MEMORANDUM

July 11, 1995

TO: DIVISION OF RECORDS AND REPORTING

FROM: DIVISION OF AUDITING AND FINANCIAL ANALYSIS (VANDIVER)

RE: DOCKET NO. 950007-EI* -- FLORIDA POWER & LIGHT COMPANY

ENVIRONMENTAL COST RECOVERY CLAUSE AUDIT REPORT

AUDIT CONTROL NO. 94-284-4-1

The above-referenced audit report is forwarded. Audit exceptions document deviations from the Uniform System of Accounts, Commission rule or order, Staff Accounting Bulletin and generally accepted accounting principles. Audit disclosures show information that may influence the decision process.

The audit was prepared using a micro computer and has been recorded on three diskettes. The diskettes may be reviewed using IBM compatible equipment and LOTUS 1-2-3 software. There are confidential working papers associated with this audit.

Please forward a complete copy of this report to:

Florida Power & Light Company Bill Walker 215 South Monroe Street, Suite 810 Tallahassee, Florida 32301-1859

DNV/sp

Attachment

cc: Chairman Clark

Commissioner Deason

Commissioner Johnson

Commissioner Kiesling

Commissioner Garcia

Mary Andrews Bane, Deputy Executive Director/Technical

Legal Services

Division of Auditing and Financial Analysis (Devlin/Causseaux/

File Folder)

Division of Electric and Gas (Breman)

Miami District Office (Welch)

Office of Public Counsel

* NOTE: ASR was initiated under Docket No. 940042-EI.

The docket no. has been changed to 950007-EI.

U6557 JULII

FLORIDA PUBLIC SERVICE COMMISSION

AUDIT REPORT

THE PERIOD OF APRIL 1993 THROUGH MARCH 1995

June 30, 1995

Florida Power and Light, Inc.

Miami, Florida

Dade County

Environmental Cost Recovery Clause

Docket Number 940042-El

950007- FI

Audit Control No. 94-284-4-1

Gabriela Leon Audit Manager

Audit Staff

Raymond Grant Yen Ngo Ruth Young Minority Opinion

Yes No W

Yes No Res

Kathy Welch Miami

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I. Executive Summary

Audit Purpose: We have applied the procedures described in Section II of this report to the Company's prepared schedules of the Environmental Cost Recovery Clause from April 1993 through March 1995 for the Florida Power and Light Company, FPSC Docket 940042-EI.

Scope Limitation: The exit conference was held on June 30, 1995. This report is based on confidential information which is separately filed with the Commission Clerk.

Disclaim Public Use: This is an internal accounting report prepared after performing a limited scope audit; accordingly, this document must not be relied upon for any purpose except to assist the Commission staff in the performance of their duties. Substantial additional work would have to be performed to satisfy generally accepted auditing standards and produce audited financial statements for public use.

Opinion: The schedules of Environmental Recovery Clause for the period April 1993 through March 1995 represent Florida Power and Light Company books and records which have been maintained in substantial compliance with Commision Directives; The expressed opinions extend only to the scope of work described in section II of this report.

II. Audit Scope

The opinions contained in this report are based on the audit work described below: When used in this report COMPILED and EXAMINED means that audit work includes:

COMPILED – Means that the audit staff reconciled exhibit amounts with the general ledger; visually scanned account for error or inconsistency; disclosed any unresolved error, irregularity, or inconsistency; and, except as otherwise noted performed no other audit work.

EXAMINED— Means that the audit staff reconciled exhibit amounts with the general ledger; traced general ledger account balances to subsidiary ledgers; applied selective analytical review procedures; tested account balances to the extent further described; and disclosed any error, irregularity, or inconsistency observed

INVESTMENT: Compiled Investment. Staff pulled a judgemental sample of work orders based on their highest dollar values. Within these work orders staff audited the Purchase Orders with the highest dollar values.

ACCUMULATED DEPRECIATION: Compiled Accumulated Depreciation. Depreciation expense was recalculated for one month for each of the projects listed below:

PROJECT	DATE
Low NOx Burner Technology	2/95
Continuous Emissions Monitoring	12/94
Clean Closure Equivalency Demonstration	10/94
Relocate Turbine Oil	8/93

Depreciation expense was recomputed from the Company's Detailed Transaction Report and agreed to the depreciation expense on the Company's filing. The rates used to recompute the depreciation expense were traced to Commission Orders.

OPERATING AND MAINTENANCE EXPENSES: Compiled Operating and Maintenance Expenses. Staff pulled a statistical sample of Operating and Maintenance Expenses from an extract file of the General Ledger using Audit Analyzer.

RETURN ON INVESTMENT: Compiled Return on Investment. Recalculated Return on Investment and traced rates used to Florida Public Service Commission Orders. III. AUDIT EXCEPTION

AUDIT EXCEPTION NO. 1

SUBJECT: OIL SPILL CLEANUP/RESPONSE EQUIPMENT - REVENUE

STATEMENT OF FACTS:

As explained by FPL personnel, the equipment and expenses for the response to the Tampa Bay Oil Spill Cleanup were charged to Project 8 in the Environmental Clause. According to FPL personnel, payroll is included in the environmental expenses for the oil spill and billed to Maritrans (the Company who hired FPL). FPL is being reimbursed by Maritrans. Therefore, payment from Maritrans is considered revenue and accounted for as contra to expense.

Fc: the period April through September 1993 there was a credit in the filing of \$: 4,000 and for the period October 1994 through March 1995 a credit of \$359,463; for a total credit of \$673,463.

Information provided to us from FPL indicated that the total expenditures for the Tampa Bay Oil Spill Response were \$642,407.85. After a negotiated settlement, FPL received \$1,325,693.13 from Maritrans. The difference between payments received and expenses is \$687,526.80 (\$1,325,693.15-\$642,407.85).

OPINION:

According to the information above, FPL's net profit is \$9,822.28 more than reported in the filings. There should have been a credit to the March 1995 expenses in the above amount.

COMPANY COMMENT:

The Company agrees with the exception. FPL stated that an estimated number was filed. They Company has corrected this error in the May 1995 filing. The May 1995 correction is reflected in Mr. Birkett's Document #6 included in the Company's June 20, 1995 projection filing.

IV. AUDIT DISCLOSURE

AUDIT DISCLOSURE NO. 1

SUBJECT: MATHEMATICAL AND CROSSFOOTING ERRORS

STATEMENT OF FACTS:

In compiling the expenses reported in the filings for the months of April 93 through December 93, the company made some mathematical and crossfooting errors.

The months effected were April, May, July, November and December 93. The company discovered this and made an adjustment to the month of March 1995; reducing expenses in the amount of \$11,409. This includes interest.

The Company calculated this as follows:

Based on where the mathematics crossfooting errors occured in 19		10,505.00 (148.00) 494.00 316.00
Gross up for Jurisdictional	Divided by	11,167.00 97.87555
Based on where the mathematical	and	11,409.00
crossfooting errors occured in 199 company removed 26% from Proje and 74% from Project 5 expenses.	ect 4 expenses	(2,966.00) (8,443.00)
		(11,409.00)

OPINION:

As the company made an adjustment before the end of March 1995; the expenses that were in error in 1993 were accounted for in the six month true up filing ending March 31, 1995. No further adjustment to the filling is necessary.

Florida Power & Light Company FPSC Dock 940042-EI Exhibit No.

Exhibit No.
Testimony of B. T. Birkett

January 18, 1994

Document No. 8

Page 1 of 1

FLORIDA POWER & LIGHT COMPANY ENVIRONMENTAL COST RECOVERY CLAUSE APRIL THROUGH SEPTEMBER 1993 ACTUAL

1993 ACTUALS

				111714010140					2.0
		APRIL.	MAY	AUNE	JULY	AUGUST	SEPTEMBER	TOTAL	
	ENVIRONMENTAL COSTS	50	50	\$0	\$0	50	\$0	50	COMPANY'S
	1. Air Operating Permit Fees - O & M		50	50	50	50	\$0	50	N. V.
	2. Low NOs Burner Tuchenings - Capital	\$0	3,75-0	\$0	50	50	50	10	~
	3. Continuous Emission Monitoring Systems - Capital	50	50		\$37,900	\$7,600	\$36,000	\$124,100	
	4a. Clean Closure Equivalency - O & M	\$7,200	\$23,500	\$11,900			50	50	丑
	6b. Clean Closure Equivalency - Capital	\$0	50	50	\$0	\$0			EXHIBITS
	Se. Maintenance of Stationary Above Ground Fuel Storage Tanks - O & M	\$147,530	\$133,461	(\$43,875)	\$30,714	(\$29,724)	\$7,092	\$245,198	cs.
	2n. Maintenance of Stationary Above Ground Firel Storage Tanks - Capital	50	50	\$0	so	50	\$0	10	
5	Secondary Containment Around Pollutant Storage and Hazardous Materials Tunks - O & M	\$4,731	\$17,678	\$12,007	\$24,871	(\$4,215)	(\$25)	\$55,647	
	Relocate Turbine Labe Oil Underground Piping to Above Ground - Capital	10	\$190	\$360	\$375	\$370	2369	\$1,684	
	Sa. Oil Spill Cleanup/Response Equipment - O & M	\$23	\$34,000	\$11,856	\$18,947	5106	50	164,934	
	8b. CAI Spill Cleenup/Response Equipment - Capital	20	50	50	\$0	\$0	10	50	
	Sc. Oil Spill Cleanup/Response Equipment - Revenue	50	50	\$0	\$0	50	(\$314,000)	(\$314,000)	
	9. Low-Level Radioactive Waste Access Fees - O & M	50	50	50	\$99,522	50	\$0	\$99,522	
		\$0	50	10	50	\$0	\$0	30	
	10. Relocate Storm Water Rusoff - Capital	\$0	50	\$0	\$0	50	\$0	50	
	11. SO2 Allowances - Revenue		\$208,829	(\$7,732)	\$212,329	(\$29,561)	(\$270,564)	\$276,485	
	12. TOTAL (Lines I through 11)	\$163,484	2400,027						

Florida Power & Light Company
Environmental Cost Recovery Clause (ECRC)
Calculation of Over/(Under Recovery
April Through September 1993

B.

FPSC Docket No. 940042-EI
Exhibit No.
Testimony of Birkett
January 18, 1994
Document No. 9
Page 1 of 2

		April	May	June	July	August	September	Total
		\$0	\$0	\$0	\$0	\$0	\$0_	\$0
1.	Revenues		208,829	(7,732)	212,329	(29,861)	(270,564)	276,485
2.	Expenses	163,484	200,027	(,,,,,,,		- 1		
2a.	Jurisdictional factor	98.59840%	98.59840%	98.59840%	98.59840%	98.59840%	98.59840%	N/A
2b.	Jurisdictional expenses	161,193	205,902	(7,624)	209,353	(29,442)	(266,772)	272,610
3.	True-up Provision for this Period - Over/	(161,193)	(205,902)	7,624	(209,353)	29,442	266,772	(272,610)
4.	(Under) Recovery Interest Provision for this period	(211)	03020		(1,233)	(1,460)	(1,083)	(5,641
5.	True-up and interest beginning of month	0	(161,404)	(367,994)	(361,335)	(571,921)	(543,939)	0
6.	End of Period True-up Amount Over/ (Under) Recoveries	(\$161,404)	(\$367,994)	(\$361,335)	(\$571,921)	(\$543,939)	(\$278,250)	(\$278,250

Flori Ja Power & Light Company
FPSC Docket N 0042-El
Exhibit No.
Testimony of B. T. Birkett
January 18, 1994
Document No. 9
Page 2 of 2

Florida Power & Light Company Environmental Cost Recovery Clause (ECRC) Calculation of Interest Provision April Through September 1993

			April	May	June	July	August	September	Total
c.		Interest Provision		(\$161,404)	(\$367 QQA)	(\$361,335)	(\$571,921)	(\$543,939)	\$2,006,594)
	1.	Beginning True-up Amount	\$0	(\$101,404)	(\$307,774)	(420.1.0.7			(2.220.203)
	2.	Ending True-Up Amount Before Interest	(161,193)	(367,306)	(360,370)	(570,688)	(542,479)	(277,168)	(2,279,203)
		Total of Beginning and Ending True-up	(161,193)	(528,709)	(728,364)	(932,024)	(1,114,400)	(821,107)	(4,285,797)
	3.	Amounts	1.54	2011000	(364,182)	(466,012)	(557,200)	(410,553)	(2,142,899)
	4.	Average True-up Amount	(80,596)	(264,355)	(304,102)	(100,012)			
	5.	Interest Rate - First Day Reporting Business Month	3.19000%	3.09000%	3.16000%	3.20000%	3.15000%	3.14000%	N/A
	6.	Interest Rate - Last Day Reporting Business Month	3.09000%	3.16000%	3.20000%	3.15000%	3.14000%		•
	0.	Dustiness in entire	6.28000%	6.25000%	6.36000%	6.350009	6.290009	6.33000 %	N/A
	7.	Total	6.28000 N				6 3.145009	3.165009	N/A
		Average Interest Rate	3.14000%	3.12500%	3.180009	3.175009	6 3.143007	2110000	
	8.	Monthly Average Interest Rate	0.261679	0.260429	0.265009	6 0.264585	% 0.262085	6 0.263759	6 N/A
	9.	Monthly Average interest interest		18600	(\$965	(\$1,23	3) (\$1,460	(\$1,083	(\$5,641
	10.	Interest Provision for Month	(\$211) (\$688	(\$303	1			

FLORIDA POWER & LIGHT COMPANY ENVIRONMENTAL COST RECOVERY CLAUSE CALCULATION OF ACTUAL/ESTIMATED VARIANCE APRIL THROUGH SEPTEMBER 1993

Florida Power & Light Company FPSC Docket No. 940042-EI Exhibit No.

Testimony of W. M. Reichel January 18, 1994 Document No. 3 Page 1 of 2

ENVIRONMENTAL COSTS	ACTUAL	ORIGINAL ESTIMATES	VARIANCE
Air Operating Permit Fees - O&M	\$0	\$0	\$0
Low No, Burner Technology - Capital	so	\$0	\$0
Continuous Emission Monitoring Systems - Capital	\$0	\$0	\$0
Clean Closure Equivalency - O&M	\$124,100	\$331,850	(\$207,750)
Clean Closure Equivalency - Capital	\$0	\$992	(\$992)
Maintenance of Stationary Above Ground Fuel Storage Tanks - O&M	\$245,198	\$737,477	(\$492,279)
Maintenance of Stationary Above Ground Fuel Storage Tanks - Capital	\$0	\$66,656	(\$66,656)
Secondary Containment Around Poliutant Storage and Hazardous Materials Tanks - O&M	\$55,047	\$133,595	(\$78,548)
Relocate Turbine Lube Oil Underground Piping to Above Ground - Capital	\$1,684	\$7,429	(\$5,745)
Oil Spill Cleanup/Response Equipment - O&M	\$64,934	\$266,500	(\$201,566)
	50	\$2,726	(\$2,726)
Oil Spill Cleanup/Response Equipment - Revenue	(\$314,000)	\$0	(\$314,000)
Low-Level Radioactive Waste Access Fees - O&M	\$99,522	\$240,000	(\$140,478)
Relocate Storm Water Runoff - Capital	\$0	\$0	\$0
SO, Allowances - Revenue			
TOTAL (Lines 1 through 11)	\$276,485	\$1,787,225	(\$1,510,740)
	Air Operating Permit Fees - O&M Low No, Burner Technology - Capital Continuous Emission Monitoring Systems - Capital Clean Closure Equivalency - O&M Clean Closure Equivalency - Capital Maintenance of Stationary Above Ground Fuel Storage Tanks - O&M Maintenance of Stationary Above Ground Fuel Storage Tanks - Capital Secondary Containment Around Pollutant Storage and Hazardous Materials Tanks - O&M Relocate Turbine Lube Oil Underground Piping to Above Ground - Capital Oil Spill Cleanup/Response Equipment - O&M Oil Spill Cleanup/Response Equipment - Capital Oil Spill Cleanup/Response Equipment - Revenue Low-Level Radioactive Waste Access Fees - O&M Relocate Storm Water Runoff - Capital SO ₂ Allowances - Revenue	Air Operating Permit Fees - O&M Low No, Burner Technology - Capital Continuous Emission Monitoring Systems - Capital Clean Closure Equivalency - O&M Clean Closure Equivalency - Capital Maintenance of Stationary Above Ground Fuel Storage Tanks - O&M Maintenance of Stationary Above Ground Fuel Storage Tanks - Capital Secondary Containment Around Pollutant Storage and Hazardous Materials Tanks - O&M Relocate Turbine Lube Oil Underground Piping to Above Ground - Capital Oil Spill Cleanup/Response Equipment - O&M Oil Spill Cleanup/Response Equipment - Capital Oil Spill Cleanup/Response Equipment - Capital Oil Spill Cleanup/Response Equipment - Capital Oil Spill Cleanup/Response Equipment - Source Low-Level Radioactive Waste Access Fees - O&M Relocate Storm Water Runoff - Capital SO 2 Allowances - Revenue	Air Operating Permit Fees - O&M \$0 \$0 Low No, Burner Technology - Capital \$0 \$0 Continuous Emission Monitoring \$0 \$0 Systems - Capital \$0 \$31,850 Clean Closure Equivalency - O&M \$124,100 \$331,850 Clean Closure Equivalency - Capital \$0 \$992 Maintenance of Stationary Above \$245,198 \$737,477 Ground Fuel Storage Tanks - O&M \$66,656 Ground Fuel Storage Tanks - Capital \$0 \$66,656 Ground Fuel Storage and Hazardous \$1,684 \$7,429 Pollutant Storage and Hazardous \$1,684 \$7,429 Piping to Above Ground - Capital \$1,684 \$7,429 Piping to Above Ground - Capital \$1,684 \$266,500 O&M \$0 \$1,684 \$266,500 O&M \$1,684 \$266,500 O&M \$1,684 \$266,500 O&M \$1,684 \$266,500 O&M \$2,726 Capital

FLORIDA POWER & LIGHT COMPANY ENVIRONMENTAL COST RECOVERY CLAUSE FINAL TRUE-UP FOR THE PERIOD OCTOBER 1993 TO MARCH 1994

No.			
1	Final true-up	for period October 1993 to March 1994	(\$1,882,031)
2	Less ·	estimated true-up amounts approved in Order No. PSC-94393-FOF-EI to be collected in the period April 1994 to September 1994	(\$2,356,140)
3	Adjusted net	true-up (to be carried over to October 1994 through March 1995 period)	\$474,109

() Reflects Underrecovery

FLORIDA POWER & LIGHT COMPANY ENVIRONMENTAL COST RECOVERY CLAUSE CALCULATION OF ACTUAL/ESTIMATED VARIANCE OCTOBER 1993 THROUGH MARCH 1994

Florida Power & Light Company FPSC Docket No.940042-EI Exhibit No._____

Testmony of W. M. Reichel January 18, 1994 Document No. 3 Page 2 of 2

	ENVIRONMENTAL COSTS	ACTUAL/ ESTIMATED	ORIGINAL ESTIMATES	VARIANCE
1.	Air Operating Permit Fees - O&M	\$757,773	\$757,773	\$0
2.	Low No, Burner Technology - Capital	\$137,452	\$104,917	\$32,535
3.	Continuous Emission Monitoring	\$72,784	\$136,606	(\$83,822)
	Syr ems - Capital			
4a.	Clean Closure Equivalency - O&M	\$416,700	\$449,350	(\$32,650)
4b.	Clean Closure Equivalency - Capital	\$2,666	\$4,231	(\$1,565)
5a.	Maintenance of Stationary Above	\$297,864	\$198,214	\$99,650
	Ground Fuel Storage Tanks - O&M			
5b.	Maintenance of Stationary Above	\$36,785	\$245,737	(\$208,952)
	Ground Fuel Storage Tanks - Capital			
6 .	Secondary Containment Around	\$43,630	\$0	\$43,630
	Pollutant Storage and Hazardous			
	Materials Tanks - O&M			
7.	Relocate Turbine Lube Oil Underground	\$2,200	\$12,246	(\$10,046)
	Piping to Above Ground - Capital			
8a.	Oil Spill Cleanup/Response Equipment -	\$54,000	\$2,187	\$51,813
	O&M			
8b.	Oil Spill Cleanup/Response Equipment -	\$80,237	\$4,686	\$55,551
	Capital			
8c.	Oil Spill Cleanup/Response Equipment -	\$0	\$0	\$0
	Revenue			
9.	Low-Level Radioactive Waste Access	\$208,875	\$240,000	(\$31,125)
	Fees - O&M			
10.	Relocate Storm Water Runoff - Capital	\$5,886	\$0	\$5,886
1 11.	SO ₂ Allowances - Revenue	(\$174.210)		(\$174,210)
12.	TOTAL (Lines 1 through 11)	\$1,922,642	\$2,155,947	(\$233,305)

FLORIDA POWER & LIGHT COMPANY FNVTRONMENTAL COST RECOVERY CLAUSE OCTOBER 1993 THROUGH MARCH 1994 ACTUAL

ENVIRONMENTAL COSTS	OCTOBER	NOVEMBER	DECEMBER	JANUARY	FEBRUARY	MARCH	TOTAL
1 Air Operating Permit Fees - O & M	50	50	50	50	\$634,849	\$0	\$634,849
2 Lew NOs Burner Technology - Capital	50	\$0	50	\$18,752	\$37,383	\$32,828	\$88,963
3. Continuous Emission Monitoring Systems - Capital	50	so	50	50	\$4	50	\$0
4a. Clean Closure Equivalency - O & M	(\$3,900)	\$29,800	\$248,069	\$16,818	(\$17,995)	\$67,486	\$340,278
4b. Clean Closure Equivalency - Capital	50	\$0	50	\$110	\$367	\$564	\$1,041
5a. Maintenance of Stationary Above Ground Fuel Storage Tanks - O & M	\$49,757	(\$8,394)	\$47,805	50	\$48,084	\$60,414	\$217,666
5b. Maintenance of Stationary Above Ground Fuel Storage Tanks - Capital	50	50	50	\$6,168	\$12,593	\$13,520	\$32,081
6. Secondary Containment Around Pollutant Storage and Hazardous Materials Tanks - O & M	50	\$23,620	\$6,747	50	(\$1,642)	\$0	\$36,735
Relocate Turbine Lube Oil Underground Piping to Above Ground - Capital	\$367	\$348	\$368	\$367	\$366	5386	\$2,222
Ba. Oil Spill Cleanup/Response Equipment - O & M	50	50	\$4,442	50	\$32,225	\$675	\$37,342
81. Oil Spill Cleanup/Response Equipment - Capital (Note 1)	50	\$2,192	\$15,175	\$28,857	\$10,330	\$10,303	\$66,857
Sc. Off Spill Cleanup/Response Equipment - Revenue	50	50	50	50	50	50	50
9. Law-Level Radioactive Waste Access Fees - O & M	\$81,458	50	\$73,417	50	50	Se	\$154,875
10. Relocate Storm Water Runoff - Capital (Note 2)	\$0	50	50	50	\$175	\$2,000	\$2,175
11. SO2 Allowances - Negative Return on Deferred Gain	\$0	50	(5841)	(\$1,682)	(\$1,682)	(\$1,682)	(\$5,887)
12. TOTAL (Lines 1 through 11)	\$127,682	\$57,596	\$395,182	\$69,390	\$774,853	\$186,494	\$1,611,197

Note 1 January includes an adjustment of \$10,815 for depreciation applicable to November

Note 2 March includes an adjustment of \$597 applicable to February

Florida Power & Light Company Environmental Cost Recovery Clause (ECRC) Calculation of Over/(Under) Recovery October 1993 Through March 1994

		ACTUAL							
		October	November	December	January	February	March	Total	
1.	Revenues	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
2.	Expenses	127,682	57,596	395,182	69,390	774,853	186,494	1,611,197	
2a.	Jurisdictional factor	98.59840%	98.59840%	98.59840%	98.59840%	98.59840%	98.59840%	N/A	
2b.	Jurisdictional expenses	125,892	56,789	389,643	68,417	763,993	183,880	1,588,614	
3.	True-up Provision for this Period - Over/ (Under) Recovery	(125,892)	(56,789)	(389,643)	(68,417)	(763,993)	(183,880)	(1,588,614	
4.	Interest Provision for this period	(900)	(1,136)	(1,779)	(2,384)	(3,606)	(5,362)	(15,166	
5.	True-up and interest beginning of month	(278,250)	(405,043)	(462,967)	(854,389)	(925,191)	(1,692,789)	(278,250	
6.	End of Period True-up Amount Over/ (Under) Recoveries	(\$405,043)	(\$462,967)	(\$854,389)	(\$925,191)	(\$1,692,789)	(\$1,882,031)	(\$1,882,031	

					ACTUAL			
		October	November	December	January	February	March	Total
	Interest Provision							
1.	Beginning True-up Amount	(\$278,250)	(\$405,043)	(\$462,967)	(\$854,389)	(\$925,191)	(\$1,692,789)	(\$3,935,337)
2.	Ending True-Up Amount Before Interest	(404,143)	(461,831)	(852,610)	(922,807)	(1,689,184)	(1,876,670)	(5,341,270)
3.	Total of Beginning and Ending True-up Amounts	(682,393)	(866,874)	(1,315,578)	(1,777,196)	(2,614,375)	(3,569,459)	(9,276,608)
3.	Allouids	(002,393)	(000,074)	(1,313,370)	(1,777,190)	(2,014,575)	(5,565,455)	(7,270,000)
4.	Average True-up Amount	(341,197)	(433,437)	(657,789)	(888,598)	(1,307,187)	(1,784,729)	(4,638,304)
	Interest Rate - First Day Reporting							
5.	Business Month	3.19000%	3.14000%	3.15000%	3.34000%	3.10000%	3.52000%	N/A
	Interest Rate - Last Day Reporting							
6.	Business Month	3.14000%	3.15000%	3.34000%	3.10000%	3.52000%	3.69000%	N/A
7.	Total	6.33000%	6.29000%	6.49000%	6.44000%	6.62000%	7.21000%	N/A
8.	Average Interest Rate	3.16500%	3.14500%	3.24500%	3.22000%	3.31000%	3.60500%	N/A
9.	Monthly Average Interest Rate	0.26375%	0.26208%	0.27042%	0.26833%	0.27583%	0.30042%	N/A
10.	Interest Provision for Month	(\$900)	(\$1,136)	(\$1,779)	(\$2,384)	(\$3,606)	(\$5,362)	

FLORIDA POWER & LIGHT COMPANY ENVIRONMENTAL COST RECOVERY CLAUSE FINAL TRUE-UP FOR THE PERIOD APRIL TO SEPTEMBER 1994

No.
1 Final true-up for period April to September 1994 \$1,205,632

2 Less - estimated true-up amounts approved in Order No. PSC-94-.1207-FOF-EI to be collected in the period - October 1994 to March 1995 1,094,071

3 Adjusted net true-up (to be carried over to April to September 1995 period. \$111,56:

() Reflects Underrecovery

Line

FLORIDA POWER & LIGHT COMPANY ENVIRONMENTAL COST RECOVERY CLAUSE CALCULATION OF VARIANCE APRIL 1994 THROUGH SEPTEMBER 1994

	ENVIRONMENTAL COSTS	ACTUAL	ESTIMATED/ACTUAL	VARIANCE
1.	Air Operating Permit Fees - O & M	\$28,503	\$32,638	(\$4,135)
2	Low NOx Burner Technology - Capital	\$405,529	\$383,171	\$22,358
3.	Continuous Emission Monitoring Systems - Capit	\$17,797	\$26,175	(\$8,378)
44	Clean Closure Equivalency - O & M	\$182,530	\$318,597	(\$136,067)
b	Clean Closure Equivalency - Capital	\$2,915	\$2,984	(\$69)
5a	Maintenance of Stationary Above Ground Fuel Storage Tanks - O & M	\$212,777	\$217,002	(\$4,225)
5b	Maintenance of Stationary Above Ground Fuel Storage Tanks - Capital	\$90,916	\$107,069	(\$16,153)
6	Secondary Containment Around Pollutant Storage and Hazardous Materials Tanks - O & M	\$0	\$0	\$0
7.	Relocate Turbine Lube Oil Underground Piping to Above Ground - Capital	\$2,268	\$2,225	\$43
84	Oil Spill Cleanup/Response Equipment - O & M	\$73,771	\$78,000	(\$4,229)
86	Oil Spill Cleanup/Response Equipment - Capital	\$61,070	\$61,281	(\$211)
8c	Oil Spill Cleanup/Response Equipment - Revenue	\$0	\$0	\$0
9.	Low-Level Radioactive Waste Access Fees - O &	\$206,075	\$213,710	(\$7,635)
10	Relocate Storm Water Runoff - Capital	\$8,831	\$8,801	\$30
11	SO2 Allowances - Negative Return on Deferred G	(\$15,707)	(\$11,153)	(\$4,554)
12	Scherer Discharge Pipeline - Capital	\$32,731	\$40,259	(\$7,528)
13	TOTAL (Lines 1 through 12)	\$1,310,006	\$1,480,759	(\$170,753)
14.	Jurisdictionalized Environmental Costs	\$1,291,569	\$1,460,007	(\$168,438)
15	Jurisdictional Revenues, Net of Revenue Taxes	2,029,169	2,087,343	(\$58,174)
16	True-up Provision (Lines 15-14)	\$737,600	\$627,336	\$110,264
17.	Interest Provision	-6,078	-7,374	1,296
18	Deferred True up beginning of period	474,109	474,109	Q
19.	End of Period Net True-up Amount (Lines 16+17+18) Over(Under) Recovery	\$1,205,631	\$1,094,071	\$111,560

Florida Power & Light Company FPSC Docket No. 940042-E1 Exhibit No. Testimony of B.T. Birkett November 14, 1994 Document No. 2 Page 1 of 1

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PLORIDA POWER & LIGHT COMPANY ENVIRONMENTAL COST RECOVERY CLAUSE APRIL 1994 THROUGH SEPTEMBER 1994 ACTUAL

ENVIRONMENTAL COSTS	APRIL.	MAY	ANE	TULY	AUGUST	SEPTEMBER	TOTAL
	\$839	\$0	\$15,340	\$4,108	\$4,108	\$4,106	\$28,503
Ac Operating Permit Fees - O & M	27.000	134.615	534,476	\$57,006	\$79,071	\$165,262	\$405,529
2. Low NOx Burner Technology - Capital	\$35,099	234,613	81.5	250043	\$4,670	\$12,889	\$17,797
3. Continuous Emission Monitoring Systems - Capital	\$0	\$0	50	\$238	Antonio Carlos	0478550000	1000000
4s. Clean Clours Equivalency - O & M	(\$12,928)	\$1,526	\$16,314	\$101,384	150,586	\$25,648	\$182,530
4b. Clean Closure Equivalency - Capital	\$522	1495	\$493	\$492	\$490	\$423	\$2,915
St. Maintenance of Stationary Above Ground Fuel Storage Tanks - O & M	\$1,764	\$20,048	\$150,095	\$10,870	\$0	\$30,000	\$212,777
So. Maintenance of Stationary Above Ground Fuel Storage Tanks - Capital	\$12,907	\$12,785	\$12,743	\$14,485	\$18,630	\$19,366	\$10,916
Secondary Containment Around Pollutant Startige and Hazardous Materials Tanks - O & M	\$0	\$0	\$0	50	\$0	\$0	\$0
 Relocate Turbine Lube Oil Underground Piping to Above Ground - Capital 	\$375	\$372	\$371	\$370	\$370	\$410	\$2,268
So. CE Spill Chernspillaspones Equipment - O & M	\$2,138	50	\$3,016	\$1,581	\$48,229	\$18,807	\$73,771
Bb. Oil Spill Comman@exponer Equipment - Capital	\$10,259	\$10,166	\$10,115	\$10,058	\$9,998	\$10,474	\$61,070
	50	50	50	\$0	\$0	\$0	\$0
Bc. GP Spill Cleanup/Response Equipment - Revenue		164,892	10	\$0	(\$4,819)	\$79,122	\$206,075
Low-Level Radioactive Waste Access Fees - O & M	\$66,880	Vistorial		0.00	\$1,503	\$1,501	\$8,831
10. Relocate Storm Water Rusoff - Capital	\$1,385	\$1,437	\$1,502	\$1,505	0.000000	500000	414.707
11. SO2 Allowances - Negative Return on Deferred Onin	(\$1,667)	(\$1,667)	(\$1,667)	(\$2,808)	(\$3,949)	(\$3,949)	(\$15,707)
12. Schere: Discharge Pipeline - Capital	50	\$0	\$6,605	\$7,310	\$8,773	\$10,043	\$32,731
13. TOTAL (Lines 1 through 12)	\$117,579	\$144,669	\$249,403	\$206,597	\$217,660	\$374,104	\$1,310,006

_	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	TOTAL
ENVIRONMENTAL CLAUSE REVENUES (NET OF REVENUE TAXES)	550,991	683,090	749,001	817,895	785,541	788,791	4,385,309
ADJUSTMENT NOT APPLICABLE TO PERIOD - PRIOR TRUE-UP	(392,690)	(392,690)	(392,690)	(392,690)	(392,690)	(392,690)	(2,356,140)
ENVIRONMENTAL REVENUES APPLICABLE TO PERIOD (Line B1 + B2)	168,301	290,400	356,311	425,205	392,851	396,101	2,029,169
JURISDICTIONAL ENVIRONMENTAL EXPENSES (From File Maintenance/Final GL)	115,925	142,641	245,906	203,699	214,607	368,791	1,291,569
TRUE-UP THIS PERIOD (Line B3 - Line B4)	52,376	147,759	110,405	221,506	178,244	27,310	737,600
INTEREST PROVISION FOR THE MONTH (From DOCUMENT NO. 1, Page 3, Line C10)	(5,248)	(4,034)	(2,415)	(366)	1,911	4,074	(6,078)
TRUE-UP & INTEREST PROVISION BEGINNING OF MONTH (EST/ACT in factor)	(2,356,140)	(1,916,322)	(1,379,907)	(879,227)	(265,397)	307,448	(2,356,140)
 DEFERRED TRUE-UP BEGINNING OF PERIOD (Final less EST/ACT) 	474,110	474,110	474,110	474,110	474,110	474,110	474,110
PRIOR TRUE-UP COLLECTED (REFUNDED)	392,690	392,690	392,690	392,690	392,690	392,690	2,356,140
11. END OF PERIOD -TOTAL NET TRUE-UP RECOVERY (Line B5+B6+B7+B7a+B8)	(\$1,442,212)	(\$905,797)	(\$405,117)	\$208,713	\$781,558	\$1,205,632	\$1,205,632

NOTES: () Reflects Underrecovery

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PSC Docket NJ. 940042-EI shibil No estimony of D.T. Birkett devender 14, 1994 bounners No. 4 upo 1 of 2

FLORIDA POWER & LIGHT COMPANY ENVIRONMENTAL PROGRAM COSTS APRIL THROUGH SEPTEMBER 1994

	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	TOTAL
C INTEREST PROVISION							
Line 87+87a)	(\$1,882.030)	(\$1,442.212)	(\$905,797)	(\$405,117)	\$208,713	\$781,558	(\$3,644,885)
2 ENDING TRUE-UP AMOUNT BEFORE INTEREST (Line B3+B7+B7s+B8)	(1.436,964)	(901,763)	(402,702)	209,079	779,647	1,201,558	(551,145)
3 TOTAL OF BEGINNING & ENDING TRUE-UP (Line C1+C2)	(\$3,318,994)	(\$2,343,975)	(\$1,308,499)	(\$196,038)	1988,360	\$1,983,116	(\$4,196,030)
4 AVERAGE TRUE-UP AMOUNT (50% of Line C3)	(\$1,659,497)	(\$1,171,988)	(\$654,250)	(\$98,019)	\$494,180	\$991,558	(\$2,098,015)
5 INTEREST RATE - FIRST DAY OF REPORTING BUSINESS MONTH	3.69000%	3.90000%	4.36000%	4.50000%	4.46000%	4.82000%	N/A
6 INTEREST RATE - FIRST DAY OF SUBSEQUENT BUSINESS MONTH	3.90000%	4.36000%	4,50000%	4.46000%	4 82000%	5.04000%	N/A
7 TOTAL (Line C5+C6)	7.59000%	8.26000%	8.86000%	8.96000%	9.28000%	9.86000%	N/A
AVERAGE INTEREST RATE 8 (50% of Line C7)	3.79500%	4.13000%	4.43000%	4.48000%	4,64000%	4.93000%	N/A
9 MONTHLY AVERAGE INTEREST RATE (Line CB / 12)	0.31625%	0.34417%	0.36917%	0.37333%	0.38667%	0.41083%	N/A
10 INTEREST PROVISION FOR THE MONTH	(\$5,248)	(\$4,034)	(\$2,415)	(\$366)	\$1,911	\$4,074	(\$6,078)
(Line C4 x C9)							

() REFLECTS UNDERRECOVERY

FLORIDA POWER & LIGHT COMPANY ENVIRONMENTAL COST RECOVERY CLAUSE FINAL TRUE-UP FOR THE PERIOD OCTOBER 1994 THROUGH MARCH 1995

Line No.		
1	Final true-up for period October 1994 through March 1995	\$882,358
2	Less - estimated true-up amounts approved in Order No. PSC-95-0384-FOF-EI to be collected in the period - April through September 1995	462,940
3	Adjusted net true-up (to be carried over to October 1995 through March 1996 period).	\$419,418

() Reflects Underrecovery

FLORIDA POWER & LIGHT COMPANY ENVIRONMENTAL COST RECOVERY CLAUSE CALCULATION OF VARIANCE OCTOBER 1994 THROUGH MARCH 1995

	ENVIRONMENTAL COSTS	ACTUAL	ESTIMATED/ACTUAL	VARIANCE
1.	Air Operating Permit Fees - O & M	\$1,660,645	\$1,671,288	(\$10,643)
2.	Low NOx Burner Technology - Capital	\$842,192	\$933,490	(\$91,298)
3a.	Continuous Emission Monitoring Systems - O & M	\$101,357	\$125,050	(\$23,693)
3ъ.	Contin ous Emission Monitoring Systems - Capital	\$610,790	\$650,415	(\$39,625)
4a.	Clean Closure Equivalency - O & M	\$143,883	\$181,852	(\$37,969)
4b.	Clean Closure Equivalency - Capital	\$3,313	\$3,808	(\$495)
5a.	Maintenance of Stationary Above Ground Fuel Storage Tanks - O & M	\$324,750	\$314,962	\$9.788
5b.	Maintenance of Stationary Above Ground Fuel Storage Tanks - Capital	\$159,917	\$176,394	(\$16,477)
7.	Relocate Turbine Lube Oil Underground Piping to Above Ground - Capital	\$2,196	\$2,196	\$0
	Oil Spill Cleanup/Response Equipment - O & M	\$75,228	\$108,110	(\$32,882)
8b.	Oil Spill Cleanup/Response Equipment - Capital	\$62,927	\$61,970	\$957
8c	Oil Spill Cleanup/Response Equipment - Revenue	(\$359,463)	(\$359,463)	\$0
9.	Low-Level Radioactive Waste Access Fees - O & M	\$56,374	\$55,295	\$1,079
10.	Relocate Storm Water Runoff - Capital	\$8,230	\$8,835	(\$605)
11.	SO2 Allowances - Negative Return on Investment	(\$26,819)	(\$27,758)	\$939
12.	Scherer Discharge Pipeline - Capital	\$60,395	\$60,202	\$193
13.	RCRA Corrective Action - O & M	so	\$55,000	(\$55,000)
14.	TOTAL (Lines 1 through 13)	\$3,725,915	\$4,021,646	(\$295,731)
15.	Jurisdictionalized Environmental Costs	\$3,646,759	\$3,936,208	(\$289,449)
16	Jurisdictional Revenues, Net of Revenue Taxes	\$4,365,093	\$4,241,381	\$123,712
17.	True-up Provision (Line 16 - 15)	\$718,334	\$305,173	\$413,161
18.	Interest Provision	\$52,464	\$46,206	\$6,258
19	Deferred True-up beginning of period	\$111,560	\$111,560	\$0
	End of Peri d Net True-up Amount (Lines 17+18+19) Over(Under) Recovery	\$882,358	\$462,940	\$419,418

Florida Power & Light Co. FPSC Docket No. 950007-FI Exhibit No. Testimony of E. T. Birkett May 19, 1995 Document No. 2

FLORIDA POWER & LIGHT COMPANY ENVIRONMENTAL PROGRAM COSTS OCTOBER 1994 THROUGH MARCH 1995

		OCTOBER	NOVEMBER	DECEMBER	JANUARY	FEBRUARY	MARCH	TOTAL
B. 1	ENVIRONMENTAL CLAUSE REVENUES (NET OF REVENUE TAXES)	625,318	580,574	551,607	510,513	519,174	483,836	3,271,022
2	ADJUSTMENT NOT APPLICABLE TO PERIOD - PRIOR TRUE-UP	182,345	182,345	182,345	182,345	182,345	182,345	1 004 021
3	ENVIRONMENTAL REVENUES APPLICABLE TO PERIOD (Line B: + B2)	602 (41			Tiple of section	102,575	104,343	1,094,071
	Statement 1 200	807,663	762,919	733,952	692,858	701,519	666,181	4,365,093
4	JURISDICTIONAL ENVIRONMENTAL EXPENSES	(11,776)	307,117	351,520	318,743	2,003,335	677,820	3 646 750
5	TRUE-UP THIS PERIOD (Line B3 - Line B4)	819,439	455,802	382,432	374,115	(1,301,816)	(11,639)	718,334
6	INTEREST PROVISION FOR THE MONTH (From DOCUMENT NO. 1, Page 3, Line C10)	6,376	8,820	10,869	12,323	9,135	4,941	52,464
7	TRUE-UP & INTEREST PROVISION BEGINNING OF MONTH (EST/ACT in frctor)	1,094,071	1,737,541	2,019,818	2,230,774	2,434,867	959,841	1,094,071
	 DEFERRED TRUE-UP BEGINNING OF PERIOD (Final less EST/ACT) 	111,560	111,560	111,560	111,560	111.560	111.560	111,560
8	PRIOR TRUE-UP COLLECTED (REFUNDED)	(182,345)	(182,345)	(182,345)	(193.346)			,500
		(104,515)	(102,545)	(102,343)	(182,345)	(182,345)	(182,345)	(1,094,071)
	11. END OF PERIOD -TOTAL NET TRUE-UP RECOVERY (Line B5+B6+B7+B7a+B8)	\$1,849,101	\$2,131,378	\$2,342,334	\$2,546,427	\$1,071,401	\$882,358	\$882,358
	10.1014700/							-

NOTES: () Reflects Underrecovery

PSC Docket No. 950007 Exhibit No. Testimony of B. T. Birket fay 19, 1995 Document No. 4

FLORIDA POWER & COMPANY ENVIRONMENTAL COST VERY CLAUSE OCTOBER 1994 THROUGH MARCH 1995 ACTUAL

	ENVIRONMENTAL COSTS	OCTOBER	NOVEMBER	DECEMBER	JANUARY	FEBRUARY	MARCH	TOTAL
1	Air Operating Permit Fees - O & M	\$4,108	\$4,106	\$4,108	\$4,108	\$1,640,105	\$4,108	\$1,660,645
2	Low NOx Burner Technology - Capital	\$122,601	\$123,546	\$126,704	\$139,027	\$157,482	\$172,832	\$842,192
34	Continuous Emission Monitoring Systems - O & M	30	\$0	\$0	\$233	\$7,464	\$93,660	\$101,357
36	Continuous Emission Monitoring Systems - Capital	\$32,615	\$62,663	\$82,031	\$120,484	\$154,264	\$158,733	\$610,790
44	Clean Closure Equivalency - O & M	\$12,669	\$32,183	\$84,086	3494	\$660	\$13,791	\$143,883
40	Clean Closure Equivalency - Capital	3481	\$473	\$471	\$470	\$629	\$789	\$3.313
54	Maintenance of Stationary Above Ground Fuel Storage Tanks - O & M	\$18,767	\$1,696	\$53,672	\$13,569	\$30,994	\$206,052	\$324,750
58	Maintenance of Stitionary Above Ground Fuel Storage Tanks - Capital	\$21,704	\$31,366	\$26,903	\$26,632	\$25,917	\$27,395	\$159,917
7	Relocate Turbine Lube Oil Underground Piping to Above Ground - Capital	\$373	2366	\$366	\$365	\$363	\$363	\$2,196
21	Oil Spill Cleanup/Response Equipment - O & M	\$3,615	\$39,996	\$16,961	\$2,865	\$11,584	\$207	\$75,228
-	Oil Spill Cleanup/Response Equipment - Capital	\$10,552	\$10,403	\$10,552	\$10,534	\$10,473	\$10,413	\$62,927
R	Oil Spill Cleanup/Response Equipment - Revenue	(\$245,963)	50	(\$112,500)	\$0	\$0	\$0	(\$359,463)
9.	Low-Level Radiosctive Waste Access Fees - O & M	\$0	50	\$59,070	\$0	50	(82,696)	\$56,374
10	Relocate Storm Water Runoff - Capital	\$1,498	\$1,473	\$1,204	\$1,355	\$1,352	\$1,348	\$8,230
11	SOZ Allowances - Negative Return on Investment	(\$4,199)	(\$4,524)	(\$4,524)	(\$4,524)	(\$4,524)	(\$4,534)	(\$26,819)
12	Schorer Discharge Pipeline - Capital	\$10,147	\$10,034	\$10,046	\$10,050	\$10,056	\$10,062	\$60,395
13	RCRA Corrective Action - O & M	\$0	\$0	\$0	\$0	\$0	\$0	\$0
14	TOTAL (Lines 1 through 13)	(\$12,032)	\$313,783	\$359,150	\$325,662	\$2,046,819	\$692,533	\$3,725,915

Fosida Power & Light Co. FTSC Docket No. 950007-E2 Exhibit No. Testimony of B. T. Birken May 19 1495

FLORIDA POWER & LIGHT COMPANY ENVIRONMENTAL FROGRAM COSTS OCTOBER 1994 THROUGH MARCH 1995

	· -	OCTOBER	NOVEMBER	DECEMBER	JANUARY	FEBRUARY	MARCH	TOTAL
c	INTEREST PROVISION							
	1 BEGINNING TRUE-UP AMOUNT (Line B7+B7a)	\$1,205,631	\$1,849,101	\$2,131,378	\$2,342,334	\$2,546,427	\$1,071,401	\$11,146,272
	2 ENDING TRUE-UP AMOUNT BEFORE INTEREST (Line B5+B7+B7a+B8)	1,842,725	2,122,558	2,331,465	2,534,104	1,062,266	877,417	10,770,535
	 TOTAL OF BEGINNING & ENDING TRUE-UP (Line C1+C2) 	\$3,048,356	\$3,971,659	\$4,462,843	\$4,876,438	\$3,608,693	\$1,948,818	\$21,916,807
	4 AVERAGE TRUE-UP AMOUNT (50% of Line C3)	\$1,524,178	\$1,985,830	\$2,231,422	\$2,438,219	\$1,804,347	\$974,409	\$10,958,404
	5 INTEREST RATE - FIRST DAY OF REPORTING BUSINESS MONTH	5.04000%	5.00000%	5.66000%	6.03000%	6.10000%	6.05000%	N/A
	6 INTEREST RATE - FIRST DAY OF SUBSEQUENT BUSINESS MONTH	5.00000%	5.66000%	6.03000%	6.10000%	6.05000%	6.12000%	N/A
	7 TOTAL (Line C5+C6)	10.04000%	10.66000%	11.69000%	12.13000%	12.15000%	12.17000%	N/A
	AVERAGE INTEREST RATE 8 (50% of Line C7)	5.02000%	5.33000%	5.84500%	6.06500%	6.07500%	6.08500%	N/A
	9 MONTHLY AVERAGE INTEREST RATE (Line C8 / 12)	0.41833%	0.44417%	0.48708%	0.50542%	0.50625%	0.50708%	N/A
	10 INTEREST PROVISION FOR THE MONTH (Line C4 * C9)	\$6,376	\$8,820	\$10,869	\$12,323	\$9,135	\$4,941	\$52,464

() REFLECTS UNDERRECOVERY.

FPSC Docket No. 950007-E Exhibit No. Testimony of B. T. Birkett May 19, 1995 Document No. 4 Page 2 of 2

State of Florida

Commissioners: SUSAN F. CLARK, CHAIRMAN J. TERRY DEASON JULIA L. JOHNSON DIANE K. KIESLING JOE GARCIA



DIVISION OF RECORDS & REPORTING BLANCA S. BAYO DIRECTOR (904) 413-6770

Public Service Commission

July 13, 1995

Florida Power & Light Company Attn: Mr. Bill Walker 215 South Monroe Street, Suite 810 Tallahassee, Florida 32301-1859

Dear Mr. Walker:

RE: Docket No. 950007-EI - Florida Power & Light Company

Environmental Cost Recovery Clause Audit Report

Audit Control # 94-284-4-1

The enclosed audit report is forwarded for your review. Any company response filed with this office within ten (10) work days of the above date will be forwarded for consideration by the staff analyst in the preparation of a recommendation for this case.

The Division of Records and Reporting is holding the workpapers for which you requested confidential treatment. You have 21 days from the audit exit conference, or July 21, 1995 to file a formal request for Confidential Classification with the Division of Records and Reporting.

Thank you for your cooperation.

Sincerely,

Blanca S. Bayó

BSB/mas Enclosure

cc: Public Counsel Steel Law Firm