

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchase Power Cost
Recovery Clause and Generating
Performance Incentive Factor

Docket No. 140001-EI

Filed: September 26, 2014

**FLORIDA POWER & LIGHT COMPANY'S
PREHEARING STATEMENT
(OCTOBER 22-24, 2014 HEARING)**

Pursuant to Order No. PSC-14-0084-PCO-EI, dated February 4, 2014 and Order No. PSC-14-0439-PCO-EI dated August 22, 2014 establishing the prehearing procedure in this docket, Florida Power & Light Company ("FPL") hereby submits its Prehearing Statement regarding the issues to be addressed at the hearing scheduled for October 22-24, 2014.

1) WITNESSES

WITNESS	SUBJECT MATTER	ISSUES
G. YUPP	Mitigated Price Risk	2A
G. YUPP	2015 Risk Management Plan	2B
G. YUPP	Incremental Optimization Costs	2C – 2E
T.J. KEITH	Fuel Adjustment True-up and Projections	8-11 and 18-22
G.YUPP D. GRISSETTE	Fuel Adjustment True-Up and Projections	8-11 and 18
J. C. BULLOCK	GPIF Reward	16
J. C. BULLOCK	2015 GPIF Target/Ranges	17
T.J. KEITH	Nuclear Cost Recovery Amount for 2015	24A
T.J. KEITH	WCEC-3 Non-Fuel Revenue Requirements For January 2015 through December 2015	24B
T.J. KEITH	Capacity Cost Recovery True-Up And Projections	27-33
T.J. KEITH	Effective Date	34
T.J. KEITH	Should this Docket be closed	35

2) EXHIBITS

Witness	Subject Matter	Exhibits
Terry J. Keith	Fuel Cost Recovery 2013 Final True Up Calculation	TJK-1
Terry J. Keith	Capacity Cost Recovery 2013 Final True Up Calculation	TJK-2
J. C. Bullock	Generating Performance Incentive Factor Performance Results for January 2013 through December 2013	JCB-1
G. J. Yupp	2013 Incentive Mechanism Results	GJY-1
G. J. Yupp	August 2013 through December 2013 Hedging Activity True-up Report	GJY-2
Terry J. Keith	FCR 2014 Actual/Estimated True Up Calculation	TJK-3
Terry J. Keith	CCR 2014 Actual/Estimated True Up Calculation	TJK-4
G. J. Yupp	FCR 2015 Risk Management Plan	GJY-3
G. J. Yupp	Hedging Activity Report	GJY-4
G. J. Yupp	Fuel Cost Recovery Forecast Assumptions	GJY-5
Terry J. Keith	FCR 2015 E-Schedules (with Gas Reserves Project) Jan through Dec 2015	TJK-5
Terry J. Keith	FCR 2015 E-Schedules (without Gas Reserves Project) Jan through Dec 2015	TJK-6
Terry J. Keith	CCR 2015 E-Schedules (with Gas Reserves Project) Jan through Dec 2015	TJK-7
Terry J. Keith	CCR 2015 E-Schedules (without Gas Reserves Project) Jan through May 2015	TJK-8
Terry J. Keith	2015 Revenue Requirement Calculation for West County Energy Center Unit 3	TJK-9
J. C. Bullock	Generating Performance Incentive Factor Performance Targets for January 2015 through December 2015 (with Gas Reserves Project)	JCB-2
J. C. Bullock	Generating Performance Incentive Factor Performance Targets for January 2015 through December 2015 (without Gas Reserves Project)	JCB-3

3) STATEMENT OF BASIC POSITION

FPL's 2015 Fuel and Purchased Power Cost Recovery factors and Capacity Cost Recovery factors, including the prior period true-ups reflected therein, are reasonable and should be approved. FPL's hedging activities, as reported in the April 2014 and August 2014 hedging reports should be approved as prudent, and FPL's 2015 Risk Management Plan should be approved. FPL's asset optimization activities in 2013 delivered total gains of \$24,563,872. The total gains did not exceed the sharing threshold of \$46 million

and, therefore, customers received 100% of these benefits. FPL's Incremental Optimization Costs are reasonable and should be approved for recovery.

4) STATEMENT OF ISSUES AND POSITIONS

COMPANY-SPECIFIC FUEL ADJUSTMENT ISSUES

ISSUE 2A: Should the Commission approve as prudent, FPL's actions to mitigate the volatility of natural gas, residual oil, and purchased power prices, as reported in FPL's April 2014 and August 2014 hedging reports?

FPL: Yes. FPL's actions to mitigate the price volatility of natural gas, residual oil and purchased power prices, as reported in FPL's April 2014 and August 2014 hedging reports are reasonable and prudent. (YUPP)

ISSUE 2B: Should the Commission approve FPL's 2015 Risk Management Plan?

FPL: Yes. On August 5, 2008, FPL filed a petition in the fuel docket requesting approval of Hedging Order Clarification Guidelines (the "Hedging Guidelines"). The Hedging Guidelines were approved at the Commission's September 16, 2008 Agenda Conference. Section I of the Hedging Guidelines provides for investor-owned utilities such as FPL to file a risk management plan covering the activities to be undertaken during the following calendar year for hedges applicable to subsequent years, and for the Commission to review such plans for approval in the annual fuel adjustment hearing held in October. FPL's 2015 Risk Management Plan is consistent with the Hedging Guidelines and should be approved. (YUPP)

ISSUE 2C: What is the total gain in 2013 under the Incentive Mechanism approved in Order No. PSC-13-0023-S-EI, and how is that gain to be shared between FPL and customers?

FPL: FPL's asset optimization activities in 2013 delivered total gains of \$24,563,872. The total gains did not exceed the sharing threshold of \$46 million and, therefore, customers received 100% of these benefits. (YUPP)

ISSUE 2D: What is the appropriate amount of Incremental Optimization Costs under the Incentive Mechanism that FPL should be allowed to recover through the fuel clause for Personnel, Software, and Hardware costs?

FPL: The amount of Incremental Optimization Costs for Personnel, Software, and Hardware Costs that FPL should be allowed to recover through the Fuel Clause is \$464,747 for the period January 2014 through December 2014 and \$453,534 for the period January 2015 through December 2015. (YUPP)

ISSUE 2E: What is the appropriate amount of Incremental Optimization Costs under the Incentive Mechanism that FPL should be allowed to recover through the fuel

clause for variable power plant O&M costs incurred to generate output for wholesale sales in excess of 514,000 megawatt-hours?

FPL: The amount of Incremental Optimization Costs for Variable Power Plant Operations and Maintenance Costs over the 514 Megawatt Threshold that FPL should be allowed to recover through the Fuel Clause is \$1,832,655 for the period January 2014 through December 2014 and \$1,866,360 for the period January 2015 through December 2015. (YUPP)

GENERIC FUEL ADJUSTMENT ISSUES

ISSUE 6: What are the appropriate actual benchmark levels for calendar year 2014 for gains on non-separated wholesale energy sales eligible for a shareholder incentive?

FPL: FPL implemented a new Incentive Mechanism beginning in 2013, which was a component of the Stipulation and Settlement that was approved by the Commission in Order No. PSC-13-0023-S-EI issued on January 14, 2013 in Docket No. 120015-EI. The new Incentive Mechanism does not rely upon the three-year average Shareholder Incentive Benchmark specified in Order No. PSC-00-1744-PAA-EI, so there is no need to continue calculating that benchmark for FPL. (KEITH)

ISSUE 7: What are the appropriate estimated benchmark levels for calendar year 2015 for gains on non-separated wholesale energy sales eligible for a shareholder incentive?

FPL: FPL implemented a new Incentive Mechanism beginning in 2013, which was a component of the Stipulation and Settlement that was approved by the Commission in Order No. PSC-13-0023-S-EI issued on January 14, 2013 in Docket No. 120015-EI. The new Incentive Mechanism does not rely upon the three-year average Shareholder Incentive Benchmark specified in Order No. PSC-00-1744-PAA-EI, so there is no need to continue calculating that benchmark for FPL. (KEITH)

ISSUE 8: What are the appropriate fuel adjustment true-up amounts for the period January 2013 through December 2013?

FPL: \$98,482 under-recovery. (KEITH)

ISSUE 9: What are the appropriate fuel adjustment actual/estimated true-up amounts for the period January 2014 through December 2014?

FPL: \$266,562,206 under-recovery. (KEITH)

ISSUE 10: What are the appropriate total fuel adjustment true-up amounts to be collected/refunded from January 2015 to December 2015?

FPL: \$266,660,688 under-recovery. (KEITH)

ISSUE 11: What are the appropriate projected total fuel and purchased power cost recovery amounts for the period January 2015 through December 2015?

FPL: \$3,670,793,350 including prior period true-ups and revenue taxes and excluding the GPIF reward. (KEITH)

COMPANY-SPECIFIC GENERATING PERFORMANCE INCENTIVE FACTOR ISSUES

Florida Power & Light Company

No company-specific issues for Florida Power & Light Company have been identified at this time. If such issues are identified, they shall be numbered 13A, 13B, 13C, and so forth, as appropriate.

GENERATING PERFORMANCE INCENTIVE FACTOR (GPIF) ISSUES

ISSUE 16: What is the appropriate generation performance incentive factor (GPIF) reward or penalty for performance achieved during the period January 2013 through December 2013 for each investor-owned electric utility subject to the GPIF?

FPL: \$11,814,923 reward. (BULLOCK)

ISSUE 17: What should the GPIF targets/ranges be for the period January 2015 through December 2015 for each investor-owned electric utility subject to the GPIF?

<u>Plant / Unit</u>	<u>EAF</u>	
	<u>Target</u>	<u>ANOHR TARGET</u>
	<u>(%)</u>	<u>BTU/KWH</u>
Ft. Myers 2	84.1	7,197
Martin 8	84.7	6,922
Manatee 3	90.3	6,921
St. Lucie 1	83.5	10,405
St. Lucie 2	84.8	10,288
Turkey Point 3	83.2	11,143
Turkey Point 4	93.6	11,002
Turkey Point 5	91.1	7,011
West County 1	89.8	6,794
West County 2	78.8	6,866
West County 3	90.0	6,703

(BULLOCK)

FUEL FACTOR CALCULATION ISSUES

ISSUE 18: What are the appropriate projected net fuel and purchased power cost recovery and Generating Performance Incentive amounts to be included in the recovery factor for the period January 2015 through December 2015?

FPL: \$3,682,608,273 including prior period true-ups, revenue taxes and GPIF reward. (KEITH)

ISSUE 19: What is the appropriate revenue tax factor to be applied in calculating each investor-owned electric utility's levelized fuel factor for the projection period January 2015 through December 2015?

FPL: 1.00072. (KEITH)

ISSUE 20: What are the appropriate levelized fuel cost recovery factors for the period January 2015 through December 2015?

FPL: 3.403 cents/kWh for January 2015 through December 2015. (KEITH)

ISSUE 21: What are the appropriate fuel recovery line loss multipliers to be used in calculating the fuel cost recovery factors charged to each rate class/delivery voltage level class?

FPL: The appropriate fuel cost recovery line loss multipliers are provided in response to Issue No. 22. (KEITH)

ISSUE 22: What are the appropriate fuel cost recovery factors for each rate class/delivery voltage level class adjusted for line losses?

FPL:

FUEL RECOVERY FACTORS - BY RATE GROUP

ADJUSTED FOR LINE/TRANSFORMATION LOSSES

ESTIMATED FOR THE PERIOD OF: JANUARY 2015 THROUGH DECEMBER 2015

(1) (2) (3) (4) (5)

GROUPS	RATE SCHEDULE	JANUARY - DECEMBER		
		Average Factor	Fuel Recovery Loss Multiplier	Fuel Recovery Factor
A	RS-1 first 1,000 kWh	3.403	1.00284	3.090
A	RS-1 all additional kWh	3.403	1.00284	4.090
A	GS-1, SL-2, GSCU-1, WIES-1	3.403	1.00284	3.413
A-1	SL-1, OL-1, PL-1 ⁽¹⁾	3.137	1.00284	3.146
B	GSD-1	3.403	1.00277	3.412
C	GSLD-1, CS-1	3.403	1.00182	3.409
D	GSLD-2, CS-2, OS-2, MET	3.403	0.99347	3.381
E	GSLD-3, CS-3	3.403	0.96714	3.291
A	GST-1 On-Peak	4.723	1.00284	4.736
	GST-1 Off-Peak	2.835	1.00284	2.843
A	RTR-1 On-Peak	-	-	1.323
	RTR-1 Off-Peak	-	-	(0.570)
B	GSDT-1, CILC-1(G), HLFT-1 (21-499 kW) On-Peak	4.723	1.00276	4.736
	GSDT-1, CILC-1(G), HLFT-1 (21-499 kW) Off-Peak	2.835	1.00276	2.843
C	GSLDT-1, CST-1, HLFT-2 (500-1,999 kW) On-Peak	4.723	1.00182	4.732
	GSLDT-1, CST-1, HLFT-2 (500-1,999 kW) Off-Peak	2.835	1.00182	2.840
D	GSLDT-2, CST-2, HLFT-3 (2,000+ kW) On-Peak	4.723	0.99407	4.695
	GSLDT-2, CST-2, HLFT-3 (2,000+ kW) Off-Peak	2.835	0.99407	2.818
E	GSLDT-3, CST-3, CILC-1(T), ISST-1(T) On-Peak	4.723	0.96714	4.568
	GSLDT-3, CST-3, CILC-1(T), ISST-1(T) Off-Peak	2.835	0.96714	2.742
F	CILC-1(D), ISST-1(D) On-Peak	4.723	0.99316	4.691
	CILC-1(D), ISST-1(D) Off-Peak	2.835	0.99316	2.816

⁽¹⁾WEIGHTED AVERAGE 16% ON-PEAK AND 84% OFF-PEAK

DETERMINATION OF SEASONAL DEMAND TIME OF USE RIDER (SDTR)
 FUEL RECOVERY FACTORS
 ESTIMATED FOR THE PERIOD OF: JANUARY 2015 THROUGH DECEMBER 2015
 OFF PEAK: ALL OTHER HOURS

(1) (2) (3) (4) (5)

GROUPS	RATE SCHEDULE	JUNE - SEPTEMBER		
		Average Factor	Fuel Recovery Loss Multiplier	Fuel Recovery Factor
B	GSD(T)-1 On-Peak	6.837	1.00277	6.856
	GSD(T)-1 Off-Peak	2.784	1.00277	2.792
C	GSLD(T)-1 On-Peak	6.837	1.00182	6.849
	GSLD(T)-1 Off-Peak	2.784	1.00182	2.789
D	GSLD(T)-2 On-Peak	6.837	0.99407	6.796
	GSLD(T)-2 Off-Peak	2.784	0.99407	2.767

Note: On-Peak Period is defined as June through September, weekdays 3:00pm to 6:00pm
 Off Peak Period is defined as all other hours.

Note: All other months served under the otherwise applicable rate schedule.
 See Schedule E-1E, Page 1 of 2.

Note: Totals may not add due to rounding.

(KEITH)

CAPACITY ISSUES

COMPANY-SPECIFIC CAPACITY COST RECOVERY FACTOR ISSUES

ISSUE 24A: Has FPL included in the capacity cost recovery clause the nuclear cost recovery amount ordered by the Commission in Docket No. 140009-EI?

FPL: Yes. As approved by the Commission at its October 2, 2014 Special Agenda Conference, FPL has included \$14,287,862. [Note: Staff has recommended approval of this amount. If a different amount is approved by the Commission, FPL will revise its position on this and fall-out Capacity Clause issues accordingly at the Prehearing Conference.] (KEITH)

ISSUE 24B: What are the appropriate 2015 projected non-fuel revenue requirements for West County Energy Center Unit 3 (WCEC-3) to be recovered through the Capacity Clause?

FPL: \$149,615,862. (KEITH)

GENERIC CAPACITY COST RECOVERY FACTOR ISSUES

ISSUE 27: What are the appropriate capacity cost recovery final true-up amounts for the period January 2013 through December 2013?

FPL: \$11,054,159 over-recovery. (KEITH)

ISSUE 28: What are the appropriate capacity cost recovery actual/estimated true-up amounts for the period January 2014 through December 2014?

FPL: \$10,299,210 over-recovery. (KEITH)

ISSUE 29: What are the appropriate total capacity cost recovery true-up amounts to be collected/refunded during the period January 2015 through December 2015?

FPL: \$21,353,369 over-recovery. (KEITH)

ISSUE 30: What are the appropriate projected total capacity cost recovery amounts for the period January 2015 through December 2015?

FPL: Jurisdictionalized, \$484,487,754 for the period January 2015 through December 2015, excluding prior period true-ups, revenue taxes, nuclear cost recovery amount, and WCEC-3 jurisdictional non-fuel revenue requirements. (KEITH)

ISSUE 31: What are the appropriate projected net purchased power capacity cost recovery amounts to be included in the recovery factor for the period January 2015 through December 2015?

FPL: The projected net purchased power capacity cost recovery amount to be recovered over the period January 2014 through December 2014 is \$627,381,853, including prior period true-ups, revenue taxes, the nuclear cost recovery amount and WCEC-3 revenue requirements. (KEITH)

ISSUE 32: What are the appropriate jurisdictional separation factors for capacity revenues and costs to be included in the recovery factor for the period January 2015 through December 2015?

FPL: The appropriate jurisdictional separation factors are:
FPSC 94.64598%
FERC 5.35402% (KEITH)

ISSUE 33: What are the appropriate capacity cost recovery factors for the period January 2015 through December 2015?

FPL: The January 2015 through December 2015 capacity cost recovery factors including WCEC-3 factors are as follows:

RATE SCHEDULE	(1)	(10)	(11)	(12)	(13)
	Total Jan 2014 - Dec 2014 Capacity Recovery Factor				
	(\$KW)	(\$/kw h)	RDC (\$/KW) ⁽¹⁾	SDD (\$/KW) ⁽²⁾	
RS1/RTR1	-	0.00635	-	-	-
GS1/GST1/WIES1	-	0.00571	-	-	-
GSD1/GSDT1/HLFT1	1.99	-	-	-	-
OS2	-	0.00537	-	-	-
GSLD1/GSLDT1/CS1/CST1/HLFT2	2.18	-	-	-	-
GSLD2/GSLDT2/CS2/CST2/HLFT3	2.23	-	-	-	-
GSLD3/GSLDT3/CS3/CST3	2.36	-	-	-	-
SST1T	-	-	\$0.28	\$0.13	
SST1D1/SST1D2/SST1D3	-	-	\$0.28	\$0.13	
CILC D/CILC G	2.43	-	-	-	-
CILC T	2.39	-	-	-	-
MET	2.71	-	-	-	-
OL1/SL1/PL1	-	0.00150	-	-	-
SL2, GSCU1	-	0.00396	-	-	-

(KEITH)

EFFECTIVE DATE

ISSUE 34: What should be the effective date of the fuel adjustment factors and capacity cost recovery factors for billing purposes?

FPL: FPL is requesting that the fuel adjustment factors and capacity cost recovery factors become effective with customer bills for January 2015 (cycle day 1) through December 2015 (cycle day 21). This will provide for 12 months of billing for all customers. Thereafter, FPL's fuel adjustment factors and capacity cost recovery factors should remain in effect until modified by the Commission.
(KEITH)

ISSUE 35: Should this Docket be closed?

FPL: The docket should be closed after issuance of the final order approving expenditures and true-up amounts for fuel adjustment factors; GPIF targets, ranges and rewards; and projected expenditures and true-up amounts for capacity cost recovery factors.
(KEITH)

5) STIPULATED ISSUES

FPL: None at this time.

6) PENDING MOTIONS

FPL: None at this time.

7) PENDING REQUESTS FOR CONFIDENTIALITY

Florida Power and Light Company's request for confidential classification of certain material provided in connection with petition for prudence determination regarding acquisition of gas reserves [specifically testimony Exhs. SF-4 - SF-5, SF-6, SF-8, SF-9, and TT-9 - TT-10], DN 3290-14, dated June 24, 2014.

Florida Power and Light Company's request for confidential classification of certain material provided in response to Staff's amended 2nd set of Interrogatories (Nos. 12-94), DN 04127-14, dated July 31, 2014.

Florida Power and Light Company's request for confidential classification of Forms 423-1(a), 423-2, 2(a), and 2(b) for MAY/APR 2014, DN 4657-14, dated August 21, 2014.

Florida Power and Light Company's request for confidential classification of certain information contained in Schedule E12 of Appendix V to the prepared testimony of FPL witness Terry J. Keith, DN 4679-14, dated August 22, 2014.

Florida Power and Light Company's request for confidential classification of Forms 423-1(a), 423-2, 2(a), and 2(b) for JUNE/MAY 2014, DN 4815-14, dated August 27, 2014.

Florida Power and Light Company's request for confidential classification of certain material provided in response to OPC's 3rd Set of Interrogatories (Nos. 18-59) and 4th Request for PODs (Nos. 5-28), DN 05088-14, dated September 11, 2014.

Florida Power and Light Company's request for confidential classification of capacity payments to non-cogenerators identified in Schedule E12 of Terry Keith's revised testimony, DN 05163-14, dated September 15, 2014.

Florida Power and Light Company's Notice of intent to request confidential classification of certain material provided in response to Staff's 4th set of interrogatories (Nos. 135-153), DN 05150-14, dated September 15, 2014 (FPL will file a request for confidential classification by October 6, 2014).

Florida Power and Light Company's request for confidential classification of certain material provided in response to OPC's 5th request for PODs (Nos. 29-34), [x-ref. DN 04790-14], DN 05190-14, dated September 16, 2014.

Florida Power and Light Company's request for confidential classification of information provided in response to Staff's 5th set of interrogatories (No. 154), DN 05268-14, dated September 18, 2014.

8) OBJECTIONS TO A WITNESS' QUALIFICATION AS AN EXPERT

FPL: None at this time.

9) STATEMENT OF COMPLIANCE WITH ORDER ESTABLISHING PROCEDURE

There are no requirements of the Order Establishing Procedure with which FPL cannot comply.

Respectfully submitted this 26th day of September, 2014.

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By: /s/ John T. Butler
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic delivery on the 26th day of September, 2014, to the following:

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