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FPL

June 27, 2001

Ms. Blanca Bayo
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 001148-EI

Dear Ms. Bayo:

In its Order No. PSC-01-1346-PCO-EI, dated June 19, 2001, the Florida Public Service Commission (Commission) required FPL to file minimum filing requirements (MFRs) by August 15, 2001 based on a projected calendar 2002 test year. However, the Commission recognized that the effort to make such a filing is significant. The Commission directed Staff to meet with the Company and other parties to discuss the possibility of eliminating certain MFRs that are not necessary for the efficient processing of this case, and to discuss the logistical challenges to the utility in meeting the August 15, 2001 filing date. This is consistent with past Commission actions where the Commission recognized that the Company had to be given sufficient time to first develop and then to produce quality data.

FPL has reviewed its situation and determined that the Company cannot meet the MFR filing date of August 15, 2001. This is primarily due to the fact that the Company must first develop a 2002 budget which does not currently exist. FPL's budget process typically requires over five months to develop and finalize. To put itself in position to file MFRs at the earliest date possible, FPL has aggressively compressed that schedule to approximately six (6) weeks. The budget data is used to produce a financial forecast. Likewise, the Company has reduced the time for preparing the forecast to approximately three (3) weeks. The forecast provides

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- CAF _____
- OMP _____
- COM _____
- GTR _____
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- SER _____
- OTH _____

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the basis for preparing the MFRs. However, in many cases the forecast is not prepared to the level of detail required in the MFRs; therefore, additional activities must take place to generate data to supplement the forecast. For these reasons, the Company cannot start to actually develop the MFRs until approximately August 1, 2001.

As a result, FPL expects to complete the MFR filing in three (3) stages as shown on the attached schedule. The Company believes this approach (which reflects the order in which the MFRs are prepared) and time schedule are the only means by which the MFRs can be completed so as to reflect the most current information and produce meaningful outputs. It should be noted that when the Company initially proposed the above schedule, it did so on the assumption that it would only be required to produce approximately one half of the MFRs. As a result of subsequent discussions with Staff and the other parties, that number has now increased to almost 80% of the MFRs and, in addition, the Commission Staff has indicated that it also wants certain year 2000 data.

Although this remains an extremely aggressive schedule, FPL is committed to meet these deadlines. FPL's commitment is partially driven by the uncertainty that a rate review creates within the financial community. Given the Company's proposed schedule, there should be sufficient time for the Staff and other parties to complete their review and, to the extent necessary, for the Commission to render a final decision and make any required changes in rates effective upon the expiration of FPL's current rate agreement, which is April 14, 2002. However, to the extent that this date cannot be met, FPL will agree that any change in base rates, after the expiration of the current agreement, resulting from this rate review (Docket No. 001148-EI) be made as if the order directing such change was made on April 15, 2002, provided that the Company's proposed MFR schedule is adopted and a final order is rendered prior to June 30, 2002.

Sincerely,



 W. G. Walker, III
Vice President, Regulatory Affairs

cc: All Parties of Record

NO.	SCHEDULE DESCRIPTION	FILE PROPOSED DATE
A-1a	FULL REVENUE REQUIREMENTS INCREASE REQUESTED	15-Oct
A-1b	INTERIM REVENUE REQUIREMENTS INCREASE REQUESTED	waive
A-2	SUMMARY OF RATE CASE	15-Oct
A-3	REASONS FOR REQUESTED RATE INCREASE	15-Oct
A-4a	FULL REVENUE REQUIREMENTS BILL COMPARISON - TYPICAL MONTHLY BILLS	15-Oct
A-4b	INTERIM REVENUE REQUIREMENTS BILL COMPARISON - TYPICAL MONTHLY BILLS	15-Oct
A-5	SUMMARY OF TARIFFS	15-Oct
A-6	REVENUE FROM SALE OF ELECTRICITY BY RATE SCHEDULE	waive
A-7	STATISTICAL INFORMATION	15-Oct
A-8	FIVE YEAR ANALYSIS-CHANGE IN COST	15-Oct
A-9	SUMMARY OF JURISDICTIONAL RATE BASE	15-Oct
A-10	SUMMARY OF JURISDICTIONAL NET OPERATING INCOME	15-Oct
A-11	SUMMARY OF ADJUSTMENTS NOT MADE	waive
A-12a	SUMMARY OF JURISDICTIONAL CAPITAL STRUCTURE	15-Oct
A-12b	SUMMARY OF JURISDICTIONAL CAPITAL COST RATES	15-Oct
A-12c	SUMMARY OF FINANCIAL INTEGRITY INDICATORS	15-Oct
A-13	AFFILIATED COMPANY RELATIONSHIPS	15-Oct
A-14	FINANCIAL AND STATISTICAL REPORT	waive
B-1	BALANCE SHEET-JURISDICTIONAL	30-Sep
B-2a	BALANCE SHEET-JURISDICTIONAL ASSETS CALCULATION	30-Sep
B-2b	BALANCE SHEET-JURISDICTIONAL LIABILITIES CALCULATION	30-Sep
B-3	ADJUSTED RATE BASE	30-Sep
B-4	RATE BASE ADJUSTMENTS	30-Sep
B-5	COMMISSION RATE BASE ADJUSTMENTS	waive
B-6	COMPANY RATE BASE ADJUSTMENTS	waive
B-7	JURISDICTIONAL SEPARATION FACTORS-RATE BASE	30-Sep
B-8a	PLANT BALANCES BY ACCOUNT AND SUB-ACCOUNT	30-Sep
B-8b	DEPRECIATION RESERVE BALANCES BY ACCOUNT AND SUB-ACCOUNT	30-Sep
B-9a	MONTHLY PLANT BALANCES TEST YEAR-13 MONTHS	30-Sep
B-9b	MONTHLY RESERVE BALANCES TEST YEAR-13 MONTHS	30-Sep
B-10	CAPITAL ADDITIONS AND RETIREMENTS	30-Sep
B-11	CAPITAL ADDITIONS AND RETIREMENTS-PROPERTY MERGED OR ACQUIRED FROM OTHER COMPANIES	waive
B-12a	PROPERTY HELD FOR FUTURE USE-13 MONTH AVERAGE	30-Sep
B-12b	PROPERTY HELD FOR FUTURE USE-MONTHLY BALANCES	waive
B-12c	PROPERTY HELD FOR FUTURE USE-DETAILS	waive
B-12d	PROPERTY HELD FOR FUTURE USE-COLD STANDBY UNITS	30-Sep
B-13a	CONSTRUCTION WORK IN PROGRESS-13 MONTH AVERAGE BALANCE	30-Sep
B-13b	CONSTRUCTION WORK IN PROGRESS-OTHER DETAILS	30-Sep
B-13c	CONSTRUCTION WORK IN PROGRESS-AFUDC	30-Sep
B-14	WORKING CAPITAL-13 MONTH AVERAGE	30-Sep
B-15	WORKING CAPITAL-MONTHLY BALANCES	waive
B-16	NUCLEAR FUEL BALANCES	30-Sep
B-17a	SYSTEM FUEL INVENTORY	30-Sep
B-17b	FUEL INVENTORY BY PLANT	30-Sep
B-18	CAPACITY FACTORS	30-Sep
B-19	ACCOUNTS PAYABLE-FUEL	waive
B-20	PLANT MATERIALS AND OPERATING SUPPLIES	30-Sep

Code	Description	Due Date
B-21	OTHER DEFERRED CREDITS	30-Sep
B-22	MISCELLANEOUS DEFERRED DEBITS	30-Sep
B-23a	INVESTMENT TAX CREDITS-ANNUAL ANALYSIS	waive
B-23b	INVESTMENT TAX CREDITS-ANNUAL ANALYSIS BY TYPE	waive
B-24a	TOTAL ACCUMULATED DEFERRED INCOME TAXES	30-Sep
B-24b	STATE ACCUMULATED DEFERRED INCOME TAXES	waive
B-24c	FEDERAL ACCUMULATED DEFERRED INCOME TAXES	waive
B-25	ADDITIONAL RATE BASE COMPONENTS	waive
B-26	ACCOUNTING POLICY CHANGES AFFECTING RATE BASE	30-Sep
B-27	DETAIL OF CHANGES IN RATE BASE	30-Sep
B-28a	LEASING ARRANGEMENTS	30-Sep
B-28b	LEASING ARRANGEMENTS (ERTA 1981)	30-Sep
B-29	10 YEAR HISTORICAL BALANCE SHEET	30-Sep
B-30	NET PRODUCTION PLANT ADDITIONS	30-Sep
C-1	JURISDICTIONAL NET OPERATING INCOME	30-Sep
C-2	ADJUSTED JURISDICTIONAL NET OPERATING INCOME	30-Sep
C-3	JURISDICTIONAL NET OPERATING INCOME ADJUSTMENTS	30-Sep
C-4	COMMISSION NET OPERATING INCOME ADJUSTMENTS	waive
C-5	COMPANY NET OPERATING INCOME ADJUSTMENTS	waive
C-6	OUT OF PERIOD ADJUSTMENTS TO REVENUES AND EXPENSES	30-Sep
C-7	EXTRAORDINARY REVENUES AND EXPENSES	30-Sep
C-8	REPORT OF OPERATION COMPARED TO FORECAST-REVENUES AND EXPENSES	30-Sep
C-9	JURISDICTIONAL SEPARATION FACTORS-NET OPERATING INCOME	30-Sep
C-10	OPERATING REVENUES DETAIL	waive
C-11	UNBILLED REVENUES	30-Sep
C-12	BUDGETED VERSUS ACTUAL OPERATING REVENUES AND EXPENSES	30-Sep
C-13	MONTHLY FUEL REVENUES AND EXPENSES	30-Sep
C-14	MONTHLY FUEL EXPENSES	30-Sep
C-15	FUEL REVENUES AND EXPENSES RECONCILIATION	30-Sep
C-16	CONSERVATION GOALS AND PROGRESS	waive
C-17	CONSERVATION REVENUES AND EXPENSES	waive
C-18	CONSERVATION REVENUES AND EXPENSES	waive
C-19	OPERATION AND MAINTENANCE EXPENSES-TEST YEAR	15-Oct
C-20	OPERATION AND MAINTENANCE EXPENSES-PRIOR YEAR	15-Oct
C-21	DETAIL OF CHANGES IN EXPENSES	15-Oct
C-22	MAINTENANCE ON CUSTOMER FACILITIES, INSTALLATIONS ON CUSTOMER PREMISES AND LEASED PROPERTY ON CUSTOMER PREMISES	30-Sep
C-23	DETAIL OF RATE CASE EXPENSES FOR OUTSIDE CONSULTANTS	30-Sep
C-24	TOTAL RATE CASE EXPENSES AND COMPARISONS	30-Sep
C-25	UNCOLLECTIBLE ACCOUNTS	30-Sep
C-26	ADVERTISING EXPENSES	30-Sep
C-27	INDUSTRY ASSOCIATION DUES	30-Sep
C-28	ACCUMULATED PROVISION ACCOUNTS-228.1, 228.2 AND 228.4	30-Sep
C-29	LOBBYING AND OTHER POLITICAL EXPENSES	30-Sep
C-30	CIVIC AND CHARITABLE CONTRIBUTIONS	30-Sep
C-31	ADMINISTRATIVE EXPENSES	30-Sep
C-32	MISCELLANEOUS GENERAL EXPENSES	30-Sep
C-33	PAYROLL AND FRINGE BENEFIT INCREASES COMPARED TO CPI	30-Sep

NO.	SCHEDULE DESCRIPTION	FPL FUTURE DATES
C-34	DEPRECIATION EXPENSE COMPUTED ON PLANT BALANCES TEST YEAR-12 MONTHS	30-Sep
C-35	AMORTIZATION/RECOVERY SCHEDULE-12 MONTHS	30-Sep
C-36	CURRENT DEPRECIATION RATES	30-Sep
C-37	PROPOSED DEPRECIATION RATES	30-Sep
C-38a	TAXES OTHER THAN INCOME TAXES	30-Sep
C-38b	REVENUE TAXES	30-Sep
C-39	STATE DEFERRED INCOME TAXES	30-Sep
C-40	FEDERAL DEFERRED INCOME TAXES	30-Sep
C-41	DEFERRED TAX ADJUSTMENT	30-Sep
C-42	STATE AND FEDERAL INCOME TAXES	30-Sep
C-43	RECONCILIATION OF TAX EXPENSE	30-Sep
C-44	INTEREST IN TAX EXPENSE CALCULATION	30-Sep
C-45	CONSOLIDATED RETURN	available for review
C-46	INCOME TAX RETURNS	available for review
C-47	PARENT(S) DEBT INFORMATION	30-Sep
C-48	RECONCILIATION OF TOTAL INCOME TAX PROVISION	30-Sep
C-49	MISCELLANEOUS TAX INFORMATION	30-Sep
C-50	REACQUIRED BONDS	30-Sep
C-51	GAINS AND LOSSES ON DISPOSITION OF PLANT AND PROPERTY	30-Sep
C-52	NON-FUEL OPERATION AND MAINTENANCE EXPENSE COMPARED TO CPI	30-Sep
C-53	O & M BENCHMARK COMPARISON BY FUNCTION	30-Sep
C-54	O & M ADJUSTMENTS BY FUNCTION	30-Sep
C-55	BENCHMARK YEAR RECOVERABLE O & M EXPENSES BY FUNCTION	30-Sep
C-56	O & M COMPOUND MULTIPLIER CALCULATION	30-Sep
C-57	O & M BENCHMARK VARIANCE BY FUNCTION	15-Oct
C-58	REVENUE EXPANSION FACTOR	30-Sep
C-59	ATTRITION ALLOWANCE	30-Sep
C-60	TRANSACTIONS WITH AFFILIATED COMPANIES	15-Oct
C-61	PERFORMANCE INDICES	30-Sep
C-62	NON-UTILITY OPERATIONS UTILIZING UTILITY ASSETS	30-Sep
C-63	STATEMENT OF CASH FLOWS	30-Sep
C-64	EARNINGS TEST	30-Sep
C-65	OUTSIDE PROFESSIONAL SERVICES	30-Sep
C-66	PENSION COST	30-Sep
D-1	COST OF CAPITAL-13 MONTH AVERAGE	30-Sep
D-2	COST OF CAPITAL-10 YEAR HISTORY	waive
D-3a	SHORT-TERM DEBT	30-Sep
D-3b	SHORT-TERM FINANCING POLICY	30-Sep
D-4a	LONG-TERM DEBT OUTSTANDING	30-Sep
D-4b	DEBT OUTSTANDING - CALL PROVISIONS AND SPECIAL RESTRICTIONS	waive
D-5	COMMON STOCK ISSUES-ANNUAL DATA	waive
D-6	REPORTS OF OPERATIONS COMPARED TO FORECAST-COST OF CAPITAL	30-Sep
D-7	PREFERRED STOCK OUTSTANDING	30-Sep
D-8	CUSTOMER DEPOSITS	30-Sep
D-9	COMMON STOCK DATA	30-Sep
D-10a	FINANCING PLANS-STOCK AND BOND ISSUES	30-Sep
D-10b	FINANCING PLANS-GENERAL ASSUMPTIONS	30-Sep
D-11a	FINANCIAL INDICATORS-SUMMARY	30-Sep

No.	Schedule Description	Proposed Date
D-11b	FINANCIAL INDICATORS-CALCULATIONS OF INTEREST AND PREFERRED DIVIDEND COVERAGE RATIOS	waive
D-11c	FINANCIAL INDICATORS-CALCULATIONS AS A PERCENTAGE OF INCOME AVAILABLE FOR COMMON	waive
D-11d	FINANCIAL INDICATORS-CALCULATION OF THE PERCENTAGE OF CONSTRUCTION FUNDS GENERATED INTERNALLY	waive
D-12a	RECONCILIATION OF JURISDICTIONAL RATE BASE AND CAPITAL STRUCTURE	30-Sep
D-12b	SCHEDULE OF PRO-RATA ADJUSTMENTS	30-Sep
E-1	COST OF SERVICE STUDIES	15-Oct
E-2	EXPLANATION OF VARIATIONS FROM COST OF SERVICE STUDY APPROVED IN COMPANY'S LAST RATE CASE	15-Oct
E-3a	COST OF SERVICE STUDY-RATES OF RETURN BY RATE SCHEDULE (PRESENT RATES)	15-Oct
E-3b	COST OF SERVICE STUDY-RATES OF RETURN BY RATE SCHEDULE (PROPOSED RATES)	15-Oct
E-4	RECONCILIATION OF CLASS RATE OR RETURN INDICES BETWEEN THE LAST RATE CASE TEST YEAR TO THE CURRENT CASE	waive
E-5a	COST OF SERVICE STUDY-ALLOCATION OF RATE BASE COMPONENTS TO RATE SCHEDULE	15-Oct
E-5b	COST OF SERVICE STUDY-ALLOCATION OF EXPENSE COMPONENTS TO RATE SCHEDULE	15-Oct
E-6a	COST OF SERVICE STUDY-FUNCTIONALIZATION AND CLASSIFICATION OF RATE BASE	15-Oct
E-6b	COST OF SERVICE STUDY-FUNCTIONALIZATION AND CLASSIFICATION OF EXPENSES	15-Oct
E-7	SOURCE AND AMOUNT OF REVENUES-AT PRESENT AND PROPOSED RATES	15-Oct
E-8a	COST OF SERVICE STUDY-UNIT COSTS, PRESENT RATES	15-Oct
E-8b	COST OF SERVICE STUDY-UNIT COSTS, PROPOSED RATES	15-Oct
E-9	DETAILED BREAKDOWN OF CUSTOMER UNIT COSTS	15-Oct
E-10	DEVELOPMENT OF SERVICE CHARGES	15-Oct
E-11	COMPANY-PROPOSED ALLOCATION OF THE RATE INCREASE BY RATE CLASS	15-Oct
E-12	COST OF SERVICE-LOAD DATA	15-Oct
E-13	COST OF SERVICE STUDY-DEVELOPMENT OF ALLOCATION FACTORS	15-Oct
E-14	DEVELOPMENT OF COINCIDENT AND NONCOINCIDENT DEMANDS FOR COST STUDY	15-Oct
E-15	ADJUSTMENT TO TEST YEAR UNBILLED REVENUE	15-Oct
E-16a	REVENUE FROM SALE OF ELECTRICITY BY RATE SCHEDULE	15-Oct
E-16b	REVENUES BY RATE SCHEDULE-SERVICE CHARGES (ACCOUNT 451)	15-Oct
E-16c	BASE REVENUE BY RATE SCHEDULE-CALCULATIONS	15-Oct
E-16d	REVENUE BY RATE SCHEDULE-LIGHTING SCHEDULE CALCULATION	15-Oct
E-17	PROPOSED TARIFF SHEETS AND SUPPORT FOR CHARGES	15-Oct
E-18a	BILLING DETERMINANTS-NUMBER OF BILLS	15-Oct
E-18b	BILLING DETERMINANTS-KW DEMAND	15-Oct
E-18c	BILLING DETERMINANTS-MWH SALES	15-Oct
E-18d	PROJECTED BILLING DETERMINANTS-DERIVATION	15-Oct
E-19	CUSTOMERS BY VOLTAGE LEVEL	15-Oct
E-20	LOAD RESEARCH DATA	15-Oct
E-21a	CORRELATIONS BETWEEN CONTRIBUTIONS TO THE 12 MONTHLY SYSTEM PEAKS AND BILLING KW, KWH, MAXIMUM ON-PEAK DEMAND, AND ON-PEAK KWH FOR ALL DEMAND	waive
E-21b	CORRELATIONS BETWEEN CONTRIBUTIONS TO THE CLASS NONCOINCIDENT PEAK AND BILLING KW, KWH, MAXIMUM ON-PEAK DEMAND AND ON-PEAK KWH FOR ALL DEMAND CLASSES	waive
E-22	LOAD DURATION CURVES	waive
E-23	SYSTEM LOAD SHAPES	waive
E-24	MONTHLY RESERVE MARGINS AND RELIABILITY INDEXES	waive
E-25a	DAYS WITHIN 10% OF MONTHLY PEAKS	waive
E-25b	HOURS WITHIN 10% OF MONTHLY PEAKS	waive
E-26	MONTHLY PEAKS	15-Oct

NO.	SCHEDULE DESCRIPTION	FILE PROPOSED DATES
E-27a	DEMAND AND ENERGY LOSSES	15-Oct
E-27b	ENERGY LOSSES	15-Oct
E-27c	DEMAND LOSSES	15-Oct
E-28a	INTERRUPTIBLE RATES POLICY	15-Oct
E-28b	CURTAILABLE RATES POLICY	15-Oct
F-1	ANNUAL AND QUARTERLY REPORT TO SHAREHOLDERS	15-Sep
F-2	FINANCIAL STATEMENTS-OPINIONS OF INDEPENDENT CERTIFIED PUBLIC ACCOUNTANTS	15-Sep
F-3	SEC REPORTS	15-Sep
F-4	FERC AUDIT	15-Sep
F-5	COMPANY DIRECTORS	15-Sep
F-6	OFFICERS OF AFFILIATED COMPANIES OR SUBSIDIARIES	15-Sep
F-7	BUSINESS CONTRACTS WITH OFFICERS OR DIRECTORS	15-Sep
F-8	NRC SAFETY CITATIONS	15-Sep
F-9	FORECASTING MODELS	15-Sep
F-10	FORECASTING MODELS-SENSITIVITY OF OUTPUT TO CHANGES IN INPUT DATA	15-Sep
F-11	FORECASTING MODELS-HISTORICAL DATA	15-Sep
F-12	HEATING DEGREE DAYS	15-Sep
F-13	COOLING DEGREE DAYS	15-Sep
F-14	TEMPERATURE AT TIME OF MONTHLY PEAKS	15-Sep
F-15	FORECASTING MODELS-CONSISTENCY OF DATA	waive
F-16	CONSERVATION ACTIONS	waive
F-17	ASSUMPTIONS	15-Sep
F-18	NUCLEAR PLANTS-DECOMMISSIONS	waive
F-19	NUCLEAR PLANTS-SPENT FUEL AND WASTE STORAGE	waive
F-20	NUCLEAR PLANTS-STORAGE FACILITIES	waive
F-21	PUBLIC NOTICE	waive

* note: various modifications throughout as discussed with staff