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VIA ELECTRONIC FILING

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

**Re: Docket No. 20200193-EU
Florida Power & Light Company and Gulf Power Company's Statement of
Estimated Regulatory Costs**

Dear Mr. Teitzman:

Please accept this letter as the response of Florida Power & Light Company ("FPL") and Gulf Power Company ("Gulf") to Sevini K. Guffey's October 20, 2020 e-mail regarding the above referenced docket. In that communication, Ms. Guffey asked for the utilities' input on potential cost impacts that might result from proposed revisions to Rule 25-6.043, Florida Administrative Code ("F.A.C."), Investor-Owned Electric Utility Minimum Filing Requirements--Commission Designee; and Rule 25-22.0406, F.A.C., Notice and Public Information on General Rate Increase Requests and Petitions for Limited Proceedings by Electric and Gas Utilities.

I note that on October 5, 2020, I submitted Post-Workshop Comments on Rules 25-6.043 and 25-22.0406, F.A.C., on behalf of both FPL and Gulf. Within those comments I addressed the Statement of Estimated Regulatory Costs ("SERC"), and I have now revisited the SERC questions with both FPL and Gulf. I am pleased to report that there has been no change in our position on the SERC issue since that time, so I am including our comments here. I am also responding to the two specific questions contained in the referenced October 20, 2020 communication, again on behalf of both FPL and Gulf.

Section 120.54(3), Fla. Stats., referring to the SERC, requires the Agency's notice of intended action to consider the factors enumerated in §120.541, Fla. Stats. (Statement of Estimated Regulatory Costs). In that respect, FPL and Gulf offer the following comments.

FPL and Gulf do not believe the proposed rule revisions addressed in these comments will have any adverse impact, either directly or indirectly, on:

- Economic growth, private sector job creation or employment, or private sector investment, either now or within the next five years;
- Business competitiveness, including the ability of persons doing business in the state to compete with persons doing business in other states or domestic markets, productivity, or innovation, either now or in the next five years;
- Regulatory costs, including any transactional costs, either now or in the next five years.

In addition to the foregoing, FPL and Gulf do not believe that the number of individuals and entities likely to be required to comply with Rules 25-6.043 and 25-22.0406, F.A.C., will change. In fact, as outlined in our October 5, 2020 comments, we believe the proposed revisions to the referenced rules will actually facilitate a more efficient process that will likely reduce rather than increase costs.

Ms. Guffey's October 20, 2020 e-mail asked the utilities to address the following two questions:

1. What are the estimated incremental cost impacts to implement, and comply with, the proposed modifications to Rule 25-6.043, F.A.C. Please explain.

FPL and Gulf Response: As stated above, FPL and Gulf believe the proposed revisions to Rule 25-6.043, F.A.C., will actually facilitate a more efficient process that will likely reduce rather than increase costs.

2. What are the estimated incremental cost impacts to implement, and comply with, the proposed modifications to Rule 25-22.0406, F.A.C. Please explain.

FPL and Gulf Response: As stated above, FPL and Gulf believe the proposed revisions to Rule 25-22.0406, F.A.C., will actually facilitate a more efficient process that will likely reduce rather than increase costs.

Please let me know if there is anything else you will require from FPL or Gulf in order to move this forward.

Sincerely,

/s/ Kenneth M. Rubin
Kenneth M. Rubin

cc: Sevini K. Guffey, Public Utility Analyst III (Email: sguffey@psc.state.fl.us)
Russell Badders, Esq.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by electronic delivery to the following parties of record this 27th day of October, 2020:

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