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December 12, 2016

Ms. Carlotta S. Stauffer  
Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Re: Docket No. 160060-EC: Complaint and Petition of the City of Cape Coral, Florida For An Investigation Into The Rate Structure Of Lee County Electric Cooperative, Inc.

Dear Ms. Stauffer:

When Florida Power & Light (FPL) had a customer base similar to LCEC's current customer base, with a large city, a few smaller cities and large swaths of undeveloped rural areas, FPL separated the large cities, smaller cities and unincorporated areas into separate rate classes for rate-setting purposes. It appears that over time, as FPL's customer base grew to the millions and FPL's service territory included 12 of Florida's largest 20 cities (by population), FPL's cost of serving cities and rural areas became comparable enough that separate rate classes were no longer required.

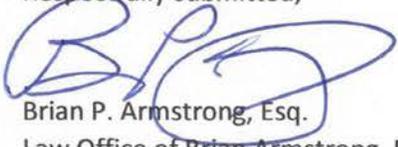
Lee County Electric Cooperative (LCEC) has had the opposite experience. What began as a service territory of only undeveloped rural areas, saw the rise of Florida's 10<sup>th</sup> largest city in an area comprising only 5% of such territory; a city called Cape Coral with a population of more than 165,000.

By this letter, the City of Cape Coral requests copies of any Florida Public Service Commission records, including rate orders, utility filings and cost of service studies, relating to the transition of FPL from the large city/smaller city/ unincorporated area rate classes to the existing rate classes.

Cape Coral recognizes that FPL's current rate structure includes many groups and sub-groups of rate classes to recognize different costs of service and factors such as load, time of day use, consumption levels, etc. To refine the City's request in this letter, we emphasize that FPL's prior rate orders and cost of service studies relating to the creation over the years of these FPL rate classes is not included in this request. Rather, the City's request is focused upon Commission records related to FPL's previous large city, smaller city and unincorporated area rate structure and rates, as well as documents from dockets concerning FPL's transition away from such rates over time.

Your assistance and cooperation in these regards are very much appreciated.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "BPA", is written over the printed name "Brian P. Armstrong, Esq.".

Brian P. Armstrong, Esq.  
Law Office of Brian Armstrong, PLLC  
Counsel for the City of Cape Coral

Cc: Parties of Record

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic delivery to the following (unless otherwise noted below) on the 12th day of December, 2016:

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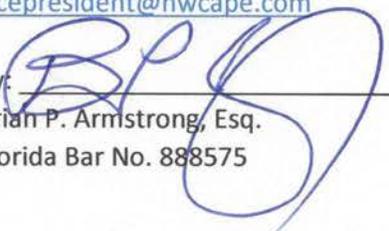
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By: 

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