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COMMISSION  
CLERK

December 20, 2001

Ms. Blanca S. Bayó, Director  
Division of the Commission Clerk  
and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0870


RE: Docket No. 001148-EI

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of Public Counsel's Preliminary List of Issues for filing in the above referenced docket.

Please indicate receipt of filing by date-stamping the attached copy of this letter and returning it to this office. Thank you for your assistance in this matter.

Sincerely,

  
John Roger Howe  
Deputy Public Counsel

JRH/dsb  
Enclosures

- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMP \_\_\_\_\_
- COM \_\_\_\_\_
- CTR \_\_\_\_\_
- ECR \_\_\_\_\_
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- OPC \_\_\_\_\_
- PAI \_\_\_\_\_
- RGO \_\_\_\_\_
- SEC \_\_\_\_\_
- SER \_\_\_\_\_
- OTH \_\_\_\_\_

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FPSC CLERK OF RECORDS

DOCUMENT NUMBER-DATE  
15883 DEC 20 01  
FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of retail rates of )  
Florida Power & Light Company. )  
\_\_\_\_\_ )

Docket No. 001148-EI  
Filed: December 20, 2001

**PUBLIC COUNSEL'S PRELIMINARY LIST OF ISSUES**

The Citizens of the State of Florida, through the Office of Public Counsel, pursuant to the Order Establishing Procedure in this docket (Order No. PSC-01-2111-PCO-EI, issued October 24, 2001) submit the following preliminary list of issues. This list is very preliminary and should not be construed to in any way limit the issues that this office may identify in the course of this proceeding.

1. Should FPL's participation in GridFlorida (as an RTO or as an ISO) affect retail rates?
2. What is the appropriate cost of common equity capital for FPL?
3. What is the appropriate weighted average cost of capital including the proper components (including the equity ratio), amounts and cost rates associated with the capital structure for the test year?
4. Should adjustments be made for the rate base effects of transactions with affiliated companies?
5. Should adjustments be made for the capital structure effects of transactions with affiliated companies?
6. Should adjustments be made for the net operating income effects of transactions with affiliated companies?
7. What is the appropriate level of Plant in Service to be included in rate base?
8. What is the appropriate level of Construction Work in Progress to be included in rate base?
9. What is the appropriate level of Property Held for Future Use to be included in rate base?
10. What is the appropriate level of Working Capital to be included in rate base?
11. What is the appropriate level of Accumulated Depreciation?

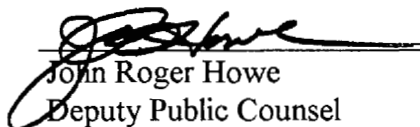
DOCUMENT NUMBER DATE

15883 DEC 20 01

FPSC-COMMISSION CLERK

12. Is FPL's requested level of Total Operating Revenues appropriate?
13. Are the company's estimated revenues for sales of electricity based upon reasonable estimates of customers, KW, and KWH billing determinants by rate class?
14. Is FPL's requested level of Operation and Maintenance Expense appropriate?
15. Is FPL's assumed growth in various expense categories appropriate? If not, what adjustment is necessary?
16. Is FPL's requested level of Other Post Employment Benefits Expense appropriate?
17. Is FPL's requested level of Pension Expense appropriate?
18. What is the appropriate amount of outside services expense to be allowed in operating expense?
19. Is FPL's requested accrual for storm damage appropriate?
20. Is FPL's requested level of Bad Debt Expense appropriate?
21. Is FPL's requested Rate Case Expense appropriate?
22. What adjustments, if any, should be made to O&M expenses for the test year?
23. What are the appropriate Consumer Price Index factors to use in determining the reasonableness of test year expenses under the benchmark test?
24. Should the traditional benchmark test be used to determine which O&M expenses FPL must justify on the record?
25. Is FPL's requested level of Nuclear O&M appropriate?
26. Is FPL's requested level of Total Fossil O&M appropriate?
27. Is FPL's requested level of tree-trimming expense appropriate?
28. Is FPL's requested level of Customer Accounts Expense appropriate?
29. Is FPL's requested level of Customer Service Expense appropriate?
30. Is FPL's requested level of Sales Expense appropriate?

31. Is FPL's requested level of Administrative and General Expense appropriate?
32. Is FPL's requested Depreciation Expense appropriate?
33. Is FPL's Fossil Fuel Dismantlement Expense appropriate?
34. Is FPL's requested level of Taxes Other Than Income Taxes appropriate?
35. Are FPL's requested Income Tax expenses appropriate?
36. Are consolidating tax adjustments appropriate, and if so, what are the appropriate amounts?
37. Is FPL's requested Net Operating Income for the test year appropriate?
38. Are FPL's proposed revenue expansion factors appropriate?
39. Is FPL's proposed rate adjustment, if any, appropriate?
40. Are FPL's separation of amounts for the wholesale and retail jurisdictions appropriate?
41. What is the appropriate cost of service methodology to be used in designing the rates of FPL?
42. If the Commission approves a rate change, how should it be allocated among the classes?

  
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**CERTIFICATE OF SERVICE  
DOCKET NO. 001148-EI**

I HEREBY certify that a copy of the foregoing PUBLIC COUNSEL'S PRELIMINARY LIST OF ISSUES has been served by \*hand delivery or U.S. Mail to the following parties of record on this 20th day of December, 2001:

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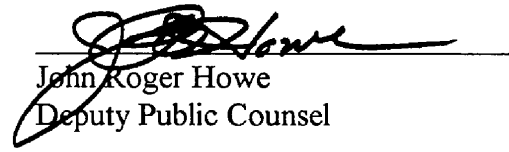
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