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October 10, 2008

-VIA HAND DELIVERY -

Ms. Ann Cole
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

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COMMISSION
CLERK

Re: Docket Nos. 070231-EI and 080244-EI

Dear Ms. Cole:

I am enclosing for filing in the above dockets the original and five (5) copies of Florida Power & Light Company's responses to the Municipal Underground Utilities Consortium's First Data Requests (Nos. 1-72). A copy of FPL's responses will be served electronically on counsel for the parties of record in these dockets.

If there are any questions regarding this transmittal, please contact me at 561-304-5639.

Sincerely,

ja John T. Butler

Enclosure

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cc: Counsel for parties of record (w/enclosure)

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MUUC 9/4/08 DATA REQUESTS - FPL RESPONSESBasic FPL System Facts & Information

1. To the extent possible, please fill in the following table showing what percentages, by length of facilities, e.g., pole-line miles for OH or circuit or trench miles for UG, of FPL's UG and OH distribution facilities were installed in each of the time periods shown.

<u>Time Period</u>	<u>% of Total 2007 UG Installed in Period</u>	<u>% of Total 2007 OH Installed in Period</u>
Before 1950	Not available	Not available
1950-1959	Not available	Not available
1960-1969	Not available	Not available
Before 1980	26%	71%
1980-1989	32%	17%
1990-1999	27%	8%
2000-2007	15%	4%

Note: Data is not available prior to 1977. The "Before 1980" figure represents the balance as of year-end 1979. Also see FPL's response to Question 5.

2. If it is not possible for FPL to answer the preceding question, please provide estimates of:

- a. the average age of FPL's OH facilities, preferably on a mileage-weighted basis, and

A. See FPL's response to Question 1.

- b. the average age of FPL's UG facilities, preferably on a mileage-weighted basis.

A. See FPL's response to Question 1.

- c. Alternately, provide length of facilities in service by PLM or trench miles for each year during this time period on the FPL system.

A. See FPL's response to Question 1.

3. Page 8 of 17 of the UG Conversion O&M Worksheet shows the mileage for OH and UG facilities on FPL's system for the years 2003-2007.

a. Do these values include "service laterals" or "service drops"?

A. No.

b. Is it correct to conclude that these data show that approximately 60 percent of new FPL distribution facilities over the 2003-2007 period are UG facilities?

A. Yes.

c. Please provide the comparable values for installed UG facilities (trench or circuit miles) and installed OH facilities (PLM) for the years, 1980, 1985, 1990, 1995, and 2000.

A.

	Underground	Overhead
1980	7,395	30,365
1985	11,101	33,797
1990	15,540	37,238
1995	18,719	38,584
2000	22,106	40,201

4. For purposes of the following questions, "rear-lot applications" means that the facilities, whether OH or UG, are installed at the rear of properties, away from roads and road rights-of-way, and "front-lot applications" means that the facilities, whether OH or UG, are installed "adjacent to a public road, normally in front of the customer's premises" (language from PSC Rule 25-5.0341(1), F.A.C.). If FPL believes that different definitions of "rear-lot" and "front-lot" are appropriate, please provide those definitions.

A. Definition is acceptable.

a. Does FPL have any UG facilities on its system that are installed in "rear-lot" applications?

A. Yes.

b. If so, please provide an estimate of the percentage of FPL's UG facilities that are installed in rear-lot applications and the percentage of FPL's UG facilities that are installed in front-lot applications.

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A. FPL does not maintain its records in this manner.

c. Please provide an estimate of the percentage of FPL's OH facilities that are installed in rear-lot applications and in front-lot installations.

A. FPL does not maintain its records in this manner.

5. In what year did FPL first install UG facilities? Are they still in service?

A. FPL does not have the information available to specify the year UG was first installed. FPL's property records date back to 1941 (all data prior to 1941 were assumed to be vintaged as 1941 when FPL first implemented its Property Record System in the late 1970's). FPL's records show that there was some limited use of underground (approximately 1 mile) dating to the 1940's. These facilities have not been retired although they have been fully depreciated.

6. What types of each of the following distribution equipment items were typical for FPL UG installations in each of the time periods listed below? For each time period, please identify all types that were typically used in FPL UG installations.

Equipment/Types:

Cable: "Paper-lead" or "PILC"; "Solid dielectric"; "Cross-linked polyethylene" or "XLPE"; "Tree retardant cross-linked polyethylene" or "TRXLPE"; bare concentric neutral cable; All other types of cable, if any

Surge Arresters (All types typically used by FPL)

Switches or Switchgear:

Air-insulated; Oil-insulated; "SF6" (sulfur hexafluoride) insulated; Solid dielectric; All other types of switchgear, if any

Terminators (All types typically used by FPL)

Time Periods:

CABLE:

Before 1950 - PILC

1950-1959 - Same as prior period

1960-1969 - Same as prior period plus solid dielectric, XLPE, bare concentric neutral, polyethylene

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1970-1979 - Same as prior period
1980-1989 - Same as prior period excluding bare concentric
neutral, polyethylene
1990-1999 - Same as prior period plus TRXLPE
2000 to present - Same as prior period

SURGE ARRESTORS:

Before 1950 - Porcelain silicon carbide series gap
1950-1959 - Same as prior period
1960-1969 - Same as prior period
1970-1979 - Same as prior period
1980-1989 - Porcelain metal oxide varistor (MOV)
1990-1999 - Polymer gapless MOV (elbow and overhead)
2000 to present - Same as prior period

SWITCHES & SWITCHGEAR:

Before 1950 - Oil-insulated, air-insulated
1950-1959 - Same as prior period
1960-1969 - Same as prior period
1970-1979 - Same as prior period plus SF6
1980-1989 - Same as prior period
1990-1999 - Same as prior period plus solid dielectric
2000 to present - Same as prior period

TERMINATORS:

Before 1950 - porcelain
1950-1959 - Same as prior period
1960-1969 - Same as prior period
1970-1979 - Same as prior period
1980-1989 - Same as prior period
1990-1999 - Cold shrink
2000 to present - Same as prior period

7. What are the current, or present-day, preferred FPL technologies for each of these equipment items?

- a. Cable - TRXPLE
- b. Surge arresters - elbow metal oxide polymer
- c. Switches of switchgear - dead front padmount air
insulated
- d. Terminators - Cold shrink

8. Does FPL have any "paper-lead (PILC)" UG facilities still in service? If so, please provide an estimate of how many circuit miles or trench miles (please specify which) of such facilities are still in service. If so, please also characterize these facilities as transmission or distribution and explain the nature of the application these facilities are used for.

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A. Yes, approximately 1,700 miles for distribution duct and manhole applications. Note that transmission-related facilities are not included in the analysis.

9. Does FPL have any "solid dielectric" UG facilities still in service? If so, please provide an estimate of how many circuit miles or trench miles (please specify which) of such facilities are still in service. If so, please also characterize these facilities as transmission or distribution and explain the nature of the application these facilities are used for.

A. Yes. All UG distribution facilities that are not PILC. Note that transmission-related facilities are not included in the analysis.

10. Please provide the amount (in circuit miles, if possible, or in trench miles - please specify which) of FPL's 2007 UG distribution facilities that are:

- a. direct buried cable without conduit;
A. FPL does not maintain specific records for this type of construction. However, FPL estimates that this represents approximately one third of current miles.
- b. "direct buried cable in conduit"; and
A. All other than that in FPL's response to Question 10.a.
- c. cable in encased ductbank.
A. Approximately 1,700 miles.

11. Does FPL have any bare concentric neutral cable in service? Is FPL still installing bare concentric neutral cable? Has FPL considered any analyses, trade information, studies, or other information relating to O&M costs associated with bare concentric neutral versus jacketed cable on the FPL system? If so, please provide any materials considered.

A. Question 1 - Yes. Though FPL does not maintain specific records for this type of construction, it is estimated to be a very small amount. Question 2 - No. Question 3 - No, FPL does not have any such studies.

O&M Cost Differential Worksheets

12. Please provide all workpapers, source documents, studies, and any other documents that support FPL's O&M Worksheets.

A. See enclosed CD.

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13. Is it correct that FPL's O&M cost and Capital Expenditures values in the O&M Worksheets include estimated O&M costs and Capital Expenditures for all of FPL's OH and UG system? If not, please explain what the O&M and Capital Expenditures values do include.

A. Yes. Note that the cost projections for all but the new Vegetation Management and Pole Inspection/Remediation activities are based on FPL's average actual historical costs. This clarification is applicable to FPL's responses to all questions that characterize costs as "estimated".

14. Is it correct that FPL's O&M cost values and Capital Expenditures values therefore reflect the cost and expenditure values for OH and UG facilities of average age?

A. No. This is an incorrect inference. The costs simply represent those actually incurred in operating and maintaining FPL's distribution infrastructure during the time periods shown. There is no implication that such costs or their levels are representative for any particular age of facilities.

15. Is it correct that FPL's O&M cost values and Capital Expenditures values therefore reflect the cost and expenditure values for OH and UG facilities based on the average percentage of rear-lot and front-lot construction on FPL's system?

A. No. Similar to FPL's response to Question 14, it would be an incorrect oversimplification to assume that the costs amounts are representative for any particular mix of facilities.

16. a. Is it correct that FPL's O&M cost values in the URD O&M Worksheets and UG Conversion O&M Worksheets include estimated O&M costs for all of FPL's UG distribution system and all of FPL's OH distribution system, based on average costs for the accounts and categories shown over the period 2003-2007?

A. Yes. The estimates are based on the 5-year average of FPL's actual historical distribution CIAC-related costs for these years.

b. If not, please explain in detail what the O&M values include.

A. Not applicable.

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17. a. Please explain in detail what costs are included in the "Capital" cost category for UG and OH facilities.

A. All distribution-related costs, as reported in FPL's FERC Form 1, which are required to be capitalized rather than expensed per the Code of Federal Regulations.

b. Please identify and provide any documents that support or relate to the calculations for Low Density and High Density UG and OH installations as reflected in the O&M Worksheets.

A. See previously provided worksheets titled "25-6.078 URD Underground v. Overhead Operational Cost Differential".

18. a. Please explain in detail what values are reflected in the "Adjustments" to the "Distribution Capital" costs shown on page 12 of 17 of the UG Conversion O&M Worksheets, and on page 14 of 23 of the URD O&M Worksheets.

A. The adjustments remove costs either: (a) not associated with facilities to which the underground rules apply; or (b) to substitute projections where costs are expected to meaningfully differ from historic levels. Certain entire FERC accounts fall into category (a), such as: substation, street & signal lighting, customer premise equipment, and meters. Also removed for the same reason were costs embedded within other FERC accounts related to these types of activities, as well as, new growth (e.g., system expansion, large commercial projects), and storm restoration. Under category (b), embedded costs for vegetation management and pole inspection/remediation were removed in order to substitute more representative projected costs for these programs (for most of the historical years, the costs for these programs did not reflect the Commission's new pole inspection/remediation or vegetation management requirements). Lastly, the analysis also adjusted out a pro-rata share of associated "supervision and engineering".

b. Do the "Adjustments" reflect the cost of new UG installations on FPL's system in each year of the five-year study period, 2003-2007?

A. See FPL's response to Question 18.a.

c. Is it FPL's intention that the net values resulting from subtracting the "Adjustments" from the "Distribution Capital"

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values should reflect the cost of repairs and replacements to all UG facilities on FPL's system, for the years and the period indicated? If not, please explain what the net values are intended to show or represent.

A. Yes. These values represent the applicable capital costs required to operate the UG, as well as the OH, infrastructure.

19. a. Does FPL agree that there are additional avoided restoration cost savings from undergrounding that result from non-major weather events, i.e., weather events, such as severe thunderstorms and microbursts, other than named tropical storms and hurricanes?

A. Yes, that is possible though not quantifiable.

b. Is it FPL's belief that all such restoration cost savings are reflected in FPL's O&M differential, or in FPL's capital cost differential values?

A. Yes.

c. If not, please explain whether such additional restoration costs are reflected in FPL's analysis of operational cost differences, and if so, where they are reflected.

A. Not applicable.

20. Please explain why the values for Overhead facilities "exclude embedded Poles"?

A. Costs for inspection and remediation of poles are included by way of a second adjustment. FPL's Pole Inspection and Remediation program was changed in 2006 (see PSC Order No. PSC-06-0144-PAA-EI, in Docket No. 060078-EI). As a result, the expected costs for these activities are different than what would be embedded in the 5-year historical average. Therefore, the historical "embedded pole" costs were removed and replaced by the new expected costs.

21. Please explain the significant variation in supervision and engineering for stations for 2007 (as compared to the 2003-2006 values) in FERC Accounts 580 and 583.

A. For clarity, FPL has combined here its responses for both this and the following Question (No. 22). The 2007 figures for the 3 FERC accounts are essentially within the normal

variation for the time period used for the analysis. Avoiding potential distortions from normal year-to-year changes was the reason FPL used a 5-year average. There is no net material impact on the 5-year average from any variation of the 2007 figures (see table below). On a "per books" basis (lines 3, 6 and 11 from the analysis), the net 5-year average for the 3 accounts differs by only \$80K (0.0% of the \$254M total) from the average of 2003-2006. On an adjusted basis (lines 48, 51 and 56), the result is a difference of \$572K (0.4% of the \$140M total). To identify the sources of these non-material variations would require performing a time-consuming analysis of all of the thousands of transactions that comprise each of these accounts.

Line	Acct	Description	5-Year Avg	2003-2006 Avg	Difference	% Difference	% of Total
FERC Form 1 Distribution O&M (per Books)							
3	580	Operation - Supervision & Engineering	20,727,037	20,776,006	(48,969)	-0.2%	0.0%
6	583	Operation - Overhead Line	6,892,482	7,318,092	(423,811)	-6.1%	-0.2%
11	588	Operation - Miscellaneous Distribution	28,000,282	27,447,908	552,374	2.0%	0.2%
		Total O&M	254,544,208		79,794	0.0%	0.0%
CIAC-Related O&M (Adjusted)							
48	580	Operation - Supervision & Engineering	15,852,121	15,299,850	352,471	2.3%	0.3%
51	583	Operation - Overhead Line	5,506,687	8,459,966	(953,279)	-17.3%	-0.7%
56	588	Operation - Miscellaneous Distribution	25,897,856	24,524,605	1,173,051	4.6%	0.8%
		Total CIAC-Related O&M	140,865,172		572,243	0.4%	0.4%

22. Please explain the significant variation for 2007 (as compared to the 2003-2006 values) in FERC Account 588.

A. See FPL's response to Question 21.

23. Without asking for specific values, do the litigation costs that are embedded in the O&M Worksheets include:

- a. settlements paid to or on behalf of claimants?
- b. damages awards?
- c. legal fees and costs?
- d. expert witness fees and costs?
- e. any and all other costs that could be attributed to such litigation?

A. The O&M Worksheets include the costs described in (a) and (b) above.

24. Please explain what the Public Utility Private Fixed Investment ("PUPFI") is and by whom or by what agency it is prepared.

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A. PUPFI is a measure of the weighted average rate of inflation for utility fixed (i.e., capital) investments such as distribution facilities. It is prepared by Global Insight, Inc.

25. Does FPL agree that materials costs and utility labor costs have increased substantially over the past 2 to 5 years?

A. While some material and labor costs have increased, this is not the case for all. Additionally, FPL continuously works to manage overall cost levels through various mitigation techniques.

26. Did FPL consider using indexes (e.g., Handy-Whitman indexes) that would more closely track cost escalation for utility materials and utility labor costs than the CPI and the PUPFI?

A. The analysis employed the indices which FPL routinely uses in its economic decision making.

27. Is it correct that there is no depreciation expense assumed in the comparison analyses in the Worksheets?

A. As a non-cash item, depreciation in a discounted cash flow analysis is only used as an element in calculating taxes. The analysis used depreciation to compute property taxes which are based on the accumulated net plant balance.

28. Is it correct that, other than the net "Capital" costs for UG and OH facilities, there are no assumed wholesale or total replacements of either the hypothetical UG system or the hypothetical OH system reflected in the O&M Worksheets?

A. Yes, only those replacements which are inherent in the course of maintenance activities.

29. a. Does FPL have any "network underground distribution" installations on its system?

A. Yes, portions of downtown Miami.

b. If so, how many miles of such network underground distribution facilities does FPL have on its system?

A. Though FPL does not maintain specific records for this type of construction, it is estimated to be approximately 5 trench miles.

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c. Are the O&M costs for FPL's network underground distribution facilities included in the cost values shown in the O&M Worksheets?

A. The costs are embedded, but are of de minimis consequence to the analysis due to the very small proportion of network facilities to FPL's total infrastructure.

d. Are the Capital Expenditures for FPL's network underground distribution facilities included in the values shown in the O&M Worksheets?

A. See FPL's response to Question 29.c.

e. Does FPL agree that the O&M costs and Capital Expenditures for network underground distribution facilities are higher, on average, than for direct burial in conduit UG facilities?

A. The costs are likely higher on a unitized basis. However, as previously mentioned, this is of little consequence to the analysis due to the very small relative proportion of network facilities.

O&M Costs According to Age of Facilities

30. Has FPL considered any analyses, whether prepared by FPL or by others, of O&M costs relating to OH and UG facilities that attempt to measure or account for differences in such O&M costs by age or vintage of the facilities? If so, please identify all such analyses and provide copies of any such analyses that FPL has available.

A. No.

31. Has FPL considered any analyses, whether prepared by FPL or by others, of Capital Expenditures relating to OH and UG facilities that attempt to measure or account for differences in such Capital Expenditures by age or vintage of the facilities? If so, please identify all such analyses and provide copies of any such analyses that FPL has available.

A. No.

32. Has FPL considered any analyses, whether prepared by FPL or by others, of replacement experience relating to OH and UG facilities that attempt to measure or account for differences in

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such replacement experience or costs by age or vintage of the facilities? If so, please identify all such analyses and provide copies of any such analyses that FPL has available.

A. No.

33. Does FPL have any analyses, whether prepared by FPL or others, of equipment failure causes and rates for UG facilities of different vintages? If so, please identify and provide such analyses.

A. No.

34. Does FPL have any analyses, whether prepared by FPL or others, of equipment failure causes and rates for OH facilities of different vintages? If so, please identify and provide such analyses.

A. No.

35. a. Does FPL agree in general that UG facilities constructed using current-day technologies, and using FPL's current construction standards and installation practices and techniques, are more reliable than UG facilities constructed using older technologies?

A. In general, the quality of equipment itself is better due to factors such as, improved design, raw materials and/or manufacturing techniques. However, the cost for operating both UG and OH systems is influenced by many factors beyond initial quality such as, the manner in which the system is designed and installed (e.g., loading levels, etc.) and environmental factors (e.g., lightning, accidents, etc.).

b. Does FPL have any analyses, whether prepared by FPL or others, of the reliability of UG facilities constructed using current-day technologies, and using FPL's current construction standards and installation practices and techniques, as compared to UG facilities constructed using older technologies?

A. No.

c. If so, please identify and provide such analyses.

A. Not applicable.

36. a. Does FPL agree in general that UG facilities constructed using current-day technologies, and using FPL's current

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construction standards and installation practices and techniques, are expected to have lower O&M costs than older UG facilities: (i) over the life of the new UG facilities, and (ii) over the first 10 years of the life of the new UG facilities?

A. (i) See FPL's response to Question 35. (ii) FPL would not expect a significant difference in cost during the first 10 years of life.

b. Does FPL have any analyses, whether prepared by FPL or others, of O&M costs for UG facilities constructed using current-day technologies, and using FPL's current construction standards and installation practices and techniques, as compared to UG facilities constructed using older technologies?

A. No.

c. If so, please identify and provide such analyses.

A. Not applicable.

37. a. Does FPL agree in general that UG facilities constructed using current-day technologies, and using FPL's current construction standards and installation practices and techniques, are expected to have lower capital replacement costs than older UG facilities: (i) over the life of the new UG facilities, and (ii) over the first 10 years of the life of the new UG facilities?

A. See FPL's response to Question 36.a.

b. Does FPL have any analyses, whether prepared by FPL or others, of capital replacement costs for UG facilities constructed using current-day technologies, and using FPL's current construction standards and installation practices and techniques, as compared to UG facilities constructed using older technologies?

A. No.

c. If so, please identify and provide such analyses.

A. Not applicable.

38. Since the projects undertaken pursuant to Rule 25-6.115, F.A.C., are per se conversion projects, will FPL agree that the UG facilities contemplated for such conversion projects are new as of the installation date? Is it correct that the analyses in the UG Conversion O&M Worksheets reflect an assumed installation date of 2008?

A. Yes, to both questions.

39. With regard to O&M costs, has FPL assumed that all new OH facilities, whether in new (URD) installations (Docket No. 070231) or in UG conversion installations (Docket No, 080244), would be installed using FPL's current construction standards and equipment specifications, in accordance with FPL's storm hardening plan? If not, please explain what assumptions FPL made in this regard.

A. Yes.

40. Have FPL's installation practices and techniques for UG facilities changed over time? Does FPL believe that its current (2007 or 2008) UG installation practices and techniques are better than:

A. FPL's installation practices have improved since the 70's. These changes are identified in the table below by decade.

- a. in 2000? - No changes.
- b. in 1990? - Began directional boring.
- c. in 1980? - Began installing cable in conduit.
- d. in 1970? - Began installing spare conduit.

41. Does FPL agree that the UG equipment and materials that FPL uses for current (2007 or 2008) UG installations are better now than:

A. The equipment FPL uses has improved since the 70's. These changes are identified in the table below by decade.

- a. in 2000? - No changes.
- b. in 1990? - Began using tree retardant cross-linked polyethylene cable.
- c. in 1980? - No changes.
- d. in 1970? - Began using XLPE and jacketed cable.

Costs for Rear-Lot and Front-Lot OH and UG Distribution Facilities

42. Has FPL considered any analyses, whether prepared by FPL or others, of vegetation management costs for OH facilities that are located in rear-lot applications as compared to the vegetation management costs for OH facilities located in front-lot applications? If so, please identify and provide all such analyses.

A. No.

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43. Has FPL considered any analyses, whether prepared by FPL or others, of O&M costs other than vegetation management costs for OH facilities that are located in rear-lot applications as compared to the O&M costs other than vegetation management costs for OH facilities located in front-lot applications? If so, please identify and provide all such analyses.

A. No.

44. Has FPL considered any analyses, whether prepared by FPL or others, of storm restoration costs for OH facilities that are located in rear-lot applications as compared to the storm restoration costs for OH facilities located in front-lot applications? If so, please identify and provide all such analyses.

A. No.

45. With regard to O&M costs, has FPL assumed that for new construction (Docket 070231), the UG facilities would all be installed as "direct buried cable in conduit underground electric distribution system" facilities in front-lot applications using FPL's current construction standards and equipment specifications? If not, please explain what assumptions FPL made in this regard.

A. FPL's basis for O&M costs is the actual costs from our accounting records rather than making assumptions as to what costs might hypothetically be.

46. With regard to O&M costs, has FPL assumed that for UG conversion projects (Docket 080244), the UG facilities would all be installed as "direct buried cable in conduit underground electric distribution system" facilities in front-lot applications using FPL's current construction standards and equipment specifications? If not, please explain what assumptions FPL made in this regard.

A. See FPL's response to Question 45.

47. Is it correct that FPL does not install any new UG facilities in rear-lot applications?

A. No. If the new construction is an extension to an existing rear-lot line, then the new facilities would be added in the rear as well. For new URD new facilities would be constructed as front-lot.

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48. Does FPL agree that Avoided Storm Restoration Costs ("ASRCs") for rear-lot OH facilities are greater on a dollars-per-pole-line-mile basis than for front-lot OH facilities?

A. FPL does not have the data necessary to respond to this question.

49. Has FPL made any analyses of the differences between rear-lot and front-lot OH storm restoration costs? If so, please provide such analyses.

A. No.

50. Has FPL performed any analyses of the ASRC factors making different assumptions regarding the proportions of rear-lot and front-lot construction in the area to be converted?

A. No.

51. Does FPL agree that where a UG conversion project replaces rear-lot OH facilities with front-lot UG facilities, ASRC savings will be greater (at least on an expected-value basis) than if the UG conversion replaced front-lot OH facilities?

A. FPL does not have the data necessary to respond to this question.

52. How, if at all, does FPL propose to reflect these facts or factors in its CIAC calculations? Is FPL willing to make adjustments to CIAC calculations on a case-by-case basis where an Applicant's UG conversion project will convert a significantly higher percentage of rear-lot OH facilities than the system average?

A. Question 1 - FPL has no plans to modify the presently-filed CIAC figures for the reasons discussed above. Question 2 - No, per FPL's previous responses, FPL has no basis for making any such case-by-case adjustments.

53. What did FPL assume regarding the proportions of rear-lot and front-lot OH construction in its GAF cost-effectiveness spreadsheet filed in Docket No. 060150-EI? Did FPL assume a system average value? If so, what is that value?

A. FPL made no explicit assumption regarding the location of facilities.

Vegetation Management Costs

54. Does FPL agree that Vegetation Management costs for rear-lot OH facilities are greater on a dollars-per-pole-line-mile basis than for front-lot OH facilities?

A. FPL does not have the data necessary to respond to this question.

55. Has FPL performed any analyses of the differences between rear-lot and front-lot OH Vegetation Management costs? If so, please provide such analyses.

A. No.

56. Does FPL agree that where a UG conversion project replaces rear-lot OH facilities with front-lot UG facilities, Vegetation Management cost savings will be greater than if the UG conversion replaced front-lot OH facilities?

A. FPL does not have the data necessary to respond to this question.

57. Has FPL performed any analyses of Vegetation Management costs making different assumptions regarding the proportion of rear-lot construction in the area to be converted, e.g., system average percentage vs. 100% rear-lot vs. 100% front-lot facilities converted? If so, please provide such analyses.

A. No.

58. How, if at all, does FPL propose to reflect these facts or factors in its CIAC calculations? Is FPL willing to make adjustments to CIAC calculations on a case-by-case basis where an Applicant's UG conversion project will convert a significantly higher percentage of rear-lot OH facilities than the system average?

A. Question 1 - FPL does not plan to modify the presently-filed CIAC calculations for the reasons discussed above. Question 2 - No, per FPL's previous responses, FPL would have an insufficient basis for making any such case-by-case adjustments.

O&M Costs Other Than Vegetation Management

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59. Does FPL agree that O&M costs other than Vegetation Management costs for rear-lot OH facilities are greater on a dollars-per-pole-line-mile basis than for front-lot OH facilities?

A. FPL does not have the data necessary to respond to this question.

60. Does FPL agree that where a UG conversion project replaces rear-lot OH facilities with front-lot UG facilities, non-Vegetation Management O&M cost savings will be greater than if the UG conversion replaced front-lot OH facilities?

A. FPL does not have the data necessary to respond to this question.

61. Has FPL performed any analyses of the differences between rear-lot and front-lot O&M costs other than Vegetation Management costs? If so, please provide such analyses.

A. No.

62. Has FPL performed any analyses of O&M costs other than Vegetation Management costs making different assumptions regarding the proportion of rear-lot construction in the area to be converted? If so, please provide such analyses.

A. No.

63. How, if at all, does FPL propose to reflect these facts or factors in its CIAC calculations? Is FPL willing to make adjustments to CIAC calculations on a case-by-case basis where an Applicant's UG conversion project will convert a significantly higher percentage of rear-lot OH facilities than the system average?

A. Question 1 - FPL does not plan to modify the presently-filed CIAC calculations for the reasons discussed above. Question 2 - No, per FPL's previous responses, FPL would have an insufficient basis for making any such case-by-case adjustments.

Capital Expenditures

64. Does FPL agree that Capital Expenditures for rear-lot OH facilities are greater on a dollars-per-pole-line-mile basis than for front-lot OH facilities?

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A. FPL does not have the data necessary to respond to this question.

65. Does FPL agree that where a UG conversion project replaces rear-lot OH facilities with front-lot UG facilities, Capital Expenditure savings will be greater than if the UG conversion replaced front-lot OH facilities?

A. FPL does not have the data necessary to respond to this question.

66. Has FPL performed any analyses of the differences between rear-lot and front-lot Capital Expenditures costs? If so, please provide such analyses.

A. No.

67. Has FPL performed any analyses of Capital Expenditures costs making different assumptions regarding the proportion of rear-lot construction in the area to be converted? If so, please provide such analyses.

A. No.

68. How, if at all, does FPL propose to reflect these facts or factors in its CIAC calculations? Is FPL willing to make adjustments to CIAC calculations on a case-by-case basis where an Applicant's UG conversion project will convert a significantly higher percentage of rear-lot OH facilities than the system average?

A. Question 1 - FPL does not plan to modify the presently-filed CIAC calculations for the reasons discussed above. Question 2 - No, per FPL's previous responses, FPL would have an insufficient basis for making any such case-by-case adjustments.

ASRCs for UG Projects Between 1 and 3 Miles

69. Does FPL agree that the expected ASRC savings for a UG conversion project (or a new UG installation) of 2.8 miles (pole line miles or trench miles, as appropriate) are closer on a cost/savings-per-PLM basis to the savings of a 3.0 PLM conversion than to the savings associated with a 1.0 PLM conversion?

A. It is not possible to say conclusively because, as has been discussed in past proceedings and FPL's Data Request

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responses, the data available to develop the ASRC is limited. Therefore, FPL has adopted a "tiered" structure intended to strike the balance of being both conservative and administratively practical.

70. Please provide any and all analyses and workpapers showing how FPL determined that, in FPL's opinion, it would be appropriate to establish the Tier 1 and Tier 2 ASRC credits at 20 percent of the GAF and 40 percent of the GAF, respectively.

A. FPL does not have any such analyses, per se. One of the principal assumptions of the ASRC for GAF-eligible projects was that, because they covered large, contiguous areas, there would be no need for overhead restoration crews to go into the project neighborhoods and, hence, the savings would be maximized. The reasoning for Tier 3 was based on the assumption that there are some - though small and presently unquantifiable - ASRC benefits for small or even single customer installations. Therefore, a commensurately low percentage was assigned. For Tier 2, a conservative level of 40 percent was selected as reasonable in the absence of more specific available data.

71. Did FPL consider proposing a sliding-scale formula for calculating the ASRC/storm-related cost credits for projects between 1 pole-line mile and 3 pole-line miles?

A. Yes. However, it was determined to be unnecessarily administratively burdensome for application for both the URD and conversion tariffs. Additionally, as discussed in FPL's response to Question 69, the very limited data availability points to the most appropriate course being adoption of a conservative adjustment structure comprised of a few tiers.

72. Would FPL be amenable to establishing a formula (which could be geometric or linear) for calculating the ASRC credit value between 1 and 3 PLM?

A. No. See FPL's response to Question 71.