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9250 West Flagler St., Miami, FL 33174

June 3, 2003

Ms. Blanca Bayo
Division of the Commission Clerk and
Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard, Room 110
Tallahassee, Florida 32399-0850

030572-E1

COMMISSION CO BE NOT SE

Re: Depreciation Rates for Fort Myers Combustion Turbines

Dear Ms. Bayo:

Florida Power & Light Company (FPL) requests Commission approval to begin depreciating the Fort Myers Combustion Turbines 3A and 3B (Fort Myers Combustion Turbines) using the Whole Life Depreciation Rates currently approved for Martin Power Plant, Unit No. 4. The Fort Myers Combustion Turbines are peaking units and were not part of the rates approved in Order Nos. PSC-99-0073-FOF-EI and PSC-99-0958-FOF-EI issued January 8, 1999 and April 11, 1999, respectively, in Docket No. 971660-EI, or Order Nos. PSC 00-2434-PAA-EI and PSC 01-1337-PAA-EI.

The Fort Myers Combustion Turbines are a new installation to be used for peaking and will add approximately 314 megawatts of generation at the existing site. The Fort Myers Combustion Turbines began simple cycle operation on June 1, 2003.

The rates being requested are based on the whole life rates approved for Martin Unit 4. Martin Unit No. 4 was placed in service in 1994 and had depreciation rates last approved by the Commission in April 1999. The whole life depreciation rates approved for Martin Unit 4 will provide a reasonable capital recovery plan until depreciation studies of the Fort Myers Combustion Turbines can be prepared and reviewed and approved by the Commission. The application of whole life rates for the Fort Myers Combustion Turbines is appropriate since it has not accumulated any depreciation and, being a new unit, has a remaining life equal to the whole life.

FPL will prepare and file a site specific depreciation and dismantlement study for the Fort Myers Combustion Turbines as soon as possible after the plant dollars have been unitized.

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In summary, FPL proposes to use the whole life depreciation rates approved for Martin Unit 4 for the Fort Myers Combustion Turbines. Attached is a copy of the summary schedule for the most recent change in depreciation rates submitted by FPL in Docket No. 971660-EI and subsequently approved by the Commission for the Martin Combined Cycle Plant in Order No. PSC-99-0073-FOF-EI. If you or your staff have any questions, please contact me at (305) 552-2358.

Sincerely,

H. A Cuba

Director Regulatory and Tax Accounting

cc. Pat Lee

William G. Walker, III

Attachment

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