

AUS
CAF
CMP
COM
CTR
EGR
GCL
OPC
MMS
SEC
OTH

REDACTED

ORIGINAL

AT&T Electric Cost per kwh

Line	File Name	Electric Provider	Tariff	Bill Day	Demand (kw)			Energy Usage (kwh)			Coal Cost kwh
					Maximum	on Peak	off Peak	on Peak	off Peak	total	
1	FTLDFLOV	FPL	GSLD-1								
2				6/20/2003							
3				7/23/2003							
4				8/21/2003							
5	MIAMFLAC	FPL	GS-1								
6				6/26/2003							
7				7/28/2003							
8				8/26/2003							
9	OJUSFTL	FPL	GSLDT-1								
10				6/12/2003							
11				7/14/2003							
12				8/8/2003							
13	SPBGFLHL	Progress Energy									
14				6/1/2003							
15				7/1/2003							
16				8/1/2003							
17	WPBHFLAN	FPL	GSLDT-1								
18				6/13/2003							
19				7/15/2003							
20				8/13/2003							
21	ORLDFLMA	OUC	GSD1								
22				6/26/2003							
23				7/28/2003							
24				8/27/2003							
25	Total										
26	Average Cost Per KWH										

Highlighted information is redacted for reasons #3 and #4. Parties may obtain this information by signing a non-disclosure agreement.

DOCUMENT NUMBER-DATE
 09253 SEP 26 8
 FPSC-COMMISSION CLERK

EXHIBIT B

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1 **REBUTTAL AT 23-24).**

2 A. Mr. Turner has repeatedly pointed to that Texas PUC collocation order
3 in other collocation proceedings to support his claim that ILECs' power
4 costs, no matter how well supported, should be lower. As far as we are
5 aware, though, *no* state commission has ever followed that Texas
6 decision.

7

8 In addition, Mr. Turner misleadingly suggests that SBC itself proposed
9 the low power costs adopted in Texas. Following telephone
10 conversations with an SBC collocation witness, however, it is our
11 understanding that SBC "proposed" those costs only after it had lost
12 several crucial cost modeling questions. Thus, SBC does not believe
13 that the figures presented in that proceeding properly recover its power
14 costs.

15

16 **Q. PLEASE RESPOND TO MR. TURNER'S CLAIM THAT ILECS**
17 **SHOULD BE CONSIDERED "INDUSTRIAL" ELECTRICITY USERS**
18 **FOR PURPOSES OF ASSESSING THE AC COMPONENT OF THEIR**
19 **DC POWER RATES. (TURNER REBUTTAL AT 28).**

20 A. Mr. Turner is mistaken. No Verizon FL central office takes energy from
21 an industrial, or even an interruptible, power tariff. This should not come
22 as a surprise to Mr. Turner because, according to the data AT&T
23 provided in response to Verizon FL Interrogatory 8(g), **** Begin AT&T**
24 **proprietary :**

25

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1

2

**** End AT&T proprietary**

3

4 **Q. HOW DO MR. TURNER'S PROPOSED AC RATES FOR THE**
5 **FLORIDA ILECS COMPARE TO AT&T'S OWN ACTUAL FLORIDA**
6 **POWER RATES? (TURNER REBUTTAL AT 28).**

7 A. There is quite a discrepancy between them. Mr. Turner argues that
8 ILEC AC power costs should be assumed to be \$0.053 per kilowatt
9 hour, but, as shown in BKE-10, AT&T's own Florida power rates
10 average **** Begin AT&T proprietary** , **** End**
11 **AT&T proprietary** which is much closer to Verizon FL's proposal of
12 \$0.0717 than to Mr. Turner's proposal.

13

14 This is a prime example of why the Commission should be suspicious of
15 AT&T's proposed figures when they come from a consultant's alleged
16 "experience," rather than Florida-specific, hard data. Mr. Turner
17 obviously has access to this data, but has apparently failed to use it as
18 the basis for his recommendations.

19

20 **Q. DO YOU AGREE WITH MR. CURRY'S ASSERTION THAT VERIZON**
21 **FL'S PROPOSED COST FOR A 750 MCM CONNECTOR TAP IS**
22 **OVERSTATED? (CURRY REBUTTAL AT 21).**

23 A. No. The cost of the 750 MCM connector tap comes from Verizon's
24 GTEAMS database, which, as explained in Barbara Ellis's Direct
25 Testimony, contains actual prices that Verizon has paid for materials,

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1 square footage basis would force Verizon FL to absorb a much larger
2 percentage of the costs that it incurred only because of collocation.

3

4 Thus, in Verizon FL's cost study, Verizon FL properly assigns pro rata
5 security costs to itself as well as to an average number of ALECs per
6 central office, so that all companies that benefit equally from the security
7 devices pay equally for security costs. Verizon FL respectfully requests
8 that the Commission revisit its cost allocation requirements for security
9 equipment and endorse Verizon FL's pro rata approach.

10

11 **Q. DR. GABEL ARGUES THAT THE NUMBER OF COLLOCATORS**
12 **VERIZON FL ASSUMES IN ITS STUDY IS DRAMATICALLY**
13 **UNDERSTATED. (GABEL REBUTTAL AT 40-41). IS HE CORRECT?**

14 **A.** No. Dr. Gabel cites old data in attacking Verizon FL's assumption that
15 four collocators would share security costs with Verizon FL. As Verizon
16 FL explained in response to Staff Interrogatory 32(c), the most recent
17 data available shows an average of ** ** collocators per Verizon FL
18 central office with at least one collocator. In any event, raising the fill
19 factor in the Building Modification rate element from four to five would
20 result in a 7.5% reduction of that element, from \$237.96 to \$220.16.

21

22 **Q. IF VERIZON FL WERE ORDERED TO CHARGE FOR SECURITY ON**
23 **A PER SQUARE FOOT BASIS, WOULD VERIZON FL HAVE TO**
24 **MAKE OTHER CHANGES TO ITS STUDY?**

25 **A.** Yes. To recover security costs on a per square foot basis, Verizon FL