

EXHIBIT B

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> DOCUMENT NUMBER-DATE 06670 OCT-3 ≌ FPSC-COMMISSION CLERK

extend a customer due date for up to days. Exhibit 8 contains the number of payment arrangements requested for the years 2007 to 2011. The number of payment arrangements established has steadily increased to a high of 1,422,375 in 2011. The number of payment arrangements denied peaked in 2009 at 1,006,236, and has since declined. FPL has relaxed its criteria for granting payment extension requests, including payment extensions related to deposits, providing a better opportunity for customers to continue service with the utility.

FLOR	DA POWER	& LIGHT	COMPAN	JY	1991 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 -
	NT ARRANG				
2007 - 2011					
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Established ⁹	897,809	1,035,277	1,260,573	1,271,002	1,422,375
Denied	844,658	881,473	1,008,238	907,905	876,604
	INTERNATION	10137617510	22266 8693	IN THE REAL PROPERTY IN	22989797
EXHIBIT 8	Source: FPL	Response Doc	ument Reques	t 1.20, 1.21 an	d 3.1

The number of payment arrangements completed or defaulted for the years 2007 to 2011 is shown in **Exhibit 9.** The highest number of payment arrangements completed was in 2011 at 941,845. The number of payment arrangements that defaulted was highest in 2007 at 347,452; however, an increase in defaults occurred in 2011, as well.

PAYME	NT ARRANG	EMENT C)ISPOSIT	ION		
2007 - 2011						
	1F 17 2007 S 4			UH 201014	120 T.(*)	
Completed	550,357	748,111	837,927	854,578	941,845	
Defaulted	347.452	269,866	295,007	278,326	325,602	

EXHIBIT 9 Source: FPL Response Document Request 1.20 and 1.21

2.2.2 BENCHMARKING STUDIES

Staff found that FPL participated in a 2011 PA Consulting Group benchmarking study that provided an assessment of utility business operations, including an analysis of credit and collections strategy and development for a group of utilities. FPL states that this study showed that FPL granted more payment extensions per customer than nearly all other utilities in the study. The study also showed that FPL ranked among the lowest in broken or modified arrangements.

Additionally, FPL participated in an annual utility benchmarking program conducted by Edison Electric Institute (EEI) DataSource. Data collected from this program includes payment arrangement inguiry data for 2008-2010 related to:

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⁹ Jan 2007 – Oct 2008 psyment extensions granted or established conteins only CCR (Customer Care), IVR (Interactive Voice Response) and Web contacts. Nov 2008 – Dec 2011 payment extensions granted or established contains contacts made through the following chennels: CCR (Customer Care), IVR / VRU (Interactive Voice Response), Web, Revenue Recovery, Revenue Protection, Customer Advocacy, PSC, SCS, Assist, Customer Billing, Field Operations and Other.
¹⁰ 2007 Payment Arrangement Disposition based on the 2007 number of payment arrangements granted using the Customer Protection Customer Advocacy, PSC, SCS, Assist, Customer Billing, Field Operations and Other.

²⁰⁰⁷ Payment Arrangement Disposition based on the 2007 number of payment arrangements granted using the Customer Compliance % Care Center Overall from December 2007 Payment Extension Monthly Summary Report to calculate the completed/defaulted amounts.

- Number of deferred payment arrangements made.
- Default rate (percentage) of the deferred payment arrangements
- Number of delinquent dollars that were in deferred payment arrangements on average

Audit staff was not allowed to review any information from this study due to its proprietary nature and EEIs non-disclosure requirements.

2.2.3 DISCONNECTS OF CUSTOMER SERVICE DUE TO NON-PAYMENT

Disconnections of electrical service due to non-payment are another indication that customers are having difficulty paying their utility bills. FPL disconnects service only after collection efforts have been exhausted. Collection efforts include a notice to disconnect and field collection, and may include a telephone call. FPL states that its progressive collection actions are limited to those accounts with the highest risk of loss.

During any given month for FPL, at least twenty percent of customers pay past the due date. The total numbers of accounts disconnected for non-payment by the utility during 2007 through 2011 are shown in Exhibit 10. Accounts may be disconnected multiple times for nonpayment. Service disconnections peaked in 2009 at the percentage of accounts disconnected peaked in 2009 at the percentage of accounts disconnected peaked in 2009 at the percent. Overall, this equates to less than one percent of accounts disconnected on a monthly basis.

FLORIDA POWER & LIGHT COMPANY Total Customers Disconnected 2007 - 2011				
Year	Number of Percent of Gustomers Total Disconnected Customers 11 Disconnected	Average Number of Total Customers		
2007		4,496,593		
2008		4,509,739 4,499,079		
2010		4,520,327		
2011		4,546,125		

EXHIBIT 10 Source: FPL Response Document Requests 3.1 and 3.6

2.2.4 GROSS WRITE-OFFS

Write-offs are revenues that the company has lost due to customer inability or refusal to pay their bill. FPL will send a final bill to a customer in two instances: (1) if the customer requests that his/her service be terminated or (2) if the customer is disconnected for non-payment and does not satisfy the debt within 10 days. Deposits and deposit interest, if applicable, are applied to the outstanding balance and a final bill or a refund check is remitted to the customer. If after approximately 90 days, the customer does not make payment on the final bill, the customer s balance is systematically written-off. FPL states that it reviews reports of balances written-off on a monthly basis.

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The total gross write-offs by FPL for 2007 through 2011 are shown in Exhibit 11.

¹¹ Number of Accounts Disconnected includes accounts disconnected more than once. For example, an account disconnected twice would reflect as two disconnects in the exhibit.

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ιſ	options/arrangements?
2-	In addition to two FPL care centers, GCS Services act as virtual customer service under a 6-year contract.
3	Final Bill for residential has automated OTC.
ч	Revenue Protection handles backbilling, meter tampering or by-pass.
5	SCS - Special Consumer Services. Four personnel that work with assist agencies.
۲	DR1.11
7- 8	[7. What can you tell us about the other utilities in the PA Consulting Group study? Were any of these utilities in Florida or the Southeast?
9	None in Florida. Across all CSR.
1 » JI	18. Can you tell us whether any of the utilities in the Superduper Confidential EEI DataSource study include other Florida or other Southeast utilities?
12	Yes, in Florida.
13	DR1.12
14	(no questions regarding the data)
15	DRI.13
16 17	19. Were there any audits performed by outside companies, regarding collection of past due amounts from customers and/or payment arrangements?
18	No.
19	DR1.14
20	(no questions regarding the data)
11	DR1.15
レンガンン	 20. Can you describe: the PEXT Guidelines and Graphs on October 2011 Revenue Recovery document? The Field Collections Summary OTC Indicator Summary
26	Leave notice; CGI cannot get in.
Z7	NCO – obisourced contractor does dialing; outbound calls for collection. MES – Medical Essential Services. Amnesty

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LAPERFORMANCE ANALYSIS SECTION00 PERFORMANCE ANALYSIS AUDITSUOU Payment Attangements/FP1.3.8 Workpapers/3.5 Interview Summarks/FP1. Interview Summary - KC.doc

Field Collections Summary (DR1.21):		Field Collections	Summary	(DR1.21):
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2 OTC Indicator Summary (DR1.21): The summaries measure the effectiveness of outbound collections calls.

3 Supplemental DRI.15: Please provide the November and December 2011 data.

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DR1.16: (KC) Can you describe the Denial Codes in the spreadsheets? Carlos said employee enters code in CIS Udatabase. Some customers are granted PAs but then do not comply. Denial codes are listed in the response: -this is another risk factor that would render a customer ineligible for a payment arrangement. (KC) It appears that each attempt by a customer that is denied is counted (i.e., multiple denials). Is that correct? (KC) The (blank) denial reason is "Customer hung up or declined recommendation." This means that the customer declined the recommendation by the PPI, employee, convet? DR1.17 (KC) On the "PEXT granted" spreadsheets, account numbers indicate that accounts have been granted additional (more than one) payment arrangement. Is that correct? DR1.18 and DR1.19 (KC) Are the Gross Write-offs data in accounts or dollars? (cither JH or Carlos) Net Amnesty - this is for the medical essential services (either JH or Carlos) Write-offs - manage receivables to manage write-offs. DR1.20 (KC) is the "PEXT granted" data on this spreadsheet the number of customers that were granted a PEXT? (either JH or Carlos) ratio constant from yr to yr. ~56% DR1.21 (KC) How does the company use the reports in response to manage payment arrangements? (KC) Are PEXT seen as a tool to help collections or as a necessary evil? (KC) Does the company seck to minimize PEXTs? For those in late-payment status, FPL's philosophy is to try to keep those customers in service-minimize disconnects because it costs money to print and send the final notice and to have field collections personnel disconnect service at the premises. Late fee of 1.5% is assessed. (VC) Are there instances when FPL waives this fee? (FPL panel, not sure who) The system is set up to bill the late charge. The company may waive the late-payment fee under certain conditions, e.g., 1 waiver in 12 months of good bill paying. Also, if a customer had an extenuating circumstance, such as a water heater leak causing a

high bill, FPL may walve the late-payment fee.

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