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RECORDS AND REPORTING

July 12, 1999

**VIA HAND DELIVERY**

Ms. Blanca S. Bayó  
Director  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Room 110  
Tallahassee, FL 32399-0850

Re: Establishment of electric requirements for small photovoltaic systems (10 KW or less) requesting interconnection and parallel operation with an investor-owned utility; Docket No. 990538-EI

Dear Ms. Bayó:

Please accept for filing the original and fifteen (15) copies of this letter and the attached correspondence dated May 27, 1999 from Sam Waters to Jim Dean as Florida Power & Light Company's ("FPL") request for a rule development workshop in the above-numbered and entitled proceeding. This request is made pursuant to Rule 28-103.002 of the Florida Administrative Code.

FPL submits that a series of workshops should be conducted prior to proposing rules for adoption. The issues to be addressed are complex and potentially controversial. Further, the establishment of such interconnection requirements necessarily will involve competing points of view and interests and will have a significant impact on regulated interests. A rule development workshop would assist the Commission to better understand and address the concerns of the affected entities, including investor-owned utilities such as FPL.

A copy of this letter is being provided on the enclosed diskette in Word Perfect Version 6/7/8.

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- OTH \_\_\_\_\_

*Jim Dean*

DOCUMENT NUMBER-DATE

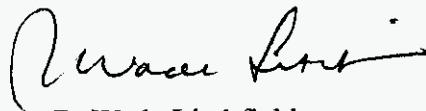
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FPSC-RECORDS/REPORTING

Blanca S. Bayó  
Division of Records and Reporting  
Federal Public Service Commission  
July 12, 1999  
Page 2 of 2

Should you or your staff have any questions regarding this filing, please don't hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Wade Litchfield". The signature is written in a cursive style with a long horizontal stroke at the end.

R. Wade Litchfield

RWL/mcm

Enclosures

Cc: Official Service List



**FPL**

P.O. Box 029100, Miami, FL 33102-9100

May 27, 1999

Mr. Jim Dean  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Dear Jim,

This letter is in regard to the opening of Docket No. 990538-EI, establishment of electric requirements for small photovoltaic systems (10Kw or less) requesting interconnection and parallel operation with an investor owned utility.

As you are aware, Staff issued it's CASR for this docket. Staff recommendation is slated for June 24, 1999, and will be put before the Commission for vote during their July 6, 1999 Agenda Conference. While a docket has been opened, and a CASR issued, as of this date the particulars of this docket have not been identified nor published in a formal proceeding.

FPL feels that this does not afford us enough time to address the issues that were discussed with you during our March 19 conference call. The issues we discussed were:

1. Reduction of insurance premiums from \$1,000,000 to \$100,000
2. Cross subsidization from other FPL ratepayers
3. Proper cost allocation (proposed FPL rider)
4. Certification and installation process, i.e., who will be the entity responsible for the certification and the inspection of the PV installations?
5. Proposed Pilot Program

These are some of the issues that FPL initially identified and brought to your attention during our conference call. Now that a docket has been initiated, we would like the opportunity to formally address those issues and others that have recently been identified in a forum such as a series of workshops or other formal proceeding, before Staff issues their recommendation to the Commission.

FPL would also like to find out if this docket will still be limited to the subject of modifying the interconnection standards for small photovoltaic systems in residential dwellings as stated in your electronic mail to FPL's Sean McCarthy (dated February 2, 1999), or if this docket will be opened to other distributed generation interests.

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MAY 27 1999

**LAW DEPT.**

Mr. Jim Dean  
Florida Public Service Commission  
May 27, 1999  
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Thank you for all your efforts and for your attention to this matter.

Sincerely,

A handwritten signature in cursive script that reads "Samuel S. Waters". The signature is written in black ink and is positioned above the typed name.

Samuel S. Waters  
Director, Regulatory Affairs

SSW/RLV:sp

copies:

Mr. Joe Jenkins  
Ms. Grace Jaye, Esquire  
Mr. Tom Ballinger  
Mr. Lee Colson  
Mr. Bill Walker  
Mr. Bill Feaster  
Ms. Anne M. Grealy  
Mr. Wade Litchfield, Esquire  
Mr. R. L. (Bob) Valdez

## CERTIFICATE OF SERVICE

I, THE UNDERSIGNED COUNSEL, HEREBY CERTIFY that a copy of Florida Power & Light Company's Request for Rule Development Workshop has been served via first class mail, postage prepaid to the parties listed below, this 12<sup>th</sup> day of July, 1999:

Carlos Fernandez  
618 Wisteria Lane  
Kissimmee, FL 34747

Florida Solar Energy Center  
Colleen Kettles  
300 State Road 401  
Cape Canaveral, FL 32920

Department of Community Affairs  
Director  
Strategic Planning  
2740 Centerview Dr.  
Tallahassee, FL 32399-2100

Gulf Power Company  
Ms. Susan D. Ritenour  
One Energy Place  
Pensacola, FL 32520-0780

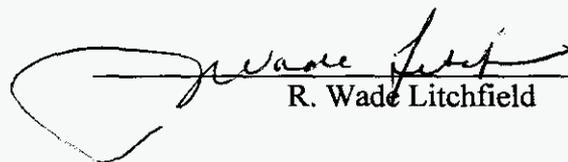
Florida Electric Cooperative Assoc.  
Michelle Hershel  
P.O. Box 590  
Tallahassee, FL 32302

Legal Environmental Assistance Foundation, Inc.  
Gail Kamaras, Director  
114-E Thomasville Road  
Tallahassee, FL 32303-6290

Florida Power Corporation  
Mr. James A. McGee, Esquire  
P.O. Box 14042 (A5A)  
St. Petersburg, FL 33733-4042

Tampa Electric Company  
Ms. Angela Llewellyn  
Regulatory Affairs  
P.O. Box 111  
Tampa, FL 33601-0111

Florida Public Utilities Company  
Mr. John T. English  
P.O. Box 3395  
West Palm Beach, FL 33402-3395

  
R. Wade Litchfield