

430

Steel Hector & Davis

Tallahassee, Florida

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April 7, 1995

By Hand Delivery

ORIGINAL
FILE COPY

Blanca S. Bayó, Director
Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32399

**Re: Conservation Cost Recovery Clause
Docket No. 950002-EG**

Dear Ms. Bayó:

Enclosed for filing on behalf of Florida Power & Light Company are the original and fifteen (15) copies of Florida Power & Light Company's Motion For Reconsideration.

If you or your Staff have any questions regarding this filing, please contact me.

Very truly yours,

Charles A. Guyton

- ACK
- AFA 3
- APP
- CAF
- CEO
- CTE
- E
- LES 1
- CAG/sh 3
- LIP
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DOCUMENT NUMBER-DATE

03617 APR-7 85

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Conservation Cost)
Recovery Clause)

Docket No. 950002-EG
Filed: April 7, 1995

FLORIDA POWER & LIGHT COMPANY'S
MOTION FOR RECONSIDERATION

Florida Power & Light Company ("FPL"), pursuant to Florida Administrative Code Rule 25-22.060, hereby requests reconsideration of Order No. PSC 95-0398-FOF-EG issued on March 23, 1995 in Docket No. 950002-EG. As grounds for reconsideration, FPL states:

1. The finding on page 3 of Order No. PSC-95-0398-FOF-EG that FPL had an "actual end-of-the-period true-up amount for the period October 1, 1993, through September 30, 1994" of "\$ (3,795,705) Overrecovery" is in error. The correct true-up amount is \$(4,113, 134).
2. The erroneous finding regarding FPL's true-up amount is due to two separate mistakes quantifying amounts that were disallowed by the Commission.
3. The first mistake is in the quantification of the amount disallowed for Conservation Goals expenses. FPL's Goals expenses for the period ending September 30, 1994 were \$ 285, 056. The number used in the Commission's order, \$ 286,233, includes an additional \$1,177 of Goals expenses incurred by FPL after September 30, 1994. While the entire \$ 286,233 was disallowed by the Commission and has been reflected in the factors approved by the Commission, only \$ 285, 056 of those expenses should have been reflected in the calculation of the true-up amount for the period ended September 30, 1994.

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

4. The second mistake made in the quantification of the true-up amount is the failure of the calculation to include the amount of Real Time Pricing expenses charged to FPL's Conservation Research and Development Program during the period ending September 30, 1994. As noted by the Commission in its order, see pages 10 and 13, the expenses associated with FPL's RTP Program that were charged to FPL's Conservation Research and Development Program were not allowed for current ECCR recovery. At page 10 those costs were quantified as "approximately \$310,000," and at page 13 those costs were quantified as "approximately \$ 320,000." The accurate value which should be used is \$ 312,679.

5. FPL has spoken with counsel for both FIPUG and Public Counsel, the other parties to the stipulation regarding the Real Time Pricing expenses, and they have authorized FPL to represent that they are agreeable to the use of \$ 312,679 as the amount of the RTP expenses to be reflected in the true-up calculation.

6. The net effect of the two corrections to the true-up calculation is to increase the amount of the overrecovery. That increase, in turn, results in an increase in the interest associated with the overrecovery. The additional amount of interest associated with the two corrections to the true-up amount is \$ 5,926.

7. The correct true-up amount which should be substituted for the Commission's finding of \$ 3,795,705 is \$ 4,113,134. A calculation showing how to reconcile the two values with the corrections discussed above is attached as Attachment A.

8. The corrections to the true-up for which FPL requests reconsideration do not affect the ECCR factors approved for FPL. Those factors were previously calculated by FPL and provided to the Commission Staff, and in their calculation FPL used the correct true-up amount

for the period ended September 30, 1994 of \$ 4,113,134. Thus, the only correction to Order No. PSC-95-0398-FOF-EG for which FPL seeks reconsideration is the correction of the true-up amount for the period ended September 30, 1994 from \$ 3,795,705 to \$ 4,113,134.

WHEREFORE, FPL respectfully requests that the Commission reconsider Order No. PSC-95-0398-FOF-EG and correct its finding for the actual end-of-the-period true-up for the period October 1, 1993 through September 30, 1994 from \$ 3,795,705 to \$ 4,113,134.

Respectfully submitted,

Steel Hector & Davis
Suite 601
215 South Monroe Street
Tallahassee, Florida 32301

Attorneys for Florida Power &
Light Company

By: 
Charles A. Guyton

ATTACHMENT A

**Florida Power & Light Company
Energy Conservation Cost Recovery Clause
Reconciliation of Filed True-up to True-up per FPSC Order**

True-up Per Filing (CT-3 page 5 of 6, line 11, "Total" column)	\$3,509,472
Disallowance of Goals Docket costs (Order No. PSC-95-0398-FOF-EI, Pages 6 & 9)	286,233
True-up per Order No. PSC-95-0398-FOF-EI, Page 3	<u>3,795,705</u>
Actual disallowed RTP costs (Estimated to be \$320,000 in FPL's prefiled testimony filed on November 14, 1994 - See page 13 of Order No. PSC-95-0398-FOF-EI)	312,679
Adjustment to disallowed Goals Docket costs	(1,177)
Increase in interest provision related to disallowances	5,926
True-up after giving effect to the disallowances and interest provision change	<u>\$4,113,134</u>

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Florida Power & Light Company's Motion For Reconsideration was served by Hand Delivery (when indicated with an *) or mailed this 7th day of April, 1995 to the following:

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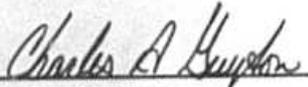
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