

070626-EI

Exhibit B

REDACTED DOCUMENTS

CMP _____
COM _____
CTR _____
ECK 1 _____
SCL _____
OPC _____
RCA _____
SCR _____
SGA _____
SEC _____
OTM _____

DOCUMENT NUMBER-DATE

02175 MAR 24 88

FPSC-COMMISSION CLERK

Q.

1 Please refer to late-filed exhibit no. 3 to FPL witness Dennis Brandt's deposition in Docket
2 No. 070650-EI. The response indicates that, in 2007, out-of-state tradable renewable energy
3 credits (TRECs) purchased under the Sunshine Energy program increased to 276,730 from
4 166,535 in 2006, while in-state TRECs decreased from 136,257 to 97,017. It is our
5 understanding that FPL's Sunshine Energy program will further encourage the development
6 of the TREC market in Florida (see page 7 of PSC Order No. PSC-03-1442-TRF-EI, issued
7 December 22, 2003, in Docket No. 030752-EI). Please provide a full explanation of why
8 there was a shift to out-of-state TRECs in 2007.

A.

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10 The difference between 2006 and 2007 is primarily due to the changes concerning the [REDACTED]
11 facility of the [REDACTED]. In 2007 Green Mountain sourced approximately [REDACTED]
12 MWhrs from [REDACTED] than 2006. The reason is two fold. This past year, the Sunshine
13 Energy Program had [REDACTED] to increase to [REDACTED] new renewable facilities (as defined by
14 by the Center for Resource Solutions). [REDACTED] TRECs are classified existing renewable. Some
15 of that Florida volume difference was made up with "new" renewable TRECs from [REDACTED]
16 [REDACTED] facility. A [REDACTED] was made between increasing the percent of TRECs from [REDACTED]
17 facilities [REDACTED] in Florida.

18 Of note, Green Mountain was in contact with several Florida [REDACTED] generators for the 2007
19 TRECs. Those facility owners indicated they were either reserving RECs for their own purposes
20 or holding off into entering agreements pending the outcome of the Renewable Portfolio Standard
21 regulations. Green Mountain is continuing to work with renewable developers in Florida to provide
22 a funding source, through TREC commitments, that will result in new projects being viable.

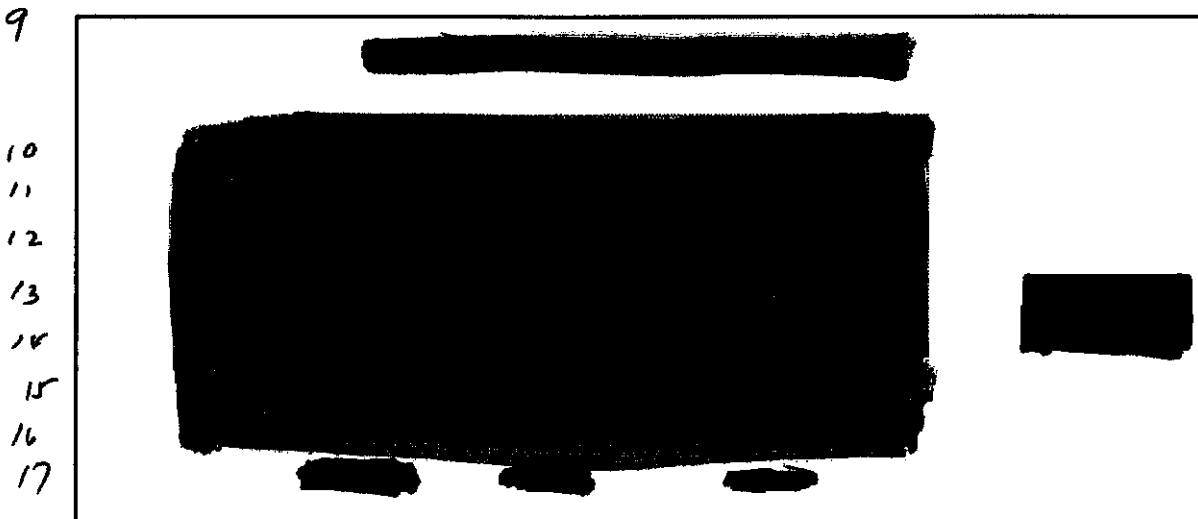
DOCUMENT NUMBER-DATE

02175 MAR 24 8

FPSC-COMMISSION CLERK

1 Q.
2 What is the cost relationship between the purchase of TRECs in the program to the cost of
3 solar generation?

4 A.
5 TREC prices for solar are generally more expensive than other renewable energy
6 resources given the greater cost to construct solar facilities and the lack of availability.
7 For example, solar RECs were [REDACTED] of the total RECs purchased for 2007, but
8 accounted for [REDACTED] for RECs.



Q.

Please provide a breakdown on how the program participants' contributions (on a per participant, per month basis) were used for the following categories for 2007:

Monthly contribution	\$ 9.75
FPL Administrative Costs	_____
Out-of-State TRECs	_____
In-State TRECs	_____
Green Mountain marketing costs	_____
Green Mountain administrative costs	_____
Solar facilities	_____

If the exact breakdown amounts are not known, please explain why the exact amounts are not known, provide an estimate, and explain how the estimate was derived. If no estimate can be provided, please explain why not. Please identify the source(s) of the breakdown information.

A.

1	Monthly contribution	\$ 9.75
2	FPL Administrative Costs	0.65
3	Out-of-State TRECs	See response to Question #3
4	In-State TRECs	See response to Question #4
5	Green Mountain marketing costs	See below
6	Green Mountain administrative costs	See below
7	Solar facilities	See below



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Q.

How much financial support does Green Mountain provide to the developer for each solar system placed on a home in the Naples project? Please provide information on financial support for both the initial purchase of the photovoltaic system and TREC purchases. Are any contributions made by Green Mountain reflected in the price of each home?

A.


 Green Mountain has no way of knowing how its contribution to the solar resources affected the sale price of the houses.

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1 Q.
2 Is the requirement of Section 18.1(1)(i) of FPL's contract with Green Mountain regarding the
3 purchase of energy from solar systems consistent with the requirements of the Commission's
4 recently proposed rule on net metering, assuming the rule becomes final in its present form?

5 A. 
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Q.

Please provide a copy of any contract between Green Mountain and any other party regarding the FPL Sunshine Energy Sun Funds Residential Solar Energy Incentive Program.

A.

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2  See FPL's
response to Staff's data request No. 27.

Q.
Under the Sunshine Energy Program contract, is Green Mountain precluded from constructing solar thermal projects?

A.

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Q.

Please refer to Section 13.1 of FPL's contract with Green Mountain. Has FPL or Green Mountain collected any information on customer satisfaction with the Sunshine Energy program? If so, please provide a copy of all documentation. If not, please explain.

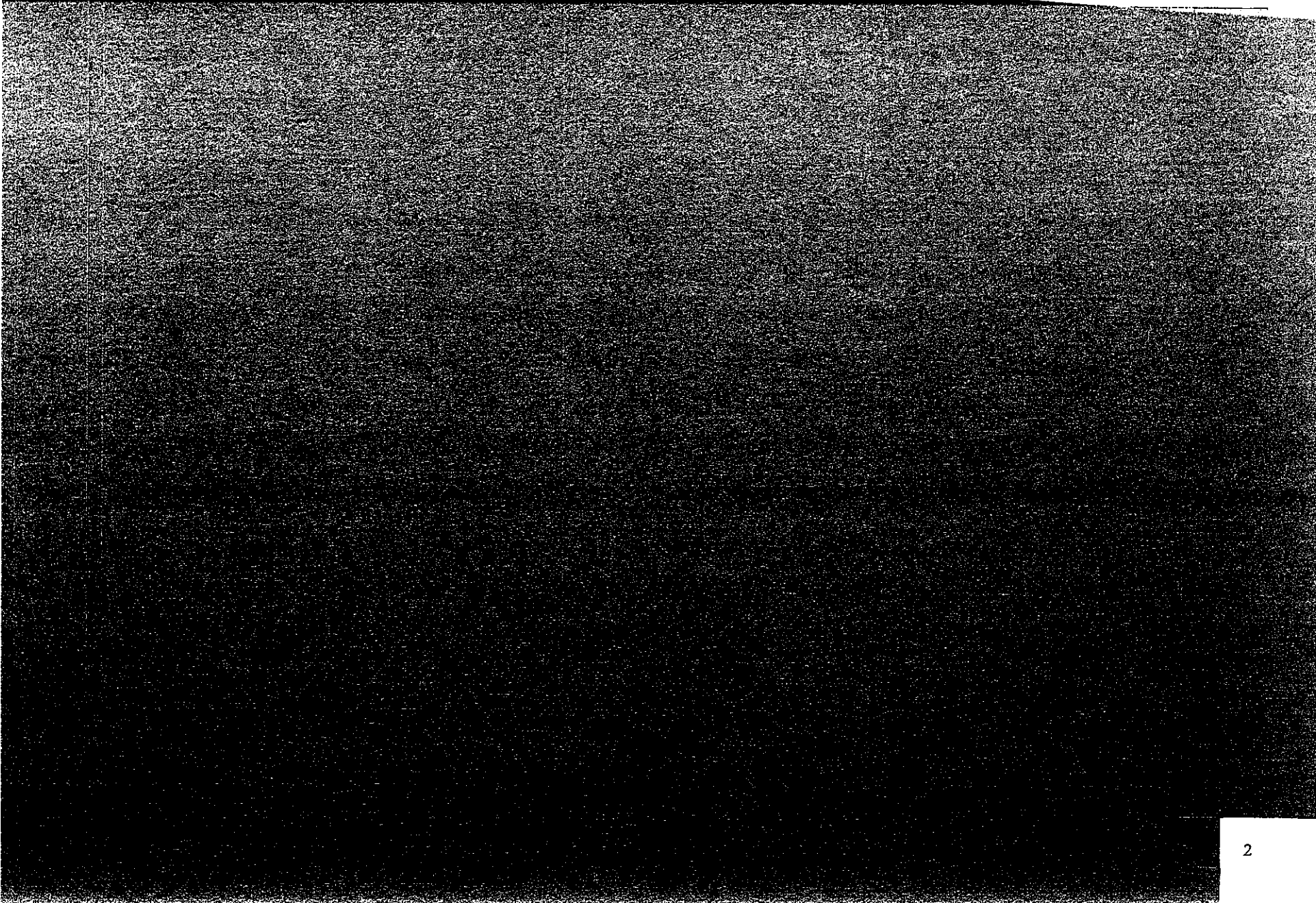
A.

1 A *Sunshine Energy* customer satisfaction survey was prepared for Green Mountain in October
2 2005, approximately 16 months after the Program launch (the presentation is attached as Exhibit
3 "C"). Among the highlights: over 75 percent were satisfied with *Sunshine Energy*; 86 percent
4 said that *Sunshine Energy* met or exceeded their expectations; almost half were extremely or very
5 likely to refer friends to the Program; and approximately 90 percent said they would remain a
6 customer for the next 6 months. Based on the very low churn rate performance of the Program,
7 such customer satisfaction surveys were not deemed necessary.

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DOCKET NO. 070626- EI
STAFF'S DATA REQUEST 2-15-08
INTERROGATORY NO. 39
ATTACHMENT # 1

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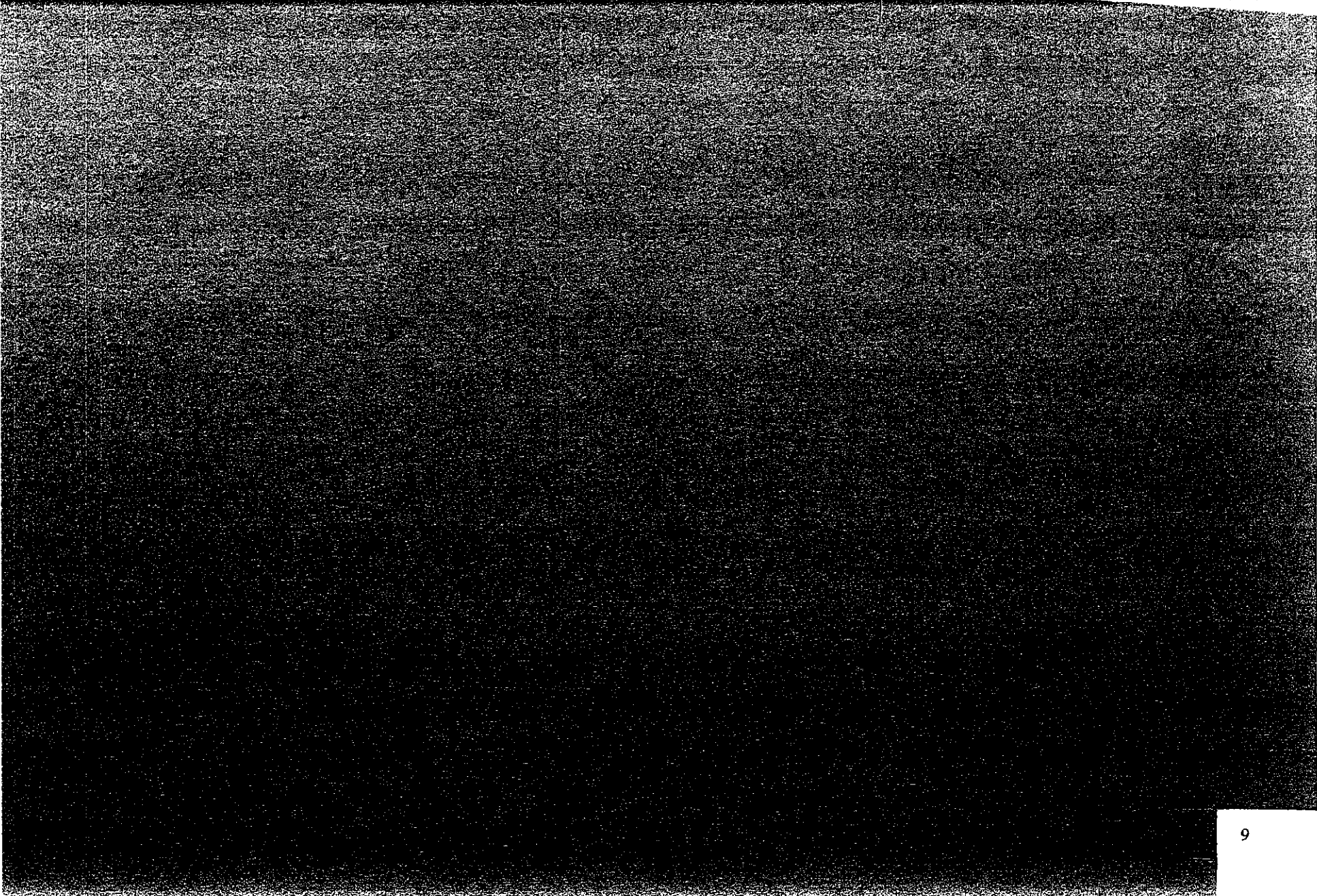


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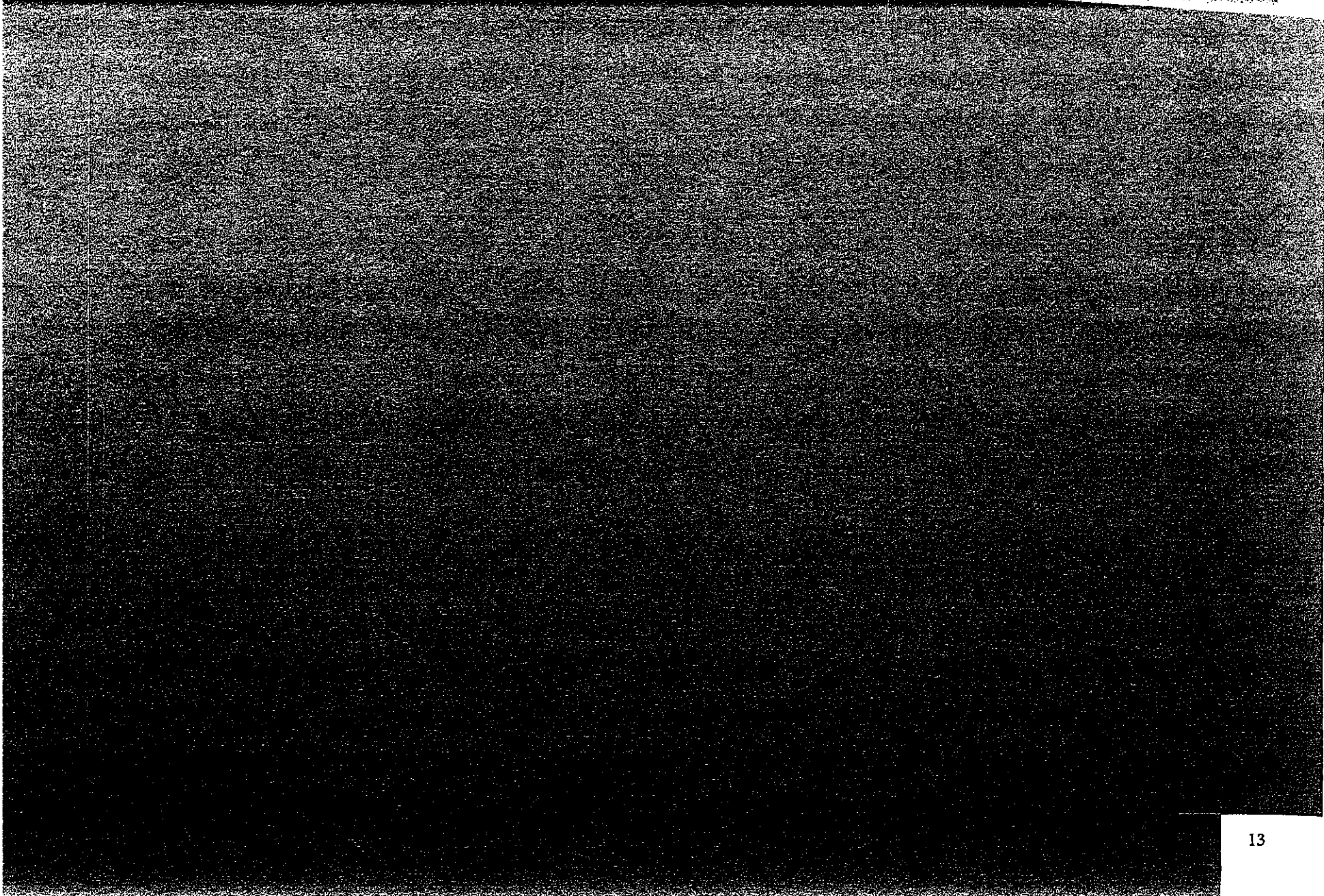
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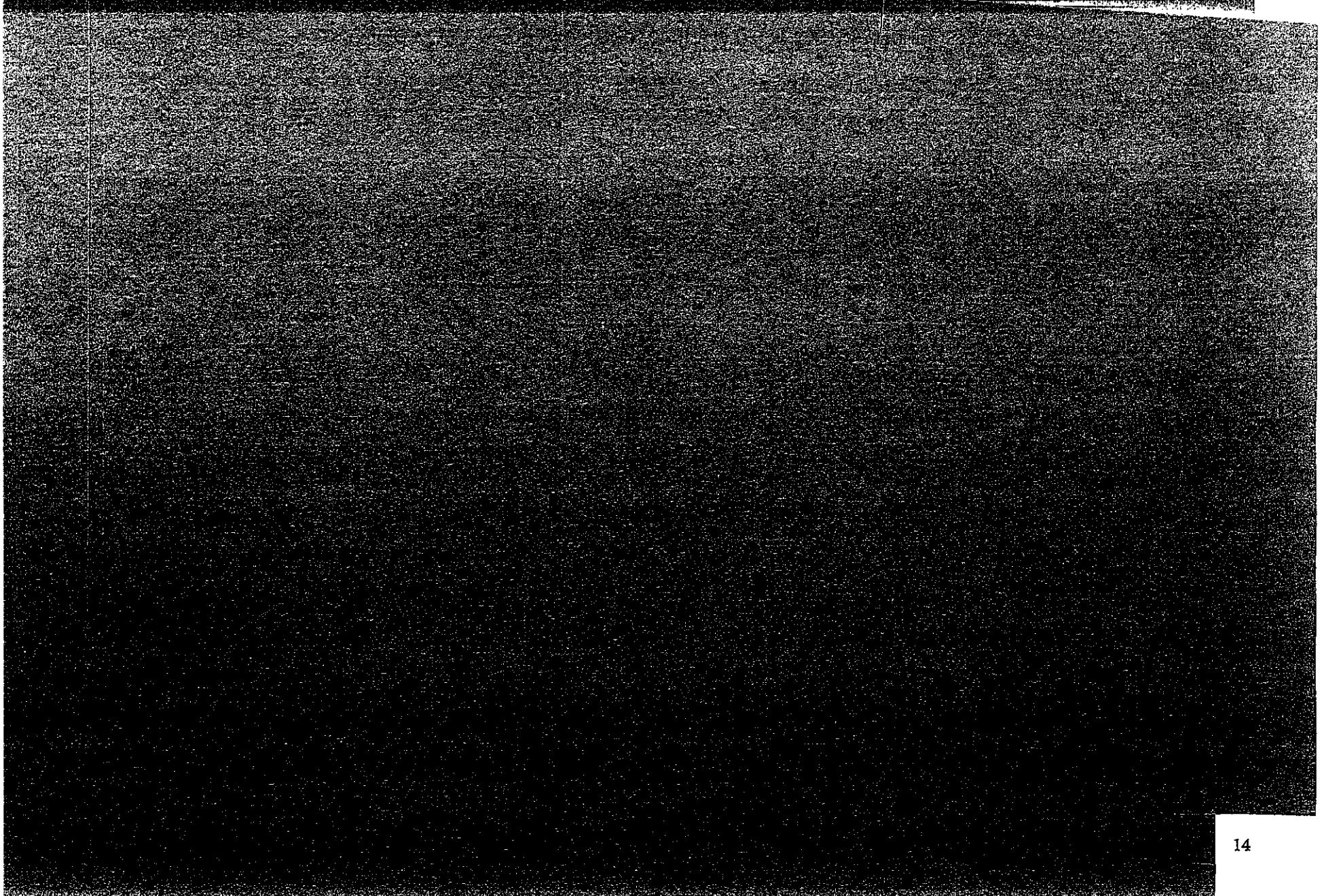
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Q.









Given the provisions in Section 17 of FPL's contract with Green Mountain, how could FPL expand its renewable energy offerings to its residential customers? Would FPL be required to renegotiate its contract with Green Mountain to expand the Sunshine Energy program?

A.

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A large black rectangular redaction covers the entire answer text.

1 Q.
2 Please refer to Section 15.3 of FPL's contract with Green Mountain. Discuss any obligation
3 Green Mountain has to purchase solar green tags from FPL. To date, has Green Mountain
4 purchased any green tags (solar or wind) from FPL or its affiliates? If so, were these green
5 tags used to meet Green Mountain's obligation under the Sunshine Energy program?

6 A.
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14  As a
15 general rule, Green Mountain does not purchase TRECs directly from FPL Energy or from
16 FPL Energy facilities.

Q.

Please refer to definition 1.56 in FPL's contract with Green Mountain. Is Green Mountain required to provide financial support to a solar project in order to meet this standard? If so, how does FPL determine that this solar financial support is sufficient to meet the standard in definition 1.56? How does FPL ensure that these solar resources would not have otherwise been built in the absence of Green Mountain's efforts and/or financial support?

A.

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[REDACTED]