802

cc: Ann Cole, Director

Office of Commission Clerk