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Public Service Commission

October 13, 2008

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Mr. John T. Butler, Esq.
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408

VIA ELECTRONIC & U.S. MAIL
STAFF'S SECOND DATA REQUEST
FOR DOCKET NO. 080244-EI
and THIRD DATA REQUEST
FOR DOCKET NO. 070231-EI

Re: DOCKET NO. 080244-EI - Petition for approval of underground conversion tariff revisions, by Florida Power & Light Company.

and

Re: DOCKET NO. 070231-EI - Petition for approval of 2007 revisions to underground residential and commercial distribution tariff, by Florida Power & Light Company.

Dear Mr. Butler:

By this letter, the Commission staff requests that Florida Power & Light Company (FPL or utility) provide responses to the following data requests.

1. Please explain in detail why the Company is using a pre-tax cost of capital as the discount rate in this docket?

The following questions refers to the Lost Pole Rental Revenue included in both dockets.

2. Does the 5-year average shown in the workpapers provided by FPL (\$21,306,811 5-year average or \$515 per pole-line mile) represent the total distribution system pole rental revenues received from all third party attachers?
3. If yes, doesn't that imply that FPL's entire distribution system will be placed underground and there are no more poles left for attachers to attach to?
4. Please explain why FPL proposes to include the total lost distribution pole rental revenues in the calculation of the non-storm operational differential when FPL will continue to receive pole rental revenues from any overhead poles.
5. Please recalculate the 30-year non-storm differential NPV for both dockets assuming that FPL only loses a) 10 percent, b) 20 percent, c) 50 percent of its total pole revenues. Or, if FPL

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believes a different percentage is appropriate, please explain what percentage is appropriate and provide the appropriate calculation.

Please file the original and five copies of the requested information by Friday, October 17, 2008 with Ms. Ann Cole, Commission Clerk, Office of Commission Clerk, 2540 Shumard Oak Boulevard, Tallahassee, Florida, 32399-0850. Please feel free to call me at (850) 413-6234 if you have any questions.

Sincerely,



Ralph R. Jaeger
Senior Attorney

RRJ:th

cc: Docket Nos. 080244-EI & 070231-EI - Parties
Office of Commission Clerk
Division of Economic Regulation (Draper, Baxter, Maurey)