

Eric Fryson

From: danlarsen [danlarsen@bellsouth.net]
Sent: Friday, April 13, 2012 3:53 PM
To: Filings@psc.state.fl.us
Cc: ken.hoffman@fpl.com; vkaufman@kagmlaw.com; schef@gbwlegal.com;
mcglothlin.joseph@leg.state.fl.us; kwiseman@andrewskurth.com
Subject: Electronic Filing (Docket 120015-EI)
Attachments: Petition to Intervene.pdf
Electronic Filing

a. Person responsible for this electronic filing:

Mr. & Mrs. Daniel R. Larson
16933 W. Harlena Dr.
Loxahatchee, FL 33470
Phone: (561) 791-0875
danlarsen@bellsouth.net

b. Docket No. 120015-EI

In re: Petition for increase in rates by Florida Power & Light Company.

c. Document being filed on behalf of:

Mr. & Mrs. Daniel R. Larson
16933 W. Harlena Dr.
Loxahatchee, FL 33470
Phone: (561) 791-0875
danlarsen@bellsouth.net

d. There are a total of 4 pages.

e. The document attached for electronic filing is: Petition to Intervene.pdf

Thank you for your attention and cooperation to this request.

Sincerely,

s/ Daniel R. Larson
Daniel R. Larson
Petitioner

s/ Alexandria Larson
Alexandria Larson
Petitioner

*Parties
updated
4/13/12
-om*

4/13/2012

DOCUMENT NUMBER: 120015-EI
02289 APR 13 2012
FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for increase in rates by Florida
Power & Light Company.

DOCKET NO.: 120015-EI

FILED: April 13, 2012

PETITION TO INTERVENE

Pursuant to sections 120.569 and 120.57(1), Florida Statutes and Rules 25-22.039 and 28-106.205, Florida Administrative Code, Mr. Daniel R. Larson and Mrs. Alexandria Larson, Husband and Wife, jointly file their Petition to Intervene in the above captioned docket. In support thereof, the petitioners state as follows:

1. Name and address of the affected agency.

Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

2. Name and address of the petitioners.

Mr. & Mrs. Daniel R. Larson
16933 W. Harlena Dr.
Loxahatchee, FL 33470

3. Service. All pleadings, motions, orders and other documents directed to the petitioners

should be served on:

Mr. & Mrs. Daniel R. Larson
16933 W. Harlena Dr.
Loxahatchee, FL 33470
Phone: (561) 791-0875
danlarson@bellsouth.net

4. Notice of Docket. Petitioners received notice of this docket by reviewing the above captioned docket on the Florida Public Service Commission (FPSC) website.

02289 APR 13 2012

FPSC-COMMISSION CLERK

5. Statement of Substantial Interests. Petitioners are residential customers of Florida Power & Light Company (FPL) and served at the above listed address. The FPL electric bill constitutes a significant portion of the petitioners' monthly household expense. The petitioners have a substantial interest in the above captioned docket as approval of the petition will increase their electric rates. Based upon the above, petitioners hereby file a Petition to Intervene in the above captioned docket to protect to their substantial interests and due process rights in the proceeding.

6. Standing. Petitioners are residential customers of FPL. Moreover, the petitioners' substantial interests are of the type that this proceeding is designed to protect. See, Agrico Chemical Company v. Department of Environmental Regulation, 406 So.2d 478 (Fla. 2nd DCA 1981). The purpose of the proceeding is to evaluate the FPL request to increase customer rates. The petitioners have a substantial interest in the above captioned docket as approval of the petition will increase their electric rates. Accordingly, the proceeding in the above captioned docket directly coincides with the substantial interests of the petitioners to ensure that FPL rates are fair, just, and reasonable.

7. Petition to Intervene. Petitioners hereby request the Commission to grant the Petition to Intervene in the above captioned docket on the basis set forth in Paragraphs 1-6 above.

8. Disputed Issues of Material Fact. Disputed issues of material fact include, but are not limited to the following:
 - a. Is the FPL proposed rate increase fair, just, and reasonable?
 - b. Does the FPL rate comparison argument provide a legal basis to increase rates?
 - c. Is the FPL proposed Return on Equity reasonable?

- d. Is the executive compensation recovered in rates fair, just, and reasonable?
- e. Is the allocation of costs recovered in rates fair, just, and reasonable?
- f. What are the appropriate depreciation rates for FPL?

WHEREFORE, petitioners respectfully request the Commission to enter an order granting the Petition to Intervene in the above captioned docket.

s/ Daniel R. Larson
Daniel R. Larson
Petitioner

s/ Alexandria Larson
Alexandria Larson
Petitioner

16933 W. Harlena Dr.
Loxahatchee, FL 33470
Phone: (561) 791-0875
danlarson@bellsouth.net

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished to the following via Electronic Mail this 13th day of April, 2012 to all parties of record as indicated below.

s/ Daniel R. Larson

Daniel R. Larson
Petitioner

s/ Alexandria Larson

Alexandria Larson
Petitioner

<p>Florida Power & Light Company Mr. Ken Hoffman 215 South Monroe Street, Suite 810 Tallahassee, FL 32301-1858 Phone: (850) 521-3900 Fax: (850) 521-3939 Email: ken.hoffman@fpl.com</p> <p>Florida Industrial Power Users Group Vickie Gordon Kaufman / Jon C. Moyle c/o Keefe Law Firm 118 North Gadsden Street Tallahassee, FL 32301 Phone: (850) 681-3828 Fax: (850) 681-8788 Email: ykaufman@kagmlaw.com</p> <p>Gardner Law Firm Robert Scheffel Wright/John T. La Via 1300 Thomaswood Drive Tallahassee, FL 32308 Phone: (850) 385-0070 Fax: (850) 385-5416 Email: schef@gbwlegal.com</p>	<p>Office of Public Counsel J.R. Kelly/Joseph A. McGlothlin c/o The Florida Legislature 111 W. Madison Street, Room 812 Tallahassee, FL 32399-1400 Phone: (850) 488-9330 Email: mcglothlin.joseph@leg.state.fl.us</p> <p>Andrews Law Firm K. Wiseman/M. Sundback/L. Purdy/W. Rap 1350 I Street NW, Suite 1100 Washington, DC 20005 Phone: (202) 662-2700 Fax: (202) 662-2739 Email: kwiseman@andrewskurth.com</p>
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