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**FPL's Responses to
Staff's Fourth Set of Interrogatories
(Nos. 108-152, 154, and 155)**

**Florida Power & Light Company
Docket No. 120015-EI
Staff's Fourth Set of Interrogatories
Interrogatory No. 108
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Q.

Please refer to the direct testimony of witness Barrett, page 18, lines 21-22. Please explain in detail why there is a significant increase in the depreciation surplus projected to be amortized in 2012. In your response, please provide the dollar amount associated with each reason for the increase, where possible.

A.

Refer to FPL's response to OPC's Sixth Set of Interrogatories No. 131 for a detailed response regarding the major contributors to the increase in surplus in 2012.

Q.

Please refer to the direct testimony of witness Barrett, page 19, line 14. Please explain in detail the reason for the derivation of the \$367 million.

A.

As shown on Exhibit REB-6, there is a projected surplus related increase in revenue requirements from 2012 to 2013 of \$367 million. The difference in projected surplus amortization in 2012, \$526 million, versus the amount of surplus projected to be amortized in 2013, \$191 million, results in a decrease in the amortization, or increase in revenue requirements, of \$335 million. In addition, the surplus depreciation amortization in 2012 increases rate base for 2013, which leads to an increased revenue requirement of \$32 million. The total increase in revenue requirement from 2012 to 2013 due to the surplus amortization is thus \$335 million + \$32 million = \$367 million.

Q.

Please refer to the direct testimony of witness Ousdahl, page 13, lines 10-17, for the following questions:

- a. Please state whether there is any change to FPL's proposal to retire Cutler Units 5&6 and Sanford Unit 3 effective November 2012.
- b. Please state whether there is any change to FPL's proposal to retire all existing Port Everglades plant effective January 2013.

A.

- a. No change to the proposed November, 2012 retirement date for Cutler Units 5 & 6 and Sanford Unit 3.
- b. No change to the proposed January, 2013 retirement date for Port Everglades Units 1, 2, 3, & 4.

Q.

Please refer to the direct testimony of witness Ousdahl, page 13, lines 19-22. Please explain why FPL proposes a four-year amortization compared to a shorter or longer amortization period.

A.

FPSC Rule 25-6.0436(10)(a), Depreciation, states: "Prior to the date of retirement of major installations, the Commission shall approve capital recovery schedules to correct associated calculated deficiencies where a utility demonstrates that (1) replacement of an installation or group of installations is prudent and (2) the associated investment will not be recovered by the time of retirement through the normal depreciation process." FPL's Cutler and Sanford plants are now expected to be retired in advance of being fully depreciated in accordance with current FPSC authorized depreciation rates. Port Everglades is fully depreciated only from the standpoint of its base rate component, as further discussed in witness Ousdahl's direct testimony. The Commission has typically allowed FPL to amortize these capital recovery schedules over a four-year period. Use of a four-year period for amortization provides for consistent treatment with that afforded by this Commission in accordance with its rule and past practice.

Q.

Please refer to MFR B-7, page 2, Cape Canaveral Modernization, for the following questions:

- a. Please identify the Commission order (and page number) that authorizes the 3.3 percent depreciation rate used.
- b. Please identify the depreciation rate's underlying parameters, for example, average service life and net salvage.
- c. Please explain the basis for each parameter.
- d. Please explain whether the investment has been stratified in accord with Rule 25-6.04361(5)(c), Florida Administrative Code. If the plant has been stratified, in your response, please identify each account and associated investment. If the plant has not been stratified, please explain why and state when it will be stratified.
- e. Please explain how FPL intends to include the Cape Canaveral Modernization in FPL's 2013 depreciation and dismantlement study and how the in-service date affects the study.

A.

- a. The Commission has not yet issued an order that specifically authorizes a 3.3 percent depreciation rate for the Cape Canaveral Modernization, a combined cycle unit. The Company expects that the Commission will approve a depreciation rate for the Cape Canaveral Modernization in the Company's 2013 depreciation study. In advance of that expectation, for purposes of the capital forecasts in this rate proceeding in which the Cape Canaveral Modernization is projected to go into service in June 2013, the Company is using the same 3.3 percent depreciation rate that the Commission authorized for the newly placed in service and similar combined cycle units at West County Energy Center. The 3.3 percent depreciation rate for each unit at West County Energy Center was approved in Order No. PSC-10-0153-FOF-EI (FPSC Docket Nos. 080677-EI and 090130-EI) issued March 17, 2010 (page 56).
- b. Please refer to the depreciation parameters (30-year average service life and zero net salvage) that were approved for use at West County Energy Center shown on page 56 of FPSC Order No. PSC-10-0153-FOF-EI. These same parameters were applied to the Cape Canaveral Modernization.
- c. Please refer to responses (a) and (b) of this interrogatory. The Commission determined a 30-year average service life and zero net salvage for the West County Energy Center. These same parameters were applied to the Cape Canaveral Modernization in the capital forecasts in this proceeding.

- d. The Cape Canaveral Modernization has not been completed and placed into service. Therefore, stratification has not been completed at the retirement unit level in accordance with the Uniform System of Accounts. The stratification process will begin once the plant goes into plant-in-service.
- e. The Company intends to include the Cape Canaveral Modernization in its 2013 depreciation study and its 2013 dismantlement study based on forecasted data, because the project is expected to go into service in June 2013. The forecasted information will be used to determine depreciation and dismantlement accruals.

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Q.

Please refer to MFR B-10, page 3, Cape Canaveral Modernization. Please identify the depreciation rate, plant balance, additions, and retirements used to calculate the depreciation expense for each month beginning with June 2013 and ending December 2013.

A.

See Attachment No. 1.

Cape Canaveral Modernization
(\$000)

	Jun-13	Jul-13	Aug-13	Sep-13	Oct-13	Nov-13	Dec-13	
Plant in Service								
Other Production								
Canaveral Modernization Project	960,817	963,768	964,413	964,546	964,653	964,755	964,840	Ties to MFR B-8CC
Transmission								
Canaveral Modernization Project	11,297	11,297	11,297	11,297	11,297	11,297	11,297	Ties to MFR B-8CC
Total Plant in Service	972,114	975,064	975,710	975,843	975,949	976,052	976,136	Ties to MFR B-8CC
CAPE CANAVERAL MODERNIZATION								
Plant Additions-Production	960,817	2,951	645	133	106	102	84	
Plant Additions-Transmission	11,297	0	0	0	0	0	0	
Total Plant Additions	972,114	2,951	645	133	106	102	84	
Total Retirements	0	0	0	0	0	0	0	
Book Depreciation Annual Rate %-Production	3.30	3.30	3.30	3.30	3.30	3.30	3.30	
Book Depreciation Annual Rate %-Transmission	2.50	2.50	2.50	2.50	2.50	2.50	2.50	
Total Book Depreciation	2,678	2,670	2,675	2,676	2,676	2,676	2,677	
Monthly Reserve Balances								
Other Production								
Canaveral Modernization Project	2,666	5,312	7,964	10,616	13,269	15,922	18,575	Ties to MFR B-10CC
Transmission								
Canaveral Modernization Project	12	35	59	82	106	129	153	Ties to MFR B-10CC
Total Reserve Balance	2,678	5,348	8,023	10,698	13,375	16,051	18,728	Ties to MFR B-10CC

Q.

Please describe the security costs recovered in your company's current base rates and Capacity Cost Recovery Clause. As part of the response, please explain the difference in accounting and cost recovery regarding the security costs before and after the 9-11-2001 event.

A.

Prior to September 11, 2001, all security costs were recovered as part of base rates. When the Commission authorized recovery of post-9/11 incremental power plant security costs through the Capacity Cost Recovery Clause (CCR), the Company created specific point accounts (see below) to facilitate the tracking and audit trail of such costs.

BASE RECOVERABLE

FOSSIL SECURITY COSTS:

Fossil-plant security costs recovered through base rates are the non-incremental costs for maintenance of plant security equipment that was not installed as a result of 9/11. Base rates also include non-incremental FPL payroll for employees supporting the fossil North American Reliability Corporation's (NERC) Critical Infrastructure Protection (CIP) program (line 8 on MFR C-43). The payroll for these FPL employees is charged to a base rate account.

NUCLEAR SECURITY COSTS:

Nuclear security costs recovered through base rates are the non-incremental costs primarily for contracted security officers, FPL positions and maintenance of equipment that existed before 9/11.

INFORMATION MANAGEMENT SECURITY COSTS:

Information Management security costs recovered through base rates are costs associated with implementation of, and compliance with, NERC CIP standards as well as costs related to the Annual Security Assessment. The following are the program descriptions:

NERC CIP Compliance - O&M and capital costs associated with Information Management's portion to ensure compliance to NERC CIP 002-009 covering Critical Cyber Assets. Examples include designing and implementing electronic security perimeters, conducting cyber vulnerability assessments and the establishment of processes to support ongoing compliance.

Annual Security Assessment - O&M costs associated with having a third-party evaluation conducted on various elements of FPL's cyber security program. Examples include a review of FPL's wireless security architecture, review of FPL's internet facing firewall configuration, a review of the System Control Center's security and an assessment of FPL's Active Directory security configuration.

TRANSMISSION:

FPL Transmission's security costs include, but are not limited to, policy, process and procedure development, physical and electronic security perimeter design and implementation, routine policy, process and procedure review/maintenance, site access provisioning, cyber vulnerability assessments and recovery plan review. Transmission did not change accounting or cost recovery processes after the 9/11 event, and none of its security costs are recovered through the CCR.

CLAUSE RECOVERABLE

FOSSIL SECURITY COSTS:

Fossil security costs recovered through the CCR are incremental costs for compliance with the NERC, CIP, security standards, Maritime Security (MARSEC) security guards, security equipment (gates, cameras, fencing, locks, etc.), equipment maintenance, training and transportation, and worker ID credentials (Transportation Worker Identity Credentials) at FPL's fossil plants. Fossil security costs recovered through the Capacity Clause are incremental security expenses incurred after and as a result of the terrorist events of 9/11. The incremental fossil security costs are charged to FERC accounts 506.075 and 549.075 (lines 6 & 7 on MFR C-43). These accounts in FPL's accounting system are identified as clause recoverable accounts.

NUCLEAR SECURITY COSTS:

Security costs recovered through the CCR include maintaining a security force as a result of implementing NRC's fitness for duty rule under Part 26, which strictly limits the number of hours security personnel may work, additional personnel training, contractor workers compensation insurance, maintaining the physical upgrades resulting from implementing NRC's physical security rule under Part 73, and impacts of implementing NRC's rule under Part 73 for Cyber Security. It also includes Force on Force (FoF) modifications at the St. Lucie and Turkey Point nuclear sites to effectively mitigate new adversary tactics and capabilities employed by the NRC's Composite Adversary Force (CAF) as required by NRC inspection procedures. All of these NRC requirements arose after 9/11 and so all of their costs are charged to FERC accounts 524.220 and 925.104 (lines 4 & 5 on MFR C-43). These accounts in FPL's accounting system are identified as clause recoverable accounts. No costs for programs or activities that were already in place prior to 9/11 are charged to these clause recoverable accounts.

Note that FPL does not recover any costs associated with IM or Transmission security costs under the CCR.

Q.

Please describe the security costs contained in MFR Schedule C-43. As part of the response, for each amount in MFR Schedule C-43, please indicate whether it contains security costs for power plant or non-power plant assets (such as transmission facilities) and provide the amounts for the two categories.

A.

All costs reported on MFR C-43 relate to power plant security. FPL only recovers power plant security costs through the Capacity Cost Recovery Clause and interprets MFR C-43 as relating to the split between base rate recovery and clause recovery for those types of costs which arose after and as a result of 9/11.

NUCLEAR SECURITY COSTS:

Security costs contained in MFR C-43, lines 4 & 5, include maintaining a security force as a result of implementing NRC's fitness for duty rule under Part 26, which strictly limits the number of hours security personnel may work, additional personnel training, contractor workers compensation insurance, maintaining the physical upgrades resulting from implementing NRC's physical security rule under Part 73, and impacts of implementing NRC's rule under Part 73 for Cyber Security. It also includes Force on Force (FoF) modifications at the St. Lucie and Turkey Point nuclear sites to effectively mitigate new adversary tactics and capabilities employed by the NRC's Composite Adversary Force (CAF) as required by NRC inspection procedures. These amounts are for power plant assets only.

FOSSIL SECURITY COSTS:

Fossil security costs on MFR C-43, lines 6, 7 & 8, provide for compliance with the North American Reliability Corporation's (NERC) Critical Infrastructure Protection (CIP) security standards, Maritime Security (MARSEC) security guards, security equipment (i.e. gates, cameras, fencing, locks, etc.), equipment maintenance, training and transportation worker ID credentials (Transportation Worker Identification Credentials) at FPL's fossil plants. MFR Schedule C-43 security costs (Base Rates and Capacity Clause) are for fossil power plant assets only.

INFORMATION MANAGEMENT COSTS:

Security costs contained in MFR C-43, lines 9 & 20, include costs associated with implementation of, and compliance with, NERC CIP standards as well as costs related to the Annual Security Assessment.

The following are the program descriptions:

NERC CIP Compliance - O&M and Capital costs associated with Information Management's portion to ensure compliance with NERC CIP 002-009 covering Critical Cyber Assets. Examples include designing and implementing electronic security perimeters, conducting cyber vulnerability assessments and the establishment of processes to support ongoing compliance.

Annual Security Assessment - O&M costs associated with having a third-party evaluation conducted on various elements of FPL's cyber security program. Examples include a review FPL's wireless security architecture, review of FPL's internet facing firewall configuration, a review of the System Control Center's security and an assessment of FPL's Active Directory security configuration.

Security costs contained in MFR Schedule C-43 line 20 represent base rate Intangible Plant (Capital) costs associated with Information Management's portion of becoming compliant with NERC CIP 002-009. Charges include the purchase of security hardware and professional services related to implementing electronic security perimeters, conducting cyber vulnerability assessments and reviewing processes to support ongoing compliance. The security costs on MFR C-43 lines 9 and 20 represent corporate shared services IM security costs that benefit company assets, including both power plant and non-power plant assets, and therefore are not directly allocated to each type of assets.

Q.

What is the appropriate adjustment for FPL's base rates should the Commission decide to transfer incremental security costs from the Capacity Cost Recovery Clause to base rates?

A.

If the Commission determines that incremental security costs should be transferred from the Capacity Cost Recovery Clause (CCR) to base rates, there are two items that need to be considered in FPL's 2013 Test Year filed in Docket No. 120015-EI:

1. The total company per book amount of O&M and capital expenditures reflected in column 10 on MFR C-43 of \$37,537,713 shifts from clause recoverable to base recoverable and needs to be reflected in the calculation of FPL's 2013 revenue requirements on MFR A-1.
2. As part of the rate case request in Docket No 120015-EI, the Company proposed an adjustment to move payroll loadings related to the incremental security payroll costs from base recoverable to CCR. This was reflected as a per book Company adjustment in the amount of \$443,770 increasing clause recoverable expenses and decreasing base recoverable expenses; therefore, this Company adjustment would have to be removed to reflect the recovery of these expenses as base recoverable.

If the Commission decides to transfer incremental power plant security costs from CCR to base rates, the total revenue requirement impact for the Test Year would be an increase of \$33,517,437.

Estimated Impact on Base Rate Request as a Result of Moving Incremental Security from Capacity Clause to Base Rates				
	Jurisdictional Adjusted Amount	Depreciation & Income Taxes Expense	Return on Investment ⁽¹⁾	Total Revenue Requirement Impact
O&M	\$ 33,404,190	\$ -	\$ -	\$ 33,483,725
Estimated Capital Components	\$ 3,870,838	\$ 2,903	\$ 30,809	\$ 33,712
Total				<u>\$ 33,517,437</u>

⁽¹⁾ Estimated Capital Expenditures \$3.9M

For clause recovery purposes, FPL would discontinue including incremental security costs in its CCR starting with the 2013 projection filing later this year.

Q.

Please explain in detail how FPL based the methodology described in page 29 of Order No. PSC-03-1461-FOF-EI, issued December 22, 2003 in Docket No. 030001-EI, titled "Methodology for Determining Incremental Costs of Post-9/11 Security Measures", and how it may continue to be used.

A.

FPL only seeks to recover through the Capacity Clause those post 9/11 related power plant security project costs that are being incurred as a result of a requirement by the NRC, the Maritime Transportation Act, Coast Guard rule, NERC Cyber Security Standards, recommendations from the Department of Homeland Security authorities and/or other regulatory authorities. Absent the 9/11 events, these costs would not be incurred.

FPL's post 9/11 power plant security costs were not included in the Company's current base rates as approved in Docket No. 080677-EI, Order No. PSC-10-0153-FOF-EI. These post 9/11 power plant security costs are recovered as clause recoverable expenses and were properly reflected on MFR C-43 as such. Consistent with the aforementioned treatment, in the current rate case Docket No. 120015-EI, the incremental power plant security expenses for the 2013 Test Year were reflected as clause recoverable.

To prevent double recovery, and to enhance the review and audit processes, FPL established separate accounts to record and track its incremental power plant security expenses. FPL only records expenses to those specific accounts if the expenses are related to post 9/11 power plant security requirements. Given the incremental nature of post 9/11 related power plant security costs, FPL has not identified any instances in which such costs resulted in an offset or reduction in base O&M expenses.

Therefore, FPL complies with the methodology set forth in Order No. PSC-03-1461-FOF-EI and would continue to utilize the methodology described above to recover incremental security costs through the Capacity Clause. In addition, FPL believes that due to the volatility of post 9/11 power plant security costs, the Capacity Clause continues to be the appropriate recovery mechanism.

Q.

Please state whether there is another a company among the five investor-owned utilities, other than FPL, that has not transferred its incremental security costs from the Capacity Cost Recovery Clause to base rates in its last full revenue requirements case.

A.

Based on the discussions with Commission staff and interested parties at the preliminary issues ID meeting associated with Docket No. 120001-EI on April 4, 2012, it is FPL's understanding that among the Florida investor-owned utilities that had recovered incremental security costs through the Capacity Cost Recovery Clause, only FPL continues to recover its incremental security costs through the Capacity Cost Recovery Clause (CCR). FPL believes the CCR is the most appropriate mechanism for recovery of post 9/11 security costs due to the volatile nature of these types of expenses.

Q.

Please refer to witness Santos direct testimony, pages 19 and 21 regarding the future implementation of the remote connect service functionality with smart meters:

- a. After installation of the smart meters, please explain in detail what additional steps will FPL need to take to be able to remotely connect customers.
- b. Please state when will FPL complete the implementation of the remote connect service functionality discussed on page 21.
- c. Will customers whose accounts are remotely reconnected still be assessed the tariffed \$17.66 reconnection charge? If yes, please explain why.
- d. Assuming a premises has a smart meter already installed, please explain under what circumstances FPL will perform remote connects, and under what circumstances a field employee will be required to perform a connect.

A.

- a) Several changes to back-office processes and computer systems are necessary to ensure that the remote connect service is optimally deployed. These steps are as follows:
 1. A detailed analysis of back-office processes and computer systems to identify opportunities for improvement and automation, including consulting with other utilities to leverage any lessons learned;
 2. Changes to back-office process and computer systems based on analysis performed in step 1;
 3. Testing changes to back-office processes and computer systems;
 4. Developing o communication plans to ensure that customers understand the new processes and that the experience is seamless to them; and
 5. Phase-in deployment of new functionality.
- b) FPL estimates that it will begin to implement the remote connect service functionality in late 2012 for customers moving in and out of premises. In 2013, we will phase in the functionality gradually for other connection and disconnection processes, including disconnection for non-payment of bills. We will gradually expand the use of remote connect service throughout our service territory and expect to be completely deployed by December 2014.

- c) Yes. FPL has proposed to keep the current service charge for reconnection for non-payment of \$17.66 and not increase it to the 2013 forecasted costs of \$46.13 as provided in MFR E-7. As explained in subpart (b) of this question, FPL plans to phase in implementation of the remote connect service in 2013. The 2013 service charge costs in MFR E-17 represent a blended cost of both the manual and automated activities. As automation is expanded, the costs associated with the service charge activity will decline from the \$46.13 in MFR E-7. FPL believes that maintaining the current charge of \$17.66 is the right thing to do as it mitigates rate volatility.
- d) FPL intends to use the remote connect service functionality at every premise that has a smart meter with remote connect capabilities, with one exception. The exception to this process is for customers on the "medically essential" service tariff. These customers will continue to require a field employee to connect and/or disconnect service. FPL plans to use the remote connect service functionality to remotely perform move-in, move-outs, emergency reconnects, and for disconnects and reconnects on non-payment accounts.

Q.

Refer to MFR Schedule C-6. For each of the historical years 2007-2011, please identify and provide the number of accounts and the total dollar amount for each account included in the total amount for Uncollectible Account 904.

A.

See Attachment No. 1 for schedule of the accounts and associated amounts for the Uncollectible Accounts (FERC 904) for the historical years of 2007 - 2011.

ACCOUNT	Account Description	2007	2008	2009	2010	2011
904000	Uncollectible accounts expense	17,870,219.64	31,279,780.24	30,341,508.48	15,224,005.73	6,856,741.67
	Uncollectible accounts expense - Unbilled					
904010	Revenues	235,937.00	420,514.00	(66,882.00)	(304,784.00)	248,225.00
904100	Uncollectible accounts-misc receivables			298.00		150.00
904151	Uncollectible accounts -storm secure component	98,638.56	148,835.58	131,276.24	250,025.46	180,826.65
904152	Uncollectible accounts -storm secure offset	(98,638.56)	(148,835.58)	(131,276.24)	(250,025.46)	(93,282.92)
GRAND TOTAL		18,106,156.64	31,700,294.24	30,274,924.48	14,919,371.73	7,192,510.40

Q.

Refer to MFR Schedule C-6. For the period January 1, 2012 through March 31, 2012, please identify and provide the total dollar for each account included in the total amount for Uncollectible Account 904. If there are no expenses for Account 904 for this period, please explain why.

A.

Below is a breakdown of the accounts included in Uncollectible Accounts (FERC 904) for the 1st Quarter of 2012:

ACCOUNT	Account Description	2012 (JAN-MAR)
904000	Uncollectible accounts expense	95,285.50
904151	Uncollectible accounts -storm secure component	33,741.48
GRAND TOTAL		129,026.98

Q.

Refer to MFR Schedule C-6. Please explain why the actual customer account expenses for Uncollectible Account 904 increased from \$18,106,000 in 2007 to \$31,700,000 in 2008.

A.

The Uncollectible Account 904 increased by \$13.6 million from 2007 to 2008. This was due to higher net write-offs driven primarily by the deteriorating economic climate affecting credit and collections. This increase in net write-offs also resulted in an increase to the provision balance.

Q.

Refer to MFR Schedule C-6. Please explain why the actual customer account expenses for Uncollectible Account 904 decreased from \$30,275,000 in 2009 to \$14,919,000 in 2010, and from \$14,919,000 in 2010 to \$7,193,000 in 2011.

A.

The Uncollectible Account 904 decreased by \$15.4 million from 2009 to 2010. This was due to lower net write-offs driven primarily by higher levels of federal payment assistance funding and lower revenues. This decrease in net write-offs also resulted in a decrease to the provision balance.

The Uncollectible Account 904 decreased by \$7.7 million from 2010 to 2011. This was due to lower net write-offs driven primarily by the improved economic climate affecting credit and collections and higher levels of federal payment assistance funding. This decrease in net write-offs also resulted in a decrease to the provision balance.

Q.

Refer to MFR Schedule C-11. Please explain in detail assumptions, facts and figures that show how the total retail write-off amounts were determined for the four historical years 2008-2011 and for the 2013 Test Year.

A.

The amounts for 2008 through 2011 on C-11, Column (2) represent actual write-offs net of recoveries which were obtained from FPL's accounting reports.

FPL uses regression analysis to forecast bad debt expense for the 2013 Test Year. Bad debt expense is modeled using historical and projected data such as the price of electricity, kWh sales, and other economic factors. This data has a strong correlation with bad debt expense and provides a means of measuring and accounting for factors that contribute to non-payment. For the detailed assumptions, facts, and figures supporting the 2013 Test Year write-off forecast please refer to FPL's response to OPC's Second Request for Production of Documents No. 12, documents Bates numbered 293582 through 293592 or Excel file name UAR Forecast 2012+.xlsx.

Q.

Refer to MFR Schedule C-11. Please explain in detail why the actual customer account expenses listed in MFR Schedule C-6 for Uncollectible Account 904 for the historical years 2008-2011 are different from the retail write-offs for uncollectible accounts listed in MFR Schedule C-11 for the same years.

A.

MFR C-11 reflects the amounts written off as a debit to the uncollectible accounts reserve, not what is charged to expense. MFR C-6 reflects charges to expense (FERC Account 904) to establish proper reserves in each reporting period.

Q.

Refer to MFR Schedule C-10, page 1. Please explain in detail the customer account, customer service and information, and the customer service sales costs shown on lines 12 through 16 for each of the last five years 2007-2011.

A.

Note that FPL is assuming this question relates to MFR C-9, lines 12 through 16.

The costs that are reflected on these lines are detailed by FERC account in MFR C-6, page 5, lines 12 through 34. Customer Account includes the costs recorded in FERC accounts 901 through 905, Customer Service & Information includes the costs recorded in FERC accounts 907 through 910 and Customer Service Sales includes the cost recorded in FERC accounts 911, 912 and 916. The costs are recorded as prescribed in the FERC Code of Federal Regulations (CFR), Uniform System of Accounts.

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Q.

Refer to MFR Schedule C-10, page 1. Please explain in detail the administrative and general costs shown on line 18 for each of the last five years 2007 through 2011.

A.

Note that FPL is assuming this question relates to MFR C-9, line 18.

The costs that are reflected on this line are detailed by FERC account in MFR C-6, page 6, lines 1 through 19. It includes the costs recorded in FERC accounts 920 through 926, 928 through 931, and account 935, as prescribed in the FERC Code of Federal Regulations (CFR), Uniform System of Accounts.

Q.

Refer to MFR Schedule C-30. Please describe the services that FPL provides to each of its affiliates and identify how transactions between FPL and its affiliates comply with Rule 25-6.1351, Florida Administrative Code (F.A.C.).

A.

The description of services is contained in the testimony of Witness Ousdahl beginning on page 26, line 7 and Exhibit KO – 9, as well as MFR's C-30 and C-31. Many of these services are non-PO and are performed either for the enterprise as a whole and allocated to affiliates or as a direct bill service and therefore, we cannot produce a list of each service for each affiliate. Please note however, that as required by the rule:

- FPL charges fully allocated cost to affiliates;
- Charges to affiliates are clearly identified using accounting codes such as internal orders and business area;
- FPL maintains a Cost Allocation Manual (Exhibit KO-9);
- FPL files information concerning its affiliates, affiliate transactions, and nonregulated activities in its "Annual Report of Major Electric Utilities" which is incorporated by reference into Rule 25-6.1351; and
- FPL obtains market appraisals to ensure that the sale of assets to affiliates are at the higher of cost or market and assets purchased from affiliates are at the lower of cost or market.

Q.

Refer to MFR Schedule C-30. Please describe the services that each of FPL's affiliates provides to FPL, if any, and identify how transactions between the affiliates and FPL comply with Rule 25-6.1351, F.A.C.

A.

The types of services routinely provided by the affiliates are described below:

NextEra Energy Resources

Duane Arnold, Point Beach, and Seabrook charges - The Nuclear Division requests assistance and expertise from the NextEra nuclear sites on an as-needed basis. The types of services primarily consist of outage-related services. These services are billed at NEER's fully loaded cost on an actual time and materials basis just as FPL does in its fleet support provided to NEER for its nuclear sites. There is no "market" equivalent for these services as they are provided only to nuclear operations within NEE and not to any third party.

NEER Seabrook Nuclear Application Support Services

The Seabrook IT group supports a number of Enterprise Nuclear applications that are shared by the entire fleet. The nuclear business applications supported by this group are Training (Learning Management System), Nuclear Security (Access Control System), Operations (Clearance Order System), Scheduling (P6), System Health (IKS), Fundamental Management System (FMS), Nuclear Documentum (record images), and Nuclear Cognos (report writing). This support cost is allocated based on number of Nuclear units between FPL (4) and NEER (4), so the cost is distributed 50% to FPL and 50% stays in NEER. These nuclear IM services are provided by a team out of the Seabrook site to all of the nuclear fleet and no market equivalent exists. These services are billed by NEER at fully loaded cost based on actual time and materials. There is no "market" equivalent for these services as the IM services are distinct to the Enterprise Nuclear fleet.

FPL FiberNet

Provides ongoing telecommunications services, including the following, primarily on a wholesale basis. The services provided by FPL FiberNet to FPL include the following:

- Private line service - Private line service that originates and terminates at customer-designated premises. Such service can take the form of TDM-based services such as SONET/SDH, or Ethernet-based services.
- Direct Internet access – access to the Internet at specified data rates.
- Dark fiber – strands of optical fiber to which the customer connects electronic equipment to transmit digital signals.
- Co-location – provision of space for fiber optic equipment together with power required to operate the equipment.
- Miscellaneous projects: Provides services to assist with various projects such as splicing fiber cable when relocating FPL facilities.

The allocation methodology used by FiberNet to charge FPL for the use of the fiber network backbone was reviewed and audited by the FPSC in 2001. The resulting allocation methodology was deemed reasonable by the Commission. For all other services, FPL obtains comparable rates from third parties in order to ensure that FiberNet charges FPL at the lower of cost or market.

FPL Energy Services

FPLES manages various ongoing revenue enhancement programs for FPL, who reimburses them for the costs of such programs and records-related revenues. The team members of FPLES include both FPL and FPLES employees. In general, FPL employees work on in-territory services and FPLES employees work on out-of-territory services. On occasion, however, the team members may be called upon to support the operations of their colleagues in the other company. In those cases, and specific to this question, the FPLES team members bill their time on a fully loaded cost basis to FPL. There is no external "market" for these services which are provided solely in support of this unique operation.

Palms Insurance

Provides ongoing insurance coverage including workers' compensation, auto liability, excess property and construction builder's risk to FPL. These coverages are not placed with commercial insurers. For the employees' workers' compensation, contractor workers' compensation and employer's liability, and fleet auto liability insurance programs, Palms' charges to FPL are based on actuarial studies plus administrative costs. For the excess property and construction builder's risk programs, Palms bills the rates established by the commercial insurance market and participates in the programs on a quota share basis.

In addition to these routine services, FPL may purchase assets including materials and supplies from NEER in the ordinary course of business and does so at the lower of cost or market in compliance with Rule 25-6.1351.

Q.

Refer to MFR Schedule C-30. Please explain how FPL and its ratepayers benefit from transactions and services received from and provided to each of its affiliates.

A.

See testimony of Witness Ousdahl beginning on page 26, line 21.

Q.

Refer to MFR Schedule C-30. Please provide by type the total amount of operations and maintenance (O&M) expenses that FPL incurred for services received from its affiliates for the years 2007-2011.

A.

See Attachment Nos. 1-5 for page 457 of Diversification Report for the years 2007 to 2011.

ANALYSIS OF DIVERSIFICATION ACTIVITY
Summary of Affiliated Transfers and Cost Allocations

FLORIDA POWER & LIGHT COMPANY
For the Year Ended December 31, 2007

Grouped by affiliate, list each contract, agreement, or other business transaction exceeding a cumulative amount of \$300 in any one year, entered into between the Respondent and an affiliated business or financial organization, firm, or partnership identifying parties, amounts, dates, and product, asset, or service involved.

a) Enter name of affiliates.
b) Give description of type of service, or name the product involved.
c) Enter contract or agreement effective dates.
d) Enter the letter "p" if the service or product is a purchase by the Respondent; "s" if the service or product is sold by the Respondent.
e) Enter utility account number in which charges are recorded.
f) Enter total amount paid, received, or accrued during the year for each type of service or product listed in column (c). Do not net amounts when services are both received and provided.

Name of Affiliate (a)	Type of Service and/or Name of Product (b)	Relevant Contract or Agreement and Effective Date (c)	Total Charge for Year		
			"P" or "S" (d)	Account Number (e)	Dollar Amount (f)
FPL Group, Inc.	See Note 1		S	146	471,666
Palms Insurance Company, Limited	See Note 1		S	146	7,423,255
FPL Group International, Inc.	See Note 1		S	146	48,384
North American Power Systems	See Note 1		S	146	88,413
Alandco Inc.	See Note 1		S	146	22,023
FPL Energy Duane Arnold, LLC	See Note 1		S	146	4,327,590
FPL Energy Point Beach, LLC	See Note 1		S	146	888,474
FPL FiberNet, LLC	See Note 1		S	146	3,175,423
FPL Readi Power, LLC	See Note 1		S	146	86,956
FPL Group Capital Inc.	See Note 1		S	146	48,273,780
FPL Energy Seabrook, LLC	See Note 1		S	146	4,429,885
FPL Energy Power Marketing, Inc.	See Note 1		S	146	3,472,991
FPL Energy Project Management, Inc.	See Note 1		S	146	3,735,142
FPL Energy, LLC	See Note 1		S	146	19,789,391
FPL Energy Maine, Inc.	See Note 1		S	146	222,844
FPL Energy Services, Inc.	See Note 1		S	146	56,234
FPL Energy Services, Inc.	See Note 1		S	146	5,389,529

Note 1: Services primarily provided by FPL include accounting, financial, consulting, human resources systems and programs, education and training, land management, legal, payroll, management and administrative, computer services, printing and duplicating, physical facilities, software maintenance, license fees, in territory gas sales and aviation services.

ANALYSIS OF DIVERSIFICATION ACTIVITY
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Name of Affiliate (a)	Type of Service and/or Name of Product (b)	Relevant Contract or Agreement and Effective Date (c)	Total Charge for Year		
			"P" or "S" (d)	Account Number (e)	Dollar Amount (f)
FPL Group, Inc.	See Note 2		P	143	1,226
FPL Group, Inc.	See Note 2		S	165	340,216
FPL Group, Inc.	See Note 2		S	228	1,234,601
FPL Group, Inc.	See Note 2		P	517	14,512
FPL Group, Inc.	See Note 2		P	920	3,383,911
FPL Group, Inc.	See Note 2		P	921	49,475
FPL Group, Inc.	See Note 2		P	923	5,547
FPL Group, Inc.	See Note 2		S	925	1,042
FPL Group, Inc.	See Note 2		P	926	1,653,917
FPL Group, Inc.	See Note 2		P	930	124,175

Note 2: Reimbursements to Group for expenses paid on behalf of FPL Utility including compensation, incentives, pension costs and directors fees.

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FLORIDA POWER & LIGHT COMPANY
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Name of Affiliate (a)	Type of Service and/or Name of Product (b)	Relevant Contract or Agreement and Effective Date (c)	Total Charge for Year		
			"P" or "S" (d)	Account Number (e)	Dollar Amount (f)
Badger Windpower, LLC	Payment for Services Rendered	No purchase order	S	Various	387
FPLE Doswell Limited Partnership	Payment for Services Rendered	No purchase order	S	553/512	50,814
FPL Energy, LLC	Payments for Services Rendered	No purchase order	S	146	4,374,085
FPL Energy, LLC	IRS Refund Reimbursement	No purchase order	P	241	10,075
FPL Energy, LLC	Payment for Services Rendered	No purchase order	S	508/549	141,644
FPL Energy, LLC	Payment for Services Rendered	No purchase order	S	506.000	3,207
FPL Energy Burreigh County Wind, LLC	Payment for Services Rendered	No purchase order	S	Various	639
FPL Energy Duane Arnold, LLC	Reimbursement for Support of PSL Plant Operations	No purchase order	P	107	3,539
FPL Energy Duane Arnold, LLC	Reimbursement for Support of PTN Operations	No purchase order	P	517	31,887
FPL Energy Duane Arnold, LLC	Support for PTN Operations and Short Notice Outages	No purchase order	P	524	86,587
FPL Energy Duane Arnold, LLC	Reimbursement for Support of PTN Operations	No purchase order	P	530	3,453
FPL Energy Fomey, LLC	Payment for Services Rendered	No purchase order	S	553/512	96,500
FPL Energy Marcus Hook 750	Payment for Services Rendered	No purchase order	S	553/512	119,746
FPL Energy New Mexico Wind, LLC	Payment for Services Rendered	No purchase order	S	Various	3,309
FPL Energy Pecos Wind, LP	Payment for Services Rendered	No purchase order	S	Various	1,278
FPL Energy Post Wind LP, LLC	Payment for Services Rendered	No purchase order	S	Various	2,167
FPL Energy Seabrook, LLC	Reimbursement for Support of PSL Plant Operations	No purchase order	P	107	111,382
FPL Energy Seabrook, LLC	Payment for Services Rendered - NED	No purchase order	S	123	1,585,167
FPL Energy Seabrook, LLC	LNS Tariff Charges - NED	No purchase order	S	123	606,890
FPL Energy Seabrook, LLC	Payment for Services Rendered	No purchase order	S	146	463,689
FPL Energy Seabrook, LLC	Payment for Services Rendered	No purchase order	S	154/241	8,973
FPL Energy Seabrook, LLC	Payment for Services Rendered	No purchase order	P	183	84,692
FPL Energy Seabrook, LLC	Reimbursement for Support of PTN Operations	No purchase order	P	517	192,464

Note: (1) Excludes Payments of cash collected on behalf of Affiliates.
(2) Excludes FPL Consolidating Entities
(3) See Page 458 for Assets or Rights Purchased from or sold to Affiliates

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Name of Affiliate (a)	Type of Service and/or Name of Product (b)	Relevant Contract or Agreement and Effective Date (c)	"P" or "S" (d)	Total Charge for Year	
				Account Number (e)	Dollar Amount (f)
FPL Energy Seabrook, LLC	Reimbursement for Support of PTN/PSL Operations	No purchase order	P	520	62,881
FPL Energy Seabrook, LLC	Support for PTN Operations and Short Notice Outages	No purchase order	P	524	263,624
FPL Energy Seabrook, LLC	Payment for Services Rendered	No purchase order	P	524	110,193
FPL Energy Seabrook, LLC	Reimbursement for Support of PTN/PSL Operations	No purchase order	P	528	96,423
FPL Energy Services, Inc.	Payments for Services Rendered	No purchase order	P	416	303
FPL Energy Services, Inc.	Gas Derivative Transactions-EMT	No purchase order	S	456	1,563,650
FPL Energy Services, Inc.	Purchases of Natural Gas for Cape Canaveral	No purchase order	P	232	13,519
FPL Energy Services, Inc.	Purchases of Natural Gas for Cape Canaveral	No purchase order	P	501	71,459
FPL Energy Services, Inc.	Purchases of Natural Gas for Cape Canaveral	No purchase order	P	588	1,586
FPL Energy Services, Inc.	Reimbursement for Services Rendered	No purchase order	P	907	90,088
FPL Energy Services, Inc.	Reimbursement for Services Rendered	No purchase order	P	908	25,839
FPL Energy Services, Inc.	Reimbursement for Services Rendered	No purchase order	P	916	185,338
FPL Energy Services, Inc.	Reimbursement for Services Rendered	No purchase order	P	921	511
FPL Energy Upton Wind 1 LP	Payment for Services Rendered	No purchase order	S	Various	968
FPL Energy Waymart LLC	Payment for Services Rendered	No purchase order	S	Various	832
FPL Energy Wyman, LLC	Payment for Services Rendered	No purchase order	S	506/549	819
FPL Energy Wyoming, LLC	Payment for Services Rendered	No purchase order	S	Various	2,399
FPL FiberNet, LLC	Reimbursement for CLEC Telephone Services	No purchase order	P	107	1,212,943
FPL FiberNet, LLC	Reimbursement for Expenses at Orlando Site	No purchase order	P	107	35,281
FPL FiberNet, LLC	Reimbursement for CLEC Telephone Services	No purchase order	P	163	132,872
FPL FiberNet, LLC	Reimbursement for Expenses at Orlando Site	No purchase order	P	506	22,840
FPL FiberNet, LLC	Reimbursement for Expenses at Orlando Site	No purchase order	P	549	3,235
FPL FiberNet, LLC	Reimbursement for CLEC Telephone Services	No purchase order	P	557	12,151
FPL FiberNet, LLC	Reimbursement for Expenses at Orlando Site	No purchase order	P	557	6,644
FPL FiberNet, LLC	Reimbursement for CLEC Telephone Services	No purchase order	P	588	132,872
FPL FiberNet, LLC	Reimbursement for CLEC Telephone Services	No purchase order	P	910	265,744
FPL FiberNet, LLC	Reimbursement for CLEC Telephone Services	No purchase order	P	921	454,003
FPL FiberNet, LLC	Reimbursement for Services Rendered	No purchase order	P	928	384
FPL FiberNet, LLC	Reimbursement for Expenses at Orlando Site	No purchase order	P	931	62,383
FPL FiberNet, LLC	Payments for FPL Tower Lease Rental	No purchase order	S	147	723,009

Note: (1) Excludes Payments of cash collected on behalf of Affiliates.
(2) Excludes FPL Consolidating Entities
(3) See Page 458 for Assets or Rights Purchased from or sold to Affiliates

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FLORIDA POWER & LIGHT COMPANY
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Name of Affiliate (a)	Type of Service and/or Name of Product (b)	Relevant Contract or Agreement and Effective Date (c)	Total Charge for Year		
			"P" or "S" (d)	Account Number (e)	Dollar Amount (f)
FPL Group, Inc.	State Income Tax Payment	No purchase order	P	236	174,167
FPL Group, Inc.	State Income Tax Payment	No purchase order	P	234	283,321
FPL Services, LLC	Commercial/Industrial Lighting Program Energy Conservation Cost Recovery Clause	No purchase order	P	908	128,773
FPL Readi Power, LLC	Payment for Services Rendered	No purchase order	P	107	2,500
FPLE Mountaineer Wind, LLC	Payment for Services Rendered	No purchase order	S	Various	832
Gray County Wind Energy, LLC	Payment for Services Rendered	No purchase order	S	Various	3,928
Indian Mesa Wind Farm LP	Payment for Services Rendered	No purchase order	S	Various	2,399
KPB Financial Corp.	Net Capital Contributions	No purchase order	S	123	429,961
KPB Financial Corp.	Storm Fund Net Income	No purchase order	P	123	3,133,873
KPB Financial Corp.	Nuclear Decommission Fund Federal and State Taxes Credit	No purchase order	P	234	8,640
KPB Financial Corp.	Tax Payment Storm Fund	No purchase order	P	234	17,508
KPB Financial Corp.	Administrative Purchase Fee	No purchase order	P	427	20,000
Lamar Power Partners II, LLC	Payment for Services Rendered	No purchase order	S	553/512	69,176
Palms Insurance Company, Limited	West County Builders Risk Insurance	No purchase order	P	107	77,500
Palms Insurance Company, Limited	Excess Property Insurance	No purchase order	P	165	24,500
Palms Insurance Company, Limited	Wrap Up Insurance	No purchase order	P	165	1,091,381
Palms Insurance Company, Limited	Worker's Compensation Insurance	No purchase order	P	165	1,077,330
West Texas Wind Energy Partners, L.P.	Payment for Services Rendered	No purchase order	S	Various	871

Note: (1) Excludes Payments of cash collected on behalf of Affiliates.
(2) Excludes FPL Consolidating Entities
(3) See Page 458 for Assets or Rights Purchased from or sold to Affiliates

Analysis of Diversification Activity
Summary of Affiliated Transfers and Cost Allocations

Florida Power & Light Company
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Grouped by affiliate, list each contract, agreement, or other business transaction exceeding a cumulative amount of \$300 in any one year, entered into between the Respondent and an affiliated business or financial organization, firm, or partnership identifying parties, amounts, dates, and product, asset, or service involved.

- a) Enter name of affiliate.
- b) Give description of type of service, or name the product involved.
- c) Enter contract or agreement effective dates.
- d) Enter the letter "P" if the service or product is a purchase by the Respondent; "S" if the service or product is sold by the Respondent.
- e) Enter utility account number in which charges are recorded.
- f) Enter total amount paid, received, or accrued during the year for each type of service or product listed in column (c). Do not net amounts when services are both received and provided.

Name of Affiliate (a)	Type of Service and/or Name of Product (b)	Relevant Contract or Agreement and Effective Date (c)	Total Charge for Year		
			"P" or "S" (d)	Account Number (e)	Dollar Amount (f)
FPL Group, Inc.	See Note 1		S	146.300	4,199,174
Palms Insurance Company, Limited	See Note 1		S	146.310	6,715,402
FPL Group International, Inc.	See Note 1		S	146.370	35,443
North American Power Systems	See Note 1		S	146.380	80,057
Alandco Inc.	See Note 1		S	146.400	10,806
FPL Energy Duane Arnold, LLC	See Note 1		S	146.430	5,763,438
FPL Energy Point Beach, LLC	See Note 1		S	146.440	9,497,561
FPL FiberNet, LLC	See Note 1		S	146.610	3,433,869
FPL Readl Power, LLC	See Note 1		S	146.612	44,697
FPL Group Capital Inc.	See Note 1		S	146.800	67,344,723
FPL Energy Seabrook, LLC	See Note 1		S	146.855	6,217,966
FPL Energy Power Marketing, Inc.	See Note 1		S	146.860	3,409,199
FPL Energy Project Management, Inc.	See Note 1		S	146.870	3,384,348
FPL Energy, LLC	See Note 1		S	146.880	37,198,933
FPL Energy Maine, Inc.	See Note 1		S	146.890	137,573
FPL Energy Services, Inc.	See Note 1		S	146.905	42,344
FPL Energy Services, Inc.	See Note 1		S	146.906	8,945,271
<p>Note 1: Services primarily provided by FPL include accounting, financial, consulting, human resources systems and programs, education and training, land management, legal, payroll, management and administrative, computer services, printing and duplicating, physical facilities, software maintenance, license fees, in territory gas sales and aviation services.</p>					

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Florida Power & Light Company
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Name of Affiliate (a)	Type of Service and/or Name of Product (b)	Relevant Contract or Agreement and Effective Date (c)	Total Charge for Year		
			"P" or "S" (d)	Account Number (e)	Dollar Amount (f)
FPL Group, Inc.	See Note 2		P	143.371	217
FPL Group, Inc.	See Note 2		S	228.331	1,391,400
FPL Group, Inc.	See Note 2		P	408.160	244
FPL Group, Inc.	See Note 2		S	517.100	457,775
FPL Group, Inc.	See Note 2		P	920.100	9,155,229
FPL Group, Inc.	See Note 2		S	921.100	30,489
FPL Group, Inc.	See Note 2		P	923.100	134,028
FPL Group, Inc.	See Note 2		S	925.103	333
FPL Group, Inc.	See Note 2		P	926.000	19,851
FPL Group, Inc.	See Note 2		P	930.200	645,875
<p>Note 2: Reimbursements to Group for expenses paid on behalf of FPL Utility including compensation, incentives, pension costs and director's fees.</p>					

**Analysis of Diversification Activity
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Name of Affiliate (a)	Type of Service and/or Name of Product (b)	Relevant Contract or Agreement and Effective Date (c)	Total Charge for Year		
			"P" or "S" (d)	Account Number (e)	Dollar Amount (f)
Badger Windpower, LLC	Payment for Services Rendered	No purchase order	S	Various	522
Capricorn Ridge Wind, LLC	Payment for Services Rendered	No purchase order	S	506.000	3,308
FPL Energy, LLC	Payments for Services Rendered	No purchase order	S	146.880	8,750,190
FPL Energy, LLC	Payment for Services Rendered	No purchase order	P	232.200	3,678
FPL Energy, LLC	IRS Refund Reimbursement	No purchase order	S	241.100	1,913
FPL Energy, LLC	IRS Refund Reimbursement	No purchase order	S	241.100	7,442
FPL Energy, LLC	Payment for Services Rendered	No purchase order	S	506/549	585
FPL Energy, LLC	Payment for Services Rendered	No purchase order	S	549/506	8,916
FPL Energy, LLC	Payment for Services Rendered	No purchase order	P	923.200	3,445
FPL Energy Cowboy Wind, LLC	Payment for Services Rendered	No purchase order	S	Various	1,064
FPL Energy Duane Arnold, LLC	Payment for Services Rendered	No purchase order	P	107.100	7,312
FPL Energy Duane Arnold, LLC	IRS Refund Reimbursement	No purchase order	S	241.100	772
FPL Energy Duane Arnold, LLC	Payment for Services Rendered	No purchase order	P	517.000	11,087
FPL Energy Duane Arnold, LLC	Payment for Services Rendered	No purchase order	P	524.000	72,143
FPL Energy Duane Arnold, LLC	Payment for Services Rendered	No purchase order	P	528.000	4,176
FPL Energy Duane Arnold, LLC	Payment for Services Rendered	No purchase order	P	530.000	30,825
FPL Energy Hancock County Wind, LLC	Payment for Services Rendered	No purchase order	S	Various	1,548
FPL Energy Horse Hollow Wind II, LLC	Payment for Services Rendered	No purchase order	S	506.000	400
FPL Energy Marcus Hook 750	Payment for Services Rendered	No purchase order	S	553/512	56,379
FPL Energy New Mexico Wind, LLC	Payment for Services Rendered	No purchase order	S	Various	2,612
FPL Energy North Dakota Wind, LLC	Payment for Services Rendered	No purchase order	S	Various	13,528
FPL Energy Oklahoma Wind, LLC	Payment for Services Rendered	No purchase order	S	Various	1,084
FPL Energy Point Beach, LLC	Payment for Services Rendered	No purchase order	P	107.100	5,195
FPL Energy Point Beach, LLC	Payment for Services Rendered	No purchase order	P	517.000	6,372
FPL Energy Point Beach, LLC	Payment for Services Rendered	No purchase order	P	524.000	18,858
FPL Energy Point Beach, LLC	Payment for Services Rendered	No purchase order	P	528.000	1,676
FPL Energy Post Wind LP, LLC	Payment for Services Rendered	No purchase order	S	Various	813
FPL Energy Power Marketing, LLC	Payment for Services Rendered	No purchase order	P	232.200	7,163
FPL Energy Power Marketing, LLC	IRS Refund Reimbursement	No purchase order	S	241.100	1,988
FPL Energy Project Management, Inc.	IRS Refund Reimbursement	No purchase order	S	241.100	4,476
FPL Energy Seabrook, LLC	Payment for Services Rendered	No purchase order	P	107.100	430,274
FPL Energy Seabrook, LLC	Payment for Services Rendered - NED	No purchase order	P	123.199	2,534,612
Notes: Excludes Payments of Cash Collected on Behalf of Affiliates Excludes FPL Consolidating Entities See Page 458 for Assets or Rights Purchased From or Sold to Affiliates					

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Name of Affiliate (a)	Type of Service and/or Name of Product (b)	Relevant Contract or Agreement and Effective Date (c)	Total Charge for Year		
			"P" or "S" (d)	Account Number (e)	Dollar Amount (f)
FPL Energy Seabrook, LLC	Payment for Services Rendered - NED	No purchase order	S	123.199	1,350,605
FPL Energy Seabrook, LLC	LNS Tariff Charges - NED	No purchase order	S	146.320	252,856
FPL Energy Seabrook, LLC	IRS Refund Reimbursement	No purchase order	S	241.100	1,344
FPL Energy Seabrook, LLC	Payment for Services Rendered	No purchase order	P	517.000	239,629
FPL Energy Seabrook, LLC	Payment for Services Rendered	No purchase order	P	519.000	7,205
FPL Energy Seabrook, LLC	Payment for Services Rendered	No purchase order	P	520.000	17,868
FPL Energy Seabrook, LLC	Payment for Services Rendered	No purchase order	P	524.000	539,079
FPL Energy Seabrook, LLC	Payment for Services Rendered	No purchase order	P	524.220	83,310
FPL Energy Seabrook, LLC	Payment for Services Rendered	No purchase order	P	528.000	286,732
FPL Energy Seabrook, LLC	Payment for Services Rendered	No purchase order	P	530.000	14,251
FPL Energy Seabrook, LLC	Payment for Services Rendered	No purchase order	P	531.000	4,137
FPL Energy Services, Inc.	Payment for Services Rendered	No purchase order	P	107.100	1,767
FPL Energy Services, Inc.	Payment for Services Rendered	No purchase order	P	165.100	95,329
FPL Energy Services, Inc.	Payment for Services Rendered	No purchase order	P	186.808	13,232
FPL Energy Services, Inc.	Payment for Services Rendered	No purchase order	P	253.200	712
FPL Energy Services, Inc.	Gas Derivative Transactions - EMT	No purchase order	S	456.374	739,550
FPL Energy Services, Inc.	Purchases of Natural Gas for Cape Canaveral	No purchase order	P	501.230	40,783
FPL Energy Services, Inc.	Payment for Services Rendered	No purchase order	P	903.000	2,593
FPL Energy Services, Inc.	Payment for Services Rendered	No purchase order	P	907.100	71,894
FPL Energy Services, Inc.	Payment for Services Rendered	No purchase order	P	908.400	43,760
FPL Energy Services, Inc.	Payment for Services Rendered	No purchase order	P	916	445,888
FPL Energy Services, Inc.	Payment for Services Rendered	No purchase order	P	921.200	324
FPL Energy Services, Inc.	Payment for Services Rendered	No purchase order	P	928.000	1,804
FPL Energy South Dakota Wind, LLC	Payment for Services Rendered	No purchase order	S	Various	522
FPL Energy Wyman, LLC	Payment for Services Rendered	No purchase order	S	Various	1,026
FPL FiberNet, LLC	Payment for CLEC Telephone Services	No purchase order	P	107.100	1,037,617
FPL FiberNet, LLC	Payment for CLEC Telephone Services	No purchase order	P	163.000	95,282
FPL FiberNet, LLC	Payment for Services Rendered	No purchase order	S	232.685	51,120
FPL FiberNet, LLC	Payment for Expenses at Orlando Site	No purchase order	P	508.000	20,412
FPL FiberNet, LLC	Payment for Expenses at Orlando Site	No purchase order	P	549.000	2,318
FPL FiberNet, LLC	Payment for Services Rendered	No purchase order	P	Various	20,528

Notes:
Excludes Payments of Cash Collected on Behalf of Affiliates
Excludes FPL Consolidating Entities
See Page 458 for Assets or Rights Purchased From or Sold to Affiliates

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Name of Affiliate (a)	Type of Service and/or Name of Product (b)	Relevant Contract or Agreement and Effective Date (c)	Total Charge for Year		
			"P" or "S" (d)	Account Number (e)	Dollar Amount (f)
FPL FiberNet, LLC	Payment for CLEC Telephone Services	No purchase order	P	557,000	56,194
FPL FiberNet, LLC	Payment for CLEC Telephone Services	No purchase order	P	588	103,222
FPL FiberNet, LLC	Payment for FPL Tower Lease Rental	No purchase order	S	146,615	754,383
FPL FiberNet, LLC	Reimbursement for Transfer of Liability	No purchase order	S	234,610	67,824
FPL FiberNet, LLC	Payment for CLEC Telephone Services	No purchase order	P	910,105	206,444
FPL FiberNet, LLC	Payment for CLEC Telephone Services	No purchase order	P	921	219,696
FPL FiberNet, LLC	Payment for Expenses at Orlando Site	No purchase order	P	931,005	48,892
FPL Group, Inc.	Federal Excise Taxes	No purchase order	P	165,300	134,803
FPL Group, Inc.	State Income Tax Payment	No purchase order	P	236,110	380,206
FPL Readi Power, LLC	Payment for Services Rendered	No purchase order	P	107,100	276,346
FPL Services, LLC	Commercial/Industrial Lighting Program - ECCR	No purchase order	P	908,170	31,430
Gray County Wind Energy, LLC	Payment for Services Rendered	No purchase order	S	Various	5,012
Hawkeye Power Partners, LLC	Payment for Services Rendered	No purchase order	S	Various	387
High Winds, LLC	Payment for Services Rendered	No purchase order	S	Various	19
KPB Financial Corp.	Net Capital Contributions	No purchase order	S	123,190	240,259
KPB Financial Corp.	Storm Fund Net Income	No purchase order	P	123,190	5,367,344
KPB Financial Corp.	Storm Fund Tax Payment	No purchase order	P	234,190	88,045
Lake Barton Power Partners II, LLC	Payment for Services Rendered	No purchase order	S	Various	2,245
Lamar Power Partners II, LLC	Payment for Services Rendered	No purchase order	S	553/512	91,594
Luz Solar Partners Ltd., VII	Reimbursement for Services Rendered	No purchase order	P	506,100	68,195
Mojave 16/17/18, LLC	Payment for Services Rendered	No purchase order	S	Various	445
Palms Insurance Company, Limited	Wrap Up Insurance	No purchase order	P	165,312	113,252
TPC Windfarms, LLC	Payment for Services Rendered	No purchase order	S	Various	561
West Texas Wind Energy Partners, L.P.	Payment for Services Rendered	No purchase order	S	Various	247
Wind Power Partners 1993, L.P.	Payment for Services Rendered	No purchase order	S	Various	1,374
WindLogics Inc.	Payment for Services Rendered	No purchase order	P	183,655	225,625
Notes: Excludes Payments of Cash Collected on Behalf of Affiliates Excludes FPL Consolidating Entities See Page 458 for Assets or Rights Purchased From or Sold to Affiliates					

ANALYSIS OF DIVERSIFICATION ACTIVITY
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FLORIDA POWER & LIGHT COMPANY
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Grouped by affiliate, list each contract, agreement, or other business transaction exceeding a cumulative amount of \$300 in any one year, entered into between the Respondent and an affiliated business or financial organization, firm, or partnership identifying parties, amounts, dates, and product, asset, or service involved.

a) Enter name of affiliate.
b) Give description of type of service, or name the product involved.
c) Enter contract or agreement effective dates.
d) Enter the letter "p" if the service or product is a purchase by the Respondent; "s" if the service or product is sold by the Respondent.
e) Enter utility account number in which charges are recorded.
f) Enter total amount paid, received, or accrued during the year for each type of service or product listed in column (c). Do not net amounts when services are both received and provided.

Name of Affiliate (a)	Type of Service and/or Name of Product (b)	Relevant Contract or Agreement and Effective Date (c)	Total Charge for Year		
			"P" or "S" (d)	Account Number (e)	Dollar Amount (f)
Alandco Inc.	See Note 1		S	146	14,908
Backbone Mountain Windpower, LLC	Fleet Support Services Provided by FPL		S	Various	759
Badger Windpower, LLC	Fleet Support Services Provided by FPL		S	Various	1,884
Capricorn Ridge Wind, LLC	Fleet Support Services Provided by FPL		S	Various	13,662
Capricorn Ridge Wind II, LLC	Fleet Support Services Provided by FPL		S	Various	5,169
Crystal Lake Wind, LLC	Fleet Support Services Provided by FPL		S	Various	1,710
Doswell Limited Partnership	Services Provided by FPL		S	512/531	49,916
Delaware Mountain Wind Farm, LLC	Fleet Support Services Provided by FPL		S	Various	4,241
FPL Energy Cabazon Wind, LLC	Fleet Support Services Provided by FPL		S	Various	1,156
FPL Energy Callahan Wind, LP	Fleet Support Services Provided by FPL		S	Various	7,687
FPL Energy Cowboy Wind, LLC	Fleet Support Services Provided by FPL		S	Various	5,784
FPL Energy Hancock County Wind, LLC	Fleet Support Services Provided by FPL		S	Various	4,661
FPL Energy Horse Hollow Wind, LLC	Fleet Support Services Provided by FPL		S	Various	10,752
FPL Energy Horse Hollow Wind II, LLC	Fleet Support Services Provided by FPL		S	Various	3,158
FPL Energy Marcus Hook 750	Services Provided by FPL		S	512/553	138,448
FPL Energy New Mexico Wind, LLC	Fleet Support Services Provided by FPL		S	Various	9,362
FPL Energy North Dakota Wind, LLC	Fleet Support Services Provided by FPL		S	Various	962
FPL Energy Oklahoma Wind, LLC	Fleet Support Services Provided by FPL		S	Various	1,425
FPL Energy Oliver Wind, LLC	Fleet Support Services Provided by FPL		S	Various	1,346
FPL Energy Pecos Wind	Fleet Support Services Provided by FPL		S	Various	10,485
FPL Energy Post Wind LP, LLC	Fleet Support Services Provided by FPL		S	Various	2,618
FPL Energy Services, Inc.	Services Received by FPL		P	107	30,998
FPL Energy Services, Inc.	See Note 1		S	146	5,655
FPL Energy Services, Inc.	See Note 1		S	146	1,499,951
FPL Energy Services, Inc.	Services Received by FPL		P	165	38,160
FPL Energy Services, Inc.	Derivative Transactions on EMT Natural Gas Sales		S	456	1,962,620

**ANALYSIS OF DIVERSIFICATION ACTIVITY
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Name of Affiliate (a)	Type of Service and/or Name of Product (b)	Relevant Contract or Agreement and Effective Date (c)	Total Charge for Year		
			"P" or "S" (d)	Account Number (e)	Dollar Amount (f)
FPL Energy Services, Inc.	Natural Gas Purchases for Cape Canaveral		P	501	6,443
FPL Energy Services, Inc.	Services Received by FPL		P	901	4,000
FPL Energy Services, Inc.	Services Received by FPL		P	903	1,627
FPL Energy Services, Inc.	Services Received by FPL		P	907	24,652
FPL Energy Services, Inc.	Services Received by FPL		P	908	82,225
FPL Energy Services, Inc.	Services Received by FPL		P	910	2,691
FPL Energy Services, Inc.	Services Received by FPL		P	916	668,820
FPL Energy Services, Inc.	Services Received by FPL		P	921	4,483
FPL Energy Stateline II, Inc.	Fleet Support Services Provided by FPL		S	Various	1,896
FPL Energy Vansycle, LLC	Fleet Support Services Provided by FPL		S	Various	3,331
FPL Energy Waymart, LLC	Fleet Support Services Provided by FPL		S	Various	1,750
FPL Energy Wyoming, LLC	Fleet Support Services Provided by FPL		S	Various	5,891
FPL FiberNet, LLC	CLEC Telephone Services		P	107	1,306,193
FPL FiberNet, LLC	Rental Payments for FPL Cell Tower Leases		S	454	1,288,264
FPL FiberNet, LLC	See Note 1		S	146	3,758,831
FPL FiberNet, LLC	CLEC Telephone Services		P	163	84,657
FPL FiberNet, LLC	Services Received by FPL		P	186	1,544
FPL FiberNet, LLC	Orlando Site Expenses		P	508	20,601
FPL FiberNet, LLC	Orlando Site Expenses		P	549	2,340
FPL FiberNet, LLC	Services Received by FPL		P	556	23,265
FPL FiberNet, LLC	CLEC Telephone Services		P	557	79,570
FPL FiberNet, LLC	CLEC Telephone Services		P	569.3	23,265
FPL FiberNet, LLC	CLEC Telephone Services		P	581	23,970
FPL FiberNet, LLC	Services Received by FPL		P	908	413
FPL FiberNet, LLC	CLEC Telephone Services		P	910	244,957
FPL FiberNet, LLC	CLEC Telephone Services		P	921	1,018,854
FPL FiberNet, LLC	Orlando Site Expenses		P	931	45,063
FPL Group, Inc.	RSA Amortization & Equity Performance Shares		P	107	200,417
FPL Group, Inc.	Medicare Part D Subsidy		P	143	2,743
FPL Group, Inc.	See Note 1		P	146	128,709
FPL Group, Inc.	Insurance Payment		P	165	59,936
FPL Group, Inc.	Dividend Repayment on RSA Shares Forfeited		P	232	989
FPL Group, Inc.	State Income Tax Payment		P	236	28,702

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Name of Affiliate (a)	Type of Service and/or Name of Product (b)	Relevant Contract or Agreement and Effective Date (c)	Total Charge for Year		
			"P" or "S" (d)	Account Number (e)	Dollar Amount (f)
FPL Group, Inc.	RSA Forfeitures		S	517	75,945
FPL Group, Inc.	RSA Amortization		P	517	62,770
FPL Group, Inc.	Deferred Compensation, Incentives, & Stock Awards		P	920	11,540,716
FPL Group, Inc.	Services Received by FPL		P	921	84,354
FPL Group, Inc.	Professional Services Received by FPL		P	923	88,870
FPL Group, Inc.	Pension & Other Employee Benefit Plans		P	928	1,549,135
FPL Group, Inc.	BOD RSA Amortization & Membership Fees		P	930.2	711,474
FPL Group International, Inc.	See Note 1		S	146	7,030
FPL Services, LLC	Commercial/Industrial Lighting Program Incentives Paid		P	908	88,898
FPL Readl Power, LLC	See Note 1		S	146	60,773
FPL Readl Power, LLC	Product Purchases		P	341	146,351
FPLE Fomey, LLC	Services Provided by FPL		S	512/553	52,507
Gray County Wind Energy, LLC	Fleet Support Services Provided by FPL		S	Various	9,516
Hawkeye Power Partners, LLC	Fleet Support Services Provided by FPL		S	Various	2,789
High Winds, LLC	Fleet Support Services Provided by FPL		S	Various	3,742
Indian Mesa Wind Farm, LLC	Fleet Support Services Provided by FPL		S	Various	3,391
KPB Financial Corporation	Storm Fund Bonds Service & Admin Fees		P	123	138,513
KPB Financial Corporation	Net Capital Contributions		P	123	124,647
KPB Financial Corporation	Storm Fund Tax Payment		P	234	15,803
KPB Financial Corporation	Administrative Purchase Fee		P	426	40,000
Lake Benton Power Partners II, LLC	Fleet Support Services Provided by FPL		S	Various	6,997
Langdon Wind, LLC	Fleet Support Services Provided by FPL		S	Various	8,659
Logan Wind Energy, LLC	Fleet Support Services Provided by FPL		S	Various	938
Meyersdale Windpower, LLC	Fleet Support Services Provided by FPL		S	Various	387
North American Power Systems	See Note 1		S	146	76,878
NextEra Energy Duane Arnold, LLC	Services Received by FPL		P	108	15,623
NextEra Energy Duane Arnold, LLC	See Note 1		S	146	4,953,014
NextEra Energy Duane Arnold, LLC	Services Received by FPL		P	154	5,718
NextEra Energy Duane Arnold, LLC	Support of Nuclear Operations		P	517	2,126
NextEra Energy Duane Arnold, LLC	Support for Nuclear Operations		P	524	184,289
NextEra Energy Duane Arnold, LLC	Support for Nuclear Operations		P	530	1,244
NextEra Energy Maine, LLC	See Note 1		S	146	511,781
NextEra Energy Point Beach, LLC	Services Received by FPL		P	107	15,191

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Name of Affiliate (a)	Type of Service and/or Name of Product (b)	Relevant Contract or Agreement and Effective Date (c)	Total Charge for Year		
			"P" or "S" (d)	Account Number (e)	Dollar Amount (f)
NextEra Energy Point Beach, LLC	See Note 1		S	146	8,822,776
NextEra Energy Point Beach, LLC	Services Received by FPL		P	232	835
NextEra Energy Point Beach, LLC	Services Received by FPL		P	517	4,840
NextEra Energy Point Beach, LLC	Services Received by FPL		P	520	10,620
NextEra Energy Point Beach, LLC	Services Received by FPL		P	524	2,270
NextEra Energy Point Beach, LLC	Services Received by FPL		P	531	4,565
NextEra Energy Power Marketing, LLC	See Note 1		S	146	2,724,397
NextEra Energy Project Management, LLC	Tax Refund Reimbursement		P	241	19,023
NextEra Energy Project Management, LLC	See Note 1		S	146	4,308,826
NextEra Energy Resources, LLC	See Note 1		S	146	32,023,392
NextEra Energy Resources, LLC	Credit Card Rebate Reimbursement		P	234	176,754
NextEra Energy Resources, LLC	Services Received by FPL		P	146	9,307,974
NextEra Energy Resources, LLC	Tax Refund Reimbursement		P	241	43,786
NextEra Energy Seabrook, LLC	Support of Nuclear Plant Operations		P	107	231,461
NextEra Energy Seabrook, LLC	Support of Nuclear Plant Operations		P	108	18,662
NextEra Energy Seabrook, LLC	LNS Tariff Charges - New England Division		S	123	1,659,685
NextEra Energy Seabrook, LLC	Services Received by FPL - New England Division		P	123	739,345
NextEra Energy Seabrook, LLC	See Note 1		S	146	5,582,574
NextEra Energy Seabrook, LLC	Services Received by FPL		P	154	59,172
NextEra Energy Seabrook, LLC	Support of Nuclear Operations		P	517	122,356
NextEra Energy Seabrook, LLC	Support for Nuclear Operations & Short Notice Outages		P	524	645,329
NextEra Energy Seabrook, LLC	Support of Nuclear Operations		P	528	346,810
NextEra Energy Seabrook, LLC	Services Received by FPL		P	530	21,954
NextEra Energy Seabrook, LLC	Support of Nuclear Plant Operations		P	921	45,295
Osceola Windpower II, LLC	Fleet Support Services Provided by FPL		S	Various	3,016
Peetz Table Wind Energy, LLC	Fleet Support Services Provided by FPL		S	Various	4,066
Palms Insurance Company, Limited	Builders Risk Insurance		P	107	284,771
Palms Insurance Company, Limited	Excess Property All Risk Insurance		P	165	23,700
Palms Insurance Company, Limited	Solar Builders Risk Insurance		P	174	2,075
Pennsylvania Windfarms, LLC	Fleet Support Services Provided by FPL		S	Various	540
Post Wind Farm, LP	Fleet Support Services Provided by FPL		S	Various	4,269
Story Wind, LLC	Fleet Support Services Provided by FPL		S	Various	470
West Texas Wind Energy Partners, LP	Fleet Support Services Provided by FPL		S	Various	682

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FLORIDA POWER & LIGHT COMPANY
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Name of Affiliate (a)	Type of Service and/or Name of Product (b)	Relevant Contract or Agreement and Effective Date (c)	Total Charge for Year		
			"P" or "S" (d)	Account Number (e)	Dollar Amount (f)
Wilton Wind II, LLC	Fleet Support Services Provided by FPL		S	Various	1,589
Wind Power Partners 1993, LP	Fleet Support Services Provided by FPL		S	Various	3,980
Wind Power Partners 1994, LP	Fleet Support Services Provided by FPL		S	Various	6,439
Wolf Ridge Wind, LLC	Fleet Support Services Provided by FPL		S	Various	2,194
<p>Footnotes and General Comments:</p> <p>Note 1: Services primarily provided by FPL include accounting, financial, consulting, human resources systems and programs, education and training, land management, legal, payroll, management and administrative, computer services, printing and duplicating, physical facilities, software maintenance, license fees, in territory gas sales and aviation services.</p> <p>General Comments: Items exclude payments of cash collected on behalf of Affiliates. Items exclude FPL Consolidating Entities.</p>					

ANALYSIS OF DIVERSIFICATION ACTIVITY
Summary of Affiliated Transfers and Cost Allocations

FLORIDA POWER & LIGHT COMPANY
For the Year Ended December 31, 2010

Grouped by affiliate, list each contract, agreement, or other business transaction exceeding a cumulative amount of \$300 in any one year, entered into between the Respondent and an affiliated business or financial organization, firm, or partnership identifying parties, amounts, dates, and product, asset, or service involved.

a) Enter name of affiliate.
b) Give description of type of service, or name the product involved.
c) Enter contract or agreement effective dates.
d) Enter the letter "p" if the service or product is a purchase by the Respondent; "s" if the service or product is sold by the Respondent.
e) Enter utility account number in which charges are recorded.
f) Enter total amount paid, received, or accrued during the year for each type of service or product listed in column (c). Do not net amounts when services are both received and provided.

Name of Affiliate (a)	Type of Service and/or Name of Product (b)	Relevant Contract or Agreement and Effective Date (c)	Total Charge for Year		
			"P" or "S" (d)	Account Number (e)	Dollar Amount (f)
Alandco, Inc.	See Note 1		S	146	3,405
Ashtabula Wind, LLC	Fleet Support Services Provided by FPL		S	Various	3,756
Badger Wind Power, LLC	Fleet Support Services Provided by FPL		S	Various	1,141
Backbone Mountain Windpower, LLC	Fleet Support Services Provided by FPL		S	Various	1,468
Calhoun Power Company I, LLC	Products Purchased by FPL		P	154	35,500
Calhoun Power Company I, LLC	Fleet Support Services Provided by FPL		S	512/553	129,042
Capricorn Ridge Wind, LLC	Fleet Support Services Provided by FPL		S	Various	9,272
Crystal Lake Wind II, LLC	Fleet Support Services Provided by FPL		S	Various	4,503
Crystal Lake Wind I, LLC	Fleet Support Services Provided by FPL		S	Various	1,738
Delaware Mountain Wind Farm, LLC	Fleet Support Services Provided by FPL		S	Various	4,679
ESi Energy, LLC	Products Purchased by FPL		P	107	40,000
FPL Energy Callahan Wind, LP	Fleet Support Services Provided by FPL		S	Various	825
FPL Energy Cowboy Wind, LLC	Fleet Support Services Provided by FPL		S	Various	3,338
FPLE Fomey, LLC	Fleet Support Services Provided by FPL		S	Various	80,626
FPL Energy Hancock County Wind, LLC	Fleet Support Services Provided by FPL		S	Various	1,293
FPL Energy Horse Hollow Wind, LLC	Fleet Support Services Provided by FPL		S	Various	8,257
FPL Energy Horse Hollow Wind II, LLC	Fleet Support Services Provided by FPL		S	Various	4,630
FPL Energy Horse Hollow Wind III, LLC	Fleet Support Services Provided by FPL		S	Various	3,234
FPL Energy Marcus Hook, LP	Products Purchased by FPL		P	549	1,622
FPL Energy Marcus Hook, LP	Products Purchased by FPL		P	553	3,245
FPL Energy Marcus Hook, LP	Products Purchased by FPL		P	554	541
FPL Energy Mower County, LLC	Fleet Support Services Provided by FPL		S	Various	3,694
FPL Energy New Mexico Wind, LLC	Fleet Support Services Provided by FPL		S	Various	4,400
FPL Energy Oklahoma Wind, LLC	Fleet Support Services Provided by FPL		S	Various	1,610
FPL Energy Oliver Wind, LLC	Fleet Support Services Provided by FPL		S	Various	3,699
FPL Energy Pecos Wind	Fleet Support Services Provided by FPL		S	Various	5,367
FPL Energy Post Wind LP, LLC	Fleet Support Services Provided by FPL		S	Various	3,243

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Name of Affiliate (a)	Type of Service and/or Name of Product (b)	Relevant Contract or Agreement and Effective Date (c)	Total Charge for Year		
			"P" or "S" (d)	Account Number (e)	Dollar Amount (f)
FPLE Rhode Island	Services Received by FPL		P	553	3,488
FPL Energy Services, Inc.	Services Received by FPL		P	107	46,727
FPL Energy Services, Inc.	Services Received by FPL		P	143	8,141
FPL Energy Services, Inc.	See Note 1		S	146	7,027,346
FPL Energy Services, Inc.	Services Received by FPL		P	253	716
FPL Energy Services, Inc.	Services Received by FPL		P	426	62,374
FPL Energy Services, Inc.	Derivative Transactions on EMT Natural Gas Sales		S	456	2,686,730
FPL Energy Services, Inc.	Services Received by FPL		P	902	11,147
FPL Energy Services, Inc.	Services Received by FPL		P	918	917,489
FPL Energy Services, Inc.	Services Received by FPL		P	921	3,989
FPL Energy Vansycle, LLC	Fleet Support Services Provided by FPL		S	Various	1,305
FPL Energy Wyoming, LLC	Fleet Support Services Provided by FPL		S	Various	5,049
FPL FiberNet, LLC	CLEC Telephone Services		P	107	1,840,726
FPL FiberNet, LLC	See Note 1		S	146	4,793,386
FPL FiberNet, LLC	CLEC Telephone Services		P	163	102,202
FPL FiberNet, LLC	Taxes for Stock Options		P	234	74,254
FPL FiberNet, LLC	Cell Tower Lease Payments		S	454	973,705
FPL FiberNet, LLC	Orlando Site Expenses		P	506	20,739
FPL FiberNet, LLC	Orlando Site Expenses		P	549	2,356
FPL FiberNet, LLC	CLEC Telephone Services		P	556	17,099
FPL FiberNet, LLC	CLEC Telephone Services		P	557	57,361
FPL FiberNet, LLC	CLEC Telephone Services		P	569	17,099
FPL FiberNet, LLC	CLEC Telephone Services		P	581	17,617
FPL FiberNet, LLC	CLEC Telephone Services		P	902	6,652
FPL FiberNet, LLC	CLEC Telephone Services		P	910	241,569
FPL FiberNet, LLC	CLEC Telephone Services		P	921	984,785
FPL FiberNet, LLC	Orlando Site Expenses		P	931	50,032
FPL Group International, Inc.	See Note 1		S	146	5,220
FPL Group Resources, LLC	See Note 1		S	146	1,125,491
FPL Readi Power, LLC	Products Purchased by FPL		P	107	28,400
FPL Readi Power, LLC	See Note 1		S	146	75,679
Gray County Wind Energy, LLC	Fleet Support Services Provided by FPL		S	Various	2,948
Hawkeye Power Partners, LLC	Fleet Support Services Provided by FPL		S	Various	393
High Winds, LLC	Fleet Support Services Provided by FPL		S	Various	3,835

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Name of Affiliate (a)	Type of Service and/or Name of Product (b)	Relevant Contract or Agreement and Effective Date (c)	Total Charge for Year		
			"P" or "S" (d)	Account Number (e)	Dollar Amount (f)
Indian Mesa Wind Farm, LLC	Fleet Support Services Provided by FPL		S	Various	8,519
KPB Financial Corporation	Net Capital Contributions		P	123	220,000
KPB Financial Corporation	Tax Reimbursement		P	234	55,256
KPB Financial Corporation	Storm Fund Bond Issue Admin. Fees		P	234	277,027
KPB Financial Corporation	Administrative Purchase Fee		P	428	20,000
Lake Benton Power Partners II, LLC	Fleet Support Services Provided by FPL		S	Various	4,692
Lamar Power Partners	Products Purchased by FPL		P	553	636
Langdon Wind, LLC	Fleet Support Services Provided by FPL		S	Various	3,811
Logan Wind Energy, LLC	Fleet Support Services Provided by FPL		S	Various	4,502
New Hampshire Transmission, LLC	Interest Related to Sale of FPL-NED Seabrook Substation		S	123	7,855
NextEra Duane Arnold, LLC	Services Received by FPL		P	107	5,497
NextEra Duane Arnold, LLC	Services Received by FPL		P	108	1,161
NextEra Duane Arnold, LLC	See Note 1		S	146	4,503,279
NextEra Duane Arnold, LLC	Support for Nuclear Operations		P	517	1,551
NextEra Duane Arnold, LLC	Support for Nuclear Operations		P	520	1,281
NextEra Duane Arnold, LLC	Support for Nuclear Operations		P	524	63,218
NextEra Duane Arnold, LLC	Support for Nuclear Operations		P	524	123,271
NextEra Duane Arnold, LLC	Support for Nuclear Operations		P	530	54,826
NextEra Duane Arnold, LLC	Support for Nuclear Operations		P	531	17,284
NextEra Energy, Inc.	RSA Amortization & Equity Performance Shares		P	107	398,983
NextEra Energy, Inc.	Medicare Part D Subsidy & FAS 106 Medicare		P	143	3,939
NextEra Energy, Inc.	See Note 1		S	146	242,977
NextEra Energy, Inc.	Services Received by FPL		P	165	58,935
NextEra Energy, Inc.	Dividend Repayment on RSA Shares Forfeited		P	232	2,716
NextEra Energy, Inc.	State Tax Payment Reimbursement		P	236	174,503
NextEra Energy, Inc.	Sales Tax Payment		P	241	1,201
NextEra Energy, Inc.	RSA Amortization		P	517	8,551
NextEra Energy, Inc.	Deferred Compensation, Incentives & Stock Awards		P	920	4,443,236
NextEra Energy, Inc.	Services Received by FPL		P	921	8,300
NextEra Energy, Inc.	Services Received by FPL		P	921	49,834
NextEra Energy, Inc.	Pension & Other Employees Benefit Plans		P	926	5,682,116
NextEra Energy, Inc.	BOD RSA Amortization & Membership Fees		P	930	400,009
NextEra Energy Maine, LLC	See Note 1		S	146	596,637
NextEra Point Beach, LLC	See Note 1		S	146	6,513,826

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			"P" or "S" (d)	Account Number (e)	Dollar Amount (f)
NextEra Point Beach, LLC	Support for Nuclear Operations		P	154	1,304
NextEra Point Beach, LLC	Support for Nuclear Operations		P	517	3,417
NextEra Point Beach, LLC	Support for Nuclear Operations		P	520	2,116
NextEra Point Beach, LLC	Support for Nuclear Operations		P	524	17,715
NextEra Point Beach, LLC	Support for Nuclear Operations		P	528	5,622
NextEra Point Beach, LLC	Support for Nuclear Operations		P	530	8,827
NextEra Point Beach, LLC	Support for Nuclear Operations		P	531	30,241
NextEra Power Marketing, LLC	See Note 1		S	146	2,353,867
NextEra Project Management, LLC	See Note 1		S	146	5,190,116
NextEra Energy Resources, LLC	Services Received by FPL		P	Various	9,369,926
NextEra Energy Resources, LLC	Services Received by FPL		P	107	22,497
NextEra Energy Resources, LLC	See Note 1		S	146	29,025,345
NextEra Energy Resources, LLC	Credit Card Rebate Reimbursement		P	234	193,100
NextEra Energy Resources, LLC	Tax Refund Reimbursement		P	241	98,729
NextEra Energy Seabrook, LLC	Services Received by FPL		P	107	260,018
NextEra Energy Seabrook, LLC	Services Rendered to FPL New England Division		P	123	385,013
NextEra Energy Seabrook, LLC	Net LNS Tariff Charges - New England Division		S	123	959,801
NextEra Energy Seabrook, LLC	See Note 1		S	146	5,282,869
NextEra Energy Seabrook, LLC	Support for Nuclear Operations		P	154	21,242
NextEra Energy Seabrook, LLC	Support for Nuclear Operations		P	517	69,567
NextEra Energy Seabrook, LLC	Support for Nuclear Operations		P	520	16,387
NextEra Energy Seabrook, LLC	Support for Nuclear Operations		P	524	210,475
NextEra Energy Seabrook, LLC	Support for Nuclear Operations		P	528	253,817
NextEra Energy Seabrook, LLC	Support for Nuclear Operations		P	530	53,214
NextEra Energy Seabrook, LLC	Support for Nuclear Operations		P	531	191,887
NextEra Energy Seabrook, LLC	Support for IM Security Operations		P	910	849
NextEra Energy Seabrook, LLC	Support for IM Security Operations		P	921	58,049
NextEra Energy Seabrook, LLC	Support for IM Security Operations		P	923	13,710
North American Power Systems	See Note 1		S	146	77,043
North American Power Systems	Products Purchased by FPL		P	553	110,366
Northern Colorado Wind Energy, LLC	Fleet Support Services Provided by FPL		S	Various	402
Osceola Windpower, LLC	Fleet Support Services Provided by FPL		S	Various	1,093
Osceola Windpower II, LLC	Fleet Support Services Provided by FPL		S	Various	7,179
Palms Insurance Company, Limited	Excess Property All Risk Insurance		P	165	30,240

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			"P" or "S" (d)	Account Number (e)	Dollar Amount (f)
Palms Insurance Company, Limited	Contractor Wrap Up Insurance		P	165	135,031
Palms Insurance Company, Limited	Worker's Compensation Insurance		P	165	548,569
Palms Insurance Company, Limited	Fleet Vehicle Liability Insurance		P	165	2,238
Peetz Table Wind Energy, LLC	Fleet Support Services Provided by FPL		S	Various	3,165
Story Wind, LLC	Fleet Support Services Provided by FPL		S	Various	1,351
Wilton Wind II, LLC	Fleet Support Services Provided by FPL		S	Various	944
Wind Power Partners 1993, LP	Fleet Support Services Provided by FPL		S	Various	1,043
Wind Power Partners 1994, LP	Fleet Support Services Provided by FPL		S	Various	6,264
Wolf Ridge Wind, LLC	Fleet Support Services Provided by FPL		S	Various	2,125
Footnotes and General Comments: Note 1: Services primarily provided by FPL include accounting, financial, consulting, human resources systems and programs, education and training, land management, legal, payroll, management and administrative, computer services, printing and duplicating, physical facilities, software maintenance, license fees, in territory gas sales and aviation services. General Comments: Items exclude payments of cash collected on behalf of Affiliates. Items exclude FPL Consolidating Entities.					

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Grouped by affiliate, list each contract, agreement, or other business transaction exceeding a cumulative amount of \$300 in any one year, entered into between the Respondent and an affiliated business or financial organization, firm, or partnership identifying parties, amounts, dates, and product, asset, or service involved.

- a) Enter name of affiliate.
- b) Give description of type of service, or name the product involved.
- c) Enter contract or agreement effective dates.
- d) Enter the letter "p" if the service or product is a purchase by the Respondent; "s" if the service or product is sold by the Respondent.
- e) Enter utility account number in which charges are recorded.
- f) Enter total amount paid, received, or accrued during the year for each type of service or product listed in column (c). Do not net amounts when services are both received and provided.

Name of Affiliate (a)	Type of Service and/or Name of Product (b)	Relevant Contract or Agreement and Effective Date (c)	Total Charge for Year		
			"P" or "S" (d)	Account Number (e)	Dollar Amount (f)
Alandco, Inc.	See Note 1		S	146	1,504
Allamont Infrastructure Company, LLC	Services Provided by FPL		S	146	2,580
Ashtabula Wind, LLC	Services Provided by FPL		S	146	17,371
Ashtabula Wind II, LLC	Services Provided by FPL		S	146	1,561
Backbone Mountain Windpower, LLC	Services Provided by FPL		S	146	23,348
Badger Wind Power, LLC	Services Provided by FPL		S	146	5,428
Baldwin Wind, LLC	Services Provided by FPL		S	146	988
Bayswater Peaking Facility, LLC	Services Provided by FPL		S	146	15,936
Butler Ridge Wind Energy Center	Services Provided by FPL		S	146	1,486
Calhoun Power Company I, LLC	Services Provided by FPL		S	146	147,686
Capricorn Ridge Wind, LLC	Services Provided by FPL		S	146	26,871
Capricorn Ridge Wind II, LLC	Services Provided by FPL		S	146	12,920
Cherokee County Cogen Partners	Services Provided by FPL		S	146	13,968
Crystal Lake Wind I, LLC	Services Provided by FPL		S	146	11,170
Crystal Lake Wind II, LLC	Services Provided by FPL		S	146	10,135
Crystal Lake Wind III, LLC	Services Provided by FPL		S	146	4,446
Day County Wind, LLC	Services Provided by FPL		S	146	2,300
Delaware Mountain Wind Farm, LLC	Services Provided by FPL		S	146	2,168
Elk City Wind, LLC	Services Provided by FPL		S	146	359
Elk City II Wind, LLC	Services Provided by FPL		S	146	1,533
ESI Vansycle Partners LP	Services Provided by FPL		S	146	1,755
Flagstaff Dam	Services Provided by FPL		S	146	1,838
FPL Energy Burleigh County Wind, LLC	Services Provided by FPL		S	146	30,365
FPL Energy Cabazon Wind, LLC	Services Provided by FPL		S	146	2,768
FPL Energy Callahan Wind, LP	Services Provided by FPL		S	146	14,483
FPL Energy Cape, LLC	Services Provided by FPL		S	146	2,074
FPL Energy Cowboy Wind, LLC	Services Provided by FPL		S	146	2,281

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			"P" or "S" (d)	Account Number (e)	Dollar Amount (f)
FPL Energy Doswell Holdings, Inc.	Services Provided by FPL		S	146	45,607
FPL Energy Hancock County Wind, LLC	Services Provided by FPL		S	146	22,875
FPL Energy Horse Hollow Wind, LLC	Services Provided by FPL		S	146	4,410
FPL Energy Horse Hollow Wind II, LLC	Services Provided by FPL		S	146	12,808
FPL Energy Illinois Wind, LLC	Services Provided by FPL		S	146	41,861
FPL Energy MH50, LP	Services Provided by FPL		S	146	21,893
FPL Energy Maine Hydro, LLC	Services Provided by FPL		S	146	79,804
FPL Energy Marcus Hook, LP	Services Provided by FPL		S	146	131,067
FPL Energy Mojave Operating Svcs LLC	Services Provided by FPL		S	146	8,685
FPL Energy Montezuma Wind	Services Provided by FPL		S	146	26,204
FPL Energy Mower County, LLC	Services Provided by FPL		S	146	2,890
FPL Energy New Mexico Wind, LLC	Services Provided by FPL		S	146	8,456
FPL Energy North Dakota Wind, LLC	Services Provided by FPL		S	146	1,443
FPL Energy Oklahoma Wind, LLC	Services Provided by FPL		S	146	9,882
FPL Energy Oliver Wind II, LLC	Services Provided by FPL		S	146	27,324
FPL Energy Oliver Wind I, LLC	Services Provided by FPL		S	146	33,426
FPL Energy Services, Inc.	See Note 1		S	146	4,433,384
FPL Energy Services, Inc.	Services Received by FPL		P	107	6,983
FPL Energy Services, Inc.	Taxes for Stock Options		P	234	10,416
FPL Energy Services, Inc.	Services Received by FPL		P	902	37,554
FPL Energy Services, Inc.	Services Received by FPL		P	916	644,438
FPL Energy Services, Inc.	Services Received by FPL		P	Various	45,193
FPL Energy South Dakota Wind, LLC	Services Provided by FPL		S	146	333
FPL Energy StateLine II, Inc	Services Provided by FPL		S	146	660
FPL Energy Upton Wind I, LLC	Services Provided by FPL		S	146	9,486
FPL Energy Vansycle, LLC	Services Provided by FPL		S	146	16,714
FPL Energy Wayman, LLC	Services Provided by FPL		S	146	10,319
FPL Energy Wayman, IV LLC	Services Provided by FPL		S	146	23,231
FPL Energy Wyoming, LLC	Services Provided by FPL		S	146	9,873
FPLE Forney, LLC	Services Provided by FPL		S	146	743,869
FPLE Pecos Wind, LLC	Services Provided by FPL		S	146	5,283
FPLE Rhode Island State Energy LP, LLC	Services Provided by FPL		S	146	156,185

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			"P" or "S" (d)	Account Number (e)	Dollar Amount (f)
FPLE Rhode Island State Energy LP, LLC	Products Purchased by FPL		P	553	3,422
FPLE Solar Partners III-VII, LLC	Services Provided by FPL		S	146	8,463
FPL FiberNet, LLC	See Note 1		S	146	4,373,193
FPL FiberNet, LLC	Cell Tower Lease Payments		S	165	912,474
FPL FiberNet, LLC	CLEC Telephone Services		P	107	730,334
FPL FiberNet, LLC	CLEC Telephone Services		P	163	37,348
FPL FiberNet, LLC	CLEC Telephone Services		P	556	53,123
FPL FiberNet, LLC	CLEC Telephone Services		P	557	219,054
FPL FiberNet, LLC	CLEC Telephone Services		P	569	53,123
FPL FiberNet, LLC	CLEC Telephone Services		P	581	54,734
FPL FiberNet, LLC	CLEC Telephone Services		P	902	5,700
FPL FiberNet, LLC	CLEC Telephone Services		P	910	97,104
FPL FiberNet, LLC	CLEC Telephone Services		P	920	626,357
FPL FiberNet, LLC	CLEC Telephone Services		P	921	120,882
FPL FiberNet, LLC	Orlando Site Expenses		P	506	9,856
FPL FiberNet, LLC	Orlando Site Expenses		P	549	11,679
FPL FiberNet, LLC	Orlando Site Expenses		P	931	31,244
FPL FiberNet, LLC	Taxes for Stock Options		P	234	4,812
FPL Group International, Inc.	See Note 1		S	146	655,915
FPL Readi Power, LLC	Products Purchased by FPL		P	548	2,000
FPL Readi Power, LLC	See Note 1		S	146	86,518
FPL Services, LLC	Commercial/Industrial Lighting Program Incentives Paid		P	908	105,992
Garden Wind, LLC	Services Provided by FPL		S	146	3,369
Generation Repair and Services, LLC	Services Provided by FPL		S	146	9,796
Genesis Solar, LLC	Services Provided by FPL		S	146	417,140
Gray County Wind Energy, LLC	Services Provided by FPL		S	146	13,174
Green Ridge Power, LLC	Services Provided by FPL		S	146	2,186
Hatch Solar Energy Center, LLC	Services Provided by FPL		S	146	46,102
Hawkeye Power Partners, LLC	Fleet Support Services Provided by FPL		S	146	22,393
High Majestic Wind Energy Center, LLC	Services Provided by FPL		S	146	7,882
High Winds, LLC	Services Provided by FPL		S	146	8,215
Horse Hollow Gen Tie	Services Provided by FPL		S	146	41,179
Indian Mesa Wind Farm, LLC	Services Provided by FPL		S	146	4,215
Jamaica Bay Peaking Facility, LLC	Services Provided by FPL		S	146	4,602

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			"P" or "S" (d)	Account Number (e)	Dollar Amount (f)
KPB Financial Corporation	Capital Contribution		P	123	115,000
KPB Financial Corporation	Storm Fund Bond Issue Admin Fees		P	234	415,540
KPB Financial Corporation	Administrative Purchase Fee		P	426	20,000
KPB Financial Corporation	Interest Income		S	146	75,000
Lake Benton Power Partners, LLC	Services Provided by FPL		S	146	5,991
Lamar Power Partners, LLC	Products Purchased by FPL		P	553	9,243
Lamar Power Partners, LLC	Products Purchased by FPL		P	154	12,214
Lamar Power Partners, LLC	Services Provided by FPL		S	146	419,525
Langdon Wind, LLC	Fleet Support Services Provided by FPL		S	146	23,944
Logan Wind Energy, LLC	Fleet Support Services Provided by FPL		S	146	30,534
Lone Star Transmission, LLC	See Note 1		S	146	871,395
Luz Solar Partners Ltd. III	Services Provided by FPL		S	146	5,197
Luz Solar Partners Ltd. V	Services Provided by FPL		S	146	1,360
Luz Solar Partners Ltd. VI	Services Provided by FPL		S	146	893
Luz Solar Partners Ltd. VII	Services Provided by FPL		S	146	1,010
Luz Solar Partners Ltd. VIII	Services Provided by FPL		S	146	35,127
Luz Solar Partners Ltd. IX	Services Provided by FPL		S	146	4,848
Meyersdale Windpower, LLC	Services Provided by FPL		S	146	2,854
Mill Run Windpower, LLC	Services Provided by FPL		S	146	1,034
Minco Wind, LLC	Services Provided by FPL		S	148	2,333
Minco Wind II, LLC	Services Provided by FPL		S	146	19,420
Mojave 16/17/18	Services Provided by FPL		S	146	8,261
Naps Wind, LLC	Services Provided by FPL		S	148	17,360
New Hampshire Transmission, LLC	See Note 1		S	146	220,970
NextEra Desert Center Blythe, LLC	Services Provided by FPL		S	146	138,300
NextEra Energy Canada, UCL	Services Provided by FPL		S	148	1,401
NextEra Energy Capital Holdings	See Note 1		S	146	46,881,875
NextEra Energy Capital Holdings	Services Received by FPL		P	146	37,878
NextEra Energy Duane Arnold, LLC	See Note 1		S	146	5,284,020
NextEra Energy Duane Arnold, LLC	Support for Nuclear Operations		P	107	74,717
NextEra Energy Duane Arnold, LLC	Support for Nuclear Operations		P	517	22,932
NextEra Energy Duane Arnold, LLC	Support for Nuclear Operations		P	524	42,587
NextEra Energy Duane Arnold, LLC	Support for Nuclear Operations		P	528	1,297
NextEra Energy Duane Arnold, LLC	Support for Nuclear Operations		P	531	6,546
NextEra Energy Duane Arnold, LLC	Support for Nuclear Operations		P	107	48,448
NextEra Energy Duane Arnold, LLC	Services Received by FPL		P	517	11,561

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			"P" or "S" (d)	Account Number (e)	Dollar Amount (f)
NextEra Energy Duane Arnold, LLC	Services Received by FPL		P	528	1,056
NextEra Energy Duane Arnold, LLC	Services Received by FPL		P	242	13,889
NextEra Energy Fibemet, LLC	Services Provided by FPL		S	146	33,701
NextEra Energy Capital Holdings, Inc.	Medicare Part D Subsidy		P	143	441,364
NextEra Energy, Inc.	Medicare Part D Subsidy & FAS 106 Medicare		P	143	3,608
NextEra Energy, Inc.	See Note 1		S	146	3,991,649
NextEra Energy, Inc.	Services Received by FPL		P	242	90,431
NextEra Energy, Inc.	Services Received by FPL		P	165	58,047
NextEra Energy, Inc.	2010 Tax Payment for NED		P	923	29,053
NextEra Energy, Inc.	Deferred Comp, Incentives, Stock Awards, RSA Amortization, Pension & Other Employee Benefit Plans		P	Various	10,924,789
NextEra Energy, Inc.	Services Received by FPL		P	921	23,980
NextEra Energy Infrastructure, LLC	See Note 1		S	146	1,214,563
NextEra Energy Infrastructure, LLC	Services Received by FPL		P	566	7,680
NextEra Energy Infrastructure, LLC	Services Received by FPL		P	588	7,680
NextEra Energy Infrastructure, LLC	Services Received by FPL		P	922	8,181
NextEra Energy Maine, LLC	See Note 1		S	146	287,944
NextEra Energy Operating Services, LLC	Services Provided by FPL		S	146	28,886
NextEra Energy Operating Services, LLC	Services Received by FPL		P	553	2,711
NextEra Point Beach, LLC	See Note 1		S	146	7,486,274
NextEra Point Beach, LLC	Support for Nuclear Operations		P	528	63,910
NextEra Point Beach, LLC	Support for Nuclear Operations		P	524	6,750
NextEra Point Beach, LLC	Products Purchased by FPL		P	530	1,584
NextEra Point Beach, LLC	Services Received by FPL		P	524	3,037
NextEra Point Beach, LLC	Services Received by FPL		P	530	21,032
NextEra Point Beach, LLC	Services Received by FPL		P	922	33,260
NextEra Power Marketing, LLC	See Note 1		S	146	2,525,630
NextEra Project Management, LLC	See Note 1		S	146	4,285,511
NextEra Energy Project Management, LLC	Services Received by FPL		P	506	9,369
NextEra Energy Project Management, LLC	Services Received by FPL		P	517	47,930
NextEra Energy Project Management, LLC	Services Received by FPL		P	524	284,086
NextEra Energy Project Management, LLC	Services Received by FPL		P	549	15,952

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			"P" or "S" (d)	Account Number (e)	Dollar Amount (f)
NextEra Energy Project Management, LLC	Services Received by FPL		P	580	514
NextEra Energy Project Management, LLC	Services Received by FPL		P	922	144,861
NextEra Energy Project Management, LLC	Services Received by FPL		P	107	16,514
NextEra Energy Resources, LLC	Services Received by FPL		P	Various	5,837,742
NextEra Energy Resources, LLC	Tax for Stock Options		P	234	468,309
NextEra Energy Resources, LLC	See Note 1		S	146	49,548,941
NextEra Energy Resources, LLC	Services Received by FPL		P	500	20,057
NextEra Energy Resources, LLC	Services Received by FPL		P	506	79,558
NextEra Energy Resources, LLC	Services Received by FPL		P	510	384
NextEra Energy Resources, LLC	Services Received by FPL		P	517	2,390
NextEra Energy Resources, LLC	Services Received by FPL		P	524	83,498
NextEra Energy Resources, LLC	Services Received by FPL		P	546	35,464
NextEra Energy Resources, LLC	Services Received by FPL		P	549	146,540
NextEra Energy Resources, LLC	Services Received by FPL		P	553	29,448
NextEra Energy Resources, LLC	Services Received by FPL		P	560	21,567
NextEra Energy Resources, LLC	Services Received by FPL		P	570	395
NextEra Energy Resources, LLC	Services Received by FPL		P	580	38,894
NextEra Energy Resources, LLC	Services Received by FPL		P	902	2,765
NextEra Energy Resources, LLC	Services Received by FPL		P	922	1,186,287
NextEra Energy Resources, LLC	Services Received by FPL		P	Various	1,150,177
NextEra Energy Seabrook, LLC	Services Received by FPL		P	517	5,106
NextEra Energy Seabrook, LLC	Services Received by FPL		P	524	49,249
NextEra Energy Seabrook, LLC	Services Received by FPL		P	528	2,281
NextEra Energy Seabrook, LLC	Services Received by FPL		P	530	618
NextEra Energy Seabrook, LLC	Services Received by FPL		P	107	49,439
NextEra Energy Seabrook, LLC	Bond Reimbursement		P	232	370
NextEra Energy Seabrook, LLC	Support for Nuclear Operations		P	107	120,310
NextEra Energy Seabrook, LLC	Support for Nuclear Operations		P	154	12,485
NextEra Energy Seabrook, LLC	See Note 1		S	146	5,792,205
NextEra Energy Seabrook, LLC	Support for Nuclear Operations		P	517	942
NextEra Energy Seabrook, LLC	Support for Nuclear Operations		P	520	5,955
NextEra Energy Seabrook, LLC	Support for Nuclear Operations		P	524	71,708
NextEra Energy Seabrook, LLC	Support for Nuclear Operations		P	528	17,805
NextEra Energy Seabrook, LLC	Support for Nuclear Operations		P	530	15,935

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			"P" or "S" (d)	Account Number (e)	Dollar Amount (f)
NextEra Energy Seabrook, LLC	Support for Nuclear Operations		P	923	5,425
NextEra Energy Seabrook, LLC	Products Purchased by FPL		P	530	207,499
NextEra Energy Spain Holdings, BV	Services Provided by FPL		S	146	11,164
North American Power Systems	See Note 1		S	146	75,391
North American Power Systems	Products Purchased by FPL		P	154	1,260
Northeast Energy Associates, LP	Services Provided by FPL		S	146	70,991
North Jersey Energy Associates, LP	Services Provided by FPL		S	146	210,725
North Jersey Energy Associates, LP	Products Purchased by FPL		P	154	5,003
North Jersey Energy Associates, LP	Products Purchased by FPL		P	107	29,441
Northern Colorado Wind Energy, LLC	Fleet Support Services Provided by FPL		S	146	1,835
Osceola Windpower, LLC	Fleet Support Services Provided by FPL		S	146	12,021
Osceola Windpower II, LLC	Fleet Support Services Provided by FPL		S	146	12,537
Palms Insurance Company, Limited	Excess Property All Risk Insurance		P	165	45,738
Palms Insurance Company, Limited	Contractor Wrap Up Insurance		P	165	1,429,646
Palms Insurance Company, Limited	Worker's Compensation Insurance		P	165	531,746
Palms Insurance Company, Limited	Builders Risk Insurance		P	107	99,738
Paradise Solar Urban Renewal, LLC	Services Provided by FPL		S	146	9,000
Peetz Logan Interconnect, LLC	Services Provided by FPL		S	146	42,629
Peetz Table Wind Energy, LLC	Services Provided by FPL		S	146	31,487
Pennsylvania Wind Farms, LLC	Services Provided by FPL		S	146	928
Perrin Ranch Wind, LLC	Services Provided by FPL		S	146	56,242
Post Wind Farm, LP	Services Provided by FPL		S	146	38,855
Pubnico Point, LP	Services Provided by FPL		S	146	1,944
Red Mesa Wind, LLC	Services Provided by FPL		S	146	5,393
Sky River, LLC	Services Provided by FPL		S	146	7,365
Somerset Windpower, LLC	Services Provided by FPL		S	146	4,218
Story Wind, LLC	Services Provided by FPL		S	146	5,881
TPC Wind Farms, LLC	Services Provided by FPL		S	146	309
Vasco Wind, LLC	Services Provided by FPL		S	146	7,965
Victory Garden Phase IV, LLC	Services Provided by FPL		S	146	343
Waymart Wind Farm, LP	Services Provided by FPL		S	146	2,483
Wessington Wind Energy Center, LLC	Services Provided by FPL		S	146	4,311
West Texas Wind, LLC	Services Provided by FPL		S	146	2,597
Western Dam Location	Services Provided by FPL		S	146	5,533
White Oak Energy, LLC	Services Provided by FPL		S	146	7,070
Wilton Wind II, LLC	Services Provided by FPL		S	146	2,680

ANALYSIS OF DIVERSIFICATION ACTIVITY
Summary of Affiliated Transfers and Cost Allocations

FLORIDA POWER & LIGHT COMPANY
For the Year Ended December 31, 2011

Name of Affiliate (a)	Type of Service and/or Name of Product (b)	Relevant Contract or Agreement and Effective Date (c)	Total Charge for Year		
			"P" or "S" (d)	Account Number (e)	Dollar Amount (f)
Windlogistics, Inc	Services Provided by FPL		S	146	59,673
Windlogistics, Inc	Products Purchased by FPL		P	107	73,510
Windlogistics, Inc	Products Purchased by FPL		P	183	26,350
Windlogistics, Inc	Products Purchased by FPL		P	506	26,440
Wind Power Partners 1991-2, LP	Services Provided by FPL		S	146	1,391
Wind Power Partners 1993, LP	Services Provided by FPL		S	146	67,386
Wind Power Partners 1994, LP	Services Provided by FPL		S	146	4,710
Wolf Ridge Wind, LLC	Services Provided by FPL		S	146	4,552

Footnotes and General Comments:
Note 1: Services primarily provided by FPL include accounting, financial, consulting, human resources systems and programs, education and training, land management, legal, payroll, management and administrative, computer services, printing and duplicating, physical facilities, software maintenance, license fees, in territory gas sales and aviation services.

General Comments:
Items exclude payments of cash collected on behalf of Affiliates.

Q.

Refer to page 26, lines 10-18, of witness Ousdahl's direct testimony. Please identify all "new operating affiliates," if any, within the NextEra Energy, Inc., corporate umbrella that were formed in 2010 and 2011. For each new operating affiliate, if applicable,

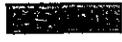
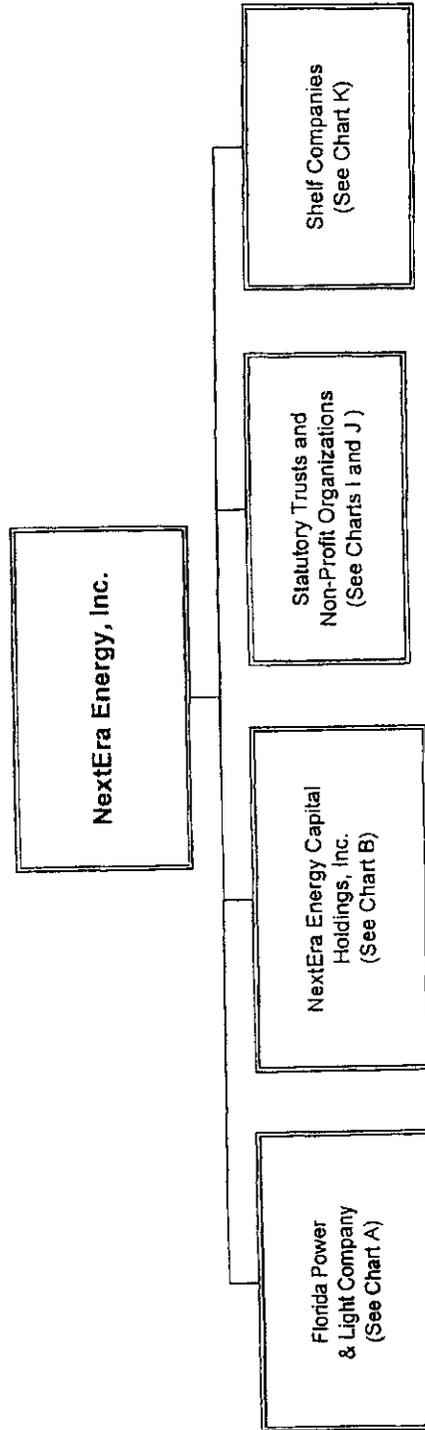
- a. Describe the type of service FPL receives from or provides to the affiliate.
- b. Identify by type of service the total O&M expenses that FPL incurred in 2010, 2011 and projects for the 2013 Test Year, and provide justification that shows why those expenses should be passed on to the ratepayers.
- c. Identify how costs were allocated for the new operating affiliate.

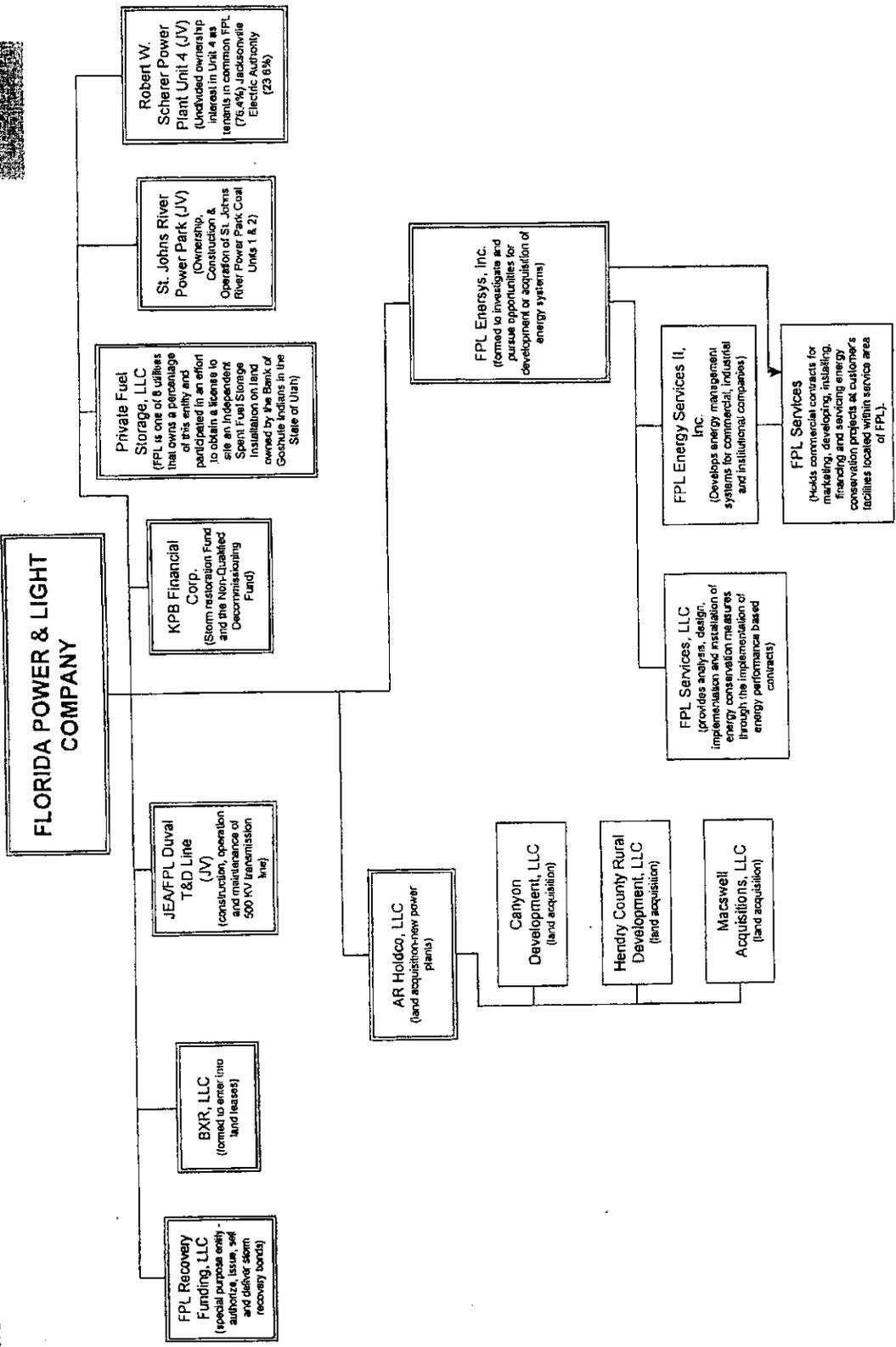
A.

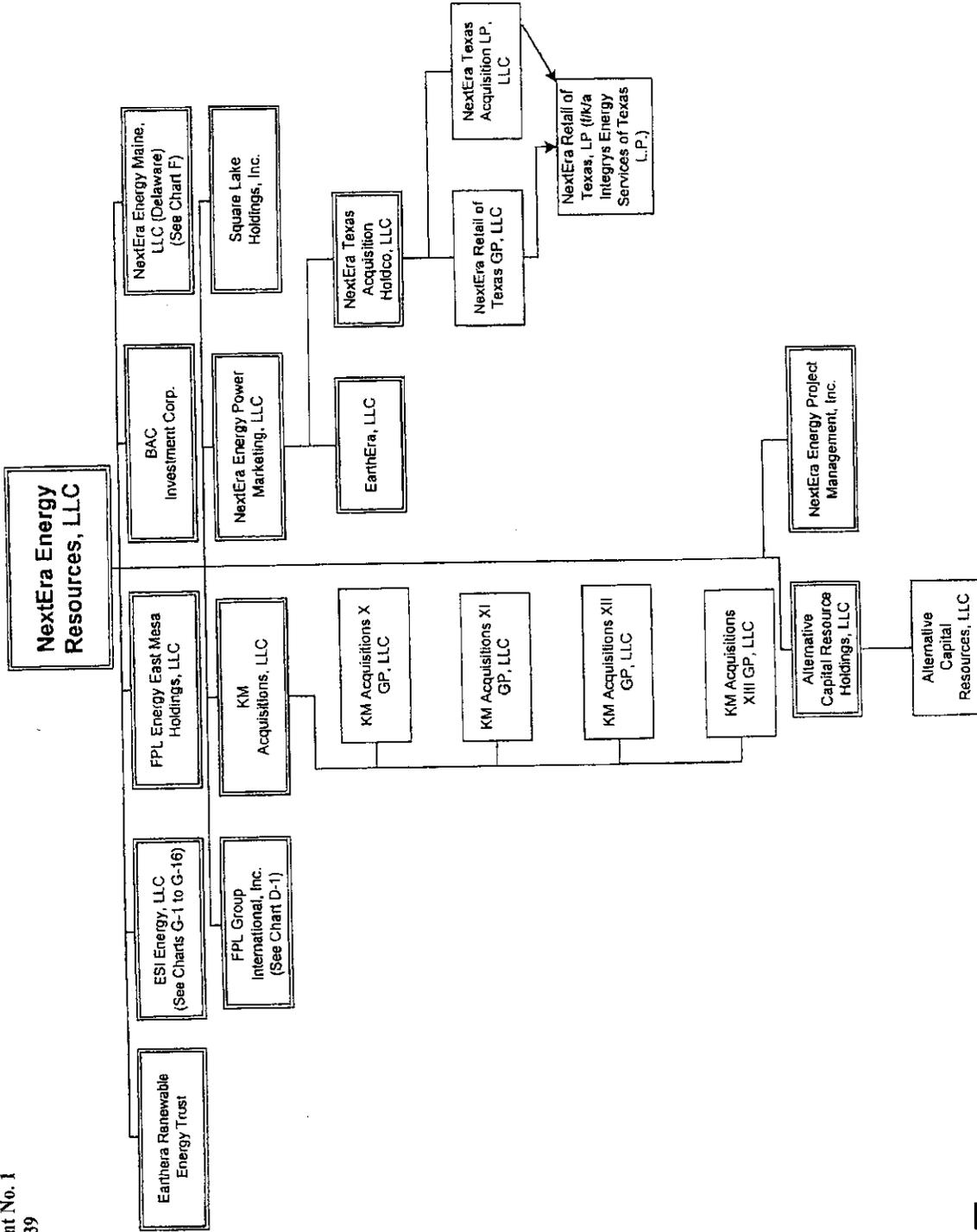
See Attachment Nos. 1 and 2 for pages 454-29 thru 454-35 of the 2010 Diversification Report, and pages 454-32 thru 454-38 of the 2011 Diversification Reports for Changes in Corporate Structure.

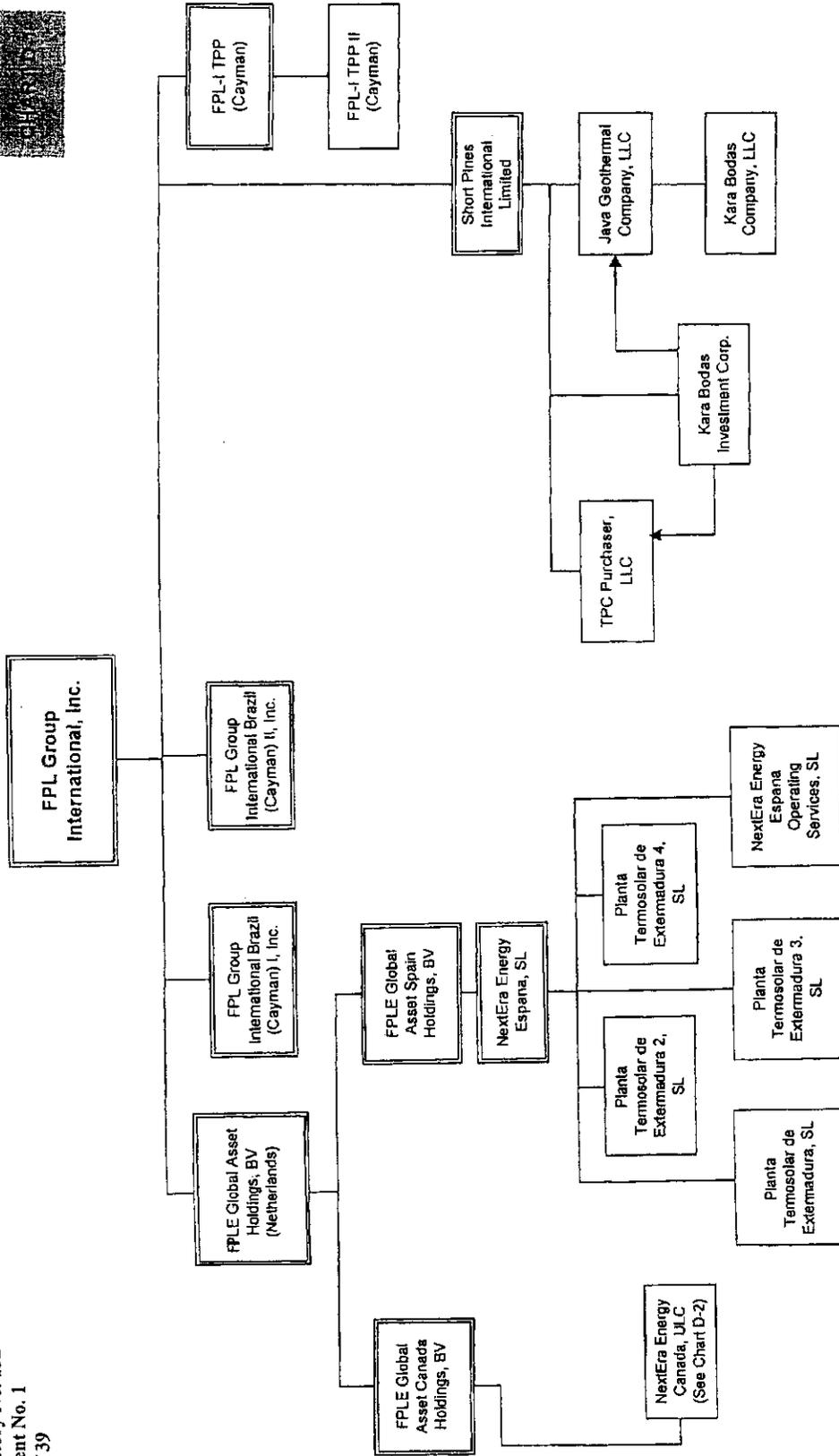
- a. New operating affiliates are included in the allocation of costs under the AMF. New affiliates may also receive direct charges for services provided by FPL based on specific internal orders. FPL has not, nor does it expect to receive services from affiliates formed in 2010 and 2011.
- b. See answer to subpart (a) above.
- c. Estimated metrics associated with new operating affiliates are included prospectively in the drivers for allocation of costs under the Massachusetts Formula.

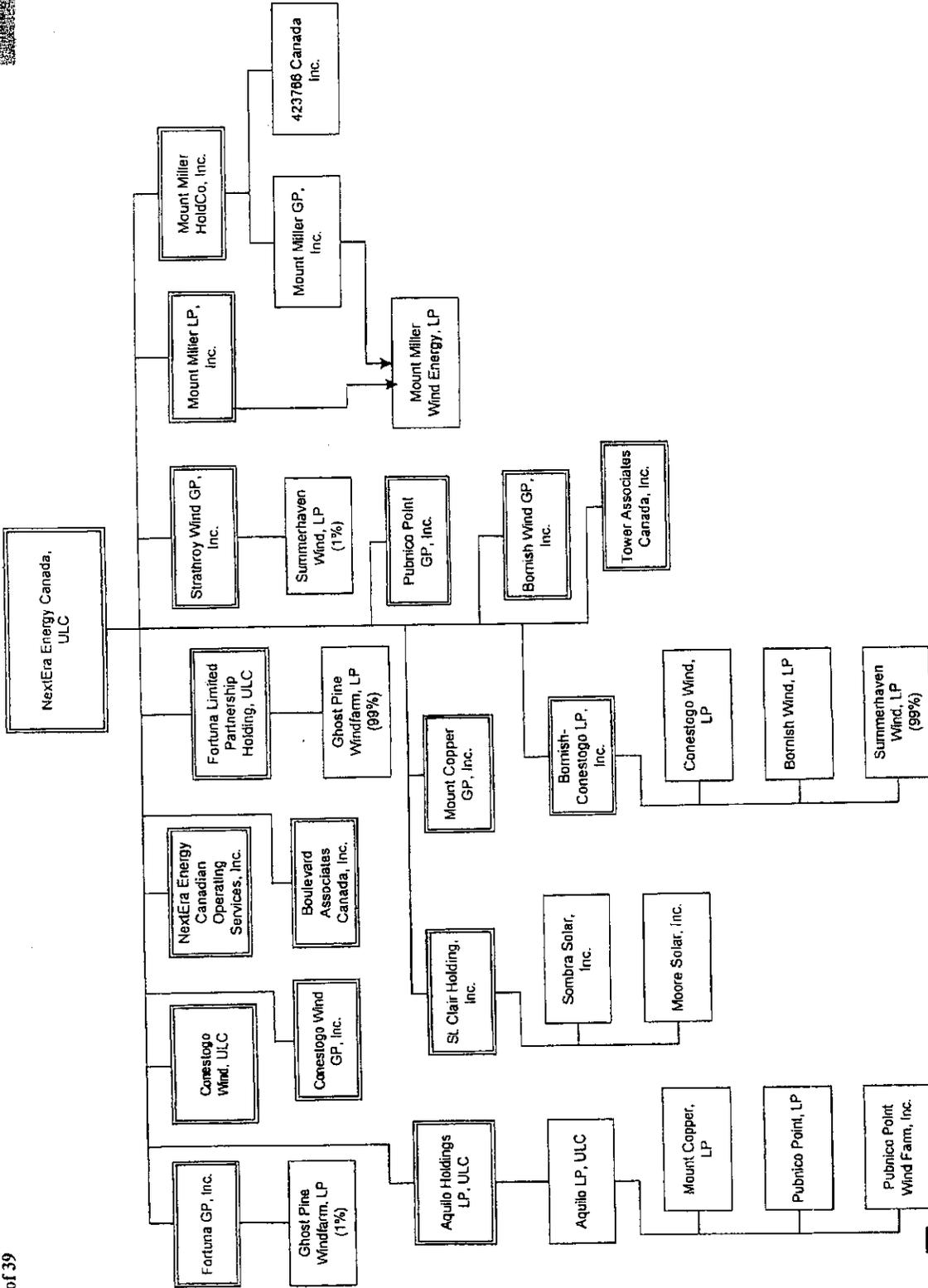
NextEra Energy, Inc. Entity Organization Chart

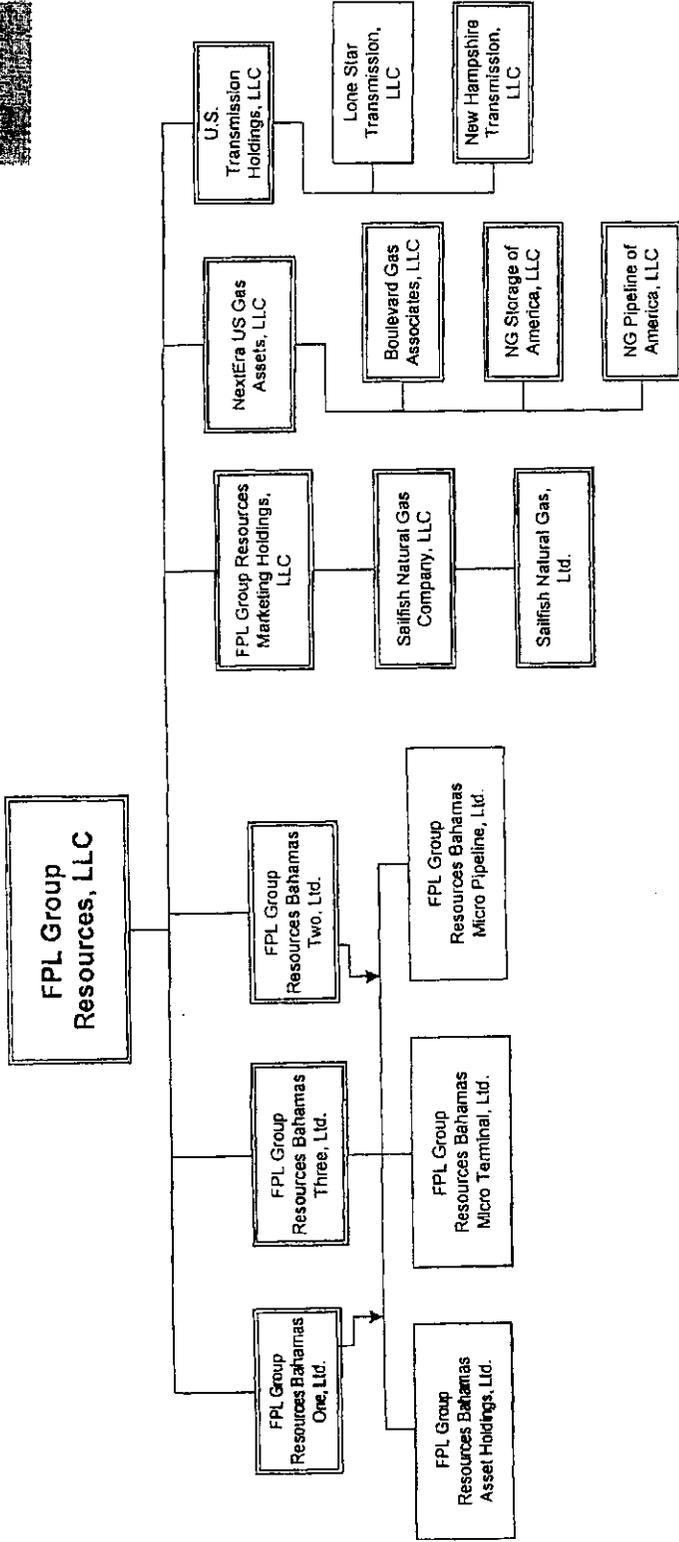


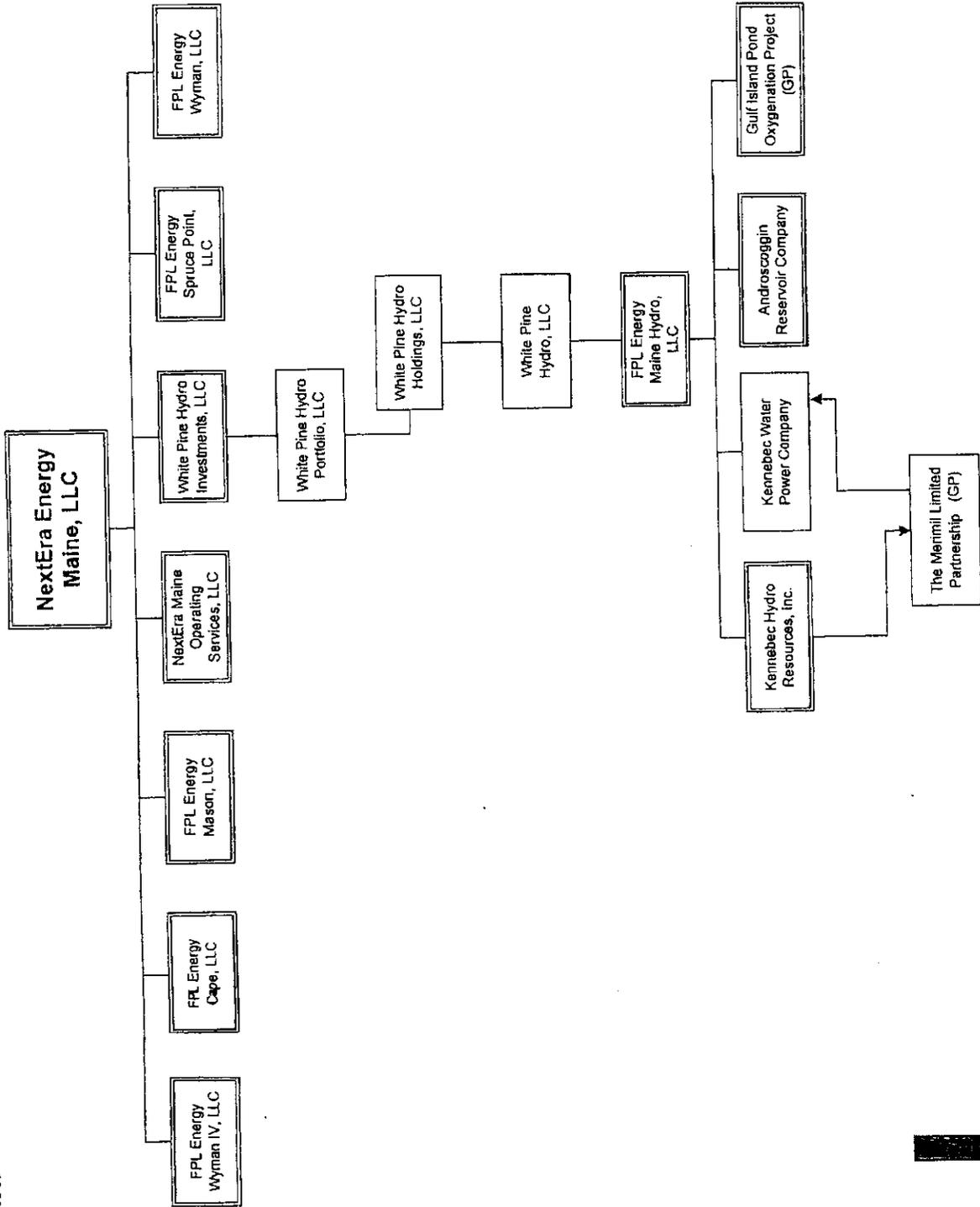




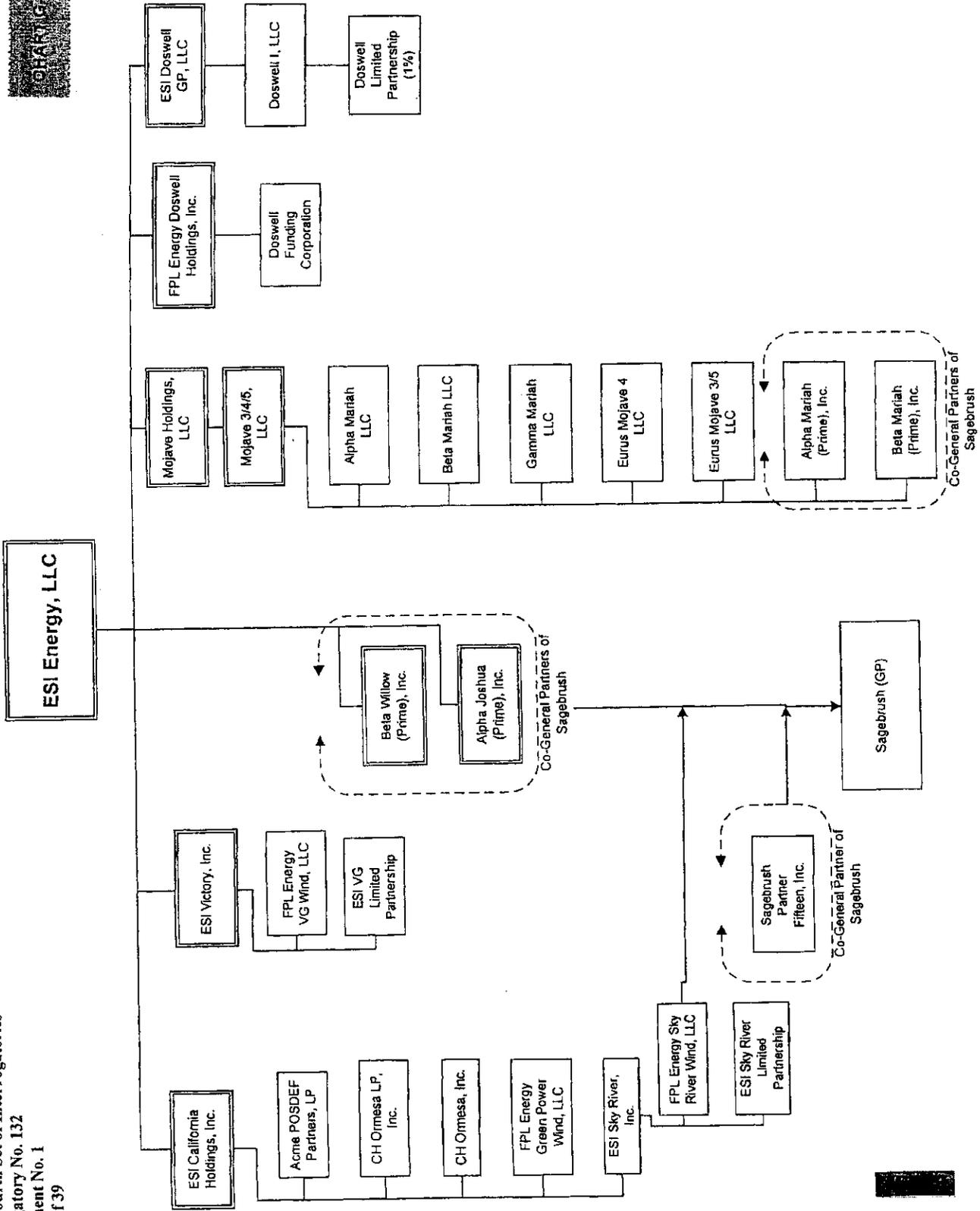


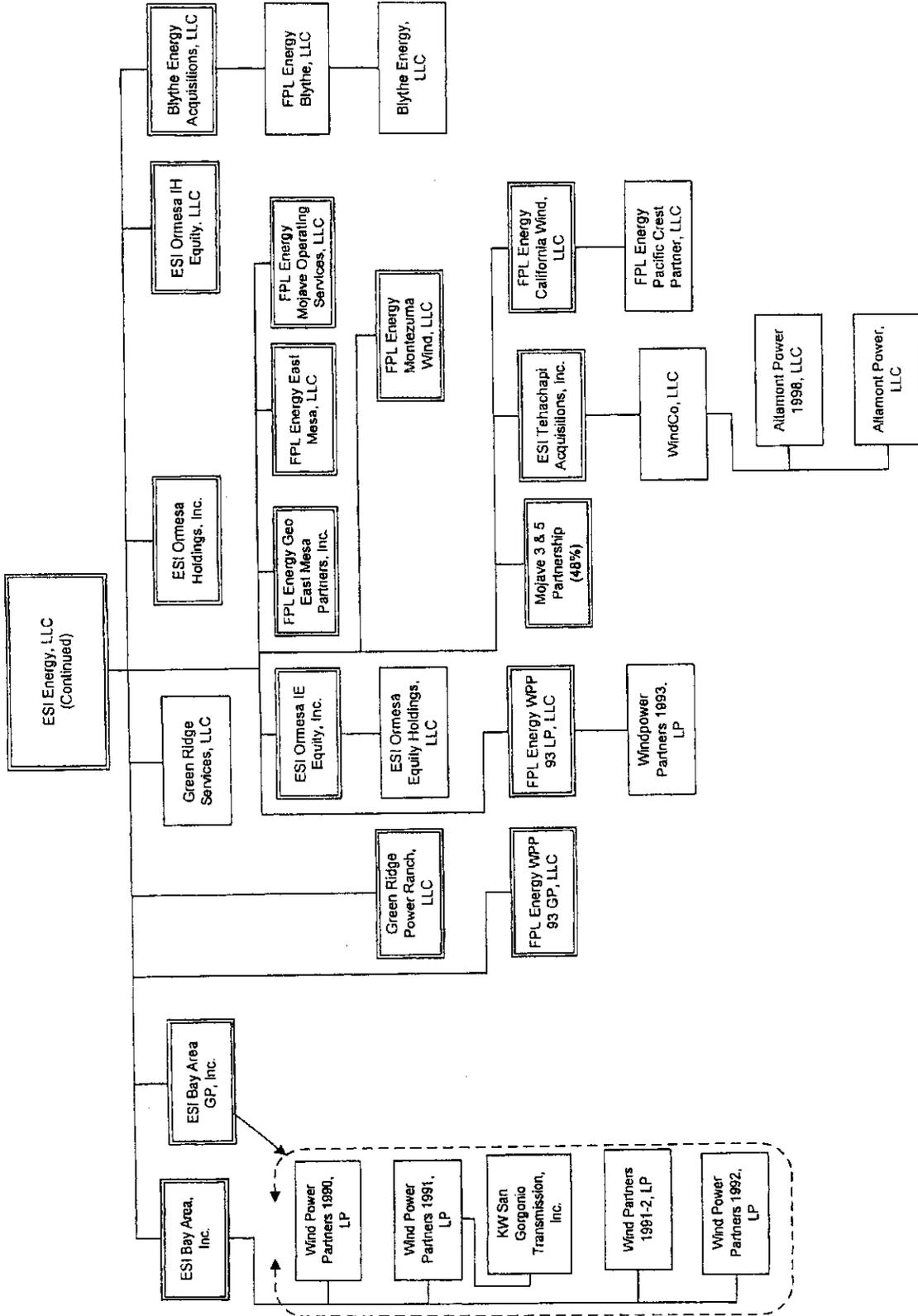


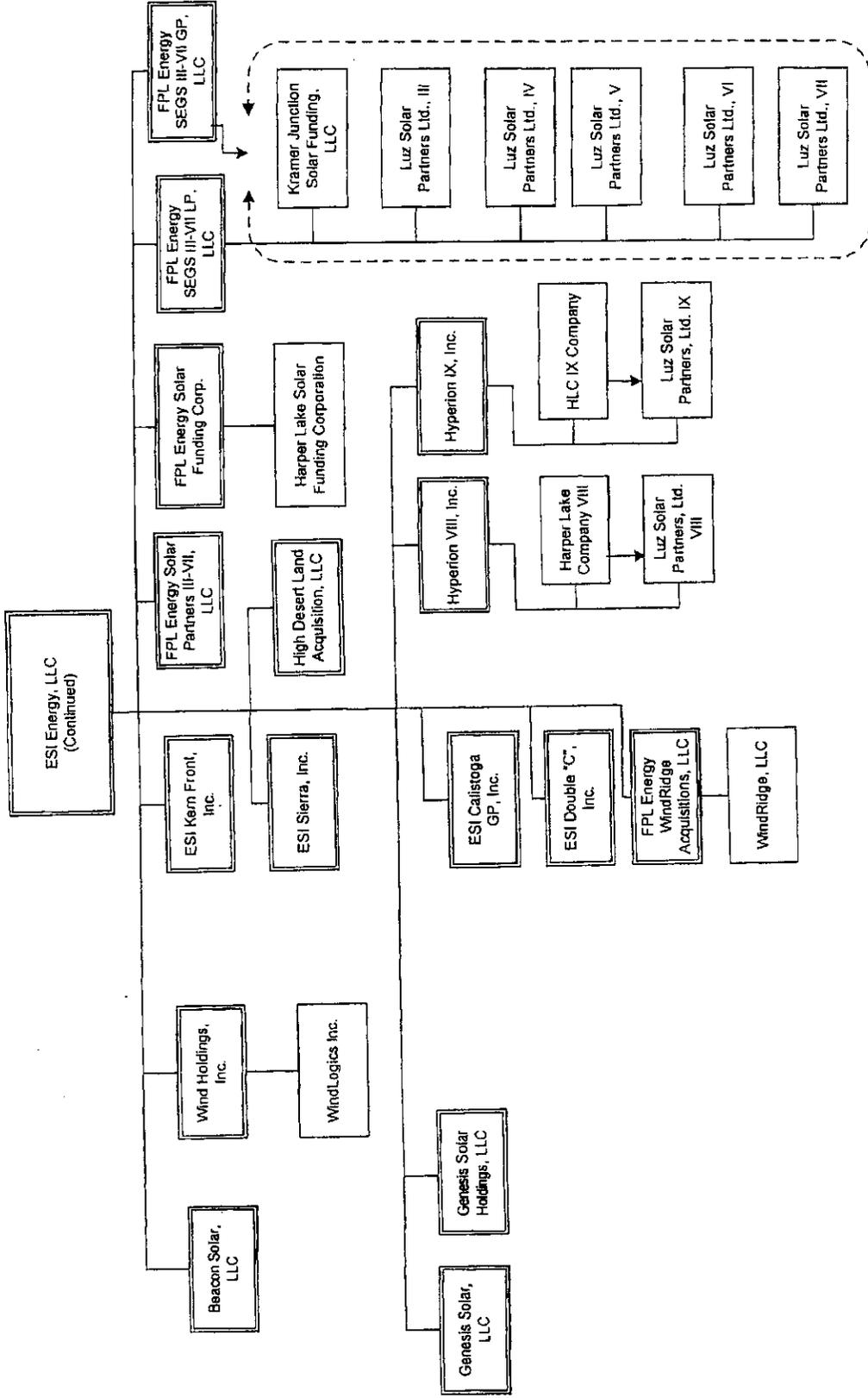


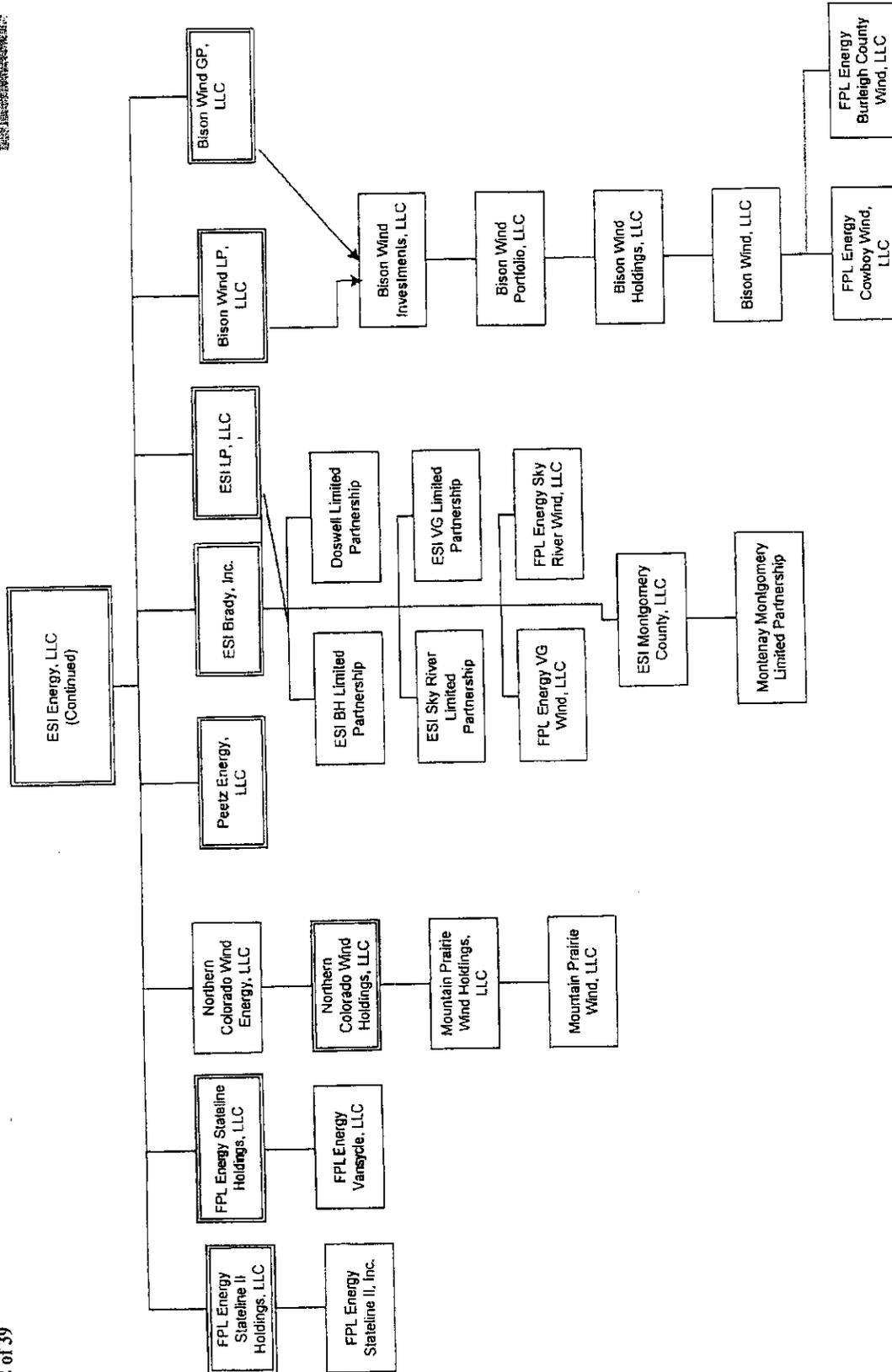


LP = Limited Partnership GP = General Partnership JV = Joint Venture LLC = Limited Liability Company

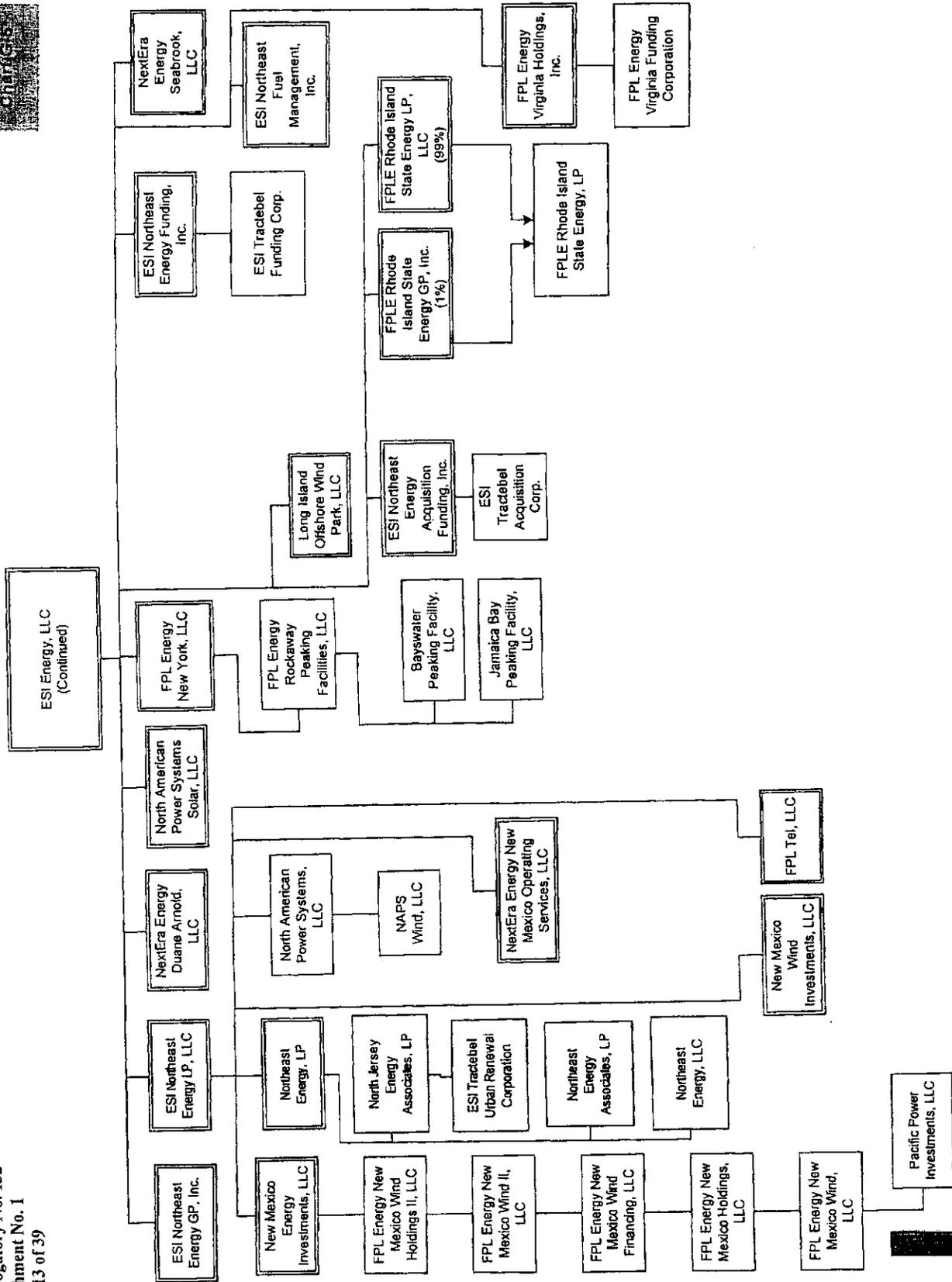






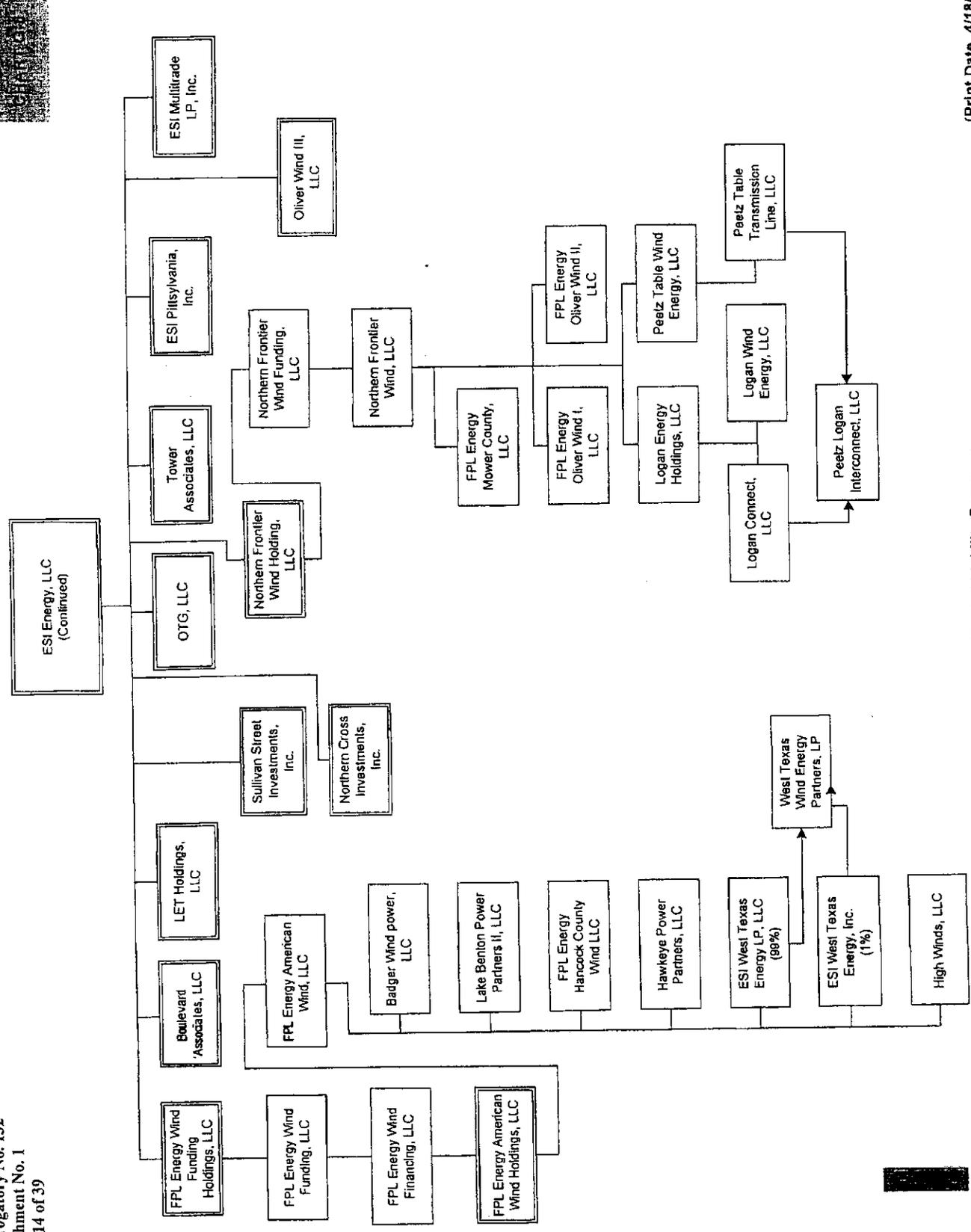


LP = Limited Partnership GP = General Partnership JV = Joint Venture LLC = Limited Liability Company

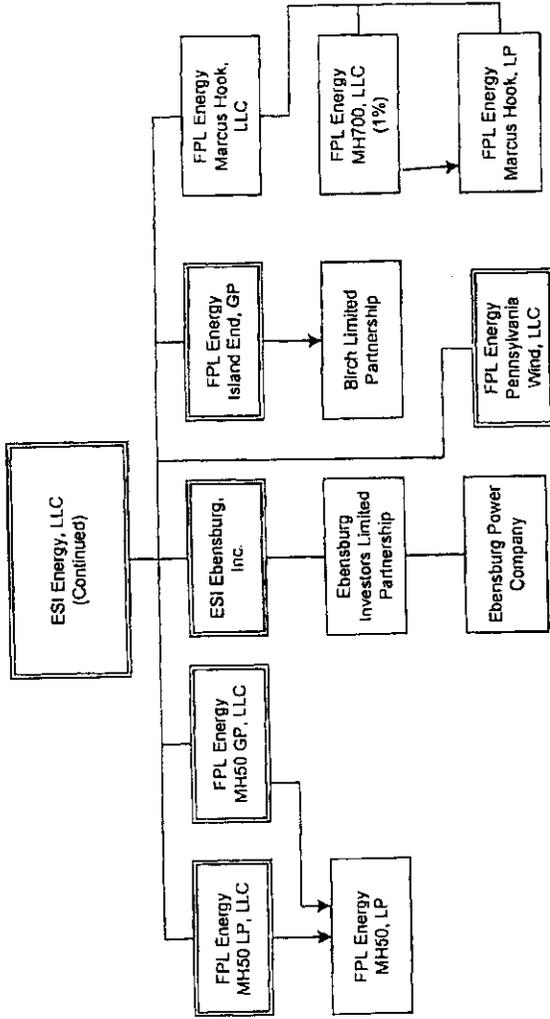


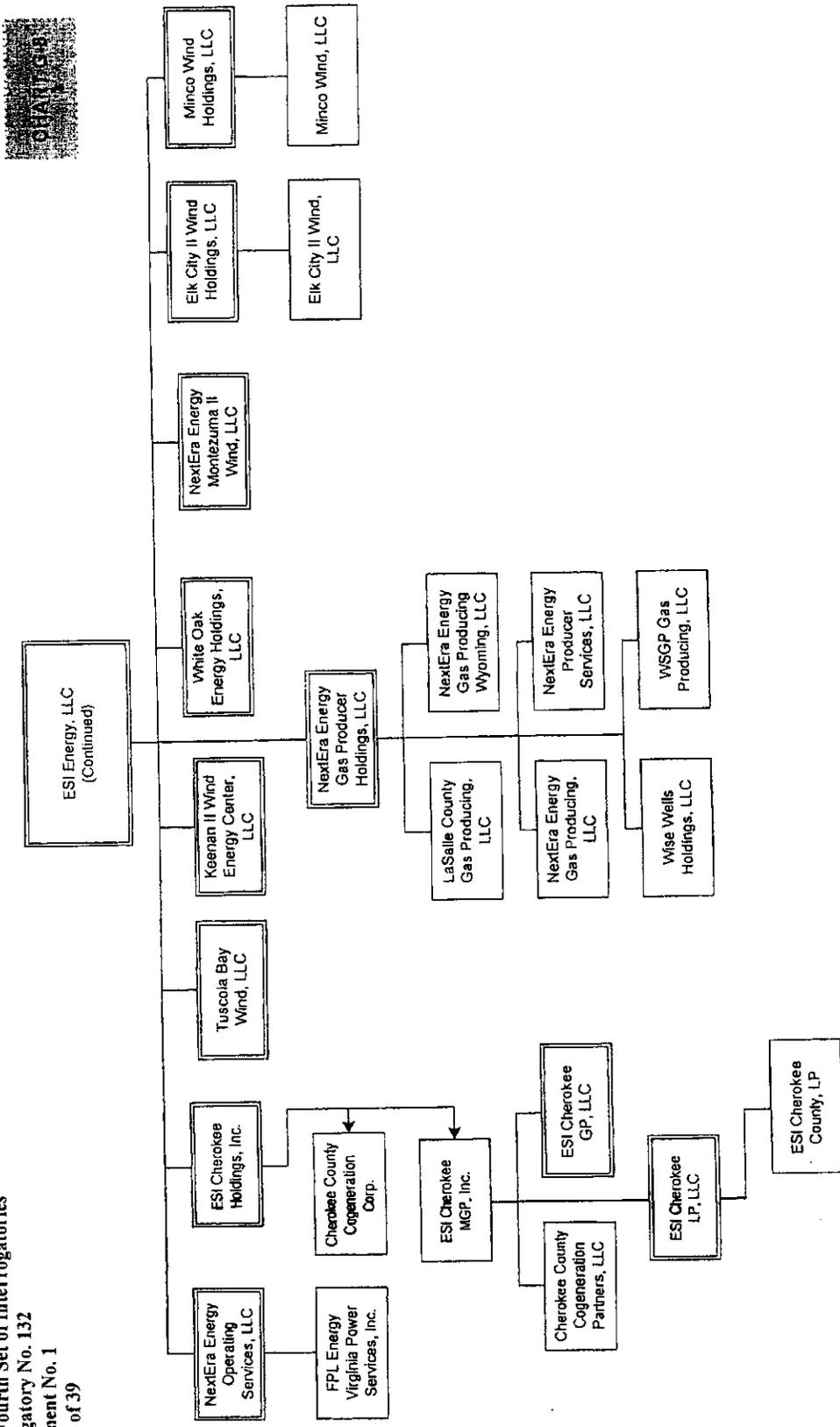
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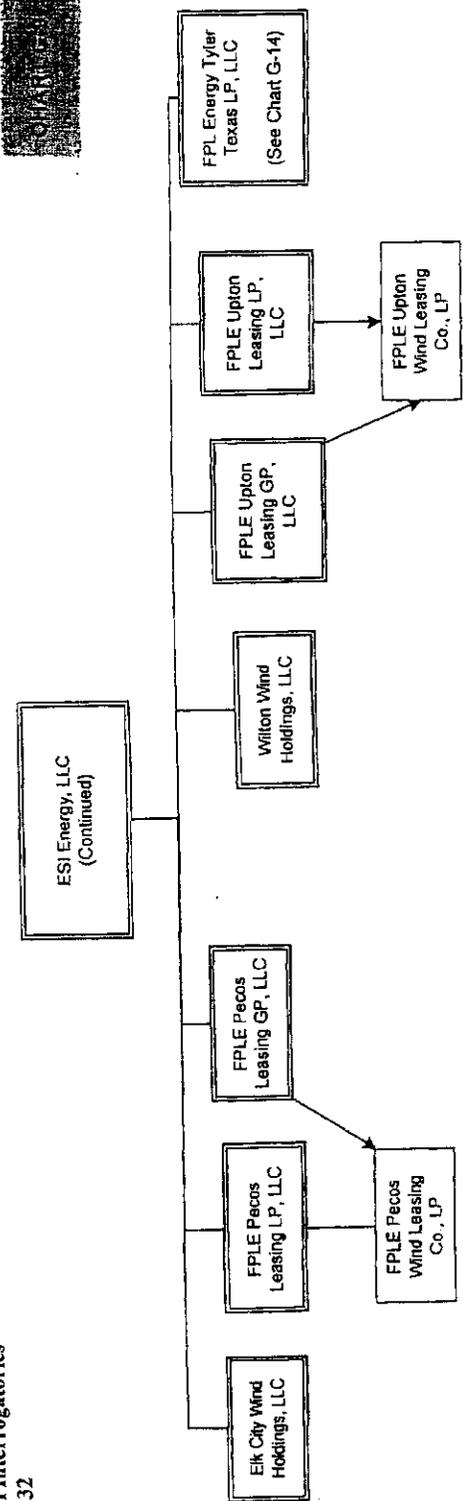
LP = Limited Partnership GP = General Partnership JV = Joint Venture LLC = Limited Liability Company

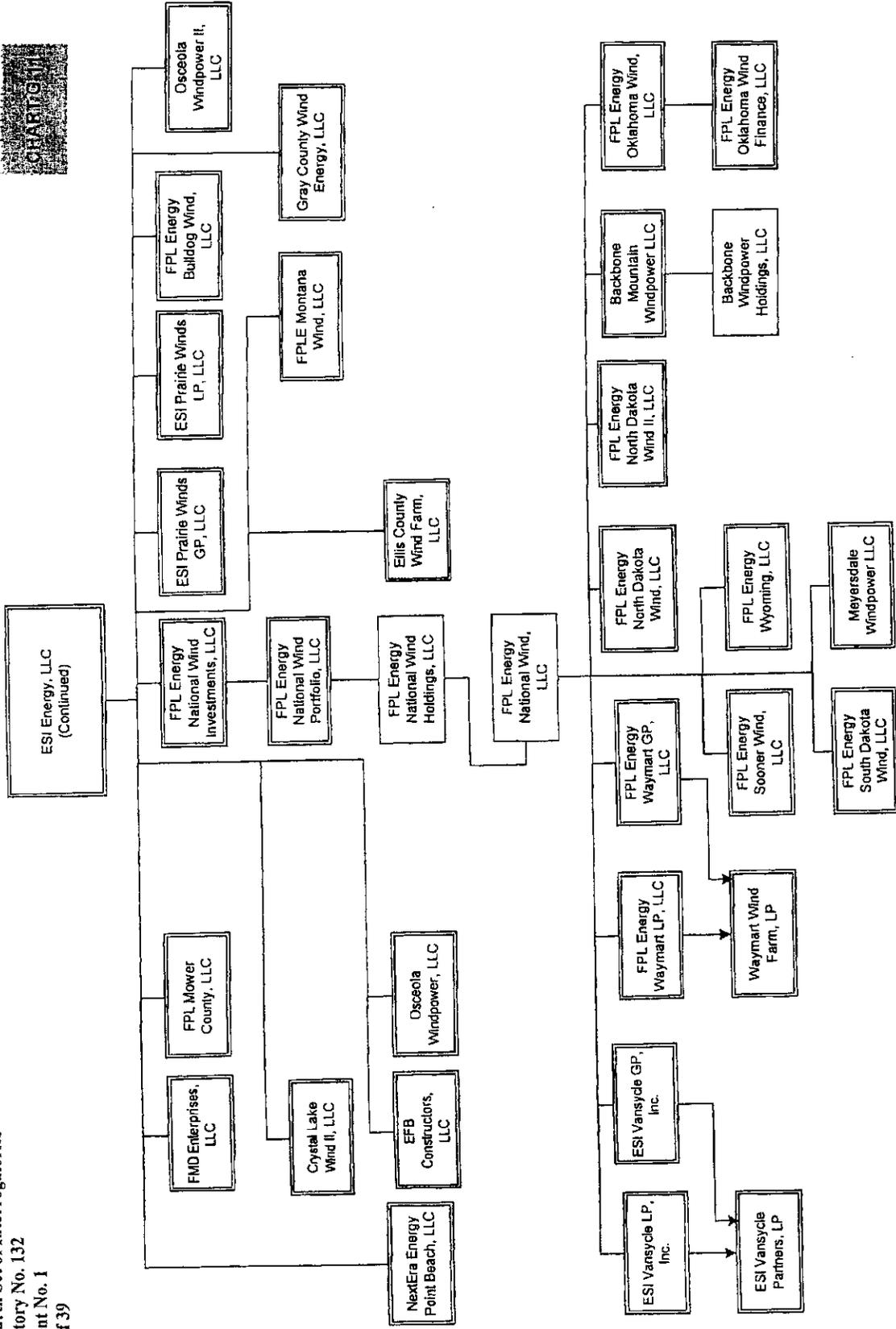


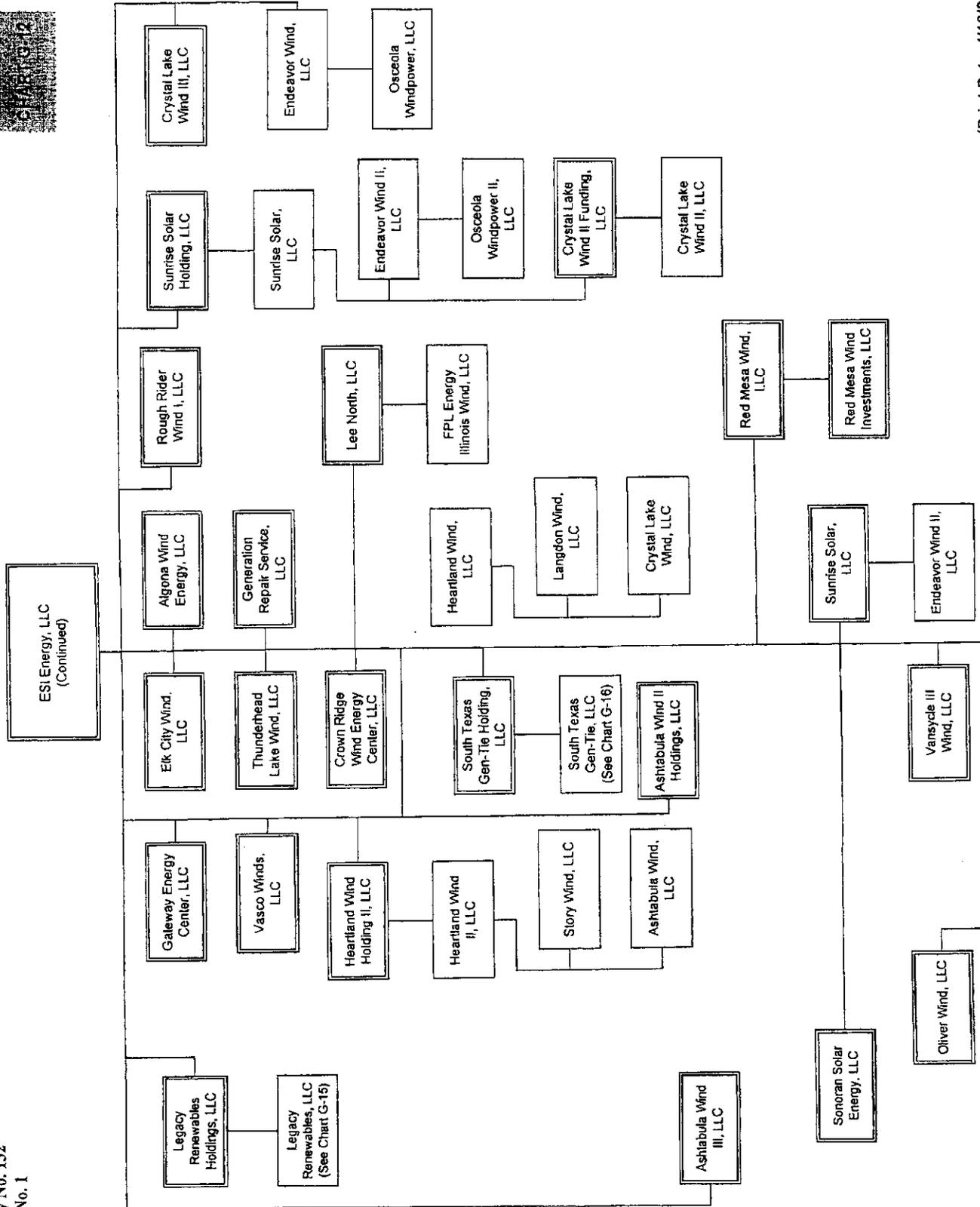
LP = Limited Partnership GP = General Partnership JV = Joint Venture LLC = Limited Liability Company



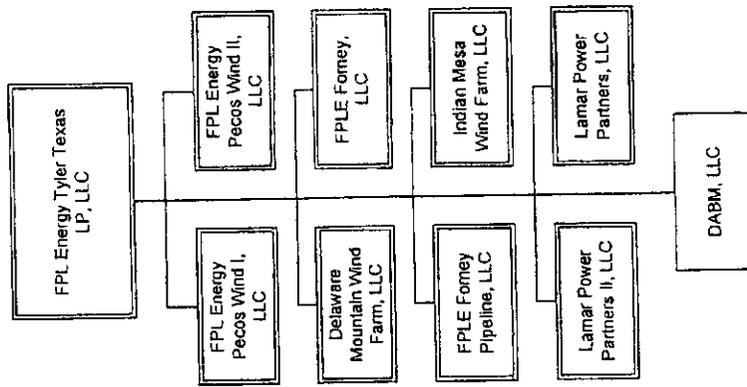


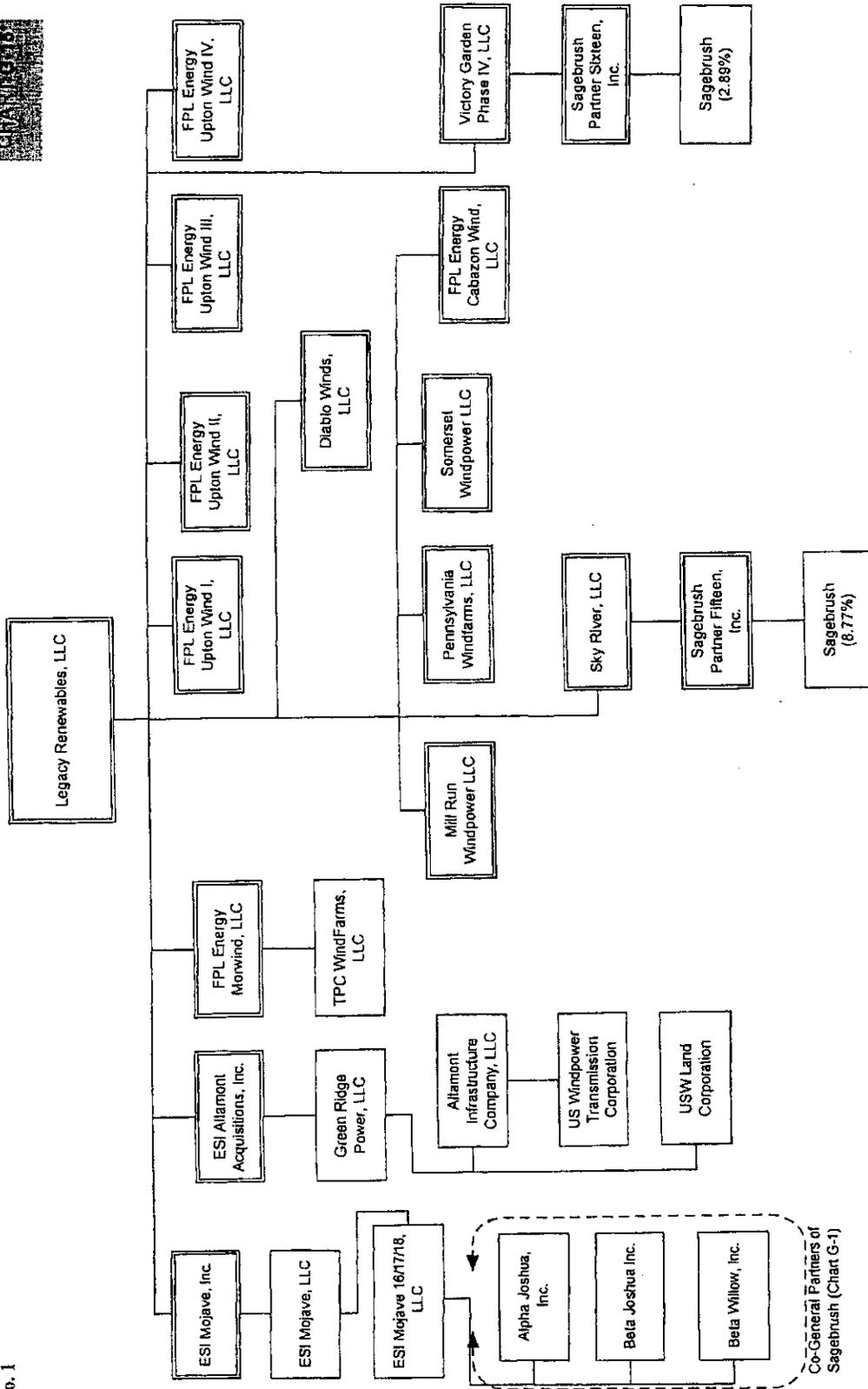


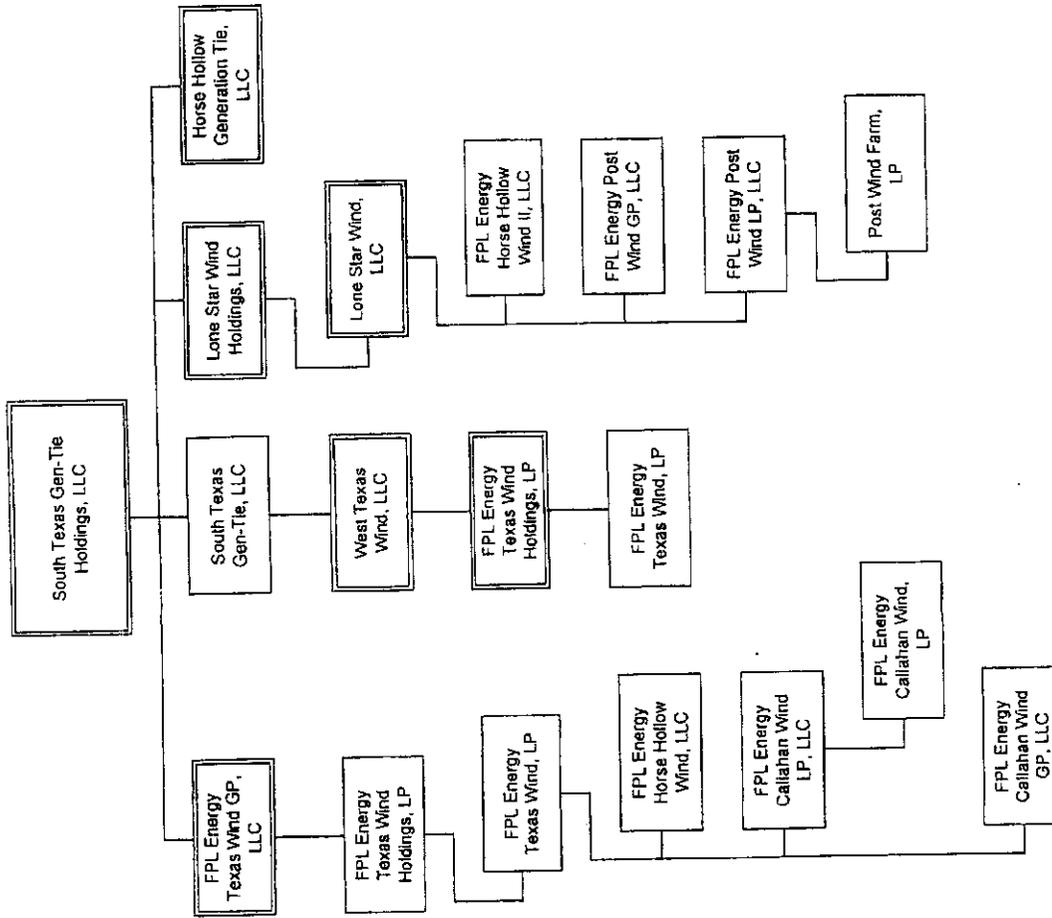




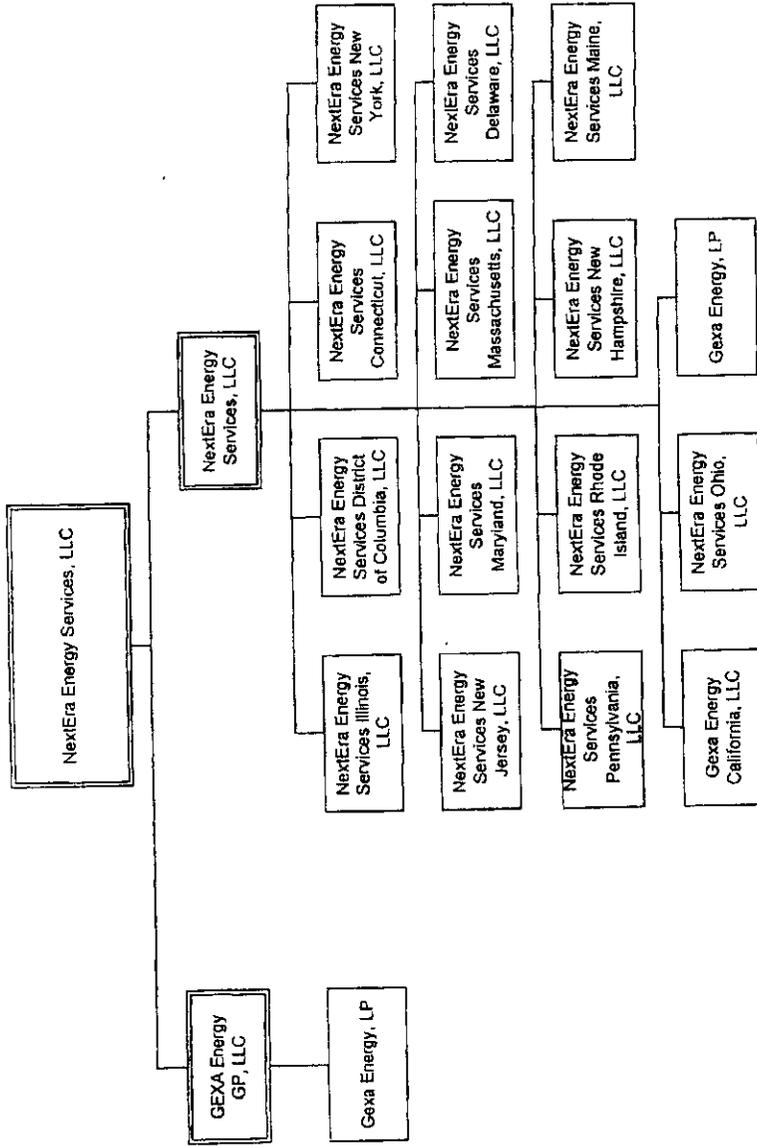
LP = Limited Partnership GP = General Partnership JV = Joint Venture LLC = Limited Liability Company

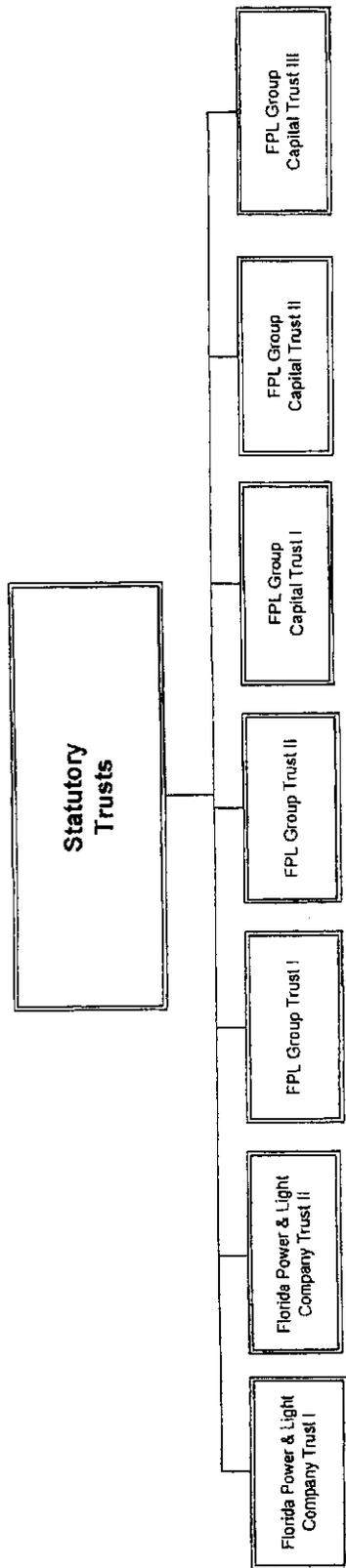






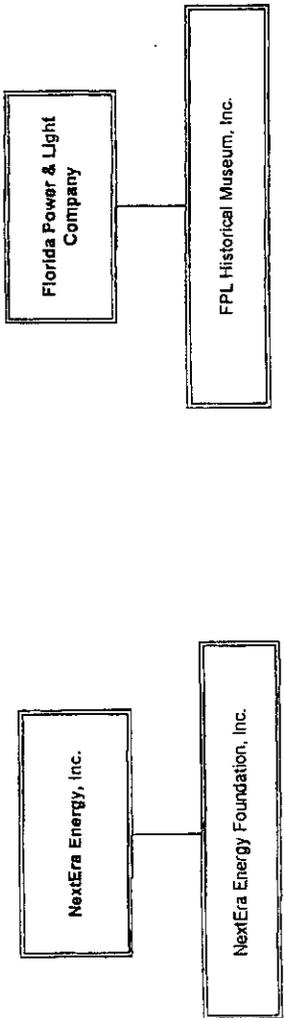
LP = Limited Partnership GP = General Partnership JV = Joint Venture LLC = Limited Liability Company

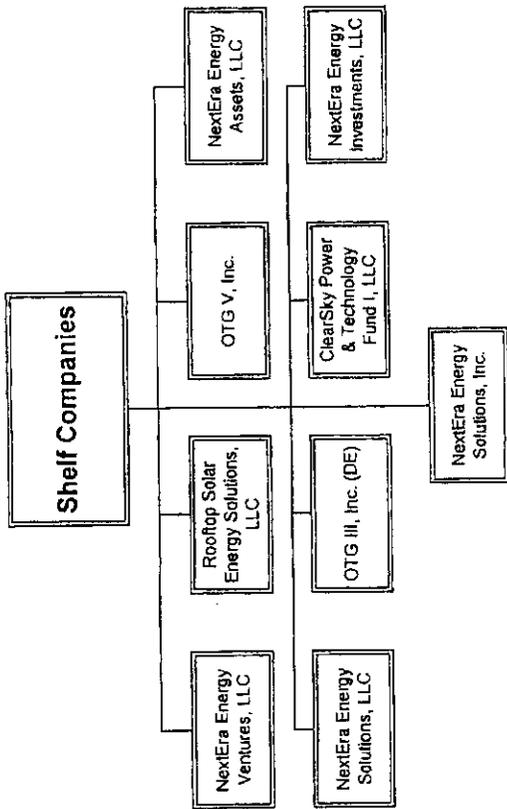




CONFIDENTIAL

NON-PROFIT
ORGANIZATIONS





ANALYSIS OF DIVERSIFICATION ACTIVITY
Changes in Corporate Structure

Florida Power & Light Company
For the Year Ended December 31, 2010

Provide any changes in corporate structure including partnerships, Minority interests and joint ventures, and an updated organizational chart		
Line No	Effective Date (a)	Description of Change (b)
	1/14/2010	Peace Garden Wind Holdings, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	1/14/2010	Peace Garden Wind Funding, LLC, a Delaware limited liability company, formed as a subsidiary of Peace Garden Wind Holdings, LLC
	1/14/2010	Peace Garden Wind, LLC, a Delaware limited liability company, formed as a subsidiary of Peace Garden Wind Funding, LLC
	1/14/2010	Central States Wind Holdings, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	1/14/2010	Central States Wind, LLC, a Delaware limited liability company, formed as a subsidiary of Central States Wind Holdings, LLC
	1/14/2010	Mountain Prairie Wind Holdings, LLC, a Delaware limited liability company, formed as a subsidiary of Northern Colorado Wind Holdings, LLC
	1/14/2010	Mountain Prairie Wind LLC, a Delaware limited liability company, formed as a subsidiary of Mountain Prairie Wind Holdings, LLC
	1/15/2010	Iowa Clean Energy Express, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	2/8/2010	ESI Energy, LLC assigned its ownership interest in Butler Ridge Wind Energy Center, LLC to Central States Wind, LLC
	2/8/2010	ESI Energy, LLC assigned its ownership interest in High Majestic Wind Energy Center, LLC to Central States Wind, LLC
	2/8/2010	ESI Energy, LLC assigned its ownership interest in Wessington Wind Energy Center, LLC to Central States Wind, LLC
	2/8/2010	ESI Energy, LLC assigned its ownership interest in Ashtabula Wind II, LLC to Peace Garden Wind, LLC
	2/8/2010	ESI Energy, LLC assigned its ownership interest in Wilton Wind II, LLC to Peace Garden Wind, LLC
	2/15/2010	North Sky River Energy, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	2/25/2010	NextEra FiberNet, LLC, a Delaware limited liability company, formed as a shelf company
	2/25/2010	NextEra Retail Energy, LLC, a Delaware limited liability company, formed as a shelf company
	2/26/2010	Crowned Ridge Wind II, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	2/26/2010	Day County Wind II, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	2/26/2010	Hyde County Wind, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	2/26/2010	NextEra Energy Group Foundation, Inc., a Florida shelf company, changed its name to NextEra Energy Foundation, Inc.
	2/26/2010	NextEra Energy Group, Inc., a Florida shelf company, changed its name to OTG VI, Inc.
	2/26/2010	NextEra Energy Group, Inc., a Delaware shelf company, changed its name to OTG V, Inc.
	2/26/2010	NextEra Energy, LLC, a Florida shelf company, changed its name to NextEra, LLC
	2/26/2010	NextEra Energy, LLC, a Delaware shelf company, changed its name to NextEra, LLC
	2/26/2010	NextEra Group Capital, Inc., a Florida shelf company, changed its name to NextEra Energy Capital, Inc.

ANALYSIS OF DIVERSIFICATION ACTIVITY
Changes in Corporate Structure

Florida Power & Light Company
For the Year Ended December 31, 2010

Provide any changes in corporate structure including partnerships, Minority interests and joint ventures, and an updated organizational chart		
Line No	Effective Date (a)	Description of Change (b)
	2/26/2010	NextEra Group Capital, Inc., a Delaware shelf company, changed its name to NextEra Energy Capital, Inc.
	2/26/2010	NextEra Group Capital, LLC, a Florida shelf company, changed its name to NextEra Energy Capital, LLC
	2/26/2010	NextEra Group Capital, LLC, a Delaware shelf company, changed its name to NextEra Energy Capital, LLC
	2/26/2010	NextEra Group, Inc., a Florida shelf company, changed its name to OTG IV, Inc.
	2/26/2010	NextEra Group, Inc., a Delaware shelf company, changed its name to OTG III, Inc.
	3/1/2010	FPL Energy Oliver Wind, LLC, a Delaware limited liability company, changed its name to DABM, LLC
	3/2/2010	NextEra Corp., a Delaware shelf company, changed its name to NextEra, Inc.
	3/2/2010	NextEra Corp., a Florida shelf company, changed its name to NextEra, Inc.
	3/9/2010	NextEra Energy Services, LLC, a Delaware limited liability company, formed as a shelf company
	3/9/2010	Osborn Wind Energy, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	3/16/2010	NextEra Retail Energy, LLC, a Delaware shelf company, changed its name to NextEra Energy Solutions, LLC
	4/9/2010	Paradise Solar Urban Renewal, L.L.C., a New Jersey limited liability company, formed as a subsidiary of ESI Energy, LLC
	4/12/2010	ClearSky Power & Technology Investments LLC, a Delaware limited liability company, formed as a shelf company
	4/13/2010	Black Horse Wind, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	4/13/2010	Minco Wind, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	4/30/2010	Gexa Energy L.L.C., a New York limited liability company, changed its name to Gexa Energy New York, LLC
	4/30/2010	ESI Northeast Energy LP, Inc., a Florida corporation, converted to ESI Northeast Energy LP, LLC, a Delaware limited liability company
	5/3/2010	NextEra Energy Capital Holdings, LLC, a Florida shelf company, was dissolved
	5/3/2010	NextEra Energy Capital, LLC, a Florida shelf company, was dissolved
	5/3/2010	NextEra Energy Capital, Inc., a Florida shelf company, was dissolved
	5/3/2010	OTG IV, Inc., a Florida shelf company, was dissolved
	5/3/2010	OTG VI, Inc., a Florida shelf company, was dissolved
	5/5/2010	NextEra, LLC, a Florida shelf company, was dissolved
	5/10/2010	Paradise Solar, LLC, a Delaware limited liability company, changed its name to Mantua Creek Solar, LLC
	5/10/2010	FPL Group Resources, LLC assigned all of its ownership interest in Lone Star Transmission, LLC to U.S. Transmission Holdings, LLC
	5/13/2010	WSGP Gas Producing, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	5/21/2010	NextEra, Inc., a Florida shelf company, was dissolved
	5/21/2010	NextEra Energy, Inc., a Florida shelf company, was dissolved
	5/21/2010	FPL Group, Inc., a Florida corporation, changed its name to NextEra Energy, Inc.

ANALYSIS OF DIVERSIFICATION ACTIVITY
Changes in Corporate Structure

Florida Power & Light Company
For the Year Ended December 31, 2010

Provide any changes in corporate structure including partnerships, minority interests and joint ventures, and an updated organizational chart		
Line No	Effective Date (a)	Description of Change (b)
	5/27/2010	NextEra Texas Acquisition Holdco, LLC, a Delaware limited liability company, formed as a subsidiary of NextEra Energy Power Marketing, LLC
	5/27/2010	NextEra Texas Acquisition GP, LLC, a Delaware limited liability company, formed as a subsidiary of NextEra Texas Acquisition Holdco, LLC
	5/27/2010	NextEra Texas Acquisition LP, LLC, a Delaware limited liability company, formed as a subsidiary of NextEra Texas Acquisition Holdco, LLC
	5/27/2010	FPLE Solar Assets, S.L. changed its name to NextEra Energy Espana, SL
	5/28/2010	NextEra Energy, Inc., a Delaware shelf company, was dissolved
	5/28/2010	NextEra, Inc., a Delaware shelf company, was dissolved
	5/28/2010	NextEra, LLC, a Delaware shelf company, was dissolved
	6/4/2010	Elk City II Wind, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	6/4/2010	ClearSky Power & Technology Partners, LLC, a Delaware limited liability company, formed as a shelf company
	6/9/2010	NextEra Texas Acquisition GP, LLC, a Delaware limited liability company, changed its name to NextEra Retail of Texas GP, LLC
	6/11/2010	Red Mesa Wind Investments, LLC, a Delaware limited liability company, formed as a subsidiary of Red Mesa Wind, LLC
	6/14/2010	NextEra Texas Acquisition LP, LLC and NextEra Retail of Texas GP, LLC acquired NextEra Retail of Texas LP (f/k/a Integrys Energy Services of Texas, L.P.)
	6/24/2010	Baldwin Wind Holdings, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	6/24/2010	Ensign Wind, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	6/25/2010	ESI Energy, LLC assigned all of its ownership interest in Baldwin Wind, LLC to Baldwin Wind Holdings, LLC
	6/30/2010	Acme POSDEF Partners, L.P. and CH Posdef, LLC assigned each of their respective ownership interests in POSDEF Power Company, L.P. to DTE Woodland, LLC, an unrelated third party entity
	6/30/2010	ESI California Holdings, Inc. sold all of its ownership interest in CH Posdef LP, LLC to DTE Woodland, LLC, an unrelated third party entity
	6/30/2010	ESI California Holdings, Inc. sold all of its ownership interest in CH Posdef, LLC to DTE Woodland, LLC, an unrelated third party entity
	7/7/2010	Perrin Ranch Wind, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	7/16/2010	NextEra Energy Honey Creek Wind, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	7/16/2010	Sonoran Solar Energy I, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	7/16/2010	Sonoran Solar Energy II, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	7/16/2010	Sonoran Solar Energy III, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	7/18/2010	NextEra Energy Services, LLC, a Delaware shelf company, was dissolved

ANALYSIS OF DIVERSIFICATION ACTIVITY
Changes in Corporate Structure

Florida Power & Light Company
For the Year Ended December 31, 2010

Provide any changes in corporate structure including partnerships, minority interests and joint ventures, and an updated organizational chart		
Line No	Effective Date (a)	Description of Change (b)
	7/19/2010	FPL Group Resources LNG Holdings, LLC, a Delaware limited liability company, was dissolved
	7/23/2010	Rooftop Solar Energy Solutions, LLC, a Delaware limited liability company, formed as a subsidiary of FPL Group Capital Inc
	7/26/2010	NextEra Energy Foundation, Inc., a Florida shelf company, was dissolved
	7/26/2010	FPL Group Foundation, Inc., a Florida non-profit corporation, changed its name to NextEra Energy Foundation, Inc.
	7/27/2010	NextEra Energy Gas Producing Wyoming, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	7/29/2010	Wild Prairie Wind Holdings, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	7/29/2010	Wild Prairie Wind, LLC, a Delaware limited liability company, formed as a subsidiary of Wild Prairie Wind Holdings, LLC
	8/10/2010	BSGA Gas Producing, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	8/10/2010	NextEra FiberNet, LLC, a Delaware shelf company, changed its name to NextEra Energy Investments, LLC
	8/10/2010	NextEra FiberNet, LLC, a Delaware limited liability company, formed as a subsidiary of FPL Group Capital Inc
	8/12/2010	Sunnee Solar, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	8/12/2010	Southwest Solar Holdings, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	8/12/2010	NextEra Energy Services Maine, LLC, a Delaware limited liability company, formed as a subsidiary of GEXA Energy Holdings, LLC
	8/12/2010	Gexa Energy California, LLC, a Delaware limited liability company, formed as a subsidiary of GEXA Holdings, LLC
	8/18/2010	Mountain View Solar, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	8/19/2010	HWFII, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	8/19/2010	Heartland Wind Funding, LLC, a Delaware limited liability company, formed as a subsidiary of HWF II, LLC
	8/19/2010	NextEra Energy Gas Producer Holdings, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	8/24/2010	NextEra Wind Energy Center, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	8/26/2010	ESI Energy, LLC assigned all of its ownership interest in Heartland Wind Holding, LLC to Heartland Wind Funding, LLC
	8/31/2010	Hatch Solar Energy Center I, LLC was acquired by Southwest Solar Holdings, LLC
	8/31/2010	ESI Energy, LLC assigned all of its ownership interest in Day County Wind, LLC to Wild Prairie Wind, LLC
	8/31/2010	ESI Energy, LLC assigned all of its ownership interest in Garden Wind, LLC to Wild Prairie Wind, LLC
	9/1/2010	Gexa Energy I, LLC, a Texas limited liability company, was dissolved

ANALYSIS OF DIVERSIFICATION ACTIVITY
Changes in Corporate Structure

Florida Power & Light Company
For the Year Ended December 31, 2010

Provide any changes in corporate structure including partnerships, Minority interests and joint ventures, and an updated organizational chart		
Line No	Effective Date (a)	Description of Change (b)
	9/1/2010	FRM Holdings, LLC, a Delaware limited liability company, changed its name to NextEra Energy Services Holdings, LLC
	9/1/2010	Gexa Energy Connecticut, LLC, a Delaware limited liability company, changed its name to NextEra Energy Services Connecticut, LLC
	9/1/2010	Gexa Energy Delaware, LLC, a Delaware limited liability company, changed its name to NextEra Energy Services Delaware, LLC
	9/1/2010	Gexa Energy District of Columbia, LLC, a Delaware limited liability company, changed its name to NextEra Energy Services District of Columbia, LLC
	9/1/2010	GEXA Energy Holdings, LLC, a Delaware limited liability company, changed its name to NextEra Energy Services, LLC
	9/1/2010	Gexa Energy Illinois, LLC, a Delaware limited liability company, changed its name to NextEra Energy Services Illinois, LLC
	9/1/2010	Gexa Energy L.L.C., a Massachusetts limited liability company, changed its name to NextEra Energy Services Massachusetts, LLC
	9/1/2010	Gexa Energy Maryland, LLC, a Delaware limited liability company, changed its name to NextEra Energy Services Maryland, LLC
	9/1/2010	Gexa Energy New Hampshire, LLC, a Delaware limited liability company, changed its name to NextEra Energy Services New Hampshire, LLC
	9/1/2010	Gexa Energy New Jersey, LLC, a Delaware limited liability company, changed its name to NextEra Energy Services New Jersey, LLC
	9/1/2010	Gexa Energy New York, LLC, a New York limited liability company, changed its name to NextEra Energy Services New York, LLC
	9/1/2010	Gexa Energy Ohio, LLC, a Delaware limited liability company, changed its name to NextEra Energy Services Ohio, LLC
	9/1/2010	Gexa Energy Pennsylvania, LLC, a Delaware limited liability company, changed its name to NextEra Energy Services Pennsylvania, LLC
	9/1/2010	Gexa Energy Rhode Island, LLC, a Delaware limited liability company, changed its name to NextEra Energy Services Rhode Island, LLC
	9/2/2010	ClearSky Power & Technology Investments LLC, a Delaware shelf company, changed its name to Clear Sky Power & Technology Fund I, LLC
	9/6/2010	NextEra Energy Espana Operating Services, S.L., a Spanish company, formed as a subsidiary of NextEra Energy Espana, S.L.
	9/8/2010	ClearSky Power & Technology Partners LLC, a Delaware shelf company, was dissolved
	9/10/2010	Genesis Solar Holdings, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	9/14/2010	ESI Energy, LLC assigned all of its ownership interest in NextEra Energy Gas Producing, LLC to NextEra Energy Gas Producer Holdings, LLC
	9/14/2010	ESI Energy, LLC assigned all of its ownership interest in NextEra Energy Gas Producing Wyoming, LLC to NextEra Energy Gas Producer Holdings, LLC
	9/14/2010	ESI Energy, LLC assigned all of its ownership interest in NextEra Energy Producer Services, LLC to NextEra Energy Gas Producer Holdings, LLC
	9/14/2010	ESI Energy, LLC assigned all of its ownership interest in WSGP Gas Producing, LLC to NextEra Energy Gas Producer Holdings, LLC
	9/17/2010	Illinois Leasing, LLC, a Delaware limited liability company, changed its name to Lee North, LLC

ANALYSIS OF DIVERSIFICATION ACTIVITY
Changes in Corporate Structure

Florida Power & Light Company
For the Year Ended December 31, 2010

Provide any changes in corporate structure including partnerships, minority interests and joint ventures, and an updated organizational chart		
Line No	Effective Date (a)	Description of Change (b)
	10/4/2010	NextEra Energy Solutions, Inc., a Florida limited liability company, formed as a shelf company
	10/15/2010	NextEra Energy Montezuma II Wind, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	10/15/2010	Tuscola Bay Wind, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	10/15/2010	St. Clair Holding, Inc., an Ontario, Canada company, formed as a subsidiary of NextEra Energy Canada, ULC
	10/15/2010	Sombra Solar, Inc., an Ontario, Canada company, formed as a subsidiary of St. Clair Holding, Inc.
	10/15/2010	Moore Solar, Inc., an Ontario Canada company, formed as a subsidiary of St. Clair Holding, Inc.
	10/21/2010	NextEra Energy Capital, Inc., a Delaware shelf company, was dissolved
	10/21/2010	NextEra Energy Capital Holdings, Inc., a Delaware shelf company, was dissolved
	10/21/2010	NextEra Energy Capital Holdings, LLC, a Delaware shelf company, changed its name to NextEra Energy Assets, LLC
	10/26/2010	Elk City II Wind Holdings, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	10/26/2010	Minco Wind Holdings, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	10/26/2010	ESI Energy, LLC assigned all of its ownership interest in Minco Wind, LLC to Minco Wind Holdings, LLC
	10/26/2010	ESI Energy, LLC assigned all of its ownership interest in Elk City II Wind, LLC to Elk City II Wind Holdings, LLC
	11/12/2010	White Oak Energy Holdings, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	11/17/2010	Tower Associates Canada, Inc., a New Brunswick, Canada company, formed as a subsidiary of NextEra Energy Canada, ULC
	11/18/2010	Sonoran Solar Energy II, LLC, a Delaware limited liability company, changed its name to McCoy Solar, LLC
	11/18/2010	Sonoran Solar Energy III, LLC, a Delaware limited liability company, changed its name to Lucerne Solar, LLC
	12/1/2010	Keenan II Wind Energy Center, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	12/1/2010	NextEra Energy Capital Holdings, Inc., a Florida shelf company, was dissolved
	12/1/2010	FPL Group Capital Inc, a Florida corporation, changed its name to NextEra Energy Capital Holdings, Inc.
	12/7/2010	Mojave 3/4/5 LLC, a Delaware limited liability company, formed as a subsidiary of Mojave Holdings, LLC
	12/7/2010	Mount. Miller HoldCo, Inc., a New Brunswick, Canada company, formed as a subsidiary of NextEra Energy Canada, ULC
	12/7/2010	Mount Miller LP, Inc., a New Brunswick, Canada company, formed as a subsidiary of NextEra Energy Canada, ULC
	12/8/2010	Mojave Holdings, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC

ANALYSIS OF DIVERSIFICATION ACTIVITY
Changes in Corporate Structure

Florida Power & Light Company
For the Year Ended December 31, 2010

Provide any changes in corporate structure including partnerships, Minority interests and joint ventures, and an updated organizational chart		
Line No	Effective Date (a)	Description of Change (b)
	12/14/2010	NextEra Energy Capital, LLC, a Delaware shelf company, changed its name to NextEra Energy Ventures, LLC
	12/15/2010	Mount Miller GP, Inc., a Canadian company, was acquired by Mount Miller Hold Co., Inc.
	12/15/2010	Mount Miller Wind Energy, LP, a Canadian company, was acquired by Mount Miller LP, Inc. (Limited Partner) and Mount Miller GP, Inc. (General Partner)
	12/15/2010	423766 Canada Inc., a Canadian company, was acquired by Mount Miller HoldCo., Inc.
	12/16/2010	Wise Wells Holdings, LLC, a Delaware limited liability company, formed as a subsidiary of NextEra Energy Gas Producer Holdings, LLC
	12/17/2010	La Salle County Gas Producing, LLC, a Delaware limited liability company, formed as a subsidiary of NextEra Energy Gas Producer Holdings, LLC
	12/21/2010	Mountain View Solar Center, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	12/31/2010	Alpha Mariah LLC was acquired by Mojave 3/4/5 LLC
	12/31/2010	Beta Mariah LLC was acquired by Mojave 3/4/5 LLC
	12/31/2010	Gamma Mariah LLC was acquired by Mojave 3/4/5 LLC
	12/31/2010	Eurus Mojave 4 LLC was acquired by Mojave 3/4/5 LLC
	12/31/2010	Eurus Mojave 3/5 LLC was acquired by Mojave 3/4/5 LLC
	12/31/2010	ESI Energy, LLC assigned all of its ownership interest in Beta Mariah (Prime), Inc. to Mojave 3/4/5 LLC
	12/31/2010	ESI Energy, LLC assigned all of its ownership interest in Alpha Mariah (Prime), Inc. to Mojave 3/4/5 LLC

ANALYSIS OF DIVERSIFICATION ACTIVITY
Changes in Corporate Structure

Florida Power & Light Company
For the Year Ended December 31, 2011

Provide any changes in corporate structure including partnerships, Minority interests and joint ventures, and an updated organizational chart		
Line No	Effective Date (a)	Description of Change (b)
	12/20/2010	CG Wind Company, LLC assigned its interest in Windpower Partners 1993, L.P. to FPL Energy WPP 93 GP, LLC
	1/11/2011	NextEra Energy Equipment Leasing, LLC, a Delaware limited liability company, was formed as a subsidiary of NextEra Energy Capital Holdings, Inc.
	1/18/2011	NextEra Energy Bosque Holdings, LLC, a Delaware limited liability company, was formed as a subsidiary of ESI Energy, LLC
	1/18/2011	Watonga Wind, LLC, a Delaware limited liability company, was formed as a subsidiary of ESI Energy, LLC
	1/18/2011	Selling Wind, LLC, a Delaware limited liability company, was formed as a subsidiary of ESI Energy, LLC
	1/21/2011	Desert Center Blythe, LLC, a Delaware limited liability company, was formed as a subsidiary of Genesis Solar, LLC
	1/24/2011	Mountain View Solar Center, LLC, a Delaware limited liability company, was dissolved
	1/27/2011	Desert Center Blythe, LLC, a Delaware limited liability company, changed its name to NextEra Desert Center Blythe, LLC
	3/2/2011	Kerwood Wind, Inc., a New Brunswick, Canada corporation, was formed as a subsidiary of NextEra Energy Canada, ULC
	3/3/2011	Penta Wind Holdings, LLC, a Delaware limited liability company, was formed as a subsidiary of ESI Energy, LLC
	3/3/2011	Penta Wind, LLC, a Delaware limited liability company, was formed as a subsidiary of Penta Wind Holdings, LLC
	3/9/2011	ESI Energy, LLC assigned its interest in Central States Wind Holdings, LLC to Penta Wind, LLC
	3/9/2011	ESI Energy, LLC assigned its interest in Heartland Wind Holding II, LLC to Penta Wind, LLC
	3/11/2011	Minco Wind II, LLC, a Delaware limited liability company, was formed as a subsidiary of Minco Wind Holdings II, LLC
	3/15/2011	Limon Wind, LLC, a Delaware limited liability company, was formed as a subsidiary of ESI Energy, LLC
	3/15/2011	Elk City Wind Holdings III, LLC, a Delaware limited liability company, was formed as a subsidiary of ESI Energy, LLC
	3/15/2011	Elk City Wind III, LLC, a Delaware limited liability company, was formed as a subsidiary of Elk City Wind Holdings III, LLC
	3/16/2011	Minco Wind Holdings II, LLC, a Delaware limited liability company, was formed as a subsidiary of ESI Energy, LLC
	3/17/2011	NextEra Energy Bluff Point, LLC, a Delaware limited liability company, was formed as a subsidiary of ESI Energy, LLC
	4/1/2011	Yavapai Wind, LLC, a Delaware limited liability company, was formed as a subsidiary of ESI Energy, LLC
	4/1/2011	Penta Wind Holdings, LLC, a Delaware limited liability company, changed its name to Penta Wind Holding, LLC
	4/12/2011	Chenango Gas Producing, LLC, a Delaware limited liability company, was formed as a subsidiary of NextEra Energy Gas Producer Holdings, LLC
	4/12/2011	NextEra Energy Assets, LLC, a Delaware limited liability company, previously formed as a shelf company, was dissolved

ANALYSIS OF DIVERSIFICATION ACTIVITY
Changes in Corporate Structure

Florida Power & Light Company
For the Year Ended December 31, 2011

Provide any changes in corporate structure including partnerships, Minority interests and joint ventures, and an updated organizational chart		
Line No	Effective Date (a)	Description of Change (b)
	4/12/2011	NextEra Energy Investments, LLC, a Delaware limited liability company previously formed as a shelf company, was dissolved
	4/12/2011	NextEra Energy Ventures, LLC, a Delaware limited liability company previously formed as a shelf company, was dissolved
	4/13/2011	Blue Sky Wind Energy Center, LLC, a Delaware limited liability company, was formed as a subsidiary of ESI Energy, LLC
	4/15/2011	OTG III, Inc., a Delaware limited liability company previously formed as a shelf company, was dissolved
	4/15/2011	OTG.V, Inc., a Delaware limited liability company previously formed as a shelf company, was dissolved
	4/19/2011	Upper Canada Transmission, Inc., a New Brunswick, Canada corporation, formed as a subsidiary of NextEra Energy Canada, ULC
	4/29/2011	White Oak Energy Backleverage Holding, LLC, a Delaware limited liability company, was formed as a subsidiary of ESI Energy, LLC
	4/29/2011	White Oak Energy Funding Holding, LLC, a Delaware limited liability company, was formed as a subsidiary of White Oak Energy Backleverage Holding, LLC
	4/29/2011	White Oak Energy Funding, LLC, a Delaware limited liability company, was formed as a subsidiary of White Oak Energy Funding Holding, LLC
	4/29/2011	White Oak B Company, a Delaware limited liability company, was formed as a subsidiary of White Oak Energy Funding Holding, LLC
	5/3/2011	Golden Hills Wind, LLC, a Delaware limited liability company, was formed as a subsidiary of ESI Energy, LLC
	5/5/2011	Energy Storage Holdings, LLC, a Delaware limited liability company, was formed as a subsidiary of ESI Energy, LLC
	5/9/2011	ESI Energy, LLC assigned its interest in White Oak Energy Holdings, LLC to White Oak Energy Funding, LLC
	5/11/2011	East Durham Wind, Inc., a New Brunswick, Canada corporation, formed as a subsidiary of NextEra Energy Canada, ULC
	5/11/2011	Goshen Wind, Inc., a New Brunswick, Canada corporation, formed as a subsidiary of NextEra Energy Canada, ULC
	5/11/2011	Jericho Wind, Inc., a New Brunswick, Canada corporation, formed as a subsidiary of NextEra Energy Canada, ULC
	5/11/2011	Varna Wind, Inc., a New Brunswick, Canada corporation, formed as a subsidiary of NextEra Energy Canada, ULC
	5/24/2011	Aledo Gas Producing, LLC, a Delaware limited liability company, formed as a subsidiary of NextEra Energy Gas Producing Holdings, LLC
	5/27/2011	ESI Tehachapi Acquisitions, Inc. acquired all of the interests in WindCo, LLC from outside third parties
	6/1/2011	Wilton Wind IV, LLC, a Delaware limited liability company, was formed as a subsidiary of ESI Energy, LLC
	6/2/2011	Lucerne Valley Solar Holdings, LLC, a Delaware limited liability company, was formed as a subsidiary of ESI Energy, LLC
	6/7/2011	North Sky River Land Holdings, LLC, a Delaware limited liability company, was formed as a subsidiary of ESI Energy, LLC

ANALYSIS OF DIVERSIFICATION ACTIVITY
Changes in Corporate Structure

Florida Power & Light Company
For the Year Ended December 31, 2011

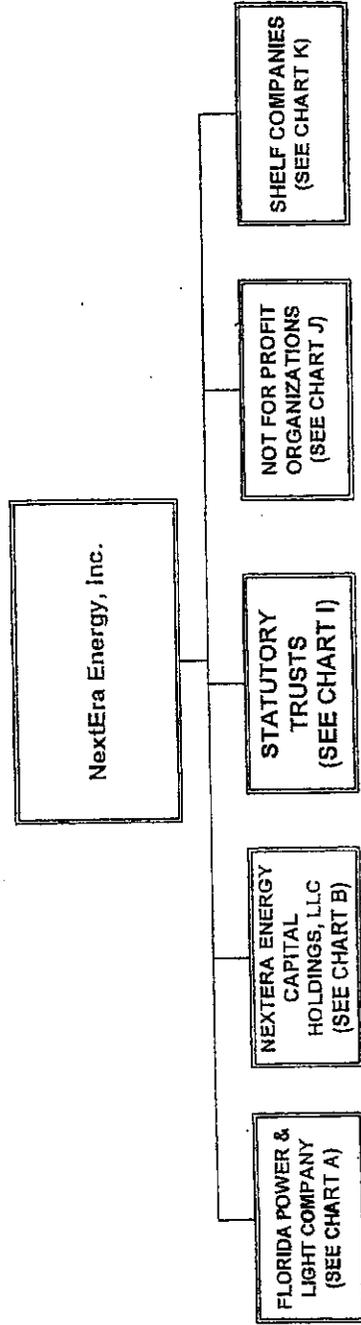
Provide any changes in corporate structure including partnerships, Minority interests and joint ventures, and an updated organizational chart		
Line No	Effective Date (a)	Description of Change (b)
	6/10/2011	White Oak Energy Holdings, LLC, a Delaware limited liability company, acquired all of the ownership interests in White Oak Energy, LLC from an outside third party
	6/17/2011	Ashtabula Wind II Holdings, LLC, a Delaware limited liability company, changed its name to PWEC, LLC
	7/20/2011	Lone Star Transmission Holdings, LLC, a Delaware limited liability company, formed as a subsidiary of U.S. Transmission Holdings, LLC
	7/20/2011	Lone Star Transmission Capital, LLC, a Delaware limited liability company, formed as a subsidiary of Lone Star Transmission Holdings, LLC
	7/26/2011	Buffalo Ridge Wind Energy, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	7/26/2011	NextEra Desert Sunlight Holdings, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	8/10/2011	Limon Wind II, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	8/10/2011	NEPM II, LLC, a Delaware limited liability company, formed as a subsidiary of NextEra Energy Resources, LLC
	8/25/2011	ESI Cherokee Holdings, Inc., a Florida corporation, assigned all of its ownership interests in Cherokee County Cogeneration Corp. to ESI Energy, LLC
	8/29/2011	Minco Wind III, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	8/29/2011	Cedar Bluff Wind, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	9/2/2011	NextEra Energy Canada Equipment, Inc., a New Brunswick, Canada company, formed as a subsidiary of NextEra Energy Canada, ULC
	9/8/2011	Desert Sunlight Investment Holdings, LLC, a Delaware limited liability company, formed as a subsidiary of NextEra Desert Sunlight Holdings, LLC
	9/8/2011	ESI LP, LLC, a Delaware limited liability company, assigned all of its ownership interests in ESI BH Limited Partnership to ESI Energy, LLC
	9/8/2011	ESI LP, LLC, a Delaware limited liability company, assigned all of its ownership interests in ESI Montgomery County, LLC to ESI Energy, LLC
	9/8/2011	ESI LP, LLC, a Delaware limited liability company, assigned all of its ownership interests in ESI Sky River Limited Partnership, LLC to ESI Energy, LLC
	9/8/2011	ESI LP, LLC, a Delaware limited liability company, assigned all of its ownership interests in FPL Energy Sky River Wind, LLC to ESI Energy, LLC
	9/8/2011	ESI LP, LLC, a Delaware limited liability company, assigned all of its ownership interests in FPL Energy VG Wind, LLC to ESI Energy, LLC
	9/8/2011	ESI LP, LLC, a Delaware limited liability company, assigned all of its ownership interests in ESI VG Limited Partnership to ESI Energy, LLC
	9/15/2011	NextEra Energy Solutions, LLC, a Delaware limited liability company, was dissolved
	9/15/2011	NextEra Energy Solutions, Inc., a Florida corporation, was dissolved
	9/16/2011	Capricorn Ridge Wind Funding, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	9/16/2011	Capricorn Ridge Wind Holdings, LLC, a Delaware limited liability company, formed as a subsidiary of Capricorn Ridge Wind Funding, LLC

ANALYSIS OF DIVERSIFICATION ACTIVITY
Changes in Corporate Structure

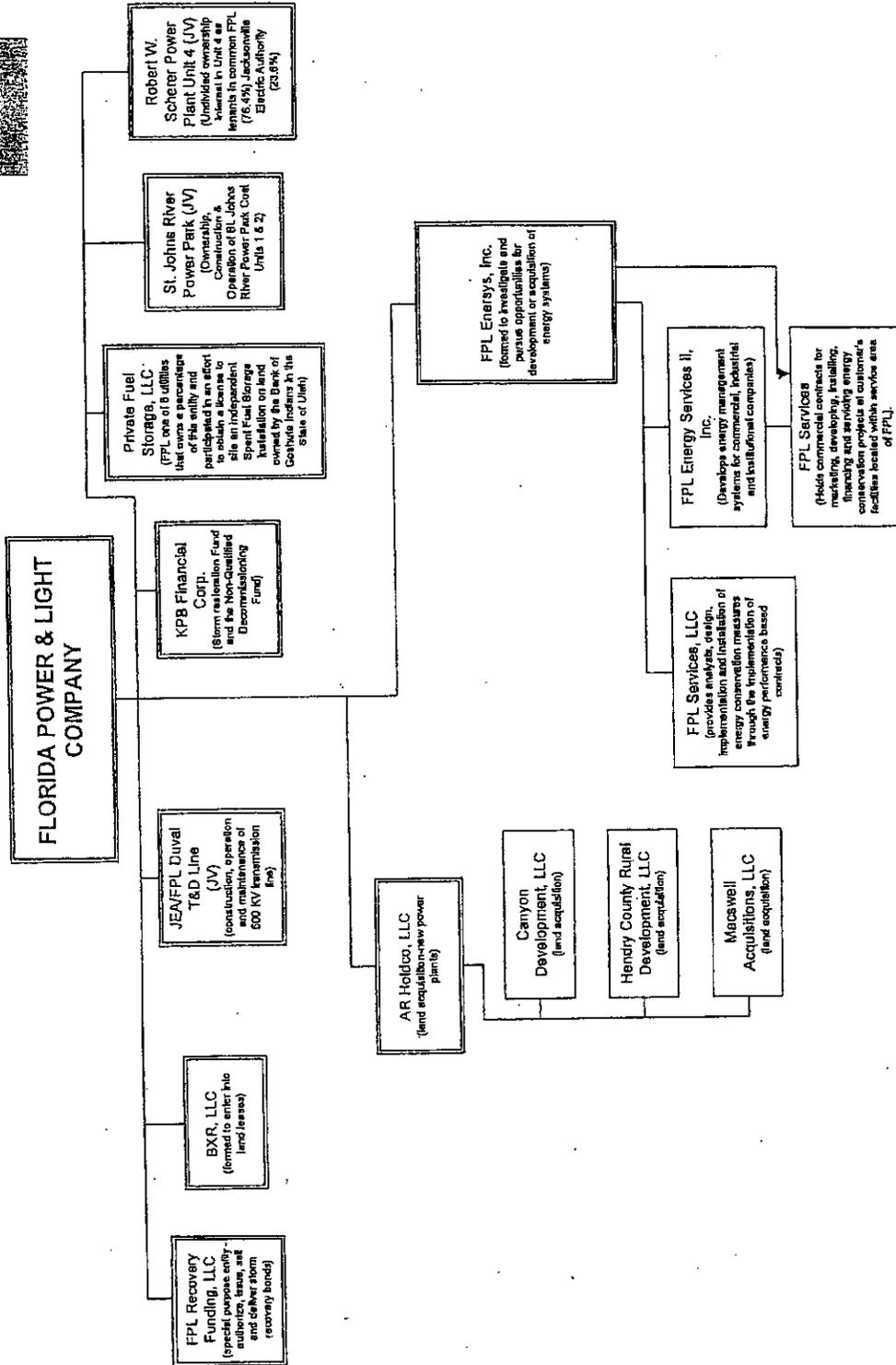
Florida Power & Light Company
For the Year Ended December 31, 2011

Provide any changes in corporate structure including partnerships, Minority Interests and joint ventures, and an updated organizational chart		
Line No	Effective Date (a)	Description of Change (b)
	9/20/2011	Minco Wind Interconnection Services, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	9/29/2011	Cherokee LIT, LLC, a Texas limited liability company, formed as a subsidiary of ESI Energy, LLC
	9/29/2011	NextEra Desert Sunlight Holdings, LLC, a Delaware limited liability company acquired all of the ownership interests in Desert Sunlight Holdings, LLC
	9/29/2011	Desert Sunlight Holdings, LLC, a Delaware limited liability company, acquired all of the ownership interests in Desert Sunlight 250, LLC
	9/29/2011	Desert Sunlight Holdings, LLC, a Delaware limited liability company, acquired all of the ownership interests in Desert Sunlight 300, LLC
	9/30/2011	ESI Energy, LLC, a Delaware limited liability company, assigned all of its ownership interest in Capricorn Ridge Wind, LLC to Capricorn Ridge Wind Funding, LLC
	9/30/2011	ESI Energy, LLC, a Delaware limited liability company, assigned all of its ownership interest in Capricorn Ridge Wind II, LLC to Capricorn Ridge Wind Funding, LLC
	10/17/2011	FPL Group Resources, LLC, a Florida limited liability company, changed its name to NextEra Energy Infrastructure, LLC
	10/19/2011	Blackwell Wind, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	10/24/2011	U.S. Transmission Holdings, LLC, a Delaware limited liability company, assigned all of its interest in Lone Star Transmission, LLC to Lone Star Transmission Capital, LLC
	10/26/2011	Carson Wind, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	10/26/2011	Carson Wind Interconnection Services, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	10/31/2011	U. S. Transmission Holdings, LLC, a Delaware limited liability company, changed its name to NextEra Energy Transmission, LLC
	11/1/2011	Carson Wind Interconnection Services, LLC, a Delaware limited liability company, changed its name to High Majestic Interconnection Services, LLC
	11/1/2011	Carson Wind, LLC, a Delaware limited liability company, changed its name to High Majestic Wind II, LLC
	11/1/2011	Minco Wind Holdings, LLC, a Delaware limited liability company, changed its name to Redwood Trails Wind, LLC
	11/1/2011	Minco Wind Holdings II, LLC, a Delaware limited liability company, changed its name to Redwood Trails Wind Holdings, LLC
	11/2/2011	Golden Winds Funding, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	11/2/2011	Golden Winds Holdings, LLC, a Delaware limited liability company, formed as a subsidiary of Golden Winds Funding, LLC
	11/2/2011	Golden Winds, LLC, a Delaware limited liability company, formed as a subsidiary of Golden Winds Holdings, LLC
	11/2/2011	NextEra Energy O&M Services, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	11/4/2011	USG Properties Bakken 1, LLC, a Delaware limited liability company, formed as a subsidiary of NextEra Energy Gas Producer Holdings, LLC

NextEra Energy, Inc. Entity Organization Chart



954



454-2

CHART B

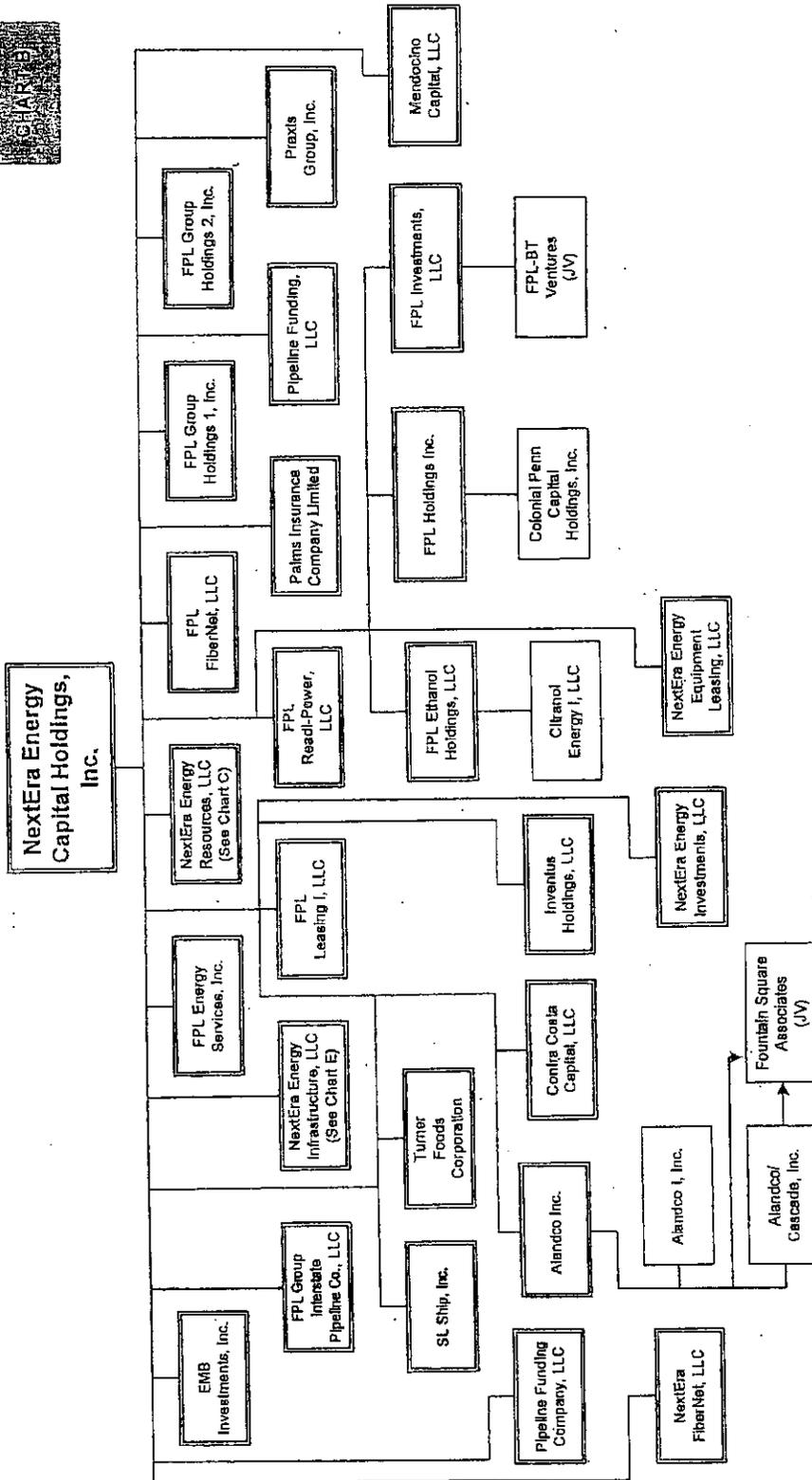
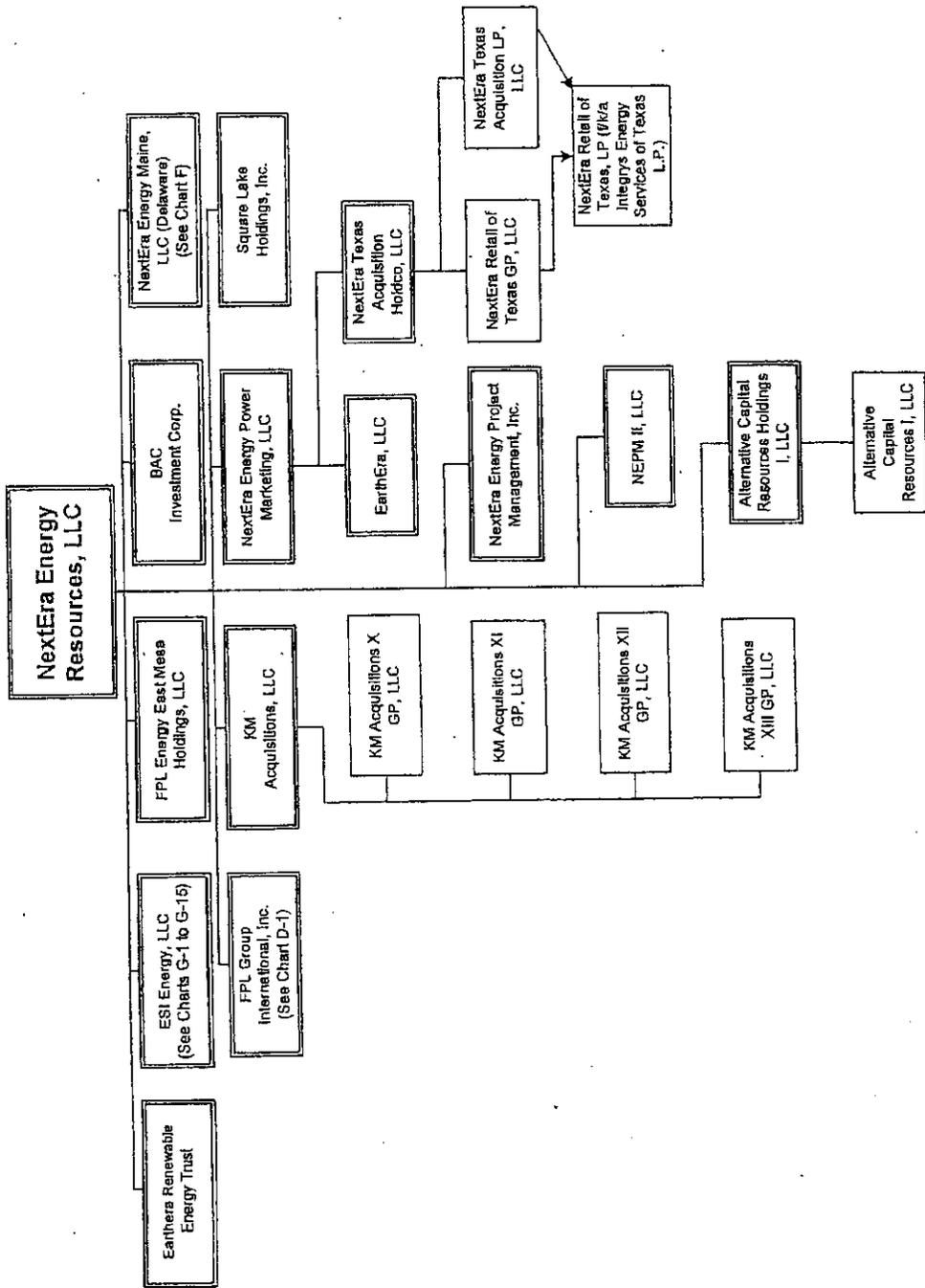


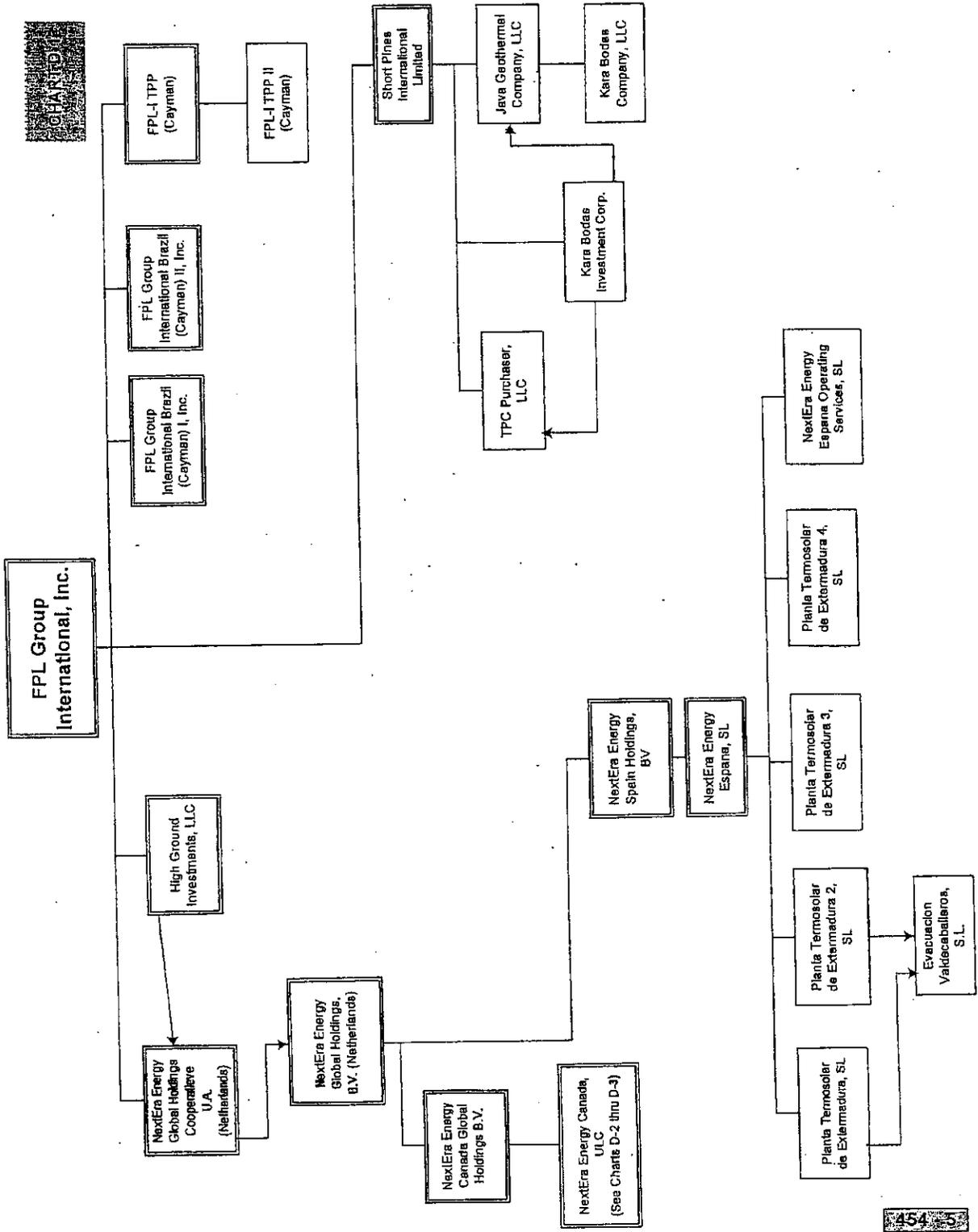
CHART B



454-4

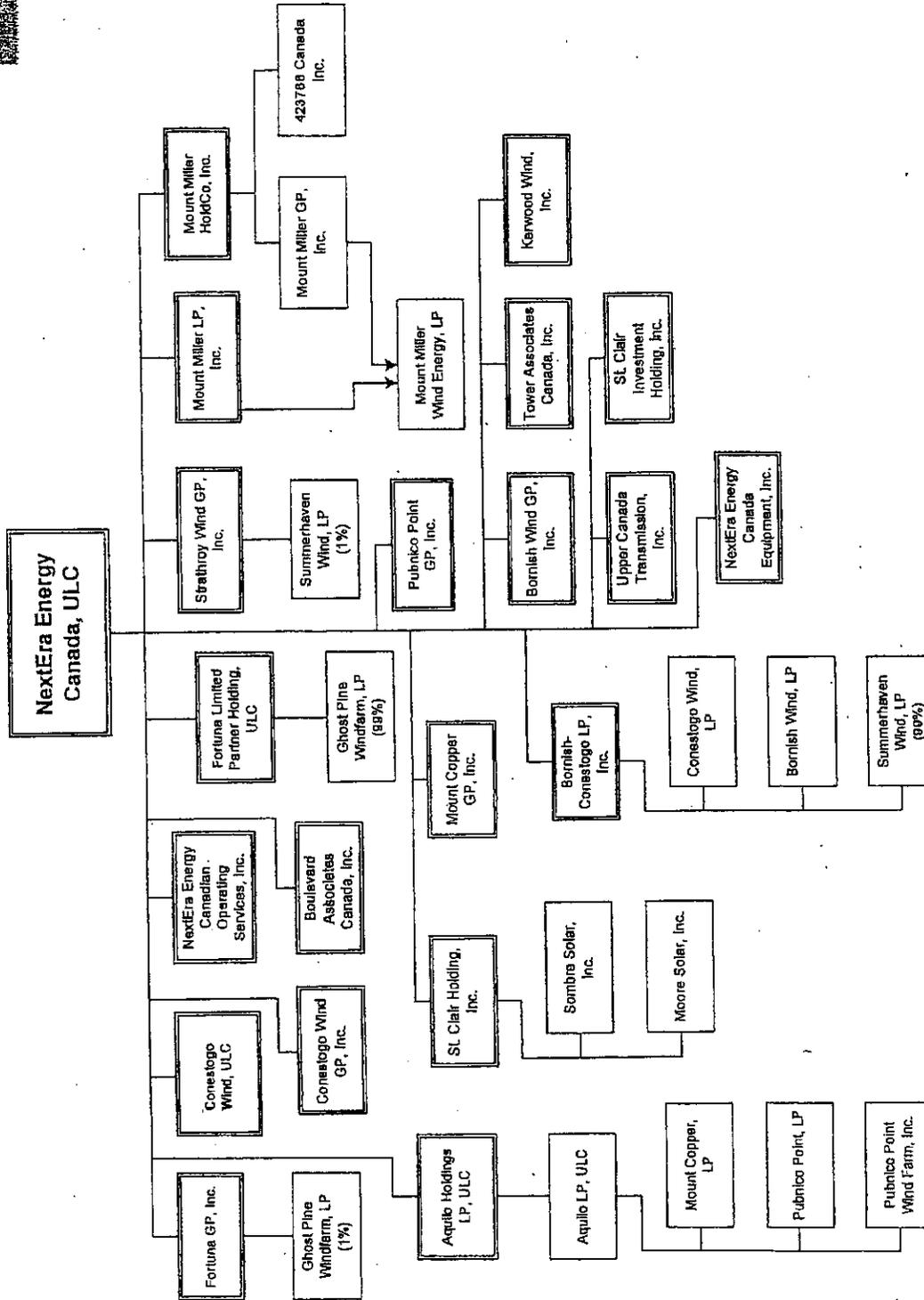
LP = Limited Partnership GP = General Partnership JV = Joint Venture LLC = Limited Liability Company

(Print Date_4/16/2012)



(Print Date_4/18/2012)

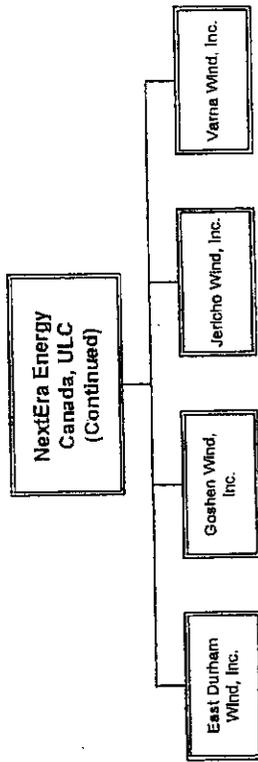
LP = Limited Partnership GP = General Partnership JV = Joint Venture LLC = Limited Liability Company



454 6A

LP = Limited Partnership GP = General Partnership JV = Joint Venture LLC = Limited Liability Company

(Print Date 4/16/2012)

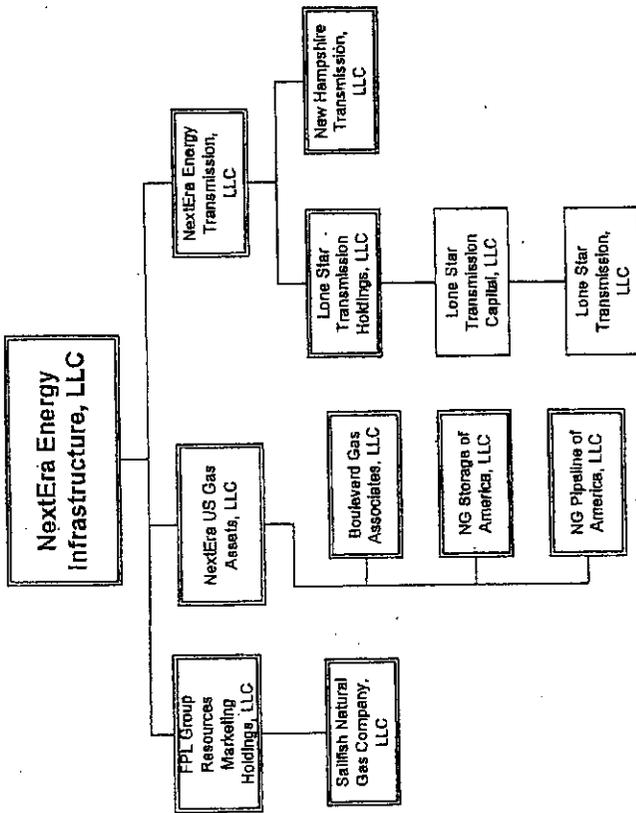


454 6B

LP = Limited Partnership GP = General Partnership JV = Joint Venture LLC = Limited Liability Company

(Print Date_4/16/2012)

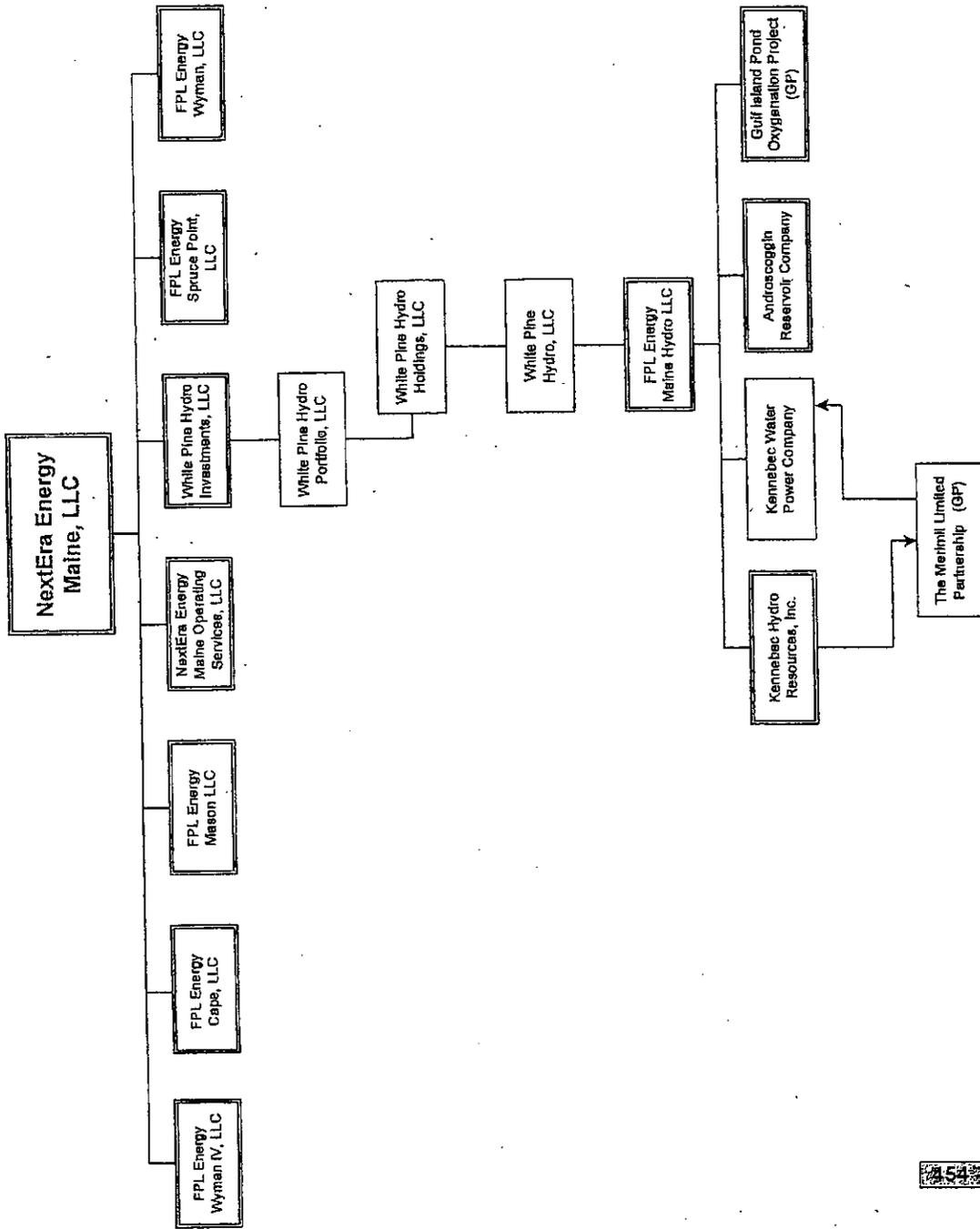
CONFIDENTIAL

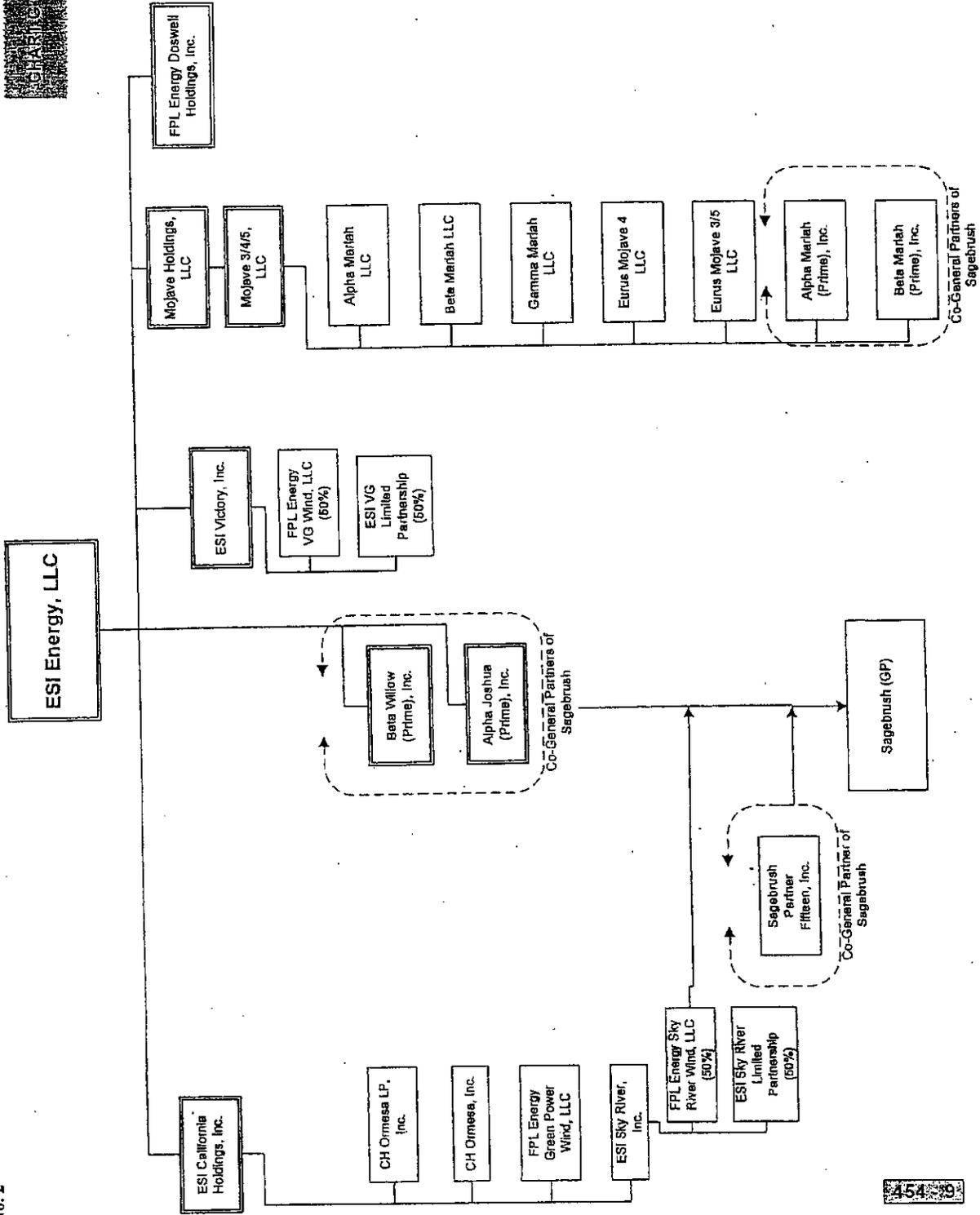


454

LP = Limited Partnership GP = General Partnership JV = Joint Venture LLC = Limited Liability Company

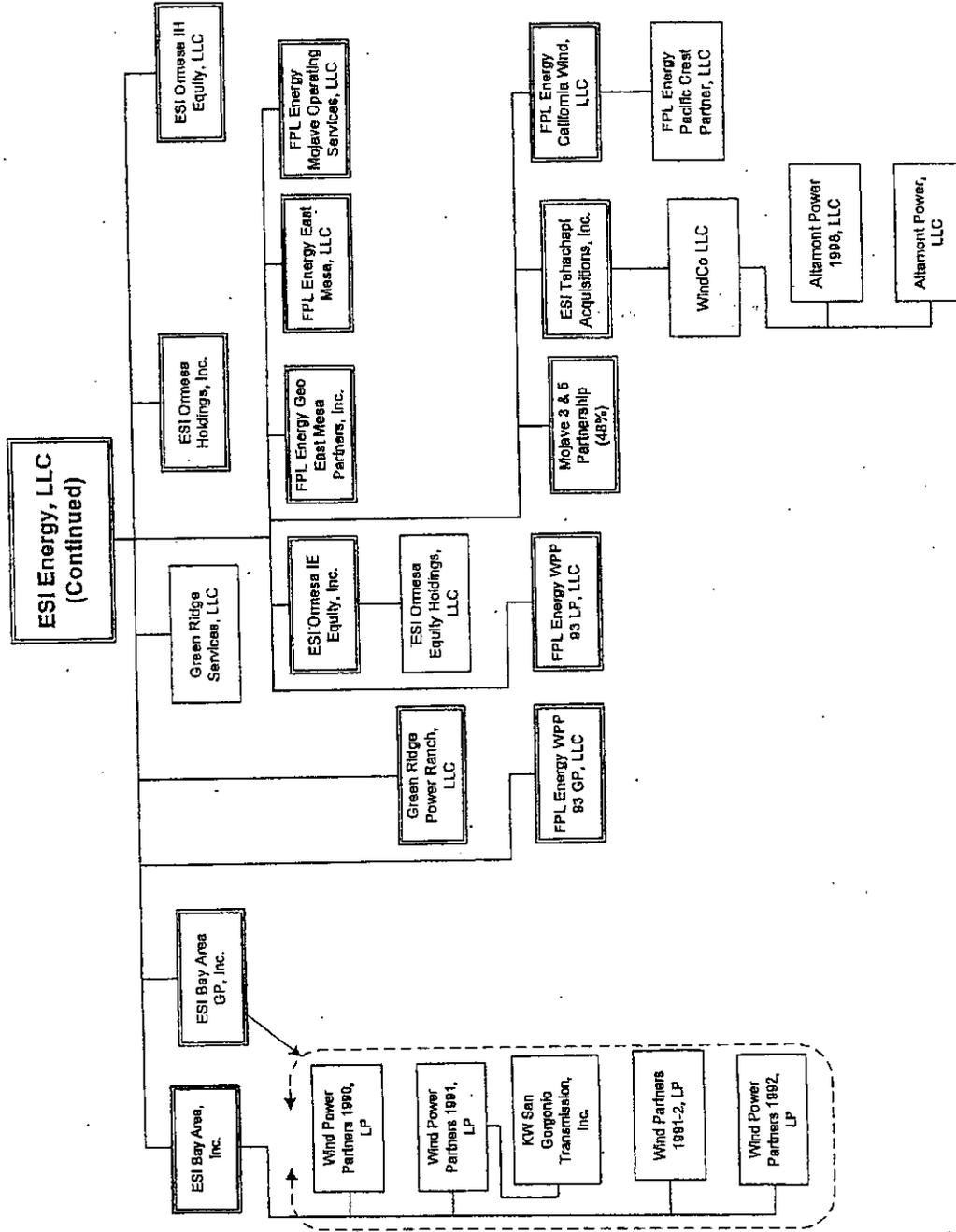
(Print Date 4/16/2012)





(Print Date 4/16/2012)

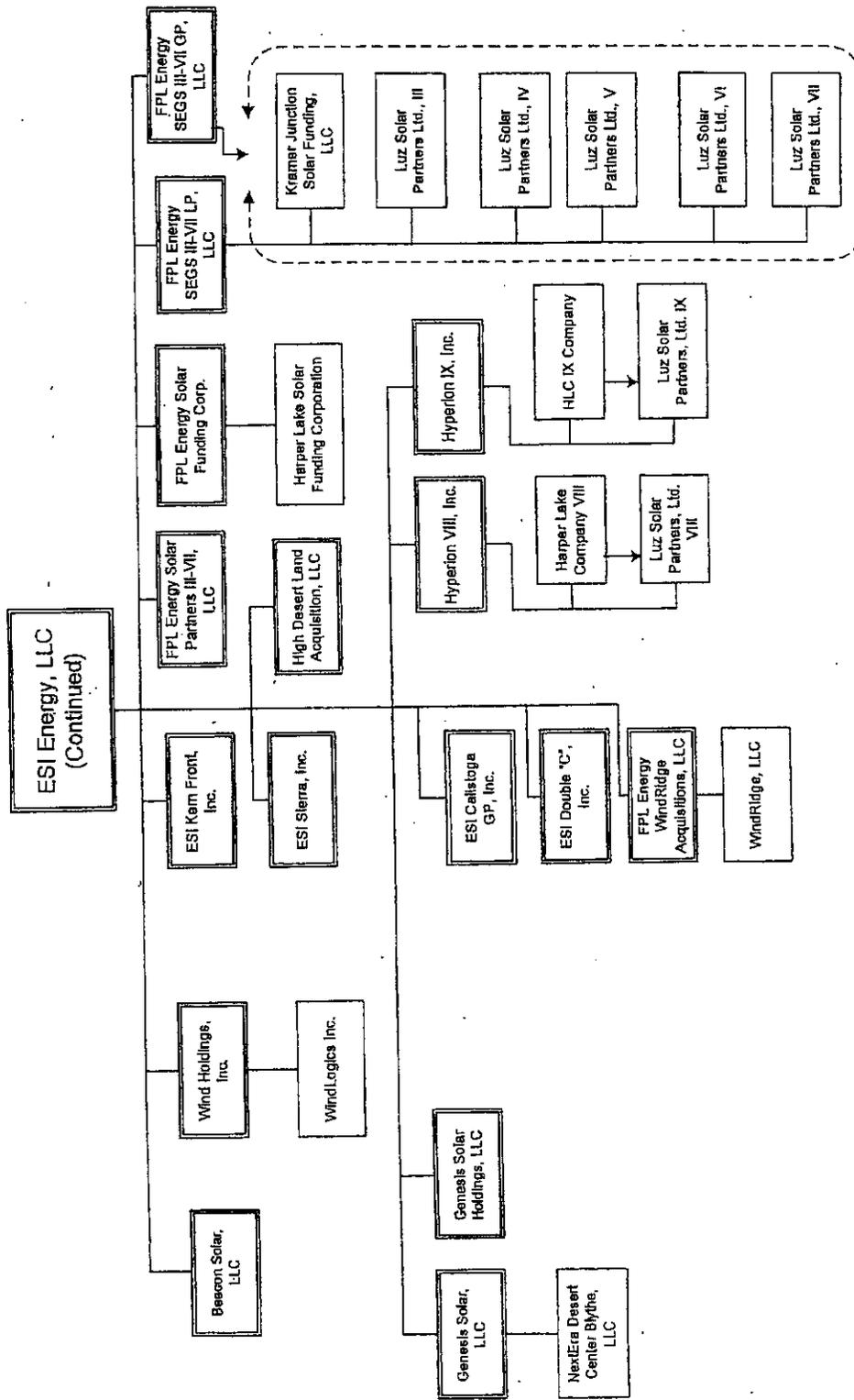
LP = Limited Partnership GP = General Partnership JV = Joint Venture LLC = Limited Liability Company

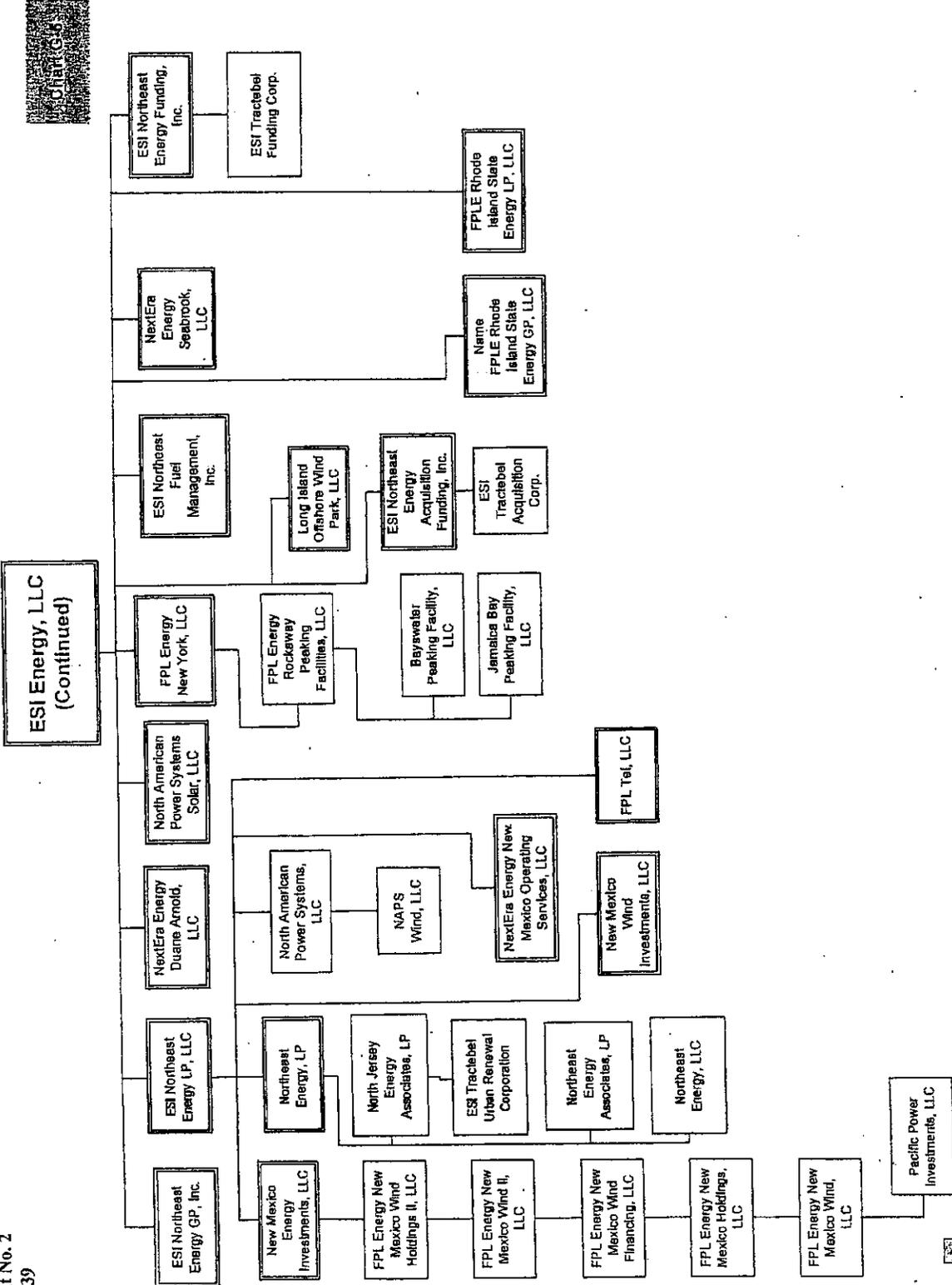


454-110

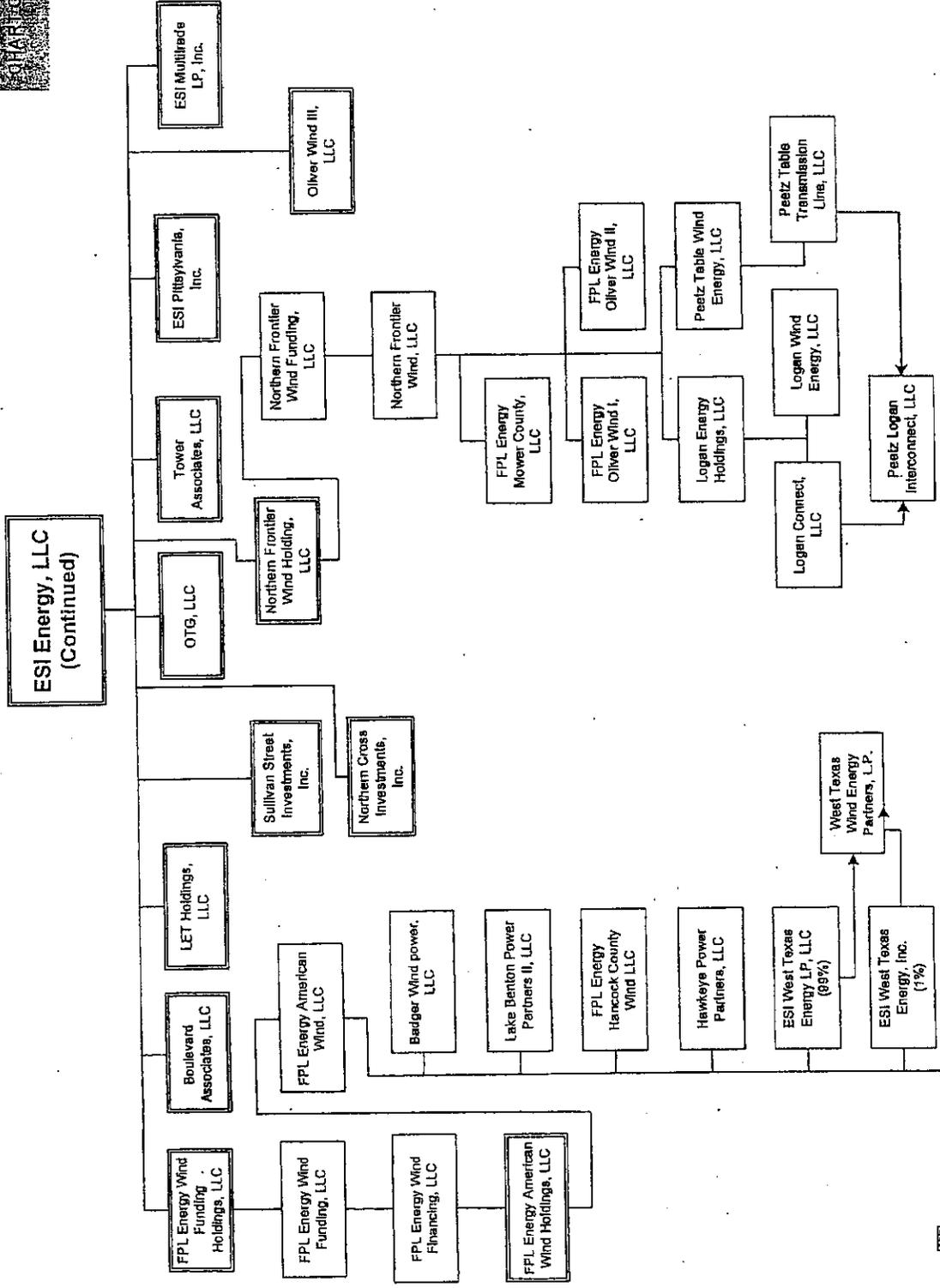
LP = Limited Partnership GP = General Partnership JV = Joint Venture LLC = Limited Liability Company

(Print Date_4/16/2012)



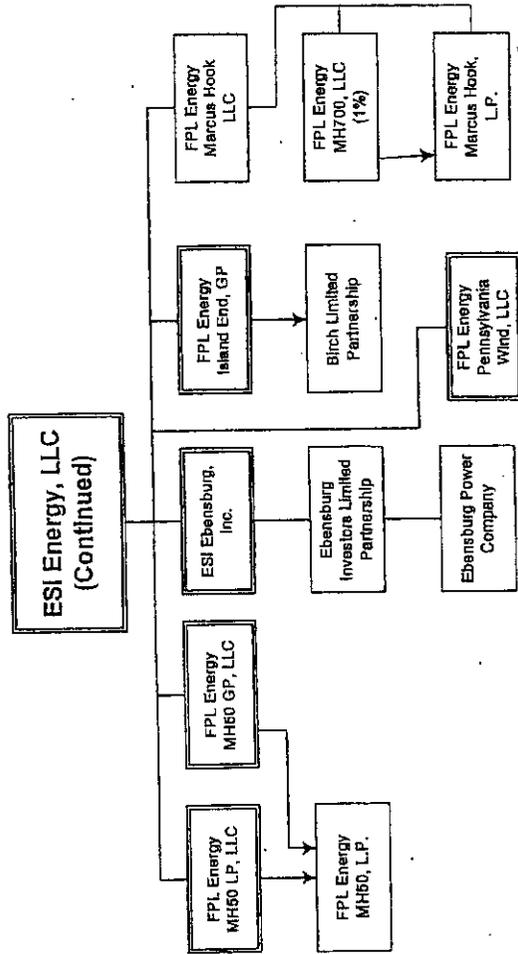


LP = Limited Partnership GP = General Partnership JV = Joint Venture LLC = Limited Liability Company (Print Date 4/16/2012)



(Print Date_4/16/2012)

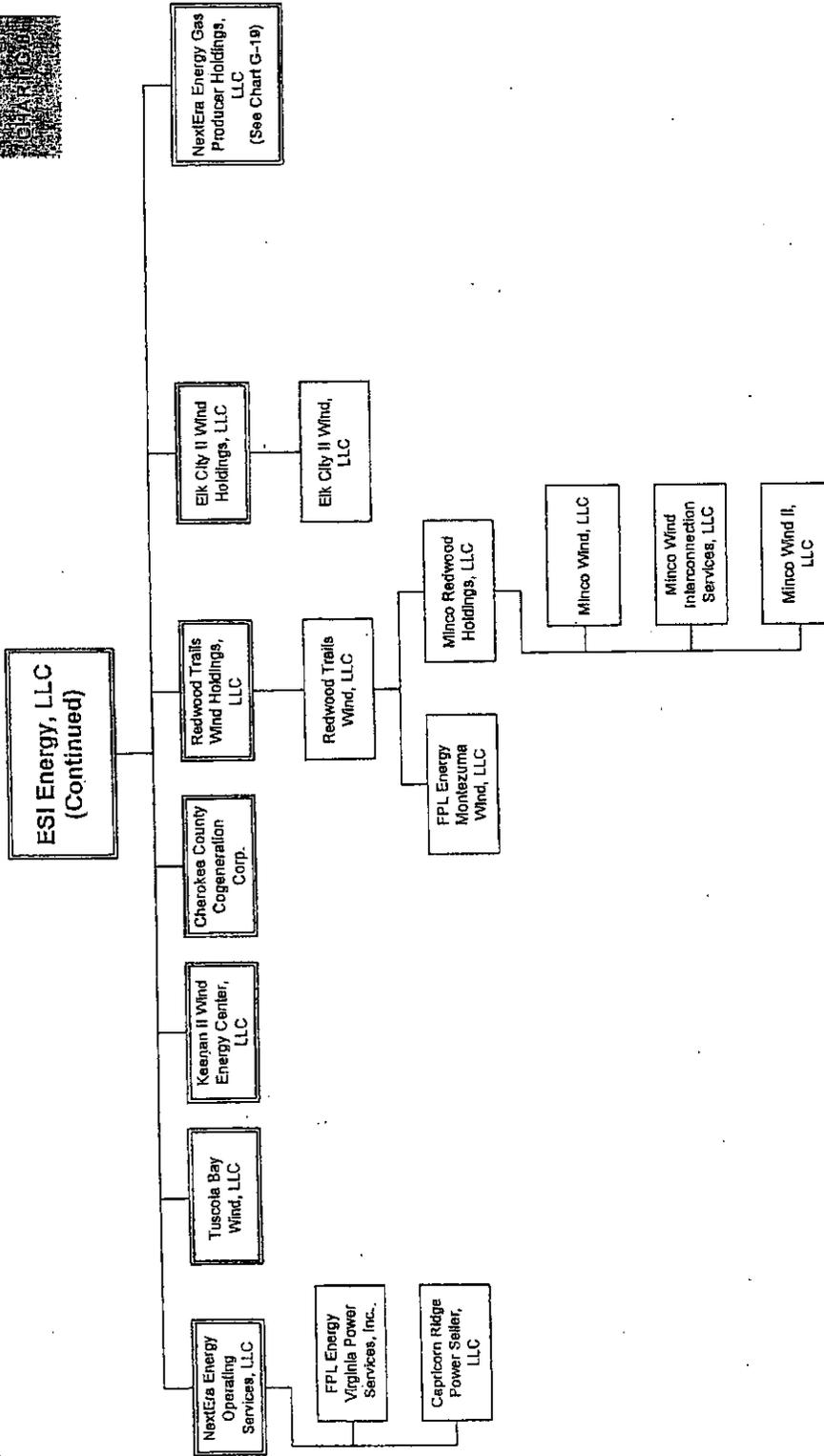
LP = Limited Partnership GP = General Partnership JV = Joint Venture LLC = Limited Liability Company



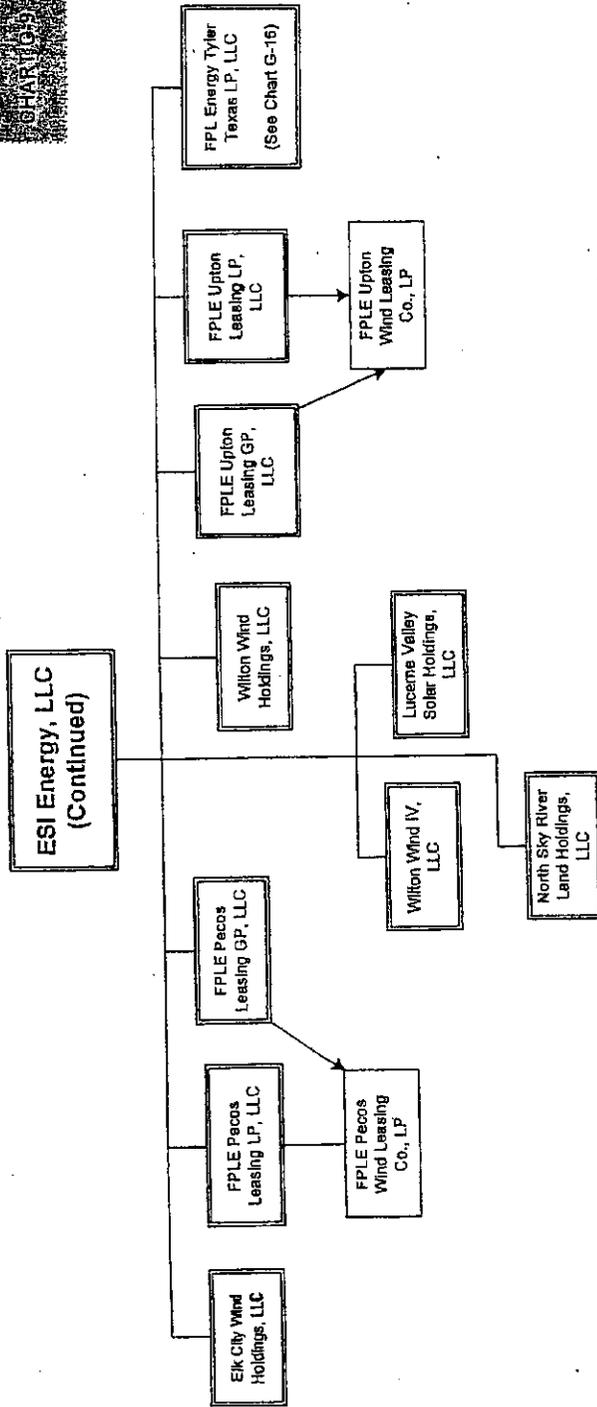
454-015

LP = Limited Partnership GP = General Partnership JV = Joint Venture LLC = Limited Liability Company

(Print Date_4/16/2012)



454-16

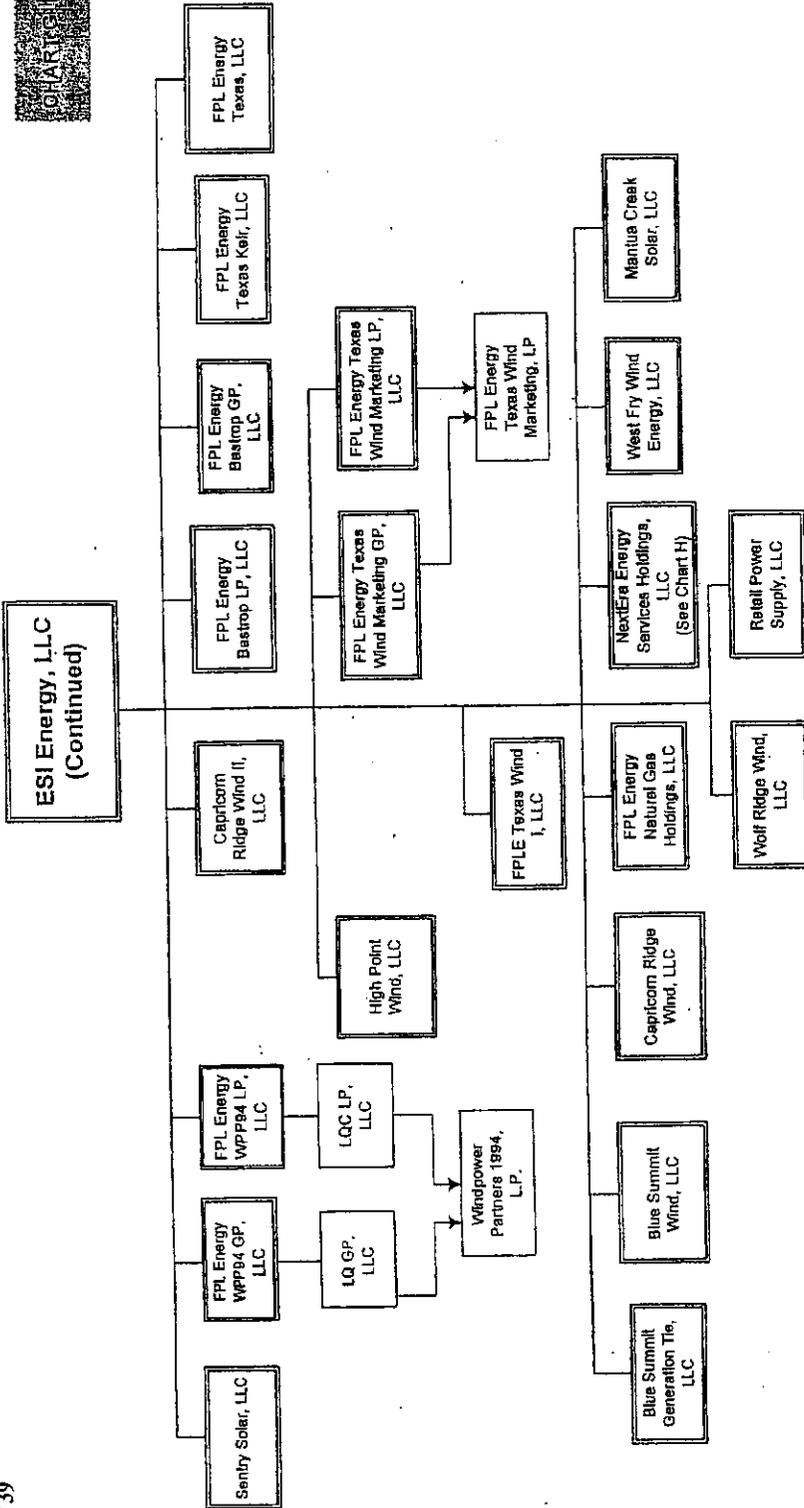


454-17

LP = Limited Partnership GP = General Partnership JV = Joint Venture LLC = Limited Liability Company

(Print Date 4/16/2012)

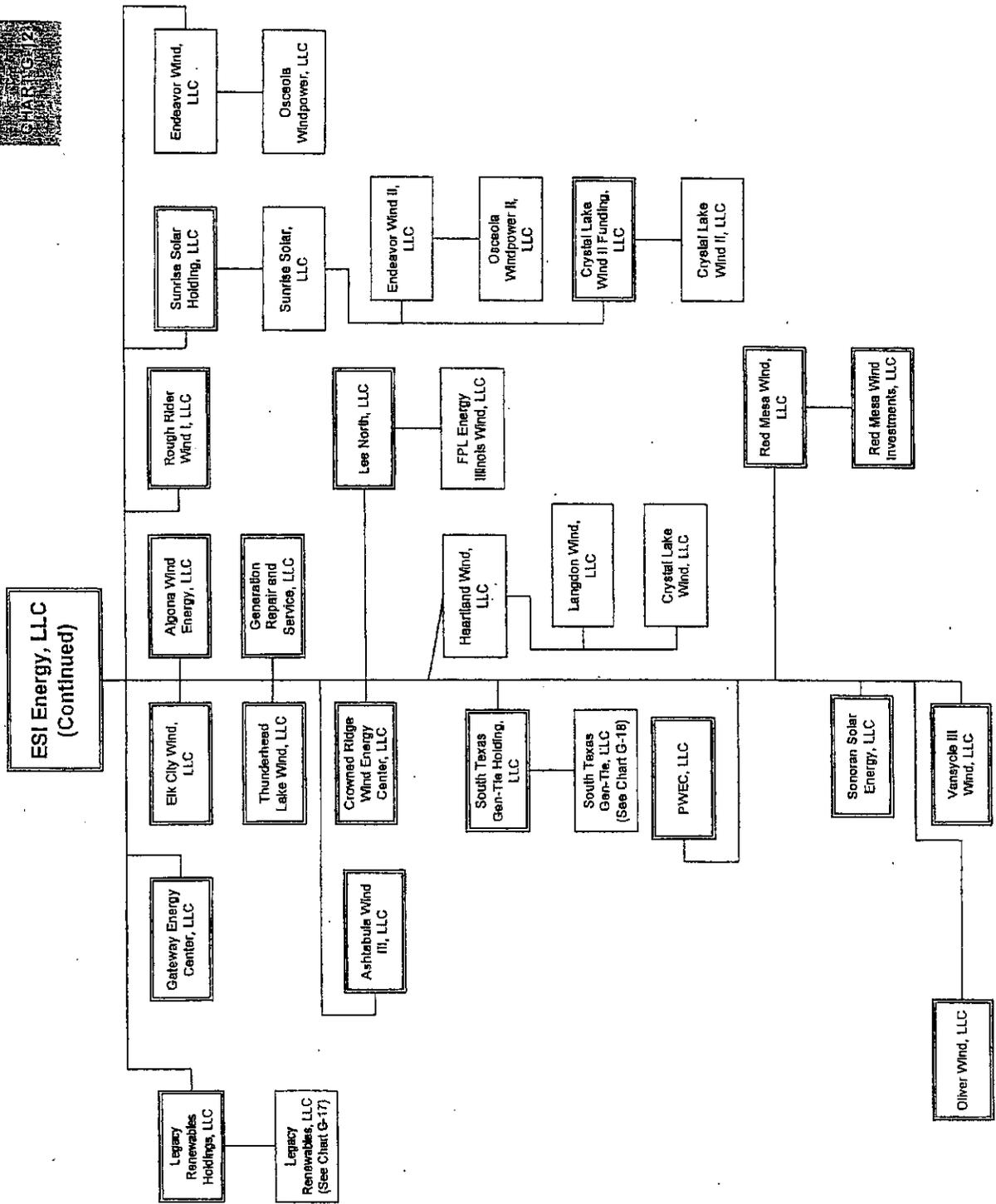
CHART 10



454-18

LP = Limited Partnership GP = General Partnership JV = Joint Venture LLC = Limited Liability Company

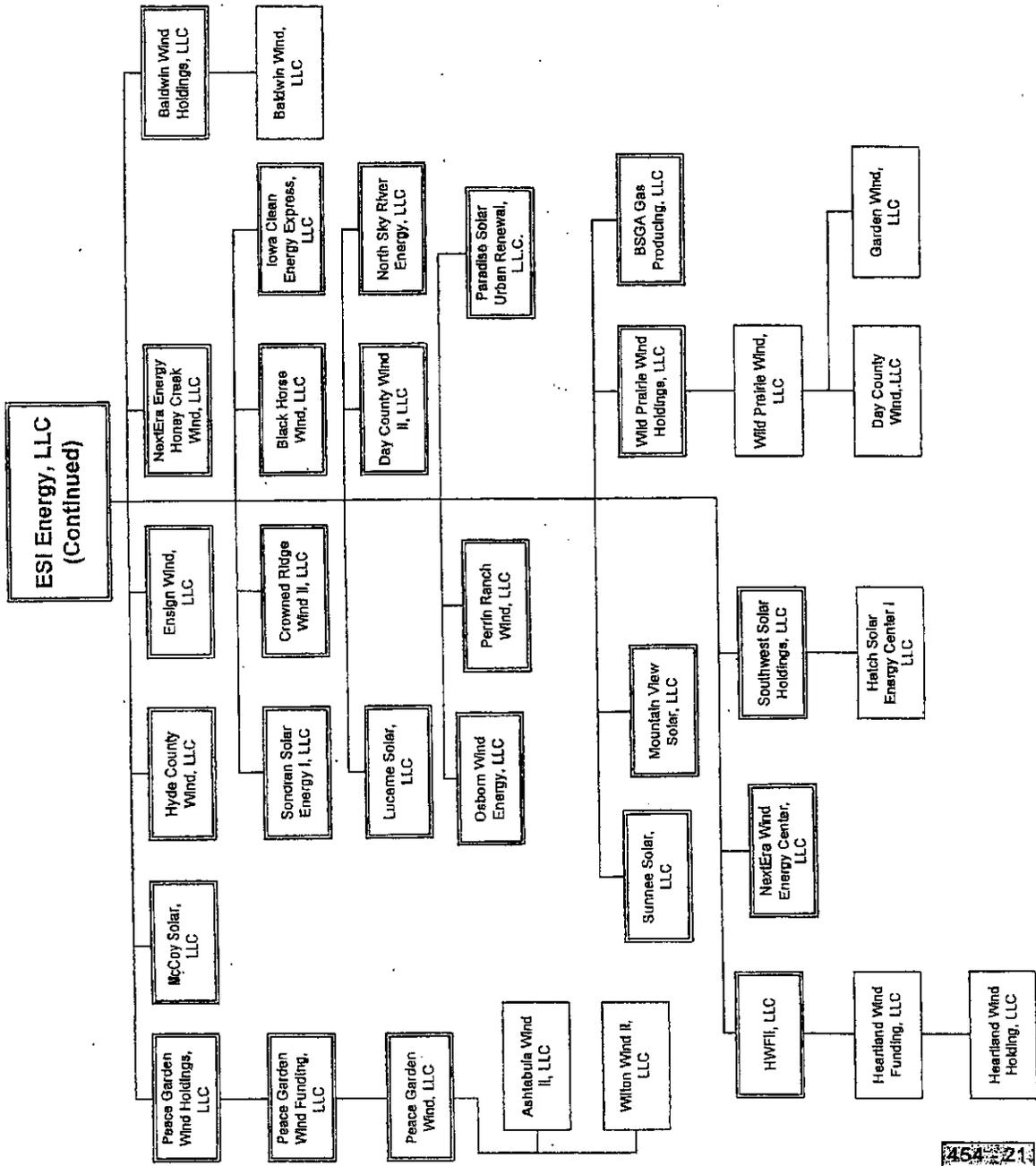
(Print Date_4/18/2012)



254-20

LP = Limited Partnership GP = General Partnership JV = Joint Venture LLC = Limited Liability Company

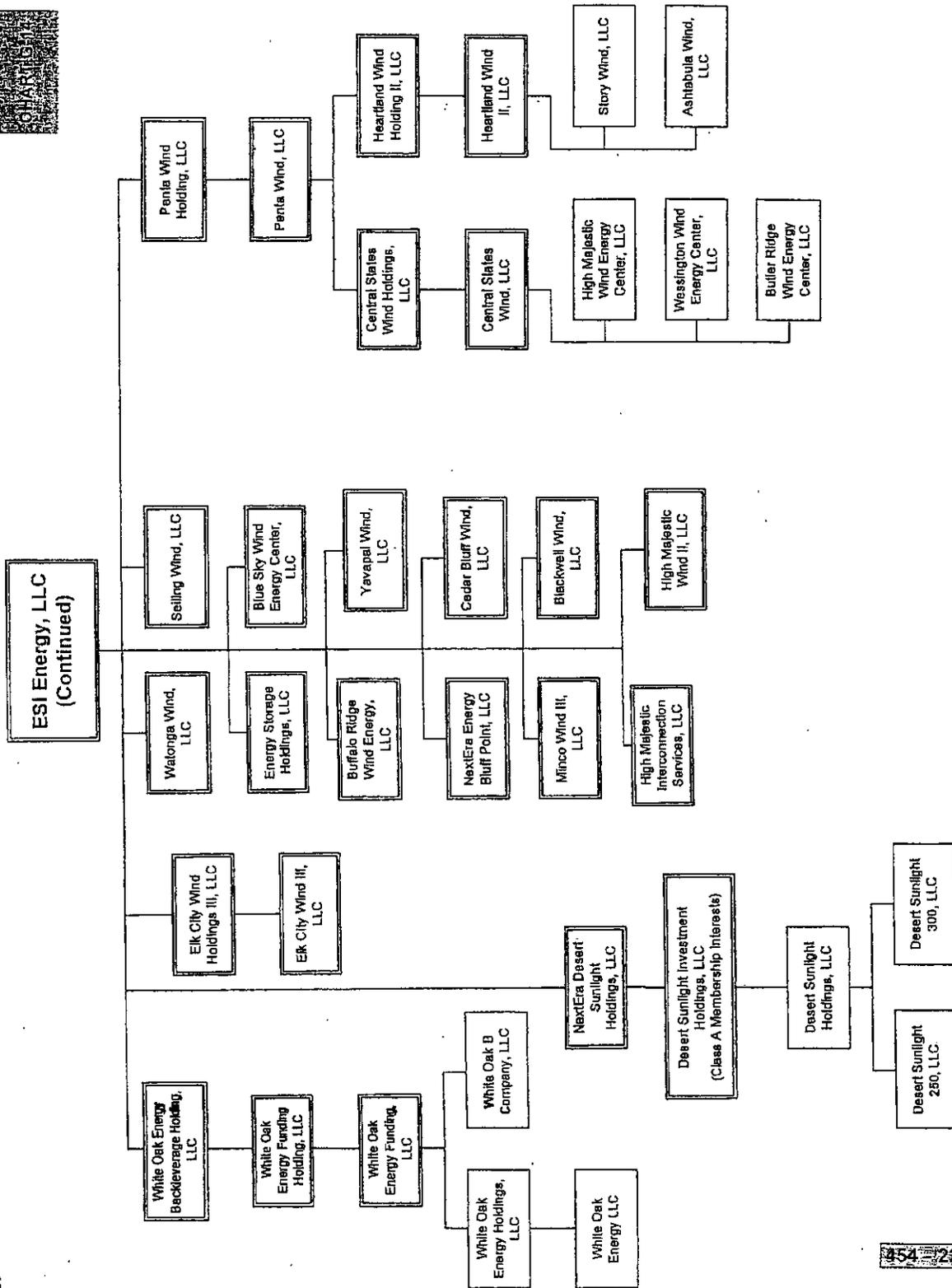
(Print Date 4/16/2012)



454-21

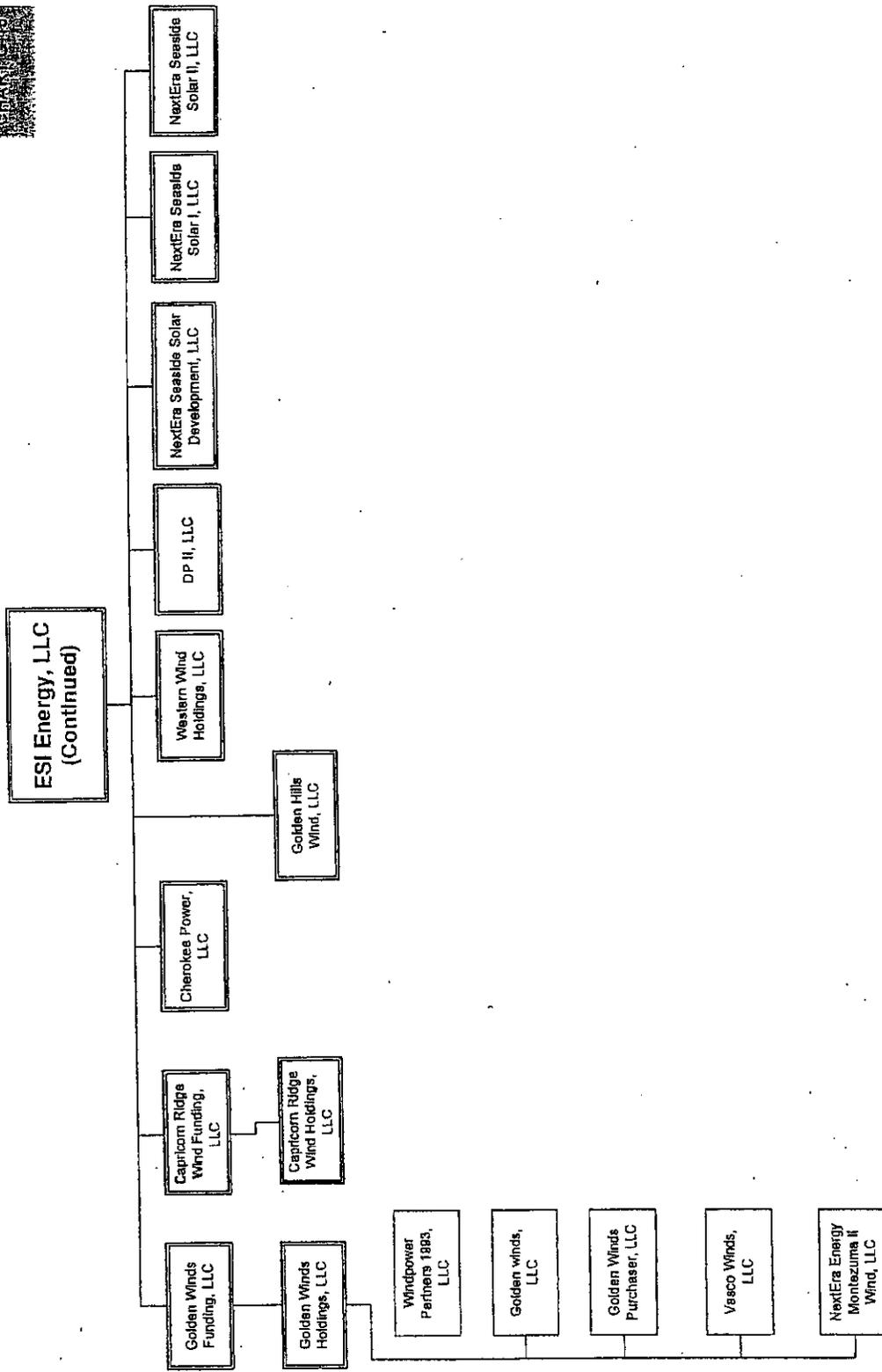
LP = Limited Partnership GP = General Partnership JV = Joint Venture LLC = Limited Liability Company

(Print Date_4/16/2012)



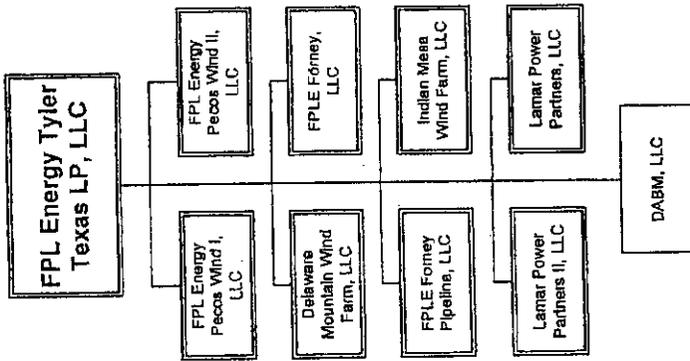
LP = Limited Partnership GP = General Partnership JV = Joint Venture LLC = Limited Liability Company

(Print Date_4/16/2012)



LP = Limited Partnership GP = General Partnership JV = Joint Venture LLC = Limited Liability Company

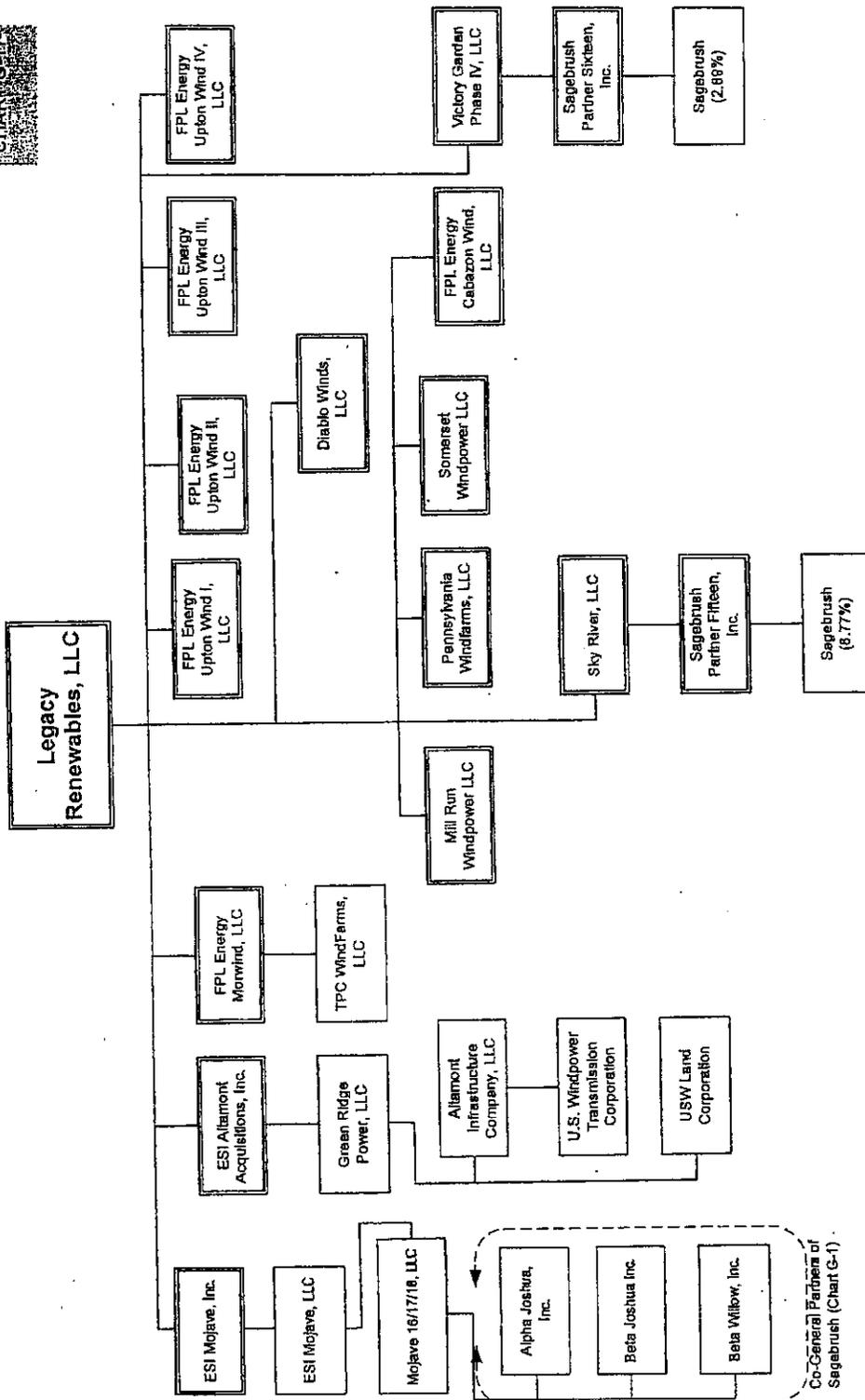
(Print Date_4/16/2012)



454-24

LP = Limited Partnership GP = General Partnership JV = Joint Venture LLC = Limited Liability Company

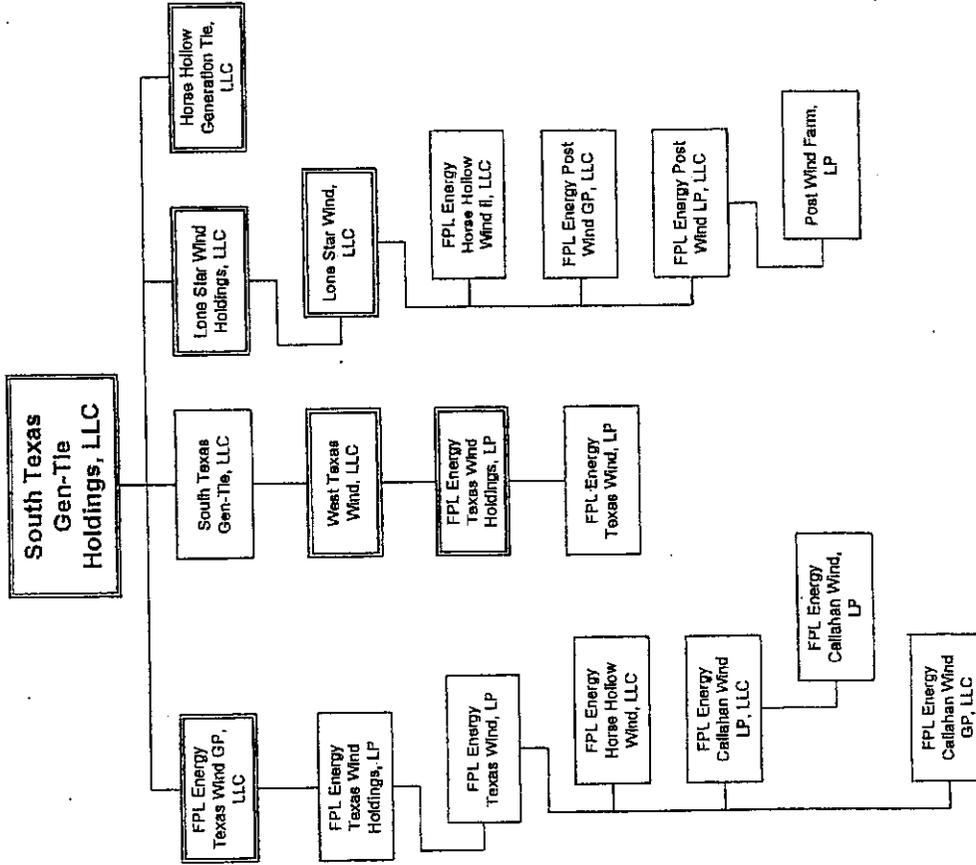
(Print Date_4/16/2012)



164 26

LP = Limited Partnership GP = General Partnership JV = Joint Venture LLC = Limited Liability Company

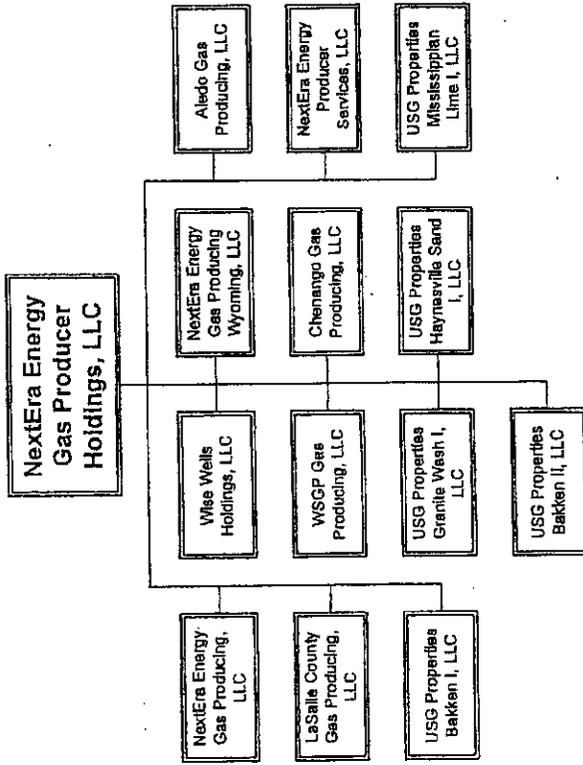
(Print Date_4/16/2012)



454 26

LP = Limited Partnership GP = General Partnership JV = Joint Venture LLC = Limited Liability Company

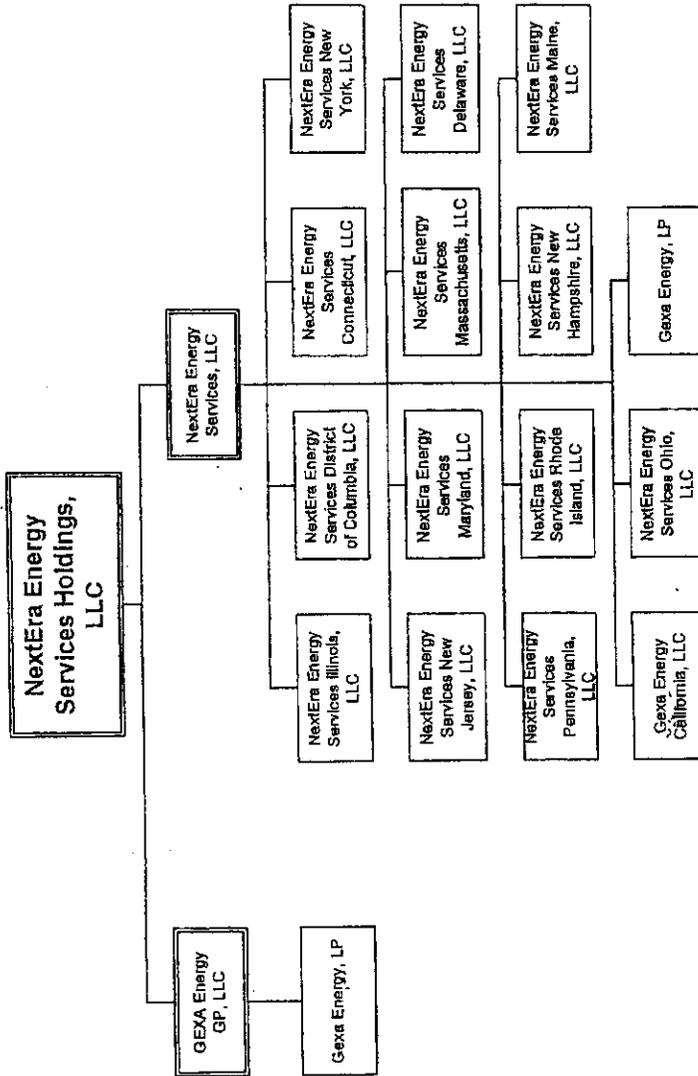
(Print Date_4/16/2012)



454-27

LP = Limited Partnership GP = General Partnership JV = Joint Venture LLC = Limited Liability Company

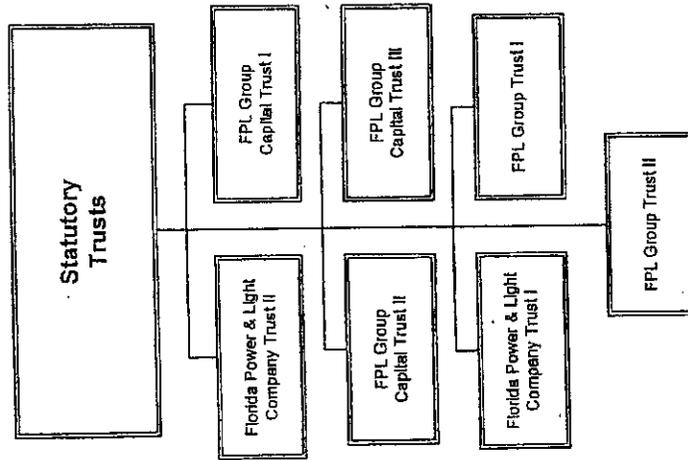
(Print Date_4/16/2012)



454-28

LP = Limited Partnership GP = General Partnership JV = Joint Venture LLC = Limited Liability Company

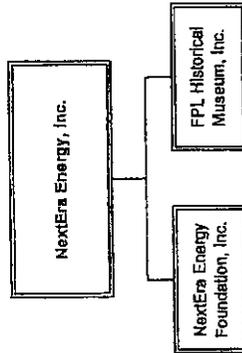
(Print Date_4/16/2012)



454-29



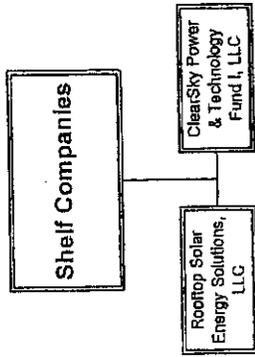
NON-PROFIT
ORGANIZATIONS



454-30

LP = Limited Partnership GP = General Partnership JV = Joint Venture LLC = Limited Liability Company

(Print Date_4/16/2012)



LP = Limited Partnership GP = General Partnership JV = Joint Venture LLC = Limited Liability Company

(Print Date_4/16/2012)

ANALYSIS OF DIVERSIFICATION ACTIVITY
Changes in Corporate Structure

Florida Power & Light Company
For the Year Ended December 31, 2011

Provide any changes in corporate structure including partnerships, Minority interests and joint ventures, and an updated organizational chart		
Line No	Effective Date (a)	Description of Change (b)
	12/20/2010	CG Wind Company, LLC assigned its interest in Windpower Partners 1993, L.P. to FPL Energy WPP 93 GP, LLC
	1/11/2011	NextEra Energy Equipment Leasing, LLC, a Delaware limited liability company, was formed as a subsidiary of NextEra Energy Capital Holdings, Inc.
	1/18/2011	NextEra Energy Bosque Holdings, LLC, a Delaware limited liability company, was formed as a subsidiary of ESI Energy, LLC
	1/18/2011	Watona Wind, LLC, a Delaware limited liability company, was formed as a subsidiary of ESI Energy, LLC
	1/18/2011	Seiling Wind, LLC, a Delaware limited liability company, was formed as a subsidiary of ESI Energy, LLC
	1/21/2011	Desert Center Blythe, LLC, a Delaware limited liability company, was formed as a subsidiary of Genesis Solar, LLC
	1/24/2011	Mountain View Solar Center, LLC, a Delaware limited liability company, was dissolved
	1/27/2011	Desert Center Blythe, LLC, a Delaware limited liability company, changed its name to NextEra Desert Center Blythe, LLC
	3/2/2011	Kerwood Wind, Inc., a New Brunswick, Canada corporation, was formed as a subsidiary of NextEra Energy Canada, ULC
	3/3/2011	Penta Wind Holdings, LLC, a Delaware limited liability company, was formed as a subsidiary of ESI Energy, LLC
	3/3/2011	Penta Wind, LLC, a Delaware limited liability company, was formed as a subsidiary of Penta Wind Holdings, LLC
	3/9/2011	ESI Energy, LLC assigned its interest in Central States Wind Holdings, LLC to Penta Wind, LLC
	3/9/2011	ESI Energy, LLC assigned its interest in Heartland Wind Holding II, LLC to Penta Wind, LLC
	3/11/2011	Minco Wind II, LLC, a Delaware limited liability company, was formed as a subsidiary of Minco Wind Holdings II, LLC
	3/15/2011	Limon Wind, LLC, a Delaware limited liability company, was formed as a subsidiary of ESI Energy, LLC
	3/15/2011	Elk City Wind Holdings III, LLC, a Delaware limited liability company, was formed as a subsidiary of ESI Energy, LLC
	3/15/2011	Elk City Wind III, LLC, a Delaware limited liability company, was formed as a subsidiary of Elk City Wind Holdings III, LLC
	3/16/2011	Minco Wind Holdings II, LLC, a Delaware limited liability company, was formed as a subsidiary of ESI Energy, LLC
	3/17/2011	NextEra Energy Bluff Point, LLC, a Delaware limited liability company, was formed as a subsidiary of ESI Energy, LLC
	4/1/2011	Yavapai Wind, LLC, a Delaware limited liability company, was formed as a subsidiary of ESI Energy, LLC
	4/1/2011	Penta Wind Holdings, LLC, a Delaware limited liability company, changed its name to Penta Wind Holding, LLC
	4/12/2011	Chenango Gas Producing, LLC, a Delaware limited liability company, was formed as a subsidiary of NextEra Energy Gas Producer Holdings, LLC
	4/12/2011	NextEra Energy Assets, LLC, a Delaware limited liability company, previously formed as a shelf company, was dissolved

ANALYSIS OF DIVERSIFICATION ACTIVITY
Changes in Corporate Structure

Florida Power & Light Company
For the Year Ended December 31, 2011

Provide any changes in corporate structure including partnerships, Minority interests and joint ventures, and an updated organizational chart		
Line No	Effective Date (a)	Description of Change (b)
	4/12/2011	NextEra Energy Investments, LLC, a Delaware limited liability company previously formed as a shelf company, was dissolved
	4/12/2011	NextEra Energy Ventures, LLC, a Delaware limited liability company previously formed as a shelf company, was dissolved
	4/13/2011	Blue Sky Wind Energy Center, LLC, a Delaware limited liability company, was formed as a subsidiary of ESI Energy, LLC
	4/15/2011	OTG III, Inc., a Delaware limited liability company previously formed as a shelf company, was dissolved
	4/15/2011	OTG V, Inc., a Delaware limited liability company previously formed as a shelf company, was dissolved
	4/19/2011	Upper Canada Transmission, Inc., a New Brunswick, Canada corporation, formed as a subsidiary of NextEra Energy Canada, ULC
	4/29/2011	White Oak Energy Backleverage Holding, LLC, a Delaware limited liability company, was formed as a subsidiary of ESI Energy, LLC
	4/29/2011	White Oak Energy Funding Holding, LLC, a Delaware limited liability company, was formed as a subsidiary of White Oak Energy Backleverage Holding, LLC
	4/29/2011	White Oak Energy Funding, LLC, a Delaware limited liability company, was formed as a subsidiary of White Oak Energy Funding Holding, LLC
	4/29/2011	White Oak B Company, a Delaware limited liability company, was formed as a subsidiary of White Oak Energy Funding Holding, LLC
	5/3/2011	Golden Hills Wind, LLC, a Delaware limited liability company, was formed as a subsidiary of ESI Energy, LLC
	5/5/2011	Energy Storage Holdings, LLC, a Delaware limited liability company, was formed as a subsidiary of ESI Energy, LLC
	5/9/2011	ESI Energy, LLC assigned its interest in White Oak Energy Holdings, LLC to White Oak Energy Funding, LLC
	5/11/2011	East Durham Wind, Inc., a New Brunswick, Canada corporation, formed as a subsidiary of NextEra Energy Canada, ULC
	5/11/2011	Goshen Wind, Inc., a New Brunswick, Canada corporation, formed as a subsidiary of NextEra Energy Canada, ULC
	5/11/2011	Jericho Wind, Inc., a New Brunswick, Canada corporation, formed as a subsidiary of NextEra Energy Canada, ULC
	5/11/2011	Varna Wind, Inc., a New Brunswick, Canada corporation, formed as a subsidiary of NextEra Energy Canada, ULC
	5/24/2011	Aledo Gas Producing, LLC, a Delaware limited liability company, formed as a subsidiary of NextEra Energy Gas Producing Holdings, LLC
	5/27/2011	ESI Tehachapi Acquisitions, Inc. acquired all of the interests in WindCo, LLC from outside third parties
	6/1/2011	Wilton Wind IV, LLC, a Delaware limited liability company, was formed as a subsidiary of ESI Energy, LLC
	6/2/2011	Lucerne Valley Solar Holdings, LLC, a Delaware limited liability company, was formed as a subsidiary of ESI Energy, LLC
	6/7/2011	North Sky River Land Holdings, LLC, a Delaware limited liability company, was formed as a subsidiary of ESI Energy, LLC

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Florida Power & Light Company
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Provide any changes in corporate structure including partnerships, Minority interests and joint ventures, and an updated organizational chart		
Line No	Effective Date (a)	Description of Change (b)
	6/10/2011	White Oak Energy Holdings, LLC, a Delaware limited liability company, acquired all of the ownership interests in White Oak Energy, LLC from an outside third party
	6/17/2011	Ashtabula Wind II Holdings, LLC, a Delaware limited liability company, changed its name to PWEC, LLC
	7/20/2011	Lone Star Transmission Holdings, LLC, a Delaware limited liability company, formed as a subsidiary of U.S. Transmission Holdings, LLC
	7/20/2011	Lone Star Transmission Capital, LLC, a Delaware limited liability company, formed as a subsidiary of Lone Star Transmission Holdings, LLC
	7/26/2011	Buffalo Ridge Wind Energy, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	7/26/2011	NextEra Desert Sunlight Holdings, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	8/10/2011	Limon Wind II, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	8/10/2011	NEPM II, LLC, a Delaware limited liability company, formed as a subsidiary of NextEra Energy Resources, LLC
	8/25/2011	ESI Cherokee Holdings, Inc., a Florida corporation, assigned all of its ownership interests in Cherokee County Cogeneration Corp. to ESI Energy, LLC
	8/29/2011	Minco Wind III, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	8/29/2011	Cedar Bluff Wind, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	9/2/2011	NextEra Energy Canada Equipment, Inc., a New Brunswick, Canada company, formed as a subsidiary of NextEra Energy Canada, ULC
	9/8/2011	Desert Sunlight Investment Holdings, LLC, a Delaware limited liability company, formed as a subsidiary of NextEra Desert Sunlight Holdings, LLC
	9/8/2011	ESI LP, LLC, a Delaware limited liability company, assigned all of its ownership interests in ESI BH Limited Partnership to ESI Energy, LLC
	9/8/2011	ESI LP, LLC, a Delaware limited liability company, assigned all of its ownership interests in ESI Montgomery County, LLC to ESI Energy, LLC
	9/8/2011	ESI LP, LLC, a Delaware limited liability company, assigned all of its ownership interests in ESI Sky River Limited Partnership, LLC to ESI Energy, LLC
	9/8/2011	ESI LP, LLC, a Delaware limited liability company, assigned all of its ownership interests in FPL Energy Sky River Wind, LLC to ESI Energy, LLC
	9/8/2011	ESI LP, LLC, a Delaware limited liability company, assigned all of its ownership interests in FPL Energy VG Wind, LLC to ESI Energy, LLC
	9/8/2011	ESI LP, LLC, a Delaware limited liability company, assigned all of its ownership interests in ESI VG Limited Partnership to ESI Energy, LLC
	9/15/2011	NextEra Energy Solutions, LLC, a Delaware limited liability company, was dissolved
	9/15/2011	NextEra Energy Solutions, LLC, a Florida limited liability company, was dissolved
	9/16/2011	Capricorn Ridge Wind Funding, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	9/16/2011	Capricorn Ridge Wind Holdings, LLC, a Delaware limited liability company, formed as a subsidiary of Capricorn Ridge Wind Funding, LLC

ANALYSIS OF DIVERSIFICATION ACTIVITY
Changes in Corporate Structure

Florida Power & Light Company
For the Year Ended December 31, 2011

Provide any changes in corporate structure including partnerships, Minority interests and joint ventures, and an updated organizational chart		
Line No	Effective Date (a)	Description of Change (b)
	9/20/2011	Minco Wind Interconnection Services, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	9/29/2011	Cherokee LIT, LLC, a Texas limited liability company, formed as a subsidiary of ESI Energy, LLC
	9/29/2011	NextEra Desert Sunlight Holdings, LLC, a Delaware limited liability company acquired all of the ownership interests in Desert Sunlight Holdings, LLC
	9/29/2011	Desert Sunlight Holdings, LLC, a Delaware limited liability company, acquired all of the ownership interests in Desert Sunlight 250, LLC
	9/29/2011	Desert Sunlight Holdings, LLC, a Delaware limited liability company, acquired all of the ownership interests in Desert Sunlight 300, LLC
	9/30/2011	ESI Energy, LLC, a Delaware limited liability company, assigned all of its ownership interest in Capricorn Ridge Wind, LLC to Capricorn Ridge Wind Funding, LLC
	9/30/2011	ESI Energy, LLC, a Delaware limited liability company, assigned all of its ownership interest in Capricorn Ridge Wind II, LLC to Capricorn Ridge Wind Funding, LLC
	10/17/2011	FPL Group Resources, LLC, a Florida limited liability company, changed its name to NextEra Energy Infrastructure, LLC
	10/19/2011	Blackwell Wind, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	10/24/2011	U.S. Transmission Holdings, LLC, a Delaware limited liability company, assigned all of its interest in Lone Star Transmission, LLC to Lone Star Transmission Capital, LLC
	10/26/2011	Carson Wind, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	10/26/2011	Carson Wind Interconnection Services, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	10/31/2011	U. S. Transmission Holdings, LLC, a Delaware limited liability company, changed its name to NextEra Energy Transmission, LLC
	11/1/2011	Carson Wind Interconnection Services, LLC, a Delaware limited liability company, changed its name to High Majestic Interconnection Services, LLC
	11/1/2011	Carson Wind, LLC, a Delaware limited liability company, changed its name to High Majestic Wind II, LLC
	11/1/2011	Minco Wind Holdings, LLC, a Delaware limited liability company, changed its name to Redwood Trails Wind, LLC
	11/1/2011	Minco Wind Holdings II, LLC, a Delaware limited liability company, changed its name to Redwood Trails Wind Holdings, LLC
	11/2/2011	Golden Winds Funding, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	11/2/2011	Golden Winds Holdings, LLC, a Delaware limited liability company, formed as a subsidiary of Golden Winds Funding, LLC
	11/2/2011	Golden Winds, LLC, a Delaware limited liability company, formed as a subsidiary of Golden Winds Holdings, LLC.
	11/2/2011	NextEra Energy O&M Services, LLC, a Delaware limited liability company, formed as a subsidiary of NextEra Energy Operating Services, LLC
	11/4/2011	USG Properties Bakken I, LLC, a Delaware limited liability company, formed as a subsidiary of NextEra Energy Gas Producer Holdings, LLC

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Changes in Corporate Structure

Florida Power & Light Company
For the Year Ended December 31, 2011

Provide any changes in corporate structure including partnerships, Minority interests and joint ventures, and an updated organizational chart		
Line No	Effective Date (a)	Description of Change (b)
	11/4/2011	USG Properties Granite Wash I, LLC, a Delaware limited liability company, formed as a subsidiary of NextEra Energy Gas Producer Holdings, LLC
	11/4/2011	USG Properties Haynesville Sand I, LLC, a Delaware limited liability company, formed as a subsidiary of NextEra Energy Gas Producer Holdings, LLC
	11/4/2011	USG Properties Mississippian Lime I, LLC, a Delaware limited liability company, formed as a subsidiary of NextEra Energy Gas Producer Holdings, LLC
	11/7/2011	St. Clair Investment Holding, Inc., a New Brunswick, Canada corporation, formed as a subsidiary of NextEra Energy Canada, ULC
	11/14/2011	West Boca Security, Inc. a Delaware corporation, was dissolved
	11/16/2011	DP II, LLC, a Virginia limited liability company, formed as a subsidiary of ESI Energy, LLC
	11/16/2011	Coyote Wind, LLC, a Delaware limited liability company, changed its name to High Ground Investments, LLC
	11/16/2011	ESI Cherokee MGP, Inc., a Delaware corporation, converted to Cherokee Generating MGP, LLC
	11/16/2011	ESI Cherokee Holdings, Inc., a Delaware corporation, converted to Cherokee Generating Holdings, LLC
	11/18/2011	Sailfish Natural Gas, Ltd., a company formed in The Bahamas, was dissolved
	11/18/2011	FPL Group Resources Bahamas One, Ltd., a company formed in The Bahamas, was dissolved
	11/18/2011	FPL Group Resources Bahamas Two, Ltd., a company formed in The Bahamas, was dissolved
	11/18/2011	FPL Group Resources Bahamas Three, Ltd., a company formed in The Bahamas, was dissolved
	11/18/2011	FPL Group Resources Bahamas Asset Holdings, Ltd., a company formed in The Bahamas, was dissolved
	11/18/2011	FPL Group Resources Bahamas Micro Pipeline, Ltd., a company formed in The Bahamas, was dissolved
	11/18/2011	FPL Group Resources Bahamas Micro Terminal, Ltd., a company formed in The Bahamas, was dissolved
	11/21/2011	NextEra Energy O&M Services, LLC, a Delaware limited liability company, changed its name to Capricorn Ridge Power Seller, LLC
	11/21/2011	ESI Energy, LLC, assigned its interest in Redwood Trails Wind, LLC, to Redwood Trails Wind Holdings, LLC
	11/21/2011	ESI Energy, LLC assigned its interest in FPL Energy Montezuma Wind, LLC to Redwood Trails Wind, LLC
	11/21/2011	ESI Energy, LLC assigned its interest in Minco Wind Interconnection Services, LLC to Redwood Trails Wind, LLC
	11/21/2011	Redwood Trails Wind, LLC assigned its interest in Minco Wind, LLC to Minco Wind Interconnection Services, LLC
	11/21/2011	Redwood Trails Wind, LLC assigned its interest in Minco Wind II, LLC to Minco Wind Interconnection Services, LLC
	11/21/2011	ESI Energy, LLC assigned its interest in FPL Group International, Inc. to High Ground Investments, LLC
	11/22/2011	ESI Energy, LLC sold it interest in ESI LP, LLC and ESI LP, LLC's subsidiaries to to an outside third party

ANALYSIS OF DIVERSIFICATION ACTIVITY
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Provide any changes in corporate structure including partnerships, Minority interests and joint ventures, and an updated organizational chart		
Line No	Effective Date (a)	Description of Change (b)
	11/22/2011	ESI Energy, LLC sold its interest in Blythe Energy Acquisition, LLC to Amsterdam Generating Company, LLC
	11/22/2011	ESI Energy, LLC sold its interest in Calhoun Power Company Holdings, LLC to Amsterdam Generating Company, LLC
	11/22/2011	ESI Energy, LLC sold its interest in Cherokee Generating Holdings, LLC to Amsterdam Generating Company, LLC
	11/22/2011	ESI Energy, LLC sold its interest in ESI Doswell GP, LLC and ESI Doswell GP, LLC's subsidiaries to an outside third party
	11/22/2011	ESI Energy, LLC sold its interest in FPL Energy Virginia Holdings, Inc. to Amsterdam Generating Company, LLC
	11/23/2011	GW Seller, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	11/23/2011	Golden Winds Purchaser, LLC, a Delaware limited liability company, formed as a subsidiary of Golden Winds Holdings, LLC
	12/1/2011	NextEra Energy Global Holdings Cooperatieve U.A., a Netherlands company, formed as a subsidiary of FPL Group International, Inc. and High Ground Investments, LLC
	12/1/2011	NextEra Seaside Solar Development, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	12/1/2011	NextEra Seaside Solar I, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	12/1/2011	NextEra Seaside Solar II, LLC, a Delaware limited liability company, formed as a subsidiary of ESI Energy, LLC
	12/5/2011	FPLE Global Asset Holdings B.V. changed its name to NextEra Energy Global Holdings, B.V.
	12/5/2011	FPLE Global Asset Spain Holdings B.V. changed its name to NextEra Energy Spain Holdings B.V.
	12/5/2011	FPLE Global Asset Canada Holdings B.V. changed its name to NextEra Energy Canada Global Holdings B.V.
	12/8/2011	Minco Redwood Holdings, LLC, a Delaware limited liability company, formed as a subsidiary of Redwood Trails Wind, LLC
	12/8/2011	GW Seller, LLC, a Delaware limited liability company, changed its name to Western Wind Holdings, LLC
	12/8/2011	Windpower Partners 1993, L.P., a Delaware limited partnership converted to Windpower Partners 1993, LLC, a Delaware limited liability company
	12/12/2011	FPLE Rhode Island State Energy GP, INC., a Delaware corporation, converted to FPLE Rhode Island State Energy GP, LLC
	12/13/2011	Mendocino Capital, LLC, a Delaware limited liability company, formed as a subsidiary of NextEra Energy Capital Holdings, Inc.
	12/14/2011	Redwood Trails Wind, LLC assigned its ownership interest in Minco Wind Interconnection Services, LLC to Minco Redwood Holdings, LLC
	12/14/2011	Minco Wind Interconnection Services, LLC assigned its ownership interest in Minco Wind, LLC to Minco Redwood Holdings, LLC
	12/14/2011	Minco Wind Interconnection Services, LLC assigned its ownership interest in Minco Wind II, LLC to Minco Redwood Holdings, LLC

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Changes in Corporate Structure

Florida Power & Light Company
For the Year Ended December 31, 2011

Provide any changes in corporate structure including partnerships, Minority interests and joint ventures, and an updated organizational chart		
Line No	Effective Date (a)	Description of Change (b)
	12/14/2011	FPL Energy WPP 93 GP, LLC assigned its ownership interest in Windpower Partners 1993, LLC to Western Wind Holdings, LLC
	12/14/2011	FPL Energy WPP 93 LP, LLC assigned its ownership interest in Windpower Partners 1993, LLC to Western Wind Holdings, LLC
	12/14/2011	ESI Energy, LLC assigned its ownership interest in Vasco Winds, LLC to Western Wind Holdings, LLC
	12/14/2011	ESI Energy, LLC assigned its ownership interest in NextEra Energy Montezuma II Wind, LLC to Western Wind Holdings, LLC
	12/14/2011	FPL Energy WPP 93 GP, LLC assigned its interest in Windpower Partnership 1993, LLC to ESI Energy, LLC
	12/14/2011	FPL Energy WPP 93 LP, LLC assigned its interest in Windpower Partnership 1993, LLC to ESI Energy, LLC
	12/14/2011	ESI Energy, LLC assigned its interest in Windpower Partners, LLC to ESI Sierra, Inc.
	12/14/2011	ESI Sierra, Inc. assigned its interest in Windpower Partners 1993, LLC to Western Wind Holdings, LLC
	12/14/2011	ESI Energy, LLC assigned its interest in Vasco Winds, LLC to ESI Sierra, Inc.
	12/14/2011	ESI Sierra, Inc. assigned its interest in Vasco Winds, LLC to Western Wind Holdings, LLC
	12/14/2011	ESI Energy, LLC assigned its interest in NextEra Energy Montezuma II Wind, LLC to ESI Sierra, Inc.
	12/14/2011	ESI Sierra, Inc. assigned its interest in NextEra Energy Montezuma II Wind, LLC to Western Wind Holdings, LLC
	12/15/2011	USG Properties Bakken II, LLC, a Delaware limited liability company, formed as a subsidiary of NextEra Energy Gas Producer Holdings, LLC
	12/16/2011	Cherokee LIT, LLC, a Texas limited liability company, changed its name to Cherokee Power, LLC
	12/16/2011	Western Wind Holdings, LLC transferred its ownership interest in Windpower Partners 1993, LLC to Golden Winds, LLC
	12/16/2011	Western Wind Holdings, LLC transferred its ownership interest in Vasco Winds, LLC to Golden Winds, LLC
	12/16/2011	Western Wind Holdings, LLC transferred its ownership interest in NextEra Energy Montezuma Wind II, LLC to Golden Winds, LLC
	12/20/2011	FPLE Rhode Island State Energy GP, LLC sold its interest in FPLE Rhode Island State Energy, L.P. to outside third parties (Entergy Nighthawk GP, LLC and Entergy Nighthawk LP, LLC)
	12/21/2011	ESI Energy, LLC assigned its ownership interest in Limon Wind, LLC to Northern Colorado Wind Holdings, LLC
	12/21/2011	ESI Energy, LLC assigned its ownership interest in Limon Wind II, LLC to Northern Colorado Wind Holdings, LLC
	12/27/2011	Limon Wind III, LLC, a Delaware limited liability company, formed as a subsidiary of Northern Colorado Wind Holdings, LLC
	12/28/2011	NextEra Energy Bosque Holdings, LLC, a Delaware limited liability company, was dissolved
	12/29/2011	Doswell Funding Corporation, a Florida Corporation, was dissolved

Q.

Refer to page 26, line 21 through page 27 line 2, of witness Ousdahl's direct testimony. What share or percentage, and corresponding dollar amount of fixed costs were FPL able to reduce in years 2008-2011 as a result of FPL charging a portion of support services to affiliates instead of the total fixed costs being incurred by the retail utility customers?

A.

FPL cannot calculate with precision the amount of fixed cost borne by affiliates as both fixed and variable costs may be billed to affiliates during any year based on services being provided. FPL's financial systems capture and manage costs by home cost center and work breakdown structure, both of which will likely include both fixed and variable costs. A reasonable estimate of the percentage of fixed costs shifted from customers to affiliates could be made by considering the allocated cost pools a proxy for the shared fixed portion of its costs. Therefore, using this approach the percentage of costs allocated to affiliates in each of the years from 2008 to 2011 is as follows:

Year	(\$ in Thousands)			
	2008	2009	2010	2011
Cost Pool	\$ 207,019	\$210,352	\$226,100	\$220,633
Amount Billed to affiliates	\$ 56,163	\$ 60,723	\$ 66,213	\$ 60,494
Percent billed to affiliates	27.13%	28.87%	31.74%	27.42%

In addition to the allocation of cost pools, the labor portion of direct bills to affiliates includes a percentage loader for A&G which in 2011 totaled \$2.8 million. This represents a billing of total A&G costs to affiliates in addition to that allocated to them by the affiliate management fee.

Q.

Refer to page 27, line 18 through page 28 line 2 of witness Ousdahl's direct testimony. Please identify the amount of shared support that are governance related, such as activities associated with the Board of Directors and Investor Relations, that FPL charged its affiliates for years 2008-2011, and explain how FPL's share of these costs was determined.

A.

The testimony of witness Ousdahl describes three major categories of support as part of an overall explanation of the types of shared services that FPL provides to Affiliates. Costs are captured by cost center and not necessarily by those specific illustrative categories, so each cost center could have charges relating to one or all these types of services. In general, FPL would include the departments in the illustrative categories as follows:

<u>Strategic and Governance</u>	<u>Fleet Construction and Operations Support</u>	<u>General Operations and Support</u>
General Counsel	Power Generation	Information Management
Finance	Nuclear	Marketing & Communications
Human Resources	Transmission	Engineering & Construction – ISC
Internal Audit	EMT	Engineering & Construction – CRE
Strategy & Policy	Engineering & Const. – Construction	
Executive		

Charges by cost center are not tracked in these specific categories.

See FPL's response to OPC's First Set of Interrogatories No. 7 for additional information and detail.

Q.

Refer to page 28, lines 17-22 of witness Ousdahl's direct testimony. Under the direct method used by FPL to charge costs to affiliates, does FPL share any portion of the costs charged to the affiliate? If yes, please explain how FPL's share of the costs is determined.

A.

In general, FPL's direct charges reflect costs for resources that are being used exclusively to provide services for the benefit of a specific affiliate and therefore 100% of those resources are included in the direct charges that are made to that affiliate. In limited instances, however, an allocation between FPL and the affiliate(s) of the resources to be direct charged may be appropriate. Examples of direct charges where the underlying resources are allocated include the cost of certain application development projects, enterprise maintenance agreements, and software licensing agreements. In those instances, the resources are direct charged for the project or agreement in question, but the project or agreement benefits both FPL and the affiliate(s). In these instances, the costs are allocated between FPL and the affiliate(s) using direct measures of cost causation.

Q.

Refer to page 32 lines 2-6 of witness Ousdahl's direct testimony. Please describe FPL's Sarbanes Oxley processes and explain how these processes are used to ensure that any payroll related to shared services is appropriately charged.

A.

FPL maintains three Sarbanes-Oxley (SOX) processes related to proper affiliate billings (see Attachment Nos. 1-3), as well as a SOX process outlining the controls around employee time reporting (see Attachment No. 4). Attachment No. 1, Direct Affiliate Charges, describes the control process for the preparation of direct billings, and ensures that FPL charges to the affiliates (both payroll and non-payroll) are billed in accordance with the company's Cost Allocation Manual. Attachment No. 2, Service Fee Charges to Affiliates, describes the controls in place to ensure that payroll charges, along with other costs included in the fee, are charged appropriately to the affiliates. Attachment No. 3, Affiliate Management Fee, provides the control for the proper allocation of the company's enterprise shared services to affiliates. In addition, the company maintains a SOX process that provides the controls over Time Reporting. This narrative, Attachment No. 4, documents the overall payroll time collection and reporting process, describing the time and attendance data used to calculate bi-weekly payroll, the authorization process and approval requirements. As indicated in this document, each employee's supervisor is required to review the biweekly payroll distribution of his/her employees and ensure that any payroll related to affiliate support is appropriately charged to the proper internal order. Each internal order has a defined and approved settlement rule which appropriately bills the proper affiliate.

In addition to the Sarbanes-Oxley processes, the company sends an annual reminder to reinforce each employee's responsibility regarding the payroll review process. The attached notice, Attachment No. 5, is the communication distributed in December 2011.

**Sarbanes-Oxley 404
Compliance**

**Florida Power & Light Co.
Process Narrative**

Process Name:	Direct Affiliate Charges		
Line of Business:	Financial		
ID#:	08.38.03	Version#:	1Q 2012
Documenter(s):	Deby Baldwin	Reviewer(s):	Jennifer Richards, Sol Stamm,
Date(s)/Time(s):	03/31/12	Location(s):	
Status:	FINAL	Sign-Off Date:	03/31/12

Objective(s)

FRF 9084 Affiliate Direct Charges (charges to affiliates for FPL incurred Corporate Service Costs) are accurately estimated and recorded.

FRF 9085 Affiliate Direct Charges are recorded in the proper accounting period.

FRF 9086 The current Direct Affiliate Charge process provides reasonable assurance that all costs with affiliate benefit are included in the internal order charges to affiliates.

Business Outcome(s)

Charge FPL Operating Business Unit and Corporate Service Costs out to the appropriate FPL Utility Affiliate.

GL Accounts Impacted by this Process

<u>Account</u>	<u>DESCRIPTION</u>	<u>Current SAP</u>	<u>New SAP Account</u>	<u>SAP FERC ACCT</u>	<u>Trading Partner</u>
146100	A/R-ASSOCIATED COMPANIES-CARMS	2000205	2000100	9146100	1100
146100	A/R-ASSOCIATED COMPANIES-CARMS	2000205	2000300	9146100	1100
146120	A/R-FPLE SEABROOK STATION-CARMS	2000205	2000100	9146100	6100
146146	A/R-CARMS-FPL RECOVERY FUND LLC	2000205	2000300	9146100	1550
146150	A/R-FPL RECOVERY FUNDING	2000205	2000300	9146100	1550
146190	A/R-ASSOC CO-KPB FINANCIAL CORP	2000205	2000300	9146100	1520
146192	Receivable from KPB - NQ Trust	2000205	2000300	9146100	1520
146250	A/R-FPL GROUP RESOURCES LLC	2000205	2000300	9146100	1254
146260	A/R-FPL GROUP RESOURCES LLC-CARMS	2000205	2000300	9146100	1254
146300	A/R-FPL GROUP	2000205	2000300	9146100	1100
146302	A/R-FPL GROUP RETN/CONTR	2000205	2000300	9146100	1100
146310	A/R-PALMS INSURANCE CO.	2000205	2000205	9146100	1270
146311	A/R-PALMS INSURANCE-CARMS	2000205	2000300	9146100	1270
146320	A/R-FPL NEW ENGLAND DIVISION	2000205	2000300	9146100	1540
146321	A/R-FPL NED SUBSTATION UPGRADE	2000205	2000300	9146100	1540
146370	A/R-FPL GROUP INTERNATIONAL	2000205	2000300	9146100	7200

**Sarbanes-Oxley 404
Compliance**

**Florida Power & Light Co.
Process Narrative**

146380	A/R-NORTH AMERICAN POWER SYSTEMS-	2000205	2000300	9146100	1260
146385	A/R-NORTH AMERICAN POWER SYSTEMS-CARMS	2000205	2000300	9146100	1260
146400	A/R-ALANDO	2000205	2000300	9146100	1310
146410	A/R-CARMS-FPL FIBERNET	2000205	2000300	9146100	1241
146412	A/R-CARMS-FPL READI-POWER	2000205	2000300	9146100	1240
146424	A/R-CARMS-FPLE POWER MKT-EMT ACTIVITY	2000205	2000300	9146100	2001
146425	A/R-CARMS-FPL ENERGY LLC EMT ACTIVITY	2000205	2000300	9146100	2000
146426	A/R-CARMS-FPL ENERGY SVCS EMT ACTIVITY	2000205	2000300	9146100	1208
146427	A/R-CARMS-FPLE PROJECT MANAGEMENT	2000205	2000300	9146100	2005
146430	A/R-CARMS-DUANE ARNOLD ENERGY CNTR-FPLE	2000205	2000100	9146100	6134
146435	A/R-DUANE ARNOLD-CARMS	2000205	2000100	9146100	6134
146440	A/R - Point Beach - FPLE	2000205	2000300	9146100	6152
146445	A/R - Point Beach - CARMS	2000205	2000300	9146100	6152
146610	ACCOUNTS RECEIVABLES-FPL FIBERNET	2000205	2000300	9146100	1241
146612	A/R-FPL READI-POWER	2000205	2000300	9146100	1240
146613	A/R - Fibernet Make Ready CIAC	2000205	2000300	9146100	1241
146615	A/R-FIBERNET TOWER LEASE	2000205	2000300	9146100	1241
146800	A/R-FPL GROUP CAPITAL, INC.	2000205	2000300	9146100	1200
146805	A/R-FPL GROUP CAPITAL-CARMS	2000205	2000300	9146100	1200
146855	A/R-SEABROOK STATION	2000205	2000100	9146100	6100
146860	FPLE POWER MARKETING, INC	2000205	2000300	9146100	2001
146870	A/R-FPLE PROJECT MANAGEMENT, INC.	2000205	2000300	9146100	2005
146880	A/R-FPL ENERGY, INC	2000205	2000300	9146100	2000
146890	ACCOUNTS RECEIVABLES-FPL ENERGY MAINE	2000205	2000300	9146100	2401
146901	Derivative Asset Current Intercompany	2500200	2500200	9146100	1208
146902	Derivative Asset Non-Current Intercompany	2904200	2904200	9146100	1208
146903	A/R-FPLES DERIVATIVES	2000205	2000205	9146100	1208
146904	A/R-FPL ENERGY SERVICES WITH EMT	2000205	2000205	9146100	1208
146905	A/R-FPLES	2000205	2000300	9146100	1208
146906	A/R-FPLES-VAP	2000205	2000300	9146100	1208

Other SOX Processes Impacted by this Process

N/A

Overview

The Cost Allocation Manual (CAM) contains the Company's policy for direct charging FPL Operating Business Units the Corporate Service Costs (including payroll and non-payroll costs as well as the affiliate management fee and service fees discussed in 08.38.01 and 08.38.02 respectively). Utility Business Units are provided instructions from various accounting departments (Cost Measurement & Allocations, Business Unit Accountants, and Corporate Accounting) on the appropriateness of charges

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to/from affiliates consistent with the policy contained in the CAM. In addition, in order to comply with corporate requirements, specific guidance for budgeting direct charges is provided by Corporate Budgets (documentation maintained by Corporate Budgets).

Sub-process Description

1. Affiliate Project Manager requests FPL employee

The project manager contacts the employee's supervisor and requests the services of the employee on a project for a specific amount of time.

2. Affiliate Project Manger completes request form for an affiliate IO

After obtaining approval by the supervisor, the Affiliate Project Manager requesting the employee must contact the FPL Utility SAP Control Group. This manager must fill out a request form for an affiliate internal order that includes the following data elements:

- a) The WBS Element the order will be assigned to and settled to
- b) The settlement rule
- c) The functional area
- d) Requesting company code

3. SAP Control Group reviews request form

The SAP Control Group will review the form and make sure it has all the required information. The request form will include a box to explain the need for special priority if applicable. For example a fire at a generation plant would be put at a greater priority than someone requesting personnel for routine maintenance. In order to expedite service, emergent work master data can be set up in advance.

4. Create affiliate IO

The SAP Control Group will create the affiliate IO using the information obtained in the request form.

5. Inform Affiliate Project Manager of IO creation

After IO creation, the SAP Control Group will inform the requester by email.

6. Provide IO to Utility company employee

Method of delivery will depend on the type of employee requested.

7. Employee charges affiliate IO on the timesheet

8. Maintain Affiliate Overhead Rates

This will be done by the SAP Control Group in the SAP configuration with the rates to be provided by the Cost Measurement and Allocation group in Regulatory Accounting.

9. Maintain settlement rules

This will be done by the SAP Control Group using the information provided on the IO request form.

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10. Execute Overhead Calculation

During the month end close, this process applies intercompany loadings to the Internal orders.

11. Run Settlement of Orders

IO settles to affiliate WBS when settlement is run at month end by the close coordinator of the FPL Utility footprint company.

12. FICO Reconciliation is run

FICO reconciliation is run at month end for all companies.

Inputs

- Internal orders
- Short and long term employee payroll loading rates

Suppliers

- Affiliate Accounting Departments
- Utility Operating Business Unit providing service to affiliates
- Corporate staff groups providing service to affiliates
- Information Management Financial Systems Department
- Utility Business Unit or Staff Group receiving charges from affiliate
- Cost Measurement & Allocation Department

Process Participants

- FPL Utility Operating Business Units
- FPL Utility Corporate Staff Groups
- Affiliate Finance/Accounting Departments
- IM Financial Systems Department

Customers

All affiliates who receive direct charges

Control Objectives/Activities

Control Activities

- No IO transactions can take place from the Utility to its affiliates without a valid IO from an affiliate. **Control Activity FRF0385**
- All internal order charges are systematically processed and summarized by SAP, thus ensuring the accuracy and completeness of charges to affiliates. **Control activity FRF0386**

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- The SAP system systematically applies the payroll loadings to the FPL payroll. The payroll loading rates are first reviewed and approved by the CMA Manager before they are provided to SAP for input in the system. **Control Activity FRF0387**
- The CMA department verifies that the appropriate rates have been entered into SAP by the SAP Control Group (annually at a minimum). **Control Activity FRF0388**
- On a limited basis, FPL employees may be utilized on a long term basis and thus a long term payroll adder is used. CMA maintains a list of such employees and verifies that the appropriate rate is being applied to the long term loaned FPL employees. **Control activity FRF0389**

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**Florida Power & Light Co.
Process Narrative**

Process Name	Service Fee Charges to Affiliates		
Line of Business	Financial		
ID#	08.08.02	Version#	1Q2012
Documenter(s)	Deby Baldwin	Reviewer(s)	Jennifer Richards, Sol Stamm
Date(s)/Time(s)	03/31/2012	Location(s)	
Status	FINAL	Sign-Off Date	03/31/2012

Control Objective(s)

FRF 9087 Service Fee charges are appropriately estimated and accurately recorded.

FRF 9088 Service Fee charges are recorded in the proper accounting period.

FRF 9089 The current Service Fee charge process provides reasonable assurance that all Service Fee related costs with affiliate benefit are included in the charges to affiliates.

GL accounts impacted by this process

<u>DESCRIPTION</u>	<u>SAP ACCT</u>	<u>Final SAP Account</u>	<u>SAP ACCOUNT DESCRIPTION</u>
SERVICE LEVEL AND AFFIL MGMT FEE CREDITS	5804000	5804000	ADMINISTRATIVE EXPENSES - CREDITS
	5974200	5974200	TX OTH INC TX-FICA(SOCIAL SECURITY)
	5974100	5974100	TX OTH INC TX-STATE UNEMPLOYMENT
	5974000	5974000	TX OTH INC TX-FEDERAL UNEMPLOYMENT
	5450200	5450200	EMPLOYEE WORKER COMP INSURANCE EXPENSE
	5300800	5300800	PENSION & WELFARE TRANSFER-FPL GROUP

Other SOX processes impacted by this process

N/A

Business Outcome(s)

- Charge FPL affiliates their appropriate costs for certain shared services using the internal order(IO) for cost collection and the level 4 work breakdown structure (WBS) for allocation between affiliates.

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Overview

Florida Power & Light Company (FPL) supports enterprise and affiliate operations through direct project activities and shared governance, compliance and other support functions. Direct activities are charged to affiliates through specific internal orders. Shared support functions are allocated through four (4) management fees. This SOX narrative describes three of those fees, including the Energy, Marketing and Trading (EMT) Back Office (Systems and Risk Management), Nuclear business unit support to the NEER nuclear plants, Information Management business unit support to the NEER nuclear plants systems. It is the responsibility of the providing FPL business unit management to ensure that all resources dedicated by FPL for the services to be provided are included in the charges.

The business unit budget coordinator/analyst is responsible for assuring appropriate payroll charges are identified, and included in the fee, and assuring that all costs are charged appropriately to the affiliates to prevent subsidization.

These Service Fees utilize the accumulate and settle method and will follow the same intercompany process for charging intercompany internal orders that will be loaded with overheads and settle to NEER cost objects. See the breakout below:

Three types of Service Fees:

1. Nuclear
2. IM- Information Management
3. EMT- Energy Marketing and Trading

The Service Fees will receive the following overheads:

- Payroll taxes
- Employee benefits - service costs
- Employee benefits - pension credits
- Performance incentives
- Affiliate - A&G payroll
- Affiliate - A&G expenses
- Affiliate - Workers Comp

Sub-process Description

Nuclear Service Fee (Allocation Based on Number of Units)

The cost pool is allocated to the affiliates based on the number of units. The CMA accountant verifies that number of units data used in the calculations is accurate. **FRF0394** The CMA department uses internal media sources such online INFPL, FYI Plus, FYI, News, Etc. to ensure the split used in the Service Fee calculations are revised when appropriate to reflect significant changes such as merger and acquisition activities. **Nuclear management reviews the designation of employees as being included in the Service Fee on a quarterly basis. FRF0399** The use of the number of units for allocation is FPL's

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approved policy (as stated in the CAM) to allocate the appropriate costs between its affiliates for these services.

IM Nuclear Service Fee (Allocation based on number of units)

The IM manager of Cost and Performance is responsible for identifying the appropriate costs and calculating the Service Fee charges. The Service Fee uses the actual costs to determine the Service Fee amount to charge affiliates. The cost pool is allocated to the affiliates based on the number of units. The CMA accountant verifies that the number of units used in the calculations is accurate. **FRF0394** The CMA department uses internal media sources such online INFPL, FYI Plus, FYI, News, etc. to ensure the split used in the Service Fee calculations are revised when appropriate to reflect significant changes such as merger and acquisition activities. **FRF0399** The use of the number of units for allocation is FPL's approved policy (as stated in the CAM) to allocate the appropriate costs between its affiliates for these services.

EMT Service Fee (Allocation based on a time study and specific drivers)

There are two components of the EMT Service Fee: 1. Systems and 2. Risk Management. Both groups are allocated based on a time study performed annually. The business unit budget coordinator/analyst is responsible for assuring that payroll is charged based on the latest available time study. CMA verifies that the calculation is revised to reflect significant changes such as merger and acquisition activities.

Sub process description for all Service Fees

The final overhead loading rates from the Cost Allocation & Measurement department for the current year are submitted to the SAP control group once they are approved by the CMA Manager.

Inputs

- Level of service requested by affiliates from business unit/staff group operations
- Business unit/staff group budget data for specific departments/personnel
- Number of nuclear units for allocation for utility and affiliates
- IO work orders
- FPL affiliate loading rates
- Schedule 3a (Budgeting Reporting Tool)

Suppliers

- FPL Nuclear business unit
- FPL Information Management business unit
- FPL EMT business unit
- FPL CMA department
- FPL Corporate Budget department

Process Participants

- FPL Nuclear Budget Coordinator / analyst

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- FPL EMT Budget Coordinator / analyst
- FPL Corporate Budget Manager
- FPL CMA Manager
- FPL CMA accountant

Control Activities

- The number of nuclear generating units ratio used by Information Management and Nuclear BU's to determine allocations is reviewed by CMA to assure allocated costs to affiliates through the fees are accurate. **FRF0394**
- The Cost Measurement & Allocation Department (CMA) ensures that the business unit budget coordinator/financial analysts, who are responsible for identifying the appropriate costs and calculating the Service Fee charges, have approved the Service Fees to be provided for the upcoming year. **FRF0395**
- During the FPL budget process, the FPL Corporate Budget Manager receives FPL business unit Service Fee charges through the Schedule 3a process. The Schedule 3a is completed and submitted by FPL business units in mid-October. The Schedule 3a is summarized and presented to FPL and affiliate senior management at the budget review meeting, which establishes the total FPL Group budget. **FRF0396**
- The FPL business units request the final affiliate loading rates for the current year from the CMA department which are also submitted to the SAP control group once they are approved by the CMA Manager. **FRF0397**
- The CMA department identifies significant changes to the number of nuclear units through various internal media such as online INFPL, FYI Plus, FYI, News, Etc. to ensure the split used in the Service Fee calculations are revised when appropriate. **FRF0399**

NEER and FPL Management meet periodically throughout the year to discuss the Service Fee activities and comparisons of the budgeted fee to actual tracked cost for year to date period. **FRF0512**

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**Florida Power & Light Co.
Process Narrative**

Process Name:	Affiliate Management Fee		
Line of Business:	Financial		
ID#:	08.38.01	Version#:	1Q2012
Documenter(s):	Deby Baldwin	Reviewer(s):	Jennifer Richards, Sol Stamm,
Date(s)/Time(s):	03-31-2012	Location(s):	
Status:	FINAL	Sign-Off Date:	03/31/2012

Objective(s)

FRF 9080 Affiliate Management fee (charges allocated to affiliates for FPL incurred Corporate Service Costs) are accurately estimated and recorded.

FRF 9081 Affiliate Management fee is recorded in the proper accounting period.

FRF 9082 The current AMF process provides reasonable assurance that all costs with affiliate benefits are included in the AMF calculation.

GL Accounts Impacted by this Process

Fin. Stmt	Account	DESCRIPTION	Company Code	Current SAP	New SAP Account
OM - A&G	922000	ADMINISTRATIVE EXPENSES TRANSFERRED-CR	1500	5804000	5804000
Oper Inc	408125	TX OTH INC TX-FICA(SOCIAL SECURITY)	1500	5974200	5974200
Oper Inc	408120	TX OTH INC TX-STATE UNEMPLOYMENT	1500	5974100	5974100
Oper Inc	408115	TX OTH INC TX-FEDERAL UNEMPLOYMENT	1500	5974000	5974000
OM - A&G	925103	EMPLOYEE WORKER COMP INSURANCE EXPENSE	1500	5450200	5450200
OM - A&G	926122	PENSION & WELFARE TRANSFER-FPL GROUP	1500	5300800	

Other SOX Processes Impacted by this Process

- N/A.

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Business Outcome(s)

Charge FPL Affiliates their appropriate costs for certain shared services using the internal order("IO") for cost collection and the level 4 work breakdown structure ("WBS") for allocation between affiliates.

Overview

Florida Power & Light Company (FPL) supports enterprise and affiliate operations through direct project activities and shared governance, compliance and other support functions. Direct activities are charged to affiliates through specific internal orders and WBS structures. Shared support functions are allocated through four (4) management fees. This SOX narrative describes the first of those fees, the Affiliate Management Fee (AMF).

FPL Corporate Staff infrastructure related costs that benefit Affiliates are transferred at fully loaded rates. This management fee is based on a cost pool of shared services, which is allocated based on specific drivers (where available), or the Massachusetts formula, which is the weighted average of Revenue, Payroll, and average Property, Plant, and Equipment. The Fee is charged monthly based on actual costs for the month accumulated in defined cost pools allocated on percentages determined at the beginning of the year. The allocation percentages may be revised during the year to reflect significant changes such as merger and acquisition activities. Examples of services provided include:

- Payroll Processing
- Tax Accounting and Compliance
- External Reporting / Auditing
- Environmental
- Information Management
- Human Resources
- Corporate Communications
- Finance / Treasury
- General Counsel (administrative and overhead)
- Engineering and Construction
- Strategy/Business Processes

Cost Pool - Corporate Shared Services

The Shared Service cost pool is determined annually through extensive review of the product and services provided by FPL's corporate staff group departments. The review, done in conjunction with the budget cycle, identifies products and services within each staff group's work breakdown structures(WBS) that benefits Affiliates as well as FPL. This review is done by Business Unit by Level 3 WBS element. For each Level 3 WBS element the Business Unit describes the activity being undertaken, the affiliates to which the service is provided and the specific cost driver applicable to the activity. If there is no specific cost driver identified the Massachusetts Formula will be used to allocate the cost pool. Each WBS element determined to be included in the AMF can only have one driver applied to it, therefore WBS elements are set up so that each level 3 only contains activities that are to be allocated on the specified driver.

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Allocation - Massachusetts Formula

FPL allocates certain shared services cost pool using the weighted average of Gross Payroll, Gross Revenues and average Gross Property Plant and Equipment. This methodology has been in use for many years in other regulatory arenas and has been named the "Massachusetts Formula." The annual forecasted amount for each of the three components above is collected from FPL and Affiliates (NEER, Lonestar, NHT, UST, FiberNet 1241, FiberNet 1242, Palms Insurance Co, FPL Energy Services, and Readi Power). The components are given equal weight and an average is computed yielding a ratio of FPL and affiliate activity.

Each month each FPL Affiliate is billed its actual monthly designated costs based on the IO driver percentages.

Sub-process Descriptions

Table Example

Staff Group Loaded Actual WBS's with Affiliate Benefit (Loaded with PWTI)
Sub Processes #1, #8, #9, #10, #12, #15

WBS Benefit	Affiliate	Payroll Costs	Non-Payroll Costs	Payroll Loadings	AMF Cost Pool
12345	Yes	\$100	\$880	\$20	\$1000

Massachusetts Formula
Sub processes #2, #11

Entity	Payroll % of TTL	Revenues % of TTL	PP&E % of TTL	Weighted AVG %
FPL	66.69%	69.31%	60.07%	65.35%
Lonestar	0.13%	0.00%	0.00%	0.04%
NHT	0.03%	0.08%	0.11%	0.07%
UST				
NEER	31.45%	29.11%	39.12%	33.22%
FPLES	0.52%	0.80%	0.04%	0.45%
Palms		0.10%		0.03%
FiberNet 1241	1.18%	0.60%	0.67%	0.82%
FiberNet 1242				
Readi Power	0.01%	0.00%	0.00%	0.00%
<i>Total Affiliate</i>				<i>34.65%</i>

Massachusetts Formula applied to Staff Group Loaded Cost Pools
Sub process #12

AMF Cost Pool	Mass. Formula	AMF Fee Amount
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\$1000	34.65%	\$347
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Sub-process Descriptions

1. CMA meets with all FPL Corporate Staff Group Budget Coordinators during the annual budget process to assess all level 3 WBS elements and identify current year budget activities with affiliate benefit on a template approved by the Business Unit manager and verify or identify an appropriate driver (Information Management, Engineering and Corporate Services, and Human Resources also provide specific allocation drivers for affiliates) for those budget activities.

For each level 3 WBS activity created by a business unit after creation of the template described above the information required for the template will also be provided to the CMA Department as part of the process to include the element in the SAP system.

AMF Activity: If during the year there is a significant event that would materially impact the allocation of shared costs (e.g. mergers and acquisitions or significant unexpected plant purchases or closures) the effected allocation percentages may be adjusted on a prospective basis to reflect the event.

2. CMA contacts all FPL and Affiliate Forecasting/Budgeting Departments during the annual budget process to obtain forecasted components for use in the calculation of the specific cost drivers identified in the template and the Massachusetts Formula.
3. The CMA Department obtains the most recently available Pre-Tax Rate of Return to apply to the year-end estimated net book values of Capitalized Software and Hardware to include in the Affiliate Management Fee calculation. The data is obtained from the Surveillance Report to generate the Pre Tax ROR (Control Activity FRF 0374).
4. The CMA Department obtains from Information Management in the fourth quarter for the previous Year-end Capitalized Hardware and Software Schedules (sent early so they can begin) to identify new additions to the Capitalized Hardware and Software Roll-forward Schedules.
5. The CMA Department updates the Capitalized Software and Hardware Roll-forwards Schedules by adding the new Capitalized Assets to the prior year schedule, and calculating depreciation for the current year on all Capitalized Assets, and removes fully depreciated Capitalized Assets. The obtained ROI rate is applied to the net book values and added to the annual depreciation. The two amounts are allocated by specific drivers provided by Information Management.

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Allocation percentages

6. The CMA Department calculates the Massachusetts Formula with the components provided by the affiliates. More than one Massachusetts Formula may be calculated if some budget activities do not benefit all affiliates. Information is reviewed and entered in the Massachusetts Formula Excel calculation file. The Affiliate Management Fee driver allocation percentage calculation worksheets and completed templates are reviewed by the Cost Measurement and Allocation Manager.
7. Prior to the closing process in January each year the CMA Department distributes the calculated allocation percentages by driver to the business units for inclusion the SAP master record for the applicable Internal Orders.
8. At the completion of the above process the CMA Department compares the information in the SAP Master Data File to the completed templates and final rate calculations to insure that the proper drivers and percentages have been included in SAP for the automated monthly billing of the AMF

Inputs

- Corporate Staff Group Data from Budget Coordinators SAP
- FPL and Affiliate Projected Gross Revenues, Gross Property Plant & Equipment, and Total Assets
- Fossil Megawatts
- Capitalized Hardware and Software Detail
- Capitalized Software and Hardware New Additions
- FPL Rate of Return
- Specific Driver Data

Suppliers

- FPL Budget Coordinators
- FPL Finance Staff
- FPL Executive Compensation Department
- FPL Information Management Department
- FPL Regulatory Accounting
- Affiliate Financial Management

Process Participants

- FPL Forecasting Manager
- FPL Staff Group Business Unit Coordinators
- FPL IM Accountants
- FPL Regulatory Accountants
- FPL CMA Accountants

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- FPL Manager of CMA

Control Objectives/Activities

Control Activities

- Business Unit Managers determine the Budget Activities with affiliate benefit and related cost drivers and respond by completing the level 3 WBS template and returning it to CMA **Control Activity _FRF 0373**
- The FPL and Affiliate Forecasting/Budgeting Departments provide the account balances for the Massachusetts Formula components and responds in email format (using approved forecast amounts). The CMA Accountant reviews the responses and enters the appropriate budget data into the respective cost allocation worksheet to calculate the percentage allocator. **Control activity_0375.**
- Regulatory Accounting provides information related to FPL Rate of Return, Capitalized Hardware and Software, Executive information, Payroll Loading Rate and any special non-recurring items that benefit affiliates to the CMA Accountant, which is carefully reviewed and included in the Affiliate Management Fee. Reliance on budget review and approval for amounts included. **Control activity 0375.**
- The Affiliate Management Fee allocation percentage calculation and completed templates are reviewed by the Cost Measurement and Allocation Manager. The CMA Department distributes the calculated allocation percentages by driver to the business units for inclusion in the SAP master record for the applicable WBS element. At the completion of the Budget process the CMA Accountant compares the information in the SAP Master Data File to the completed templates and final rate calculations to insure that the proper drivers and percentages have been included in SAP for the automated monthly billing of the AMF. **Control Activity FRF 0371**

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NextEra Energy, Inc. Process Narrative

Name:	Time Reporting		
Line of Business:	Human Resources - Payroll		
ID#:	05.02.01	Version#:	1Q12
Documenter(s):	Laura Miller	Reviewer(s):	Dick Thomas
Date:	04/06/2012	Location(s):	NextEra Energy, Inc sites
Status:	Final	Sign-Off Date:	03/31/2012

Business Objective(s)

Time and attendance data used to calculate biweekly payroll reflects employees' actual time worked, is authorized, and is accurately and timely input and processed.

GL Accounts Impacted by this Process

5202000 P/R - Non-Exempt
 5203000 P/R - Exempt
 5206000 P/R - Non-Exempt OT
 5207000 P/R - Exempt OT
 5210000 P/R-NonPd OT
 5211000 P/R-PLANT Barg Var
 5212000 P/R-PLANT Non-Exmpt
 5213000 P/R-PLANT Exmpt
 5215000 P/R-PLANT Barg Var O
 5216000 P/R-PLANT Non-Exmpt
 5217000 P/R-PLANT Exempt OT
 5220000 Overtime Meals
 5220100 P/R Temp Reliev
 5220200 P/R Shift Diff
 5203000 P/R - Exempt
 5204000 P/R - Barg Fixed
 5208000 P/R - Barg Fixed OT
 1488888 Payroll Cash Clearing

Other SOX Processes Impacted by this Process

05.02.00 – Calculating Payroll
 05.03.00 – Disbursing Payroll
 05.04.00 – Maintain Master File
 05.05.00 – Payroll Accounting (NER)

Business Outcome(s)

Time data is processed timely and accurately and is used to calculate biweekly payroll.

Overview

This narrative documents the payroll time collection and reporting process. It describes the time and attendance data used to calculate biweekly payroll, the authorization process and approval requirements.

Sub-process Descriptions

Time Reporting Overview

A. This narrative documents the payroll time collection and reporting process for approximately 15,000 employees of NextEra Energy, Inc. and seventeen of its subsidiaries.

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NextEra Energy, Inc. Process Narrative

- NextEra Energy, Inc. – less than 60 employees
 - Florida Power and Light Utility –approximately 10,000 employees
 - FPL Energy Services, Inc. – less than 120 employees
 - FPL FiberNet - less than 200 employees
 - NextEra FiberNet – less than 15 employees
 - NextEra Energy Infrastructure, LLC – less than 10 employees
 - NextEra Energy Resources, LLC – less than 650 employees
 - NextEra Energy Power Marketing, LLC. – less than 300 employees
 - NextEra Energy Project Management, LLC. – less than 250 employees
 - NextEra Energy Maine Operating Services, LLC – less than 150 employees
 - NextEra Energy Operating Services, LLC – less than 1,100 employees
 - NextEra Energy Seabrook, LLC - less than 750 employees
 - NextEra Energy New Mexico Operating Services, LLC – less than 20 employees
 - NextEra Duane Arnold, LLC – less than 650 employees
 - WindLogics Inc. – less than 75 employees
 - Gexa Energy, LP – less than 250 employees
 - NextEra Point Beach, LLC – less than 700 employees
 - Lone Star Transmission, LLC – less than 10 employees
 - NextEra FiberNet, LLC – less than 20 employees
- B. Employees are paid bi-weekly.
- C. Policies concerning employee vacation time earned, sick time paid, illness in family time paid, time off for death in family, company and floating holidays, etc., are documented and communicated to employees via the HR Employee Handbook provided to each employee upon hire and periodically updated and reissued. Time reporting guidelines for all employees can be reviewed on the NextEra Energy, Inc. Corporate Portal under My HR Direct / HR Policies Pay and Benefits Information / My Pay / Time Reporting. Specific time reporting policies for bargaining unit employees are contained in the latest Memorandum of Agreement for Seabrook, NextEra Energy Maine Operating Services, NextEra Energy Point Beach, NextEra Energy Operating Services and FPL Utility.
- D. NextEra Energy, Inc. refers to its Human Resources personnel and payroll system collectively as SAP/HRF (Human Resource/Finance) which includes the following:
1. **SAP HR** - module within SAP that stores employee master data including organizational, time, payroll and benefits data.
 2. **CATS** – (Cross Application Time System) module within SAP used for time collection. All time is entered or interfaced in the CATS time sheet and transferred to HR for payment and CO for financial posting.
 3. **sMobile** – Time collection system for approximately 1,400 distribution and transmission crew employees. The sMobile system is owned by the Distribution and Transmission business units. Time is entered in sMobile, approved by the supervisor and interfaced to SAP CATS twice daily. SAP HR sends employee data to sMobile to support the time collection process. The outbound interfaces from SAP/HRF interface to sMobile are detailed below in the sub-process 05.02.01.02.
 4. **AMP Time Collection System** – Time collection system for approximately 80 transmission employees. The AMP system is owned by the Transmission business unit. Time is entered in AMP and interfaced to SAP CATS daily. SAP HR sends absence and attendance type data to AMP to support the time collection process. AMP extracts employee data from the HR non-confidential table. The outbound interfaces from SAP/HRF interface to AMP are detailed below in the sub-process 05.02.01.02.
- E. The Time Reporting Guide in the corporate portal establishes that employees with computer access may enter their time daily, but not later than the Friday before pay date. Org Unit Leaders/Supervisors are

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expected to communicate to new employees time reporting expectations. Bargaining Unit employees are informed by their Org Unit Leader/Supervisor of time reporting requirements/deadlines and the need to submit their time to their designated timekeeper or enter their time directly into sMobile.

- F. Time reporting data is collected via the CATS module in SAP/HRF and is transferred to HR to support the pay calculation. Time recorded in the sMobile and AMP system is interfaced to CATS and follows the same process for integrating into payroll. A preliminary run of the Biweekly payroll calculation process is executed on Payroll Sunday to allow a review of payroll reports (see "Outputs") and correct errors (examples in sub-process descriptions) prior to the final calculation of payroll on Monday evening. **(PRF063)** Supervisors notify their direct reports if an error is detected, so they can make the correction themselves. **(PRF063)** Employees with computer access can enter any correction on Monday before 3pm for inclusion in the final calculation of payroll that evening. Supervisors may utilize back up/emergency timekeepers to enter corrections for their direct reports if the employee cannot access a computer before the corrections deadline. If needed, transaction ZP_TIME_SHEET can be used to identify individual time entries by the user ID of the person who created or changed the record.

CATS Time Collection

- A. Except for those field employees that do not have access to a computer terminal, most non-bargaining unit employees are required to input their own time into SAP through the Corporate Portal – HR Direct – My Time – Time Sheet system referred to as CATS, which is the time collection/reporting system of SAP.
- B. There are two types of work schedules:
- 1) *Fixed work schedule* employees are only required to report exceptions to time. Exceptions include paid absences, unpaid absences, overtime time and other premium pay and any time that should be charged to the employees default internal order or home cost center. This population is salaried. The system will automatically pay 80 regular hours, unless a time exception is reported. Fixed employees account for approximately 60% of all employees.
 - 2) *Variable work schedule* employees, including part-time employees, are required to enter all reportable time, in order to be paid. Variable employees account for approximately 40% of all employees.
- C. Time Entry Process NEE, Fibernet, NEER:
- 1) All hours entered on the timesheet must be charged to a home cost center or WBS element.
 - 2) There is a timesheet user exit that generates an error if the cost center or WBS element has not been entered
- D. Time Entry Process FPL Utility and FPLES:
- 1) All employees will have an infotype 0027 Cost Distribution employee level override. This determines where employee time will be charged if no internal order is entered on the timesheet.
 - 2) Exception time entered by the fixed population and not charged to an internal order is populated with the appropriate internal order based on the employee's override recorded in infotype 0027.
 - 3) Remaining regular hours for the fixed population are generated and charged to the appropriate internal orders based on the employee's infotype 0027 distribution.
 - 4) Hours entered by the variable population and not charged to an internal order are populated with the appropriate internal order based on the employee's infotype 0027 distribution.
 - 5) Process to default the internal order is accomplished through a custom timesheet user exit that auto populates the internal orders on time entries.
 - a. The program determines if an internal order has been entered for the time entry.
 - b. If an internal order has been entered by the user, no action is taken.
 - c. If no internal order is entered, the program determines if the employee has an infotype 0027 employee level override.
 - d. If the employee has an IT0027 employee level override, the time is allocated to the internal orders listed on the infotype 0027.
 - e. For employees with one internal order, the internal order is populated and no additional lines are generated.

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- f. For employees with greater than one internal order the time entries are allocated to the internal orders based on the percentages stored in infotype 0027 and rounded to the hundredths
 2. Remaining regular hours for fixed employees:
 - a. A custom time entry program populates the remaining regular hours for fixed employees with an IT0027 employee level override.
 - b. The remaining regular hours are allocated to the internal orders listed in the employee's IT0027.
 - c. This process will run on payroll Sunday.
 - d. The purpose of this program is to ensure all regular hours for fixed employees are distributed out of the home cost center
 3. Future dated time:
 - a. If time is entered for a work date greater than the current pay period, infotype 0027 distribution will not be defaulted on the record because the distribution may change.
 - b. The time entry program that runs on payroll Sunday will look for any hours in the timesheet that have not been distributed and distribute these hours based on the employee's infotype 0027 distribution. This will ensure the appropriate distribution is associated with time that is entered in the future.
 4. Changes to the infotype 0027 during the pay period after time has already been entered for that for that pay period:
 - a. A user exit will be called when the employee makes a change to the infotype 0027 during the pay period.
 - b. The program will check if the employee already has time entered for the pay period.
 - c. If time has been entered the employee will receive a message and be prompted to reenter the time so the appropriate distribution is applied.
 5. Non-productive time (vacation, sick, holiday):
 - a. If an employee enters distribution with the non-productive time, the hours will be charged to the internal order entered on the timesheet.
 - b. If an employee does not enter distribution with the non-productive time, the hours will be allocated to the internal orders listed in the employee's infotype 0027.
 6. Temporary relieving, shift and overtime meals:
 - a. If an employee enters distribution, the shift, temporary relieving and overtime meals will be charged to the internal order entered in the timesheet.
 - b. If an employee does not enter distribution and the employee has one IO on the IT0027, the time sheet entry will be updated with the IO from the IT0027. If the employee has more than one distribution the hours will default to the IO with the highest allocation.
- C. Employee quotas, including vacation, sick time, floating holidays, purchased vacation etc., are generated and maintained in the SAP HR module. SAP system error messages are generated if an employee attempts to enter more than their allowed/available quotas and the entry cannot be saved to the timesheet. Time off policies can be reviewed on the NextEra Energy Corporate Portal under My HR Direct / HR Policies Pay and Benefits Information / My Benefits / Time Off. The process to generate quotas will be documented in the HR Benefits narrative.
- F. *Designated timekeepers* input time for fixed and variable field employees without network computer access and the majority of time for bargaining unit employees in CATS. Timekeeper access requests are submitted through SAP GRC Access Controls which is located in the employee's Corporate Portal/My Portal/Applications. Once this online form is completed, it will automatically be forwarded to the employee's supervisor for approval. After the supervisor approves the request, the request is automatically forwarded to the Sr. Payroll Specialist. A Sr. Payroll Specialist reviews the form for completeness. If the request is for replacement or deletion of a timekeeper that has changed roles or responsibilities, a justified business need exists and the form is routinely routed to and approved by the appropriate Relationship Manager – HR/CS, and Payroll Manager - HR/Payroll. In the event a request is received to add a new timekeeper, the business unit need must be justified to the Relationship Manager – HR/CS, who then recommends approval. Once approved by the Sr. Payroll Specialist, the request is sent

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to the Payroll Manager –HR/Payroll for final approval. When the Payroll Manager approves the timekeeper request, it is automatically forwarded to IM Security for processing. The form is electronically sent to the HR Systems Manager for approval and IM Security grants timekeeper access once the request has been approved electronically.

- G. *Backup/emergency timekeepers* have been designated by each business unit and it is the Org Unit Leader's responsibility to communicate to their employees who to provide their time to, in the event of an emergency when employees who regularly enter their own time are, for some reason, unable to. Each business unit is expected to review and ensure that those who have backup/emergency timekeeper access are current.

sMobile Time Collection:

- A. Time collection for Distribution and Transmission bargaining unit crew/field employees is done daily by using handheld devices (sMobile). There are approximately 1,400 crew/field employees.
- B. WMS and TCMS referred work is scheduled to an sMobile crew.
- C. As the crew progresses the jobs on their sMobile device (enroute, arrive, complete) the start and stop times are auto populated on the timesheet. At the end of the day the crew will enter additional information including work headquarters time, total hours for each employee on the crew, overtime, temporary relieving, shift differential, meals and employee exception time.
- D. The timesheet is then submitted to the supervisor for approval. There are submittal validations the timesheet must meet in order for the timesheet to be in their supervisor's portal view for approval. The supervisor will review the timesheet and either approve or reject it.
- E. When the timesheet is approved, the sMobile system will run through the approval validations on extract. If the timesheet meets all validations, the status is updated to "approved". All approved status timesheets meet the criteria for extraction. During the extraction process, there are additional cross timesheet validations that must be met in order to be included in the extraction file to SAP.
- F. The sMobile extraction process runs twice daily. If any timesheets fail validations during the extraction process an exception will be displayed in sMobile with the details for the time clerks to investigate. The clerks would make the appropriate change to the timesheet or have the crews make the change and resubmit to the supervisor where the timesheet must meet the submittal, approval and extraction validations again.
- G. The sMobile extraction file is sent to SAP via an ftp script and loaded into the system through job ZHR_TM_I_D_SMOBILE_CATS_FILE. Errors encountered during the SAP load process are sent back to sMobile in file sMobile_error.txt. The error file includes the employee cost center, the error is sent to the responsible sMobile service center clerk based on the cost center. The clerks would make the appropriate change to the timesheet or and resubmit the timesheet to the supervisor where the timesheet must meet the submittal, approval and extraction validations again.
- H. An audit process that compares the SAP records to the sMobile records is executed weekly on Thursday evening and at 2PM on payroll Monday. sMobile sends an extract including the last 12 weeks of time data. This file is compared to an extract from the SAP timesheet. The audit job is ZHR_TM_I_W_SMOBILE_CATS_AUDIT. The purpose of the audit is to ensure SAP and sMobile are in synch. If differences are identified they are included in the audit error file, sMobile_audit_error.txt. The error file includes the employee cost center, the error is sent to the responsible sMobile service center clerk based on the cost center. The clerks would make the appropriate change to the timesheet and resubmit the timesheet to the supervisor where the timesheet must meet the submittal, approval and extraction validations again.

AMP Time Collection

- I. Time collection for approximately 80 Transmission exempt employees.
- J. The employee enters time in the AMP system. AMP has front validations for regular, overtime and holiday hours. If the time entry passes the validation it is saved to the AMP database.
- K. The AMP extraction process runs once daily at 8PM

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- L. The AMP extraction file is sent to SAP via an ftp script and loaded into the system through job ZHR_TM_I_D_AMP_CATS_FILE. Errors encountered during the SAP load process are written to the spool and error table ZPERR_CATS_LOAD. The error table is cleared by the AMP time clerk. AMP time records are corrected in AMP and resent to SAP in the next extraction.
- M. An audit process that compares the SAP records to the AMP records is executed weekly on Thursday evening and at 2PM on payroll Monday. AMP sends an extract including the last 12 weeks of time data. This file is compared to an extract from the SAP timesheet. The audit job is ZHR_TM_I_W_AMP_CATS_AUDIT. The purpose of the audit is to ensure SAP and AMP is in synch. If differences are identified they are written to the spool. The spool is reviewed and cleared by the AMP time clerk. AMP time records are corrected in AMP and resent to SAP in the next extraction.

CATS Transfer to HR

- A. The CATS Transfer, transaction CAT6, transfers time sheet data to the SAP HR module, infotypes 2001 Absences and 2002 Attendances.
- B. The time is data is automatically transferred to HR when the time record is saved. In some instances the time data does not transfer to HR (examples include locked employee records, etc.) The initial transfer and repeat transfer jobs, program RPTEXTPT, are executed daily to ensure all time has transferred to HR. Errors encountered during the transfer process are written to the job spool. The spool is reviewed by the payroll executioner during the payroll closing process.
- C. Time that has not transferred to HR can be identified in the table PTEX2000. On payroll Monday, the payroll executioner reviews this table using transaction SE16, variant TIME NOT TRFRD, to ensure all records have transferred to HR.
- D. If un-transferred records exist in the table, the records are reprocessed through the CAT6 transaction by the payroll executioner.
- E. The Over/Under 80 Hours report is reviewed by the Sr. Payroll Specialist – HR/Payroll on payroll Monday morning. Full-time variable schedule employees with greater or less than 80 straight time hours reported are reviewed for potential error. The Sr. Payroll Specialist calls or emails the employee, manager or timekeeper and reports that time is missing or reported in excess of 80 hours. This allows corrections to be made prior to final payroll calculation

Time Evaluation

- A. Time Evaluation is a standard SAP/HRF program that converts time entries (absence and attendance codes) into wage types for the pay calculation process.
- B. Program RPTIME00 is processed daily as part of the batch schedule.
- C. Errors encountered during the time evaluation process are written to the job spool. The spool is reviewed by the payroll executioner.
- D. Employees that have not successfully processed through time evaluation can be identified in query PDC Recalc Date < or = Payroll Monday. This query is executed by the payroll executioner on payroll Monday. Personnel numbers returned by the query are reprocessed through time evaluation by the payroll executioner.

Payroll Audit Reports

- A. Payroll audit reports are generated by the payroll batch schedule. The following reports are included:
 - 1) "Time Sheet Review" report (ZP_TIME_SHEET) provides time sheet information for the current pay period for supervisor approval. For fixed work schedule employees, if no exceptions are entered (e.g. absences like sick, vacation, sickness in family, etc.) then no data is displayed and it understood that regular hours of 80 (biweekly) were worked. (PRF063)

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- 2) "Over/Under 80 Hours" report (ZP_OVER_UNDER) provides a report of variable work schedule employees who have over / under regular 80 hours for the current pay period. (PRF063)
 - 3) "Prior Period Corrections" report (ZP_PRIOR_PERIOD) provides correction time sheet information for the prior pay periods reported in the current period. (PRF063)
 - 4) "Payroll Earnings" report (ZP_PER) provides an overview of employee payroll earnings for the pay period.
 - 5) Released Employees with Pay" (ZP_PAYDIST) provides a report of employees who are in terminated status with earnings in the current pay period. This allows an opportunity to verify final pay for terminated employees as well as to ensure that terminated employees are not paid in error following separation.
- D. Preliminary Payroll Audit Reports are sent on payroll Monday morning based on time entered through Sunday at 3:00 p.m. E.T. The Preliminary Reports provide Org Unit Leaders/Supervisors an opportunity to review and make changes prior to 3:00 p.m. E.T. Monday to take effect in the current pay period. Managers are notified of the report via an automated Outlook.
- E. Final Payroll audit reports are generated after payroll is exited. The post-payroll audit reports serve as a final check on employees' time entered, any prior period corrections, and payroll earnings. Opening of the final payroll earnings report by the employee's Org Unit Leader/Supervisor constitutes review by the Org Unit Leader/Supervisor of the accuracy and validity of the earnings paid to the employee. (PRF063) Org Unit Leaders/Supervisors are required to personally review Final Payroll Reports each period within 4 weeks of the report's send date. An automated reminder is sent on the Monday after payday, each pay period, to any Org Unit Leader/Supervisor with an unopened Final Payroll report. An automated Outlook email on Payroll Wednesday notifies each Org Unit Leader/Supervisor that Final Payroll Audit Reports are available in their SAP Inbox. A Final Payroll report not reviewed within 4 weeks is considered delinquent.
- F. Batch jobs ZHR_PY_R_B_PAYROLL_AUDIT_SOX_1 thru ZHR_PY_R_B_PAYROLL_AUDIT_SOX_4 are processed every other payroll Friday to report on delinquent review of final payroll audit reports. The program provides a report of un-reviewed payroll audit reports and automatically generates an email notification to each individual with un-reviewed reports. Based on the number of un-reviewed reports, the individual's immediate supervisor and next level manager may be copied on the email reminder. For example, an individual with one un-reviewed report would receive a reminder with no one else copied on the email. If the individual has two un-reviewed reports, his/her direct manager is notified; with three reports, the direct manager and the next higher level manager are notified.
- G. Transaction ZP_PAYROLL_AUDIT_SOX can also be processed on-demand. This provides the payroll department the ability to send out (manual) emails at their discretion to those Org Unit Leaders (Supervisors) that have unreviewed reports.

Inputs

- Employee electronic time entry via CATS in SAP/HRF
- Timekeeper electronic time entry via CATS in SAP/HRF
- sMobile time collection database via programmatic interface to SAP/HRF
- AMP time collection database via automatic interface to SAP/HRF

Suppliers

- Employees
- Timekeepers
- Org Unit Leaders (Supervisors)
- HR/Payroll

Process Participants

- Business Analyst – Information Management (SAP Support)
- Programmer – Information Management (sMobile)
- Business Systems Consultant – Accounting and Financial Editing Support

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- Technical Supervisor – Accounting and Financial Editing Support
- Supervisor Property Analysis – Property Accounting and Reporting Analysis
- sMobile Support (Transmission and Distribution)
- Principal Engineer – Protection & Control Operations Planning (Power Systems)
- Business Consultant – Application Support
- Payroll Executioner:
 - Sr. Payroll Specialist – HR/Payroll
 - Payroll Accountant I – HR/Payroll
 - HR Business Analyst II – HR/Payroll
- Payroll Manager – HR/Payroll
- Project Manager – HR Business Services
- Relationship Managers – HR/CS Shared Services
- HR Service Specialist - HR/Employee Benefit Services
- Org Unit Leaders (Supervisors)
- Employees
- Timekeepers
- HR Systems (IM) – Consisting of Systems Administrators/Programmer Analyst

Outputs

The following reports are an output of preliminary payroll and can be used to validate time collection data at the employee level prior to final Payroll Calculation and are therefore included as outputs of time collection for control purposes, and are generated based on Supervisor/Direct Report relationship.

- "Time Sheet Review" report (zp_time_sheet) provides time sheet information for the current pay period for supervisor approval. For fixed work schedule employees, if no exceptions are entered (e.g. absences like sick, vacation, sickness in family, etc.) then no data is displayed and it is understood that regular hours of 80 (biweekly) were worked.
- "Over/Under 80 Hours" report (zp_over_under) provides a report of variable work schedule employees who have over / under regular 80 hours for the current pay period.
- "Prior Period Corrections" report (zp_prior_period) provides correction time sheet information for the prior pay periods reported in the current period.
- "Payroll Earnings" report (zp_per) provides an overview of employee payroll earnings for the pay period.
- "Released Employees with Pay" report (zp_paydist) – sent only when pertinent – provides a report of employees who are in terminated status with earnings in the current pay period.

Tools/Technology

- SAP/HRF
- AMP
- sMobile
- Outlook (Email)
- Risk Analysis and Remediation RAR (SAP Segregation of Duties tool)
- SAP GRC Access Controls
- EWeb (intranet)
- Corporate Portal

Control Objectives and Control Activities

Control Objective:

- **PR2005** - Recorded time and attendance data reflects actual time worked and is authorized.

Control Activity:

PRF063 - Time reporting audit reports (i.e. Time Sheet Review, Over/ Under 80 Hours and Prior Period Corrections) are reviewed and approved by Org Unit Leaders on a biweekly basis for

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completeness, accuracy and validity of their employees' time entries in SAP. The review and approval take into account the following factors:

- Accuracy of actual hours worked to default cost center or charged to other WBS elements, cost centers or internal orders
- Completeness of hours entered based on employee work schedule (i.e. fixed vs. variable)
- Accuracy, completeness and validity of paid time off entered (i.e., actual time taken off is entered)
- Awareness of prior period corrections and whether they are accurate, complete and valid.

Other factors impacting their employees' time entered that may not be detailed in the reports (e.g. telecommute, travel, overtime, etc) are also considered. (Automated Control with Manual Intervention)

Risks

- Completeness and accuracy of hours reported. Incomplete and/or inaccurate time reporting data could result in employees being over or under paid which could result in over or under stated liabilities and salary expense.
- Validity of hours reported. Employees may be paid for hours not worked which could result in overstatement of payroll expense, recorded liabilities, cash flow issues, etc.

Other Comments

- There are currently two Canadian companies which are part of the NextEra Energy Resources organization – NextEra Energy Canada, ULC and NextEra Energy Canadian Operating Services, Inc. The payroll for each of these Canadian companies is administered by a third party vendor - ADP Canada. The SAS 70 report provided by ADP Canada documents the internal controls followed by ADP Canada personnel. This report is reviewed by the HR Business Analyst II in the payroll department for any exceptions noted under the test results.
- Canadian employees enter their time and cost allocations in a time and attendance web-based application provided by ADP Canada called ezLaborManager. Managers review and approve their employees' time cards in the ezLaborManager system no later than 9am EST on payroll Monday closing. Timecards cannot be transferred from ezLaborManager to ADP Canada Payroll for calculation unless all time has been approved by the Managers. ADP Canada Payroll calculates payroll and pays the employees. ADP payroll reports are available after payroll runs and are accessible by FPL Payroll and NEER Accounting to balance and generate funding to ADP Canada.
- System security and application controls related to ensuring proper segregation of duties within the SAP HR system are reviewed and documented on an ongoing basis by HR Systems (IM). The segregation of duties tool, Risk Analysis and Remediation (RAR), is used to monitor separation of duties compliance of the Process Participants. Any SOD conflicts have mitigating controls identified and documented.

Dec. 7, 2011

To all NextEra Energy company employees:

We remind all supervisors that as part of your leadership responsibilities, you are required to review the biweekly payroll reports sent to your SAP HR Inbox every payroll Monday and Wednesday morning. Please check them for accuracy regarding your employees' time entry and overall payroll earnings. As part of your review, please also validate each employee's time entry of vacation, sick, holiday, overtime, time worked, allocation of time for labor distribution, **including payroll charged to other companies**, and all other time entries.

Additionally, any earnings such as lump sums, bonuses or other earnings should also be reviewed at this time. The post-payroll audit reports serve as a final check on employees' time entered, any prior period corrections, and payroll earnings with pay.

To be in compliance with internal company controls implemented under the guidelines of the Sarbanes-Oxley Act:

"The post-payroll audit reports serve as a final check on employees' time entered, any prior period corrections, and payroll earnings. Opening of the final payroll earnings report by the employee's Org Unit Leader/Supervisor constitutes that the reports have been reviewed for the accuracy of the time charged to different projects and validity of the earnings paid to the employee."

To comply with the payroll controls, it is every leader's responsibility to review payroll reports for accuracy in a consistent and timely manner, since their accuracy has a significant impact on your employees' paychecks and the company's Sarbanes-Oxley compliance.

This message is sent from an account that is not set up to receive emails. If you have questions or comments, send them to: Employee.Communications@NextEraEnergy.com.

Q.

Refer to page 32 lines 6-18 of witness Ousdahl's direct testimony. What has the Cost Measurement and Allocations department's annual intercompany billing reports for each of the years 2008-2011 revealed regarding costs billed to affiliates by FPL?

A.

Prior to the implementation of SAP, the inter-company billings were based on budgeted amounts. After year end, the Cost Measurements and Allocations group calculated the difference between the budgeted amount billed and the amount that should have been allocated based on actual pool costs. These differences were billed to the affiliates as a true up adjustment in the subsequent fiscal period. Therefore, prior to 2012, monthly budget to actual reporting was not relevant.

Beginning in 2012, AMF budget to actual reports are reviewed monthly and significant variances are investigated. Attachment Nos. 1 and 2 are the April 2012 year to date variance analysis, along with the year to date AMF budget to actual report.

Q.

Refer to page 32 lines 17-18 of witness Ousdahl's direct testimony. Has FPL performed any internal audits of its affiliate billings in 2008, 2009, 2010 or 2011? If yes, what did the audit findings reveal?

A.

Yes. Internal Auditing performed a review of FPL's Affiliate Management Fee and Cost Allocation in 2008. The results of the audit found internal controls to be adequate. Improvement opportunities were noted and recommendations made to further strengthen the process and internal controls thereof. Management agreed with and implemented the audit recommendations. More detailed information is available in the confidential audit report provided in FPL's response to Staff's Fourth Request for Production of Documents No. 35.

Q.

Please provide a detailed description of FPL's Energy Smart Florida initiative.

A.

Florida Power & Light Company's Energy Smart Florida Project will increase Smart Grid functionality by upgrading multiple portions of the electric system with intelligent devices as well as collecting, integrating and analyzing relevant data. The planned Grid upgrades include the installation of monitoring, control and diagnostic equipment and software applications in the areas of end-use consumption, distribution and transmission.

Electric Transmission Systems – Includes the installation of various types of Protection & Control Systems, Digital Disturbance Recorders (DDR), Phasor Measurement Units (PMU), Interoperability and Analysis Infrastructure, and Intelligent Electronic Devices (IED) on the electric transmission/substation system to strengthen overall reliability.

Additional Detail

§ 45 Phasor Measurement Units

§ 54 Line Protection and Control Systems (includes 25 Transmission Line Panels, 13 Autotransformer Protection and Control upgrades and 16 Cap Bank Protection and Control upgrades)

§ 21 Distribution Substation Scheme Upgrades

§ 107 Feeder Breaker and Regulator substation IED projects

§ 22 Digital Disturbance Recorders (DDRs)

§ Intelligent Electronic Devices (IEDs)

- 78 Transformer Gas in Oil Monitors
- 102 Bushing Power Factor Monitors
- 78 Transformer Temperature Monitors
- 118 Transmission Breaker Monitors
- 506 Battery System Health Monitors
- 2 Weather and Contamination Monitoring Stations
- 6 Critical Cable Information Systems

Electric Distribution Systems – Includes monitoring, issuing and confirming control commands to capacitor banks; monitoring devices on throw-over switches; installing communicating fault indicators, voltage and current sensors on feeders and large transformers; and automated switches that isolate faults and restore service quicker.

Additional Detail

- § 230 Automated Feeder Switches
- § 1,420 Two Way Capacitor Controllers
- § 3,915 Fault Current Indicators
- § 750 Throw-over Switch Monitors
- § 1,026 Voltage and Current Sensors
- § 2,750 Transformer Monitors
- § 34 Network Monitors

Advanced Metering Infrastructure (AMI) – Includes a portion of the acceleration of the deployment of smart meters and associated communication systems to residential and small business customers throughout FPL's service territory, and Commercial and Industrial customers in Miami-Dade County. Customers with smart meters will have access to an FPL web portal where they can view their monthly, daily and hourly interval usage data.

Enhanced Performance and Diagnostic Centers – The activity that integrates the network elements and leverages the synergies among them in a crosscutting manner in order to enable additional benefits is the implementation of EPDCs. The EPDCs are the “nerve center” of the Smart Grid, gathering and analyzing information on the grid’s operating conditions to enable predictive maintenance and faster recovery from disruptions through self-healing. The EPDCs will serve as a hub for the information currently available from FPL’s existing performance and diagnostic centers as well as the information that will flow from the Intelligent Electronic Devices that will be added to the grid.

Customer Systems – Includes a pilot installation of in-home displays or home energy controllers with an alternative rate pilot for residential customers, a pilot demonstrating the integration of distributed generation, a customer education program and the development of workforce educational curriculums.

Q.

Please provide a detailed description of FPL's smart meter project.

A.

In 2007, FPL began replacing residential and small business customers' single-phase, non-demand meters with FPL's new smart meters. The project includes the installation of 4.5 million smart meters for residential and small / medium business customers. The meters are equipped with two-way communications allowing for the meters to be read remotely as well as connected and disconnected remotely. The meters collect energy consumption data at predetermined intervals. The meters also include "flags" which will be useful for the determination of outage, restoration and theft.

FPL anticipates that deployment of smart meters to residential and small business customers throughout its entire service territory will be completed in 2013. This project will improve the service we provide our customers and provide them with tangible benefits today while laying the foundation for a host of future benefits.

As part of the Energy Smart Florida initiative, FPL will pilot the installation of demand, poly-phase, time of use and net smart meters for commercial/industrial (CI) customers in Miami-Dade County. This pilot program includes the installation of approximately 83K smart meters and began in 2nd quarter 2012 and is expected to be completed by 2013. This project is fully funded by a grant from the Department of Energy.

Q.

On page 6 of her testimony, Marlene Santos states “Customers with activated smart meters have access to an online energy dashboard that provides information that allows them to see how much energy they are using by the hour, day, and month, and help them manage their energy consumption.” Please explain what information is available to the customer and how soon after the reading the information it is available.

A.

FPL’s online energy dashboard which is available on FPL.com allows customers to:

- View how much energy is being consumed by the month, day or hour - helping customers better understand and adjust their usage patterns;
- View the approximate cost of electricity for each interval;
- View the projected amount of the next bill – helping customers understand their current energy costs and what they might spend in the upcoming billing period;
- See usage information in conjunction with temperatures so that the customer can correlate the impact weather has on their energy usage;
- Compare usage for monthly, daily or hourly time periods; and
- For a selected 30-day period, a user can also compare their weekends vs. weekdays, highest five days, or lowest five days of usage.

Hourly energy consumption data is uploaded into our database daily. These readings are typically available the next day for customers to view. An example of the information available on FPL’s online energy dashboard is attached to Marlene Santos’ direct testimony as Exhibit MMS-5.

Q.

On page 18 of her testimony, Marlene Santos states "The \$200 million grant has funded several significant projects that allow us to provide many incremental benefits of the smart grid to our customers at no additional cost to them." Please describe each project that received funding from the grant, including how much was funded by FPL and the grant.

A.

The investments in smart grid technologies are called Energy Smart Florida (ESF). FPL committed a portion of the ESF project as matching funds for the DOE's smart grid investment grant. The total grant project cost is \$578 million, with FPL contributing \$378 million or 65% of the grant project cost. The DOE grant funded the remaining \$200 million or 35% of the grant project cost. FPL is applying the \$200 million grant to fully fund the grant projects described in our response to question 139, which are:

- Installation of over 9,000 intelligent devices on the distribution and transmission system;
- establishing enhanced performance and diagnostic centers for the collecting, integrating and analyzing of smart grid data;
- piloting in home technology with our customers;
- piloting distributed generation for our customers with solar generation;
- creating a workforce curriculum program;
- implementing a customer smart grid education program;
- accelerating the deployment of smart meters and associated communication systems to residential and small business customers; and
- piloting smart meters for Commercial and Industrial customers in Miami-Dade County.

Q.

On page 18 of her testimony, Marlene Santos states “The grant also funded our In-Home-Technology Project which is designed to test emerging in-home technologies and dynamic pricing associated with smart meters.” Please explain the project in greater detail, including what the company hopes to learn about its customers, what products would be made available to customers, and who would provide the customer with any potential products and services.

A.

Project Purpose – The Project involves emerging residential technologies and pricing concepts, which are unfamiliar to customers and have unknown impacts. The purpose of FPL’s Energy Smart Florida (“ESF”) In-Home Technology Project (“the Project”) is to study the technical feasibility, economic merit and customer acceptance of emerging smart-grid enabled consumer technologies and dynamic pricing. In part, the Project is helping FPL study how smart meter-enabled dynamic pricing combined with real-time energy information and load reduction enablement impact peak load and energy use. FPL is also collecting data on customer satisfaction, conservation behaviors adopted, and long-term customer acceptance of the Project approach. It is too soon to speculate on what, if any, products or services may be offered to customers stemming from this pilot. FPL intends to wait until the pilot is completed and all results have been fully analyzed before making any such determinations.

Please note, this project and dynamic pricing pilot are fully funded by a U.S. Department of Energy grant, pursuant to the American Recovery and Reinvestment Act which was awarded on March 30, 2010 (DE – OE0000211). As a result, project expenditures have no net impact on FPL’s rate base.

Project Description - To study the technical feasibility, economic merit and customer acceptance of emerging smart-grid enabled technologies and dynamic pricing, FPL is using the capabilities of its smart meters to provide participants real-time energy and price information and text messages, and to collect interval demand and energy data. Table 1 below details the distribution of up to 500 Project homes across four combinations of technology and rates.

Table 1: Distribution of Project Participants by Technology and Rate

Technology / Rate	In-Home Displays (IHD) in up to 250 homes	Home Energy Controllers (HEC) in up to 240 homes	HEC and Smart Appliances in up to 10 homes
Standard Rate RS-1	Group 1 226 homes	Group 2 111 homes	N/A
Dynamic Price Response Pilot Rate RSDPR-1	N/A	Group 3 117 homes	Group 4 10 homes

- **Group 1:** FPL provided 226 customers with in-home displays (“IHDs”) that provide real-time energy use information. Group 1 customers remain on the standard RS-1 residential rate.
- **Group 2:** FPL provided 111 customers with Home Energy Controllers (“HECs”). HECs allow customers to monitor their home’s energy usage and cost as well as monitor the energy use of selected appliances or schedule the appliance operation. Group 2 customers remain on the standard RS-1 rate.
- **Group 3:** FPL provided 117 customers with HECs that notify customers of dynamic price events and enable selected appliances to respond in a programmatic manner to dynamic price signals. Group 3 customers take service pursuant to the Residential Service Dynamic Price Response Pilot Rate (“RSDPR-1”).
- **Group 4:** FPL provided 10 customers with HECs as well as Smart Appliances, which can conserve energy and reduce load in innovative ways. Group 4 take service pursuant to the RSDPR-1 pilot rate.

The experimental design shown in Table 1 allows FPL to determine the effects of four combinations of technology and electric rates. In addition to the Project homes, a control group of randomly selected homes is being used for comparative purposes.

Pilot Rate – The RSDPR-1 rate is in the general class of dynamic rates known as Critical Peak Pricing (CPP). According to the Federal Energy Regulatory Commission, “dynamic pricing refers to prices that are not known with certainty ahead of time.”¹ In the case of CPP, prices during certain periods are known ahead of time, “but the days on which those prices will occur are not known until the day before or the day of consumption.”²

FPL is piloting a two-tier dynamic rate that is consistent with FERC’s definition of a dynamic rate, and simplifies and highlights the effect of dynamic pricing on customer behavior in order to measure customer and system impacts. Under FPL’s proposed RSDPR-1 rate, participants are buying discounted energy at least 99 percent of the time. FPL may use up to one percent of the time for dynamic-price events called Conservation Price Hours, or CPHs. Energy prices are higher during CPHs, reflecting the need for load reduction through short-term conservation.

FPL received FPSC approval of the dynamic pricing pilot and the associated tariff on May 24, 2011 (Docket No. 110031-EG).

Description of Technology - FPL provided Project participants with a free IHD or HEC. All devices receive real-time price and energy use information from FPL’s smart meter and display current and historic energy use. Using the HEC, RSDPR-1 participants can enable selected appliances to respond to CPHs by adjusting thermostat set point, turning off the water heater and turning off the pool pump. The HEC also provides participants with the option to override, at a minimum, central air conditioning and heating response during CPHs at their discretion. Ten RSDPR-1 participants received a suite of five market-ready “Smart Appliances” including an electric heat pump water heater, clothes washer and dryer, dishwasher and refrigerator. These “Smart Appliances” have the ability to communicate with the HEC and respond to CPHs in innovative ways.

Project Monitoring – FPL is tracking the response rate to the Project offer and is measuring the energy conserved as a result of participation and peak load reduction resulting from CPHs. FPL is also evaluating billing impacts of the RSDPR-1 rate, including the distribution of savings based on consumption and response to CPHs. Satisfaction among participants will also be surveyed to understand long-term customer acceptance of the Project approach.

Footnotes:

¹ Federal Energy Regulatory Commission, "A National Assessment of Demand Response Potential" June 2009, page ix, footnote 3

² *Id.*

**Florida Power & Light Company
Docket No. 120015-EI
Staff's Fourth Set of Interrogatories
Interrogatory No. 144
Page 1 of 1**

Q.

Please state how many meter readers will be employed by FPL after the smart meters are installed throughout the service territory.

A.

After smart meters are installed for residential/small medium and the commercial/industrial (C/I) pilot project, FPL expects to employ approximately 90 meter readers. These meter readers will continue to read the remaining demand meters and handle meter related service orders.

Q.

For the period of 2013-2015, how many meter readers are being laid off or reassigned due to smart meter installations?

A.

	2013	2014	2015
<i>Meter Reading positions eliminated – Res/Small-med</i>	138	19	0
<i>Meter Reading positions eliminated – C/I pilot in Miami-Dade</i>	22	0	0

We have estimated the elimination of 160 meter reading positions in 2013 and 19 in 2014. We continue to work to help as many employees as possible move into positions in other areas of the company.

Q.

Please state the O&M and capital costs associated with smart meters for the years 2013-2015. In your response, please complete the following chart.

	2013	2014	2015
O &M			
O&M Savings			
Net O&M			

A.

The smart meter deployment is scheduled to end in 2013. The cost of the project includes the incremental costs associated with new service accounts. For 2014 and 2015, the costs reflected below are primarily system integration and network infrastructure purchases, not new service accounts smart meters.

Deployment of residential/small medium smart meters

(in millions)	2013	2014	2015
Capital	\$70.5	\$6.7	\$1.2
O &M	\$20.4	\$20.2	\$13.6
O&M Savings	\$16.5	\$33.1	\$41.2
Net O&M	\$3.9	(\$12.9)	(\$27.6)

In addition to the residential deployment noted above, FPL will be deploying 83K commercial/industrial smart meters. This deployment is a pilot in Miami-Dade and the capital is funded by the DOE.

Deployment of commercial/industrial smart meter pilot in Miami-Dade (capital funding by DOE)

(in millions)	2013	2014	2015
Capital	\$0	\$0	\$0
O &M	\$0.3	\$0.1	\$0.1
O&M Savings	\$0.8	\$0.8	\$0.8
Net O&M	(\$0.5)	(\$0.7)	(\$0.7)

Notes:

1. Excludes payroll and stores loaders

Q.

Please state whether there are any savings associated with smart meters for the years of 2013-2015. In your response, please breakdown the savings for 2013 and 2015 using the chart below.

	2013	2014	2015
Meter Reading			
Back Office			
Other Operations			
Total			

A.

Yes. The savings are as shown below.

Deployment of residential/small medium smart meters

(in millions)	2013	2014	2015
Meter Reading	\$14.4	\$17.2	\$17.4
Back Office	\$0.2	\$1.0	\$1.5
Other Operations	\$1.9	\$15.0	\$22.3
Total	\$16.5	\$33.1	\$41.2

Deployment of commercial/Industrial smart meter pilot in Miami-Dade (capital funded by DOE)

(in millions)	2013	2014	2015
Meter Reading	\$.8	\$.8	\$.8
Back Office	-	-	-
Other Operations	-	-	-
Total	\$.8	\$.8	\$.8

Notes:

1. Excludes payroll and stores loaders

Q.

Please explain a deployment timeline for the smart meter installations. In your response, please include yearly capital expense.

	2013	2014	2015
Meters			
Capital			

A.

The deployment for the smart meter project is scheduled to end in 2013. For 2014 and 2015, the dollars reflected are primarily for system integration and network infrastructure. After 2014, additional smart meter installations will occur as part of normal activities such as the addition of new customers.

(millions)	2013	2014	2015
Meters	0.5	0	0
Capital	\$70.5	\$6.7	\$1.2

Notes:

1. Excludes payroll and stores loaders

Q.

On page 19 of her testimony, Marlene Santos states that smart meters "include flags which are useful for the determination of outage, restoration, and theft." Please provide additional information on how smart meters are useful in the determination of theft.

A.

Prior to the introduction of smart meters, FPL relied primarily on physical observations to generate leads. Smart meters assist in the identification and reduction of theft by allowing FPL to capture consumption data at more frequent intervals than field observations would allow, and to receive electronic signals, or "flags", that indicate changes in meter status, such as loss of communication and power interruptions. Analysis of this data assists with the identification of theft leads.

Q.

On page 21 of her testimony, Marlene Santos talks about the identification and reduction of theft of electricity. She states the success rate of the leads generated by the smart meter is twice that of the previous processes. What is the success rate of identifying and reducing the theft of electricity using smart meters versus the legacy meters? In your response, please provide the amount of kWh of energy theft that has been reduced with the use of activated smart meters and the dollars of revenue that savings represents.

A.

The success rate is defined as the amount of leads resulting in billed cases. The comparison was based on leads generated from the previous process of relying primarily on physical observations versus meter data analytics, or a success rate of 24% versus 66%. In 2011, FPL used meter data analytics to bill \$1.9 million or 15.4GWh.

Q.

Please identify the amount of electricity (in kWh) that has been stolen over the past three years and the amount of revenue lost by FPL (in dollars).

A.

FPL does not know the total amount of electricity that was stolen. However, for 2009 to 2011 the amount of theft billed is approximately \$19.8 million, or approximately 165.0 GWh. Please note, theft billed is the amount back billed for customers with theft cases.

Q.

On page 6 of her testimony, Marlene Santos stated FPL is “investing in smart grid technologies to create a smarter and more efficient system for the delivery of electricity. Smart meters serve as the initial step.” Please describe the other steps that will be involved or utilized in the future.

A.

Smart grid technologies and their associated devices, such as smart meters, are a foundational step in building the infrastructure required to provide new functions and to produce new data that enables broader range analytical decisions and improves process capabilities.

FPL’s investments in smart grid technologies are underway. These investments include intelligent devices on the electric grid, enhancements to centers that monitor the performance of the grid, and smart meters. Work has begun to integrate these technologies. In the near term, smart technologies installed on our power lines will work in tandem with smart meters to improve reliability and aid in restoration. FPL witnesses Hardy and Miranda's testimonies include information about how the installation of smart grid technologies will improve reliability. These technologies pave the way for innovation and future benefits for our customers. FPL will continue exploring these technologies in a very disciplined and methodical fashion.

Q.

Please explain what FPL means by the phrase "Excellent Customer Service."

A.

FPL's meaning and use of the phrase "Excellent Customer Service" is consistent with providing safe and reliable electric service and responding efficiently and professionally to customers' inquiries which results in superior/first-rate service.

Q.

Please explain what FPL means by the phrase "fair and equal treatment of all customers."

- a. Please provide a listing of all reports or analyses FPL uses for budgetary purposes, to track each of the following items: regional costs, regional reliability, regional efficiency of operations, fair and equal treatment of customers, and efficient operations.

A.

Witness Hardy's meaning and use of the phrase "fair and equal treatment of all customers" in his testimony is consistent with treating all customers in an impartial, unbiased, nonpartisan and unprejudiced manner and in conformance with established rules.

- a. For regional tracking of costs, reliability and efficiency, FPL utilizes the following reports: Distribution Ops Scorecard; Run Rates by Major Activity; Forecast Daily Variance Report; Pole inspection Construction Summary; SAP Standard Business Warehouse Report; Vegetation Management Order to Work Report; and the Vegetation Management Operations Tracker. While FPL requires fair and equal treatment of customers, this is not tracked.

AFFIDAVIT

Robert E Barrett Jr
(Robert E. Barrett, Jr.)

State of Florida)

County of **Palm Beach**)

I hereby certify that on this 14th day of May, 2012, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared **Robert E. Barrett, Jr.**, who is personally known to me, and he/she acknowledged before me that he/she sponsored the answer(s) to Interrogatory No(s). **108, 109, 113** from **Staff's Fourth** Set of Interrogatories to Florida Power & Light Company in Docket No. 120015-EI, and that the response(s) is/are true and correct based on his/her personal knowledge.

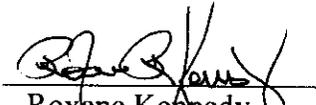
In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this 14th day of May, 2012.

Jennifer A Reklinski
Notary Public, State of Florida

Notary Stamp:



AFFIDAVIT


Roxane Kennedy

State of Florida)

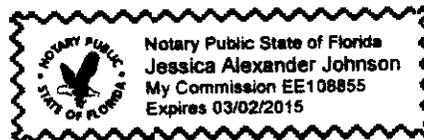
County of Palm Beach)

I hereby certify that on this 15th day of May, 2012, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared Roxane Kennedy, who is personally known to me, and he/she acknowledged before me that he/she cosponsored the answer(s) to Interrogatory No(s). 110 from Staff's 4th Set of Interrogatories to Florida Power & Light Company in Docket No. 120015-EI, and that the response(s) is/are true and correct based on his/her personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this 15th day of May, 2012.


Notary Public, State of Florida

Notary Stamp:



AFFIDAVIT



Roxane Kennedy

State of Florida)

County of Palm Beach)

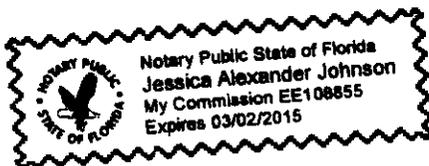
I hereby certify that on this 21st day of May, 2012, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared Roxane Kennedy, who is personally known to me, and he/she acknowledged before me that he/she sponsored the answer(s) to Interrogatory No(s). 110 from Staff's 4th Set of Interrogatories to Florida Power & Light Company in Docket No. 120015-EI, and that the response(s) is/are true and correct based on his/her personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this 21st day of May, 2012.

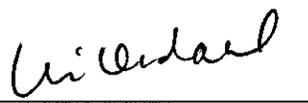


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Notary Stamp:



AFFIDAVIT



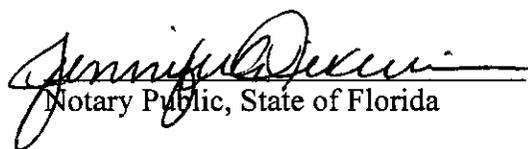
Kim Ousdahl

State of Florida)

County of Palm Beach)

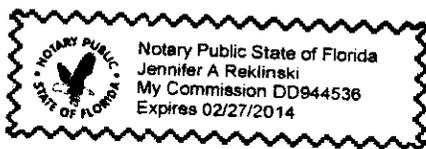
I hereby certify that on this 18th day of MAY, 2012, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared Kim Ousdahl, who is personally known to me, and she acknowledged before me that she sponsored the answers to Interrogatory Nos. 111-112, 116-118, 120-121, 125, and 127-137 from Staff's 4th Set of Interrogatories to Florida Power & Light Company in Docket No. 120015-EI, and that the responses are true and correct based on her personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this 18th day of MAY, 2012.



Notary Public, State of Florida

Notary Stamp:



AFFIDAVIT

Pamela L. Metz
Pamela L. Metz

State of Florida)

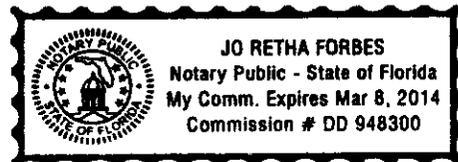
County of Palm Beach)

I hereby certify that on this 3rd day of July, 2012, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared Pamela L. Metz, who is personally known to me, and he/she acknowledged before me that he/she cosponsored the answer(s) to Interrogatory No(s). 114 and 115 from Staff's 4th Set of Interrogatories to Florida Power & Light Company in Docket No. 120015-EI, and that the response(s) is/are true and correct based on his/her personal knowledge.

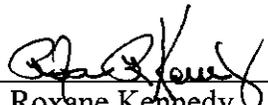
In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this 3rd day of July, 2012.

Jo Retha Forbes
Notary Public, State of Florida

Notary Stamp:



AFFIDAVIT



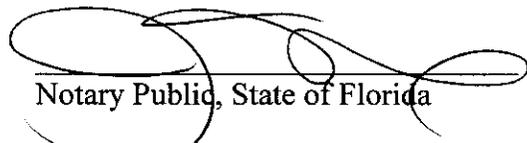
Roxane Kennedy

State of Florida)

County of Palm Beach)

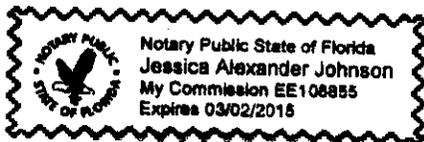
I hereby certify that on this 2nd day of May, 2012, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared Roxane Kennedy, who is personally known to me, and he/she acknowledged before me that he/she cosponsored the answer(s) to Interrogatory No(s). 114 and 115 from Staff's 4th Set of Interrogatories to Florida Power & Light Company in Docket No. 120015-EI, and that the response(s) is/are true and correct based on his/her personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this 2nd day of May, 2012.

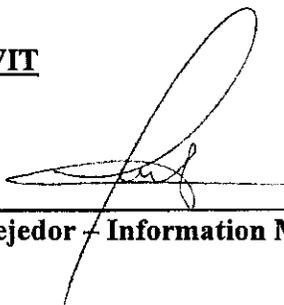


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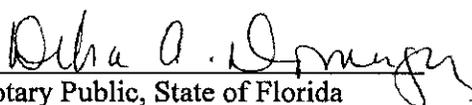
(Fabian Tejedor - Information Management)

State of Florida)

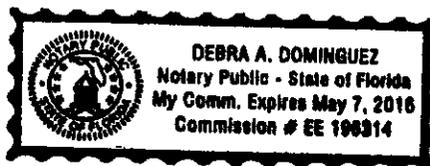
County of Dade)

I hereby certify that on this 2nd day of May, 2012, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared Fabian Tejedor, who is personally known to me, and he/she acknowledged before me that he/she co-sponsored the answer(s) to Interrogatory No(s). 114 and 115 from Staff's 4th Set of Interrogatories to Florida Power & Light Company in Docket No. 120015-EI, and that the response(s) is/are true and correct based on his/her personal knowledge.

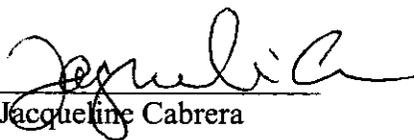
In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this 2 day of may, 2012.


Notary Public, State of Florida

Notary Stamp:



AFFIDAVIT

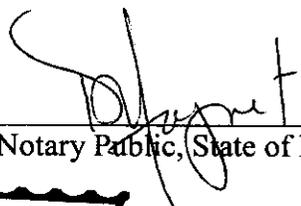

Jacqueline Cabrera

State of Florida

County of Miami-Dade

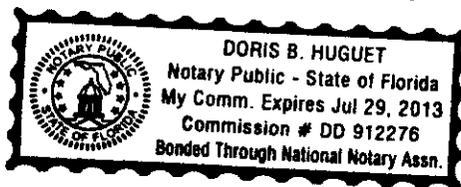
I hereby certify that on this 16 day of May, 2012, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared Jacqueline Cabrera, who is personally known to me, and she acknowledged before me that she provided the answer to interrogatory numbers 119, 122 through 124, 126, and 139 through 152 from Staff's Fourth Set of Interrogatories to Florida Power & Light Company in Docket No. 120015-EI, and that the response is true and correct based on her personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this 16th day of May, 2012.

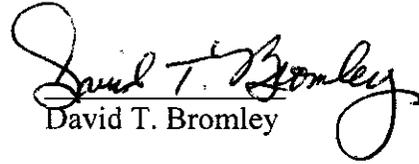


Notary Public, State of Florida

Notary Stamp:



AFFIDAVIT


David T. Bromley

State of Florida)

County of Palm Beach)

I hereby certify that on this 15th day of May, 2012, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared David T. Bromley, who is personally known to me, and he acknowledged before me that he sponsored the answers to Interrogatories 153-157 from the Florida Public Service Commission Staff's Fourth Set of Interrogatories to Florida Power & Light Company in Docket No. 120015-EI, and that the responses are true and correct based on his personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this 15th day of May, 2012.


Notary Public, State of Florida

Notary Stamp:

