BEFORE THE

FLORIDA PUBLIC SERVICE COMMISSION

Re:	**Review of the Retail Rates of Florida Power & Light Company**	))	**Docket No. 001148-EI**

DIRECT TESTIMONY

AND EXHIBITS

OF

STEPHEN J. BARON

ON BEHALF OF

SOUTH FLORIDA HOSPITAL AND HEALTHCARE ASSOCIATION

J. KENNEDY AND ASSOCIATES, INC.
ROSWELL, GEORGIA

March 2002

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TABLE OF CONTENTS

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DIRECT TESTIMONY OF STEPHEN J. BARON

Introduction

Q. Please state your name and business address.

A. My name is Stephen J. Baron. My business address is J. Kennedy and Associates, Inc. ("Kennedy and Associates"), 570 Colonial Park Drive, Suite 305, Roswell, Georgia 30075.

Q. What is your occupation and by whom are you employed?

A. I am the President and a Principal of Kennedy and Associates, a firm of utility rate, planning, and economic consultants in Atlanta, Georgia.

Q. Please describe briefly the nature of the consulting services provided by Kennedy and Associates.

A. Kennedy and Associates provides consulting services in the electric and gas utility industries. Our clients include state agencies and electricity consumers. The firm provides expertise in system planning, load forecasting, financial analysis, cost-of-service, and rate design. Current clients include the Georgia and Louisiana Public Service Commissions, and consumer groups throughout the United States.

Q. Please state your educational background.

A. I graduated from the University of Florida in 1972 with a B.A. degree with high honors in Political Science and significant coursework in Mathematics and Computer Science. In 1974, I received a Master of Arts Degree in Economics, also from the University of Florida. My areas of specialization were econometrics, statistics, and public utility economics. My thesis concerned the development of an econometric model to forecast electricity sales in the State of Florida, for which I received a grant from the Public Utility Research Center of the University of Florida. In addition, I have advanced study and coursework in time series analysis and dynamic model building.

Q. Please describe your professional experience.

A. I have more than twenty-seven years of experience in the electric utility industry in the areas of cost and rate analysis, forecasting, planning, and economic analysis.

Following the completion of my graduate work in economics, I joined the staff of the Florida Public Service Commission in August of 1974 as a Rate Economist. My responsibilities included the analysis of rate cases for electric, telephone, and gas utilities, as well as the preparation of cross-examination material and the preparation of staff recommendations.

In December 1975, I joined the Utility Rate Consulting Division of Ebasco Services, Inc. as an Associate Consultant. In the seven years I worked for Ebasco, I received successive promotions, ultimately to the position of Vice President of Energy Management Services of Ebasco Business Consulting Company. My responsibilities included the management of a staff of consultants engaged in providing services in the areas of econometric modeling, load and energy forecasting, production cost modeling, planning, cost-of-service analysis, cogeneration, and load management.

I joined the public accounting firm of Coopers & Lybrand in 1982 as a Manager of the Atlanta Office of the Utility Regulatory and Advisory Services Group. In this capacity I was responsible for the operation and management of the Atlanta office. My duties included the technical and administrative supervision of the staff, budgeting, recruiting, and marketing as well as project management on client engagements. At Coopers & Lybrand, I specialized in utility cost analysis, forecasting, load analysis, economic analysis, and planning.

In January 1984, I joined the consulting firm of Kennedy and Associates as a Vice President and Principal. I became President of the firm in January 1991.

I have presented testimony as an expert witness in Arizona, Arkansas, Colorado, Connecticut, Florida, Georgia, Indiana, Kentucky, Louisiana, Maine, Michigan, Minnesota, Maryland, Missouri, New Jersey, New Mexico, New York, North Carolina, Ohio, Pennsylvania, Texas and West Virginia. I also have presented testimony as an expert witness before the Federal Energy Regulatory Commission and in United States Bankruptcy Court. A list of my specific regulatory appearances can be found in Exhibit ____ (SJB-1)

Q. On whose behalf are you testifying in this proceeding?

A. I am testifying on behalf of the South Florida Hospital and Healthcare Association ("SFHHA" or the Hospitals), a group of general service customers taking service on the Florida Power & Light Company ("FPL") system.

Q. What is the purpose of your testimony in this proceeding?

A. I am addressing issues on FPL's retail cost of service study, rate design and resource planning, with particular emphasis on demand side management.

With respect to the Company's retail class cost of service study, I have identified two problems with the methodology utilized by FPL to allocate retail revenue requirements to customer classes. These problems result in an unreliable class cost of service study from which to make determinations for revenue allocation and rate design.

With respect to rate design issues, I discuss the Hospitals' support for the use of a properly developed class cost of service study in the design of rates. In particular, the Hospitals endorse the use of the unit cost of service results in rate design, assuming that FPL's cost allocation study is modified to properly reflect a classification of costs into demand and energy categories.

The final issue that I address on behalf of the Hospitals concerns FPL's generation resource plan and, particularly, the lack of adequate consideration in this plan to the availability of backup generation currently on-site at SFHHA Hospitals. Hospital accreditation rules require the installation of backup generation in relevant facilities. This capacity would be available to FPL to assist in meeting peak demand requirements. In light of the Company's agreement to target a 20% planning reserve margin by mid-2004, the Hospitals strongly recommend that the Commission require FPL to adequately evaluate the use of the existing backup generation available in

South Florida and develop a program to employ this capacity as part of FPL's peaking resources, whether from healthcare facilities or other sources.

Retail Cost of Service Study

Q. Would you please discuss the first issue that you have identified with respect to the Company's retail cost of service study?

A. FPL has filed a retail cost of service analysis that relies, primarily, on a Florida Public Service Commission-approved "12 CP and 1/13th" methodology for allocating production demand costs. This demand allocation methodology is consistent with prior Commission decisions regarding production demand cost allocation. This allocation factor is used to assign fixed production plant and most demand-related fixed production operation and maintenance expenses (i.e., non fuel operating expenses associated with the production or generation function).

Q. What is the significance of the Company's use of a 12 CP and 1/13th methodology for assigning fixed production costs to customer classes?

A. The Florida Public Service Commission has consistently relied on this approach for many years and it is reasonable for FPL to have used this method. However, since

the cost of service study results are impacted by both the production demand allocation methodology and the cost classification methodology, it is important to examine the specific classifications that FPL has assigned to various expense accounts associated with production.

Q. Do you have specific concerns associated with the methodology used by FPL to classify production operation and maintenance expenses?

A. Yes. I have a concern with the methodology used by FPL to classify non-fuel nuclear power operation and maintenance expenses between demand and energy related costs. For the test year ended December 31, 2002, FPL is claiming nuclear power operation and maintenance expenses of $258.6 million, excluding nuclear fuel expenses. Of this $258.6 million, FPL has classified $111.7 million as demand-related and $146.8 million as energy-related. Again, this does not include nuclear fuel expense.

FPL has effectively classified only 43% of its total non-fuel nuclear O&M as demand-related, with 57% classified as energy-related. Based on a historical analysis of data associated with nuclear O&M expenses on the FPL system and the mWh output of the nuclear generation fleet, I believe that FPL has misclassified its nuclear O&M expenses in this case.

Q. What methodology did FPL use to classify non-fuel nuclear O&M expenses?

A. Based on the Company's response to MFR No. E-13, Attachment 1 of 1, the Company has allocated FERC account 524 (miscellaneous nuclear power expenses) and FERC Account 529 (maintenance of structures, nuclear) as 100% demand-related. All of the other non-fuel nuclear O&M expenses have been either fully or partially classified as energy-related.

For example, FPL has allocated the following maintenance accounts associated with nuclear power production as 100% energy-related: accounts 530, 531 and 532. These accounts, associated with the maintenance of reactor plant, the maintenance of electric plant and the maintenance of miscellaneous nuclear plant, are all deemed to be energy-related or variable in the cost classification used by the Company. For FERC account No. 520, associated with nuclear steam expenses, the Company has allocated the labor component of the account on demand, but has allocated the remainder of the account on energy. Since the operation supervision and engineering and the maintenance supervision and engineering expenses (accounts 517 and 528) are allocated based on the classification results for the underlying operation and maintenance accounts in those categories, a substantial portion of the nuclear supervision cost is classified as energy-related in FPL's cost of service study.

Q. Would you provide an example of the type of costs that are included in some of these FERC accounts?

A. FERC accounts 530, 531 and 532 are associated with the maintenance of reactor plant, electric plant (associated with nuclear facilities) and miscellaneous nuclear plant. Examples of the types of facilities associated with these expense accounts include "Fire extinguishing equipment for general station and site use", "Cranes and hoisting equipment ...", and "Station and area radiation monitoring equipment". The FERC system of accounts characterizes the types of costs that are included as "labor, materials used and expenses incurred." Unless the unit was mothballed, in which case maintenance of reactor plant and mWh output may both be "0", the level of these costs will not vary materially with the mWh output of the Company's nuclear units, nor would these costs vary with the energy use imposed by the Company's customers.

Q. What are the consequences of a misclassification of these non-fuel nuclear production O&M expenses in the Company's cost of service study?

A. First, if the costs are misclassified, the resulting allocations to rate classes are incorrect and the resulting rate of return indices that are relied upon by FPL and the Commission to allocate revenue changes would be incorrect as well. In addition, and perhaps more importantly, the Company's rate design would be incorrect and send inappropriate price signals to consumers.

For example, if the Company incorrectly classified nuclear production O&M expenses that are fixed in nature as energy-related, these costs would be assigned to rate classes on an energy basis and appear in the energy component of unit costs for each of the Company's rate schedules, pursuant to a unit cost analysis. To the extent that the Commission relies on the unit cost data to set or even guide rate design, the resulting rates for each customer class may be biased toward an over-emphasis on non-fuel energy charges, relative to demand charges. Thus, a misclassification of costs may produce an erroneous price signal that is provided to customers with respect to demand and energy costs on the FPL system.

Overstating the energy charge would give customers a disincentive to utilize energy, everything else being equal. To the extent that consumers are responsive to price signals, this means that off-peak energy consumption would be lower than it otherwise would be, had the price signal been correct.

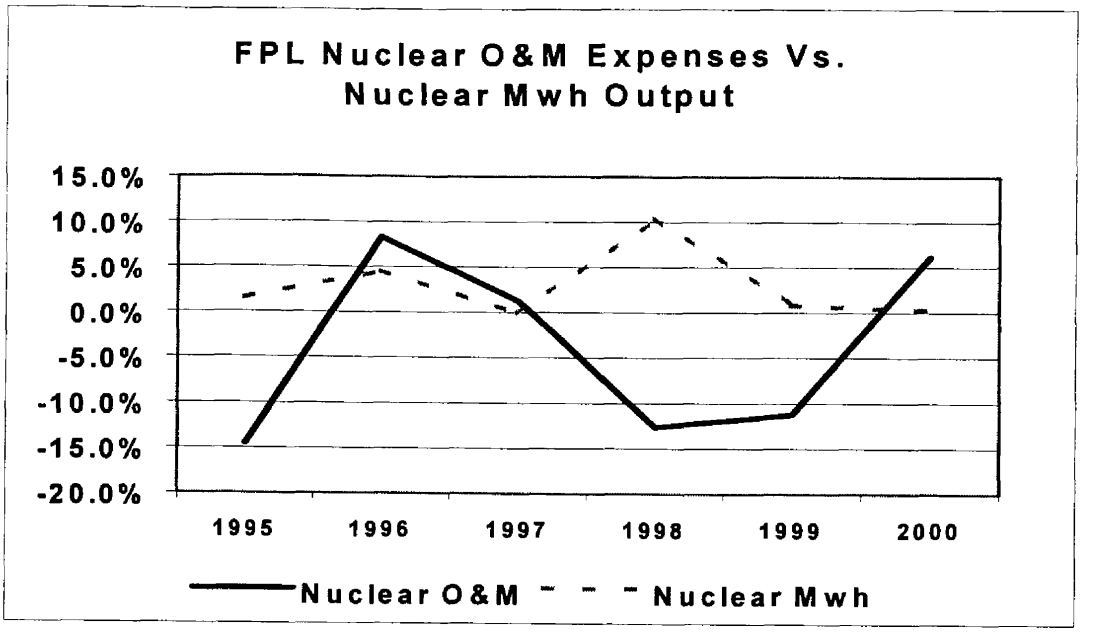
Q. Have you performed any analysis of the historic relationship between non-fuel nuclear operations and maintenance expenses on the FPL system and nuclear mWh output, in order to assess the reasonableness of the Company's classification methodology?

A. Yes. Exhibit ____(SJB-2), contains the results of a statistical regression analysis in which FPL's nuclear operations expenses were compared to the reported nuclear mWh output for the years 1994 to 2000. The results of this regression show a statistically significant relationship except that the relationship is a negative correlation. In other words, the greater the nuclear mWh output, the lower the nuclear operations expenses.

A similar result holds for an analysis of nuclear maintenance expenses versus nuclear mWh output on the FPL system for the years 1994 through 2000. Exhibit ____(SJB-3) shows the results of this regression analysis. The coefficient relating nuclear maintenance expenses to nuclear mWh output is negative. Again this implies that increases in nuclear plant mWh output results in lower total maintenance expenses for the plant. Finally, Exhibit ____(SJB-4) shows the results of a combined nuclear O&M expenses for FPL versus nuclear mWh output. Again, the result is a statistically significant negative correlation between the two variables.

The significance of these regression results is that there is no positive relationship between energy use and the incurrence of operations and maintenance expenses (non-fuel) associated with FPL's nuclear units. Based on this evidence, it would be inappropriate to classify nuclear O&M expenses as energy-related. In particular, the erroneous price signals that would be produced by the inclusion of energy classified nuclear O&M expenses may be significant, given the negative correlations that

actually exist between nuclear O&M expenses and energy output. To place this in perspective, the graph below shows the trends in both nuclear O&M expenses and mWh output for the years analyzed in the regression. As can be seen from the graph, there is no correlation whatsoever between the two variables.[1]



Q. What is your recommendation with respect to the classification of non-fuel nuclear power operation and maintenance expenses?

A. My analysis shows that non-fuel nuclear power operation and maintenance expenses should be classified exclusively as demand related costs.

[1] For the purposes of performing the regression analyses and the graph, the following FERC accounts were utilized: accounts 517, 520, 524, 528, 529, 530, 531 and 532.

Q. Would you please address the next issue that you have identified with respect to the Company's cost allocation study?

A. FPL has included an adjustment to test year electricity sales revenues of $34 million to reflect a "Provision for rate refunds – FPSC." This $34 million reduction in test year revenues results from the Company's April 1999 settlement in which a revenue sharing mechanism was established to provide rate refunds to customer classes in the event FPL revenues exceeded a stated threshold.

Q. Why is it inappropriate to include this adjustment in the Company's cost of service study?

A. First, as discussed by SFHHA witness Lane Kollen, the $34 million revenue adjustment should be excluded from the test year since the settlement provided for only a three-year period of revenue sharing. Therefore, this is not an ongoing test year condition and should be removed from the determination of revenue requirements.

Q. Is there another reason why the Company's treatment is inappropriate?

A. Yes. Independent of the revenue requirement issues in this case, it would be inappropriate to include this adjustment in the test year cost allocation service study. By the time rates go into effect in this case, the settlement will have been terminated; therefore, any cost of service study results used to develop rates for the rate-effective period in this case should exclude refunds that will no longer be provided to customers in the rate-effective period. These refund revenues should not be included as an adjustment to base revenues for the purposes of determining the relationship between rates and cost of service.

Rate Design

Q. Do you have any recommendations in this proceeding regarding rate design?

A. I support the use of the unit cost results from a properly developed retail cost of service study for the purposes of designing rates in this proceeding. In particular, for rate schedules that incorporate both demand and energy charges (non-fuel), it is appropriate to utilize the unit cost data to set the respective energy and demand charges. It is particularly important, in my opinion, to set the energy charges of such rates at a level commensurate with the energy component of revenue requirements for the rate class. To the extent that the non-fuel energy charges of a demand metered rate exceed cost of service, there is a disincentive for customers to improve their individual load factors and utilize energy during low cost, off-peak periods.

Q. How do FPL's current energy rates compare to the unit cost of service for the Company's general service rate schedules?

A. Based on FPL's unit cost analysis, at equalized base revenue requirements, the unit cost of energy for Rate Schedule GSLD-1 is $.003509 per kWh, compared to the

non-fuel energy charge of Rate Schedule GSLD-1 of $0.01165 per kWh. The energy charge is nearly three times unit cost of service for this rate. The same result occurs for Rate Schedule CILC-1D. The unit cost for energy is $.003462, while the tariff rate is $.00722. It is also important to note that the modifications to FPL's cost of service study that I previously discussed (the reclassification of nuclear O&M expenses) would have the effect, everything else being equal, of reducing the unit energy cost of FPL's rates. Thus, disparity between the tariff non-fuel energy charges and the unit cost of energy is even greater than shown in the Company's unit cost study.

Based on this disparity, I recommend that any Commission-approved revenue requirement decrease, found to be appropriate for a demand-metered rate schedule, be applied first to move the energy charge or charges of the rate towards cost of service. Unburdening the energy rate, pursuant to cost of service results, will increase the stability of FPL's base revenues (lower risk) and reduce the likelihood that FPL may gain a windfall if it has underestimated the test year level of sales in response to September 11th and the economic downturn.

Q. Why is it more important to focus on the energy charges of demand-metered rate schedules, rather than the demand charges?

A. Based on my experience, larger, general service customers taking service on demand-metered rate schedules tend to be more responsive to changes in the energy charges of the rate than the demand charges. This is particularly true in the short-run where the kW demand level established by a customer is, to a large extent, a function of the customer's connected load, while the energy use is a function of both the connected load and the hours of use. In the short-run, connected load (e.g., equipment) is fixed, while hours-of-use is not. To the extent that the energy charges deviate from cost of service, customer behavior with respect to additional hours of operation of physical equipment would be impacted. As a result, it is appropriate to focus on the energy charges (the non-fuel energy charges) of each rate schedule first, in developing adjustments to current rate design. Finally, if FPL is concerned that revenues and sales will be detrimentally impacted in an economic downturn, it would be counter-productive to overprice incremental energy consumption.

Commercial Industrial Demand Reduction Rider ("CDR")

Q. Would you please address your concerns with the Company's Commercial Industrial Load Reduction Rider?

A. This rider is designed to replace the now closed commercial/industrial load control ("CILC") rate that provided FPL and its firm customers an opportunity to obtain needed capacity through load curtailments of commercial and industrial customers or through the use of backup generation available to these customers. Pursuant to a Commission decision in Order PSC-99-0505-PCO-EG, issued March 10, 1999 in Docket No. 990002-EG, FPL closed the CILC program to new customers after December 31, 2000. In fact, Rate Schedule CILC was limited in this order to only customers that had entered into a CILC agreement as of March 19, 1996, but had not yet taken service under the rate. As of the time of the March 10, 1999 order, it was expected that there were over 100 outstanding CILC agreements not currently taking service under that rate that would produce about 38 mWs of effective generating capacity.

Q. Are there hospitals in the South Florida area that have been able to utilize the CILC rate?

A. Yes. One of the provisions of the CILC rate is that customers may make available to FPL backup generation at the customers' location. This generation, controllable by FPL, would provide the Company peak capacity service, in lieu of actually interrupting the load of a CILC customer. Since hospitals are required to have backup generation on-site, the CILC arrangement is ideal for both providing benefits to South Florida Hospitals and to FPL and its other customers by making

efficient use of existing generation in the South Florida area. Moreover, the generation is located within major load centers, not miles away. Of course, as I noted above, the CILC rate was closed by the Commission and is no longer available to new loads.

Q. Is there additional backup generation, on-site at South Florida hospitals, which could provide peaking capacity to FPL to meet its future requirements?

A. Yes. Healthcare facilities seeking accreditation are required to have on-site backup generation commensurate with occupancy and services provided. The "2001 Comprehensive Accreditation Manual for Hospitals: The Official Handbook" sets out the standards (including backup generation for hospitals) that must be met for accreditation. Standard EC.1.7.1 addresses the issue of emergency power systems that "suppl[y] electricity to the following areas when normal electricity is interrupted." The back up generation is depended upon to provide reliable service that can be called upon intermittently and on short notice, in the pertinent facilities, so as to maintain electrical service to elevators, acute care areas, medical systems and the like. This backup generating capacity, all of which is not currently being controlled by FPL, can provide valuable service under CILC. A potentially attractive alternative could involve the conversion of existing diesel generation to a dual fuel diesel/natural gas firing that would make these units even more economic for such peaking service.

Q. Based on your review of FPL's 10-year power plant site plan, does the Company anticipate the need for additional generation?

A. Yes. During the period 2001 through 2010, FPL is expecting net capacity increases of over 6,000 mWs to be required to meet its current planning reserve and loss of load probability planning criteria. Based on the most recent 10-year site plan that I have evaluated, the Company is planning to add substantial amounts of combined cycle generating capacity, as well as combustion turbines (2003 to 2004) to meet this requirement. In addition, the 10-year site plan shows that FPL will require 795 mWs of additional (cumulative) demand side management through 2009. Table 1 below shows FPL's summer mW reduction goals for DSM (at the meter) for the period 2000 through 2009 on a cumulative basis. Clearly, FPL has projected that it needs additional generating capacity and has, in fact, planned for substantial increases in DSM to meet its objectives. This is in addition to FPL's approximate 2,680 mWs of DSM through the year 2000.

TABLE 1

FPL's Summer MW Reduction Goals for DSM (At the Meter)

Year	Cumulative Summer mW
2000	122
2001	200
2002	269
2003	339
2004	410
2005	484
2006	554
2007	625
2008	697
2009	795

Source: 10-year power plant site plan, April 2001, P-55.

Q. You indicated previously that the Company is planning to add combustion turbine capacity in the 2003 to 2004 period. What is the expected cost per kW of this combustion turbine capacity?

A. Based on the Company's April 2001 10-year site plan, FPL is planning to add the Fort Meyers Combustion Turbines Nos. 13 and 14 to its system during the summer of 2003 at a cost of approximately $540 per kW.

Q. Given FPL's projected need for additional generating capacity and DSM, has the Company developed any programs that would replace the CILC program and provide incentives to the hospitals to make available their existing, on-site backup generation to FPL?

A. The Company has received approval from the Commission to initiate a new commercial industrial load reduction program that is available to customers taking service under Rate Schedules GSD-1, GSDT-1, GSLD-1 and GSLDT-1, among others. However, unlike the CILC program, customers are not permitted to utilize their existing backup generation to meet the load reduction requirements called for by FPL under this CDR rider. Effectively, in order to participate in the CDR rider, customers must reduce their otherwise applicable consumption during load control events. This is not feasible for hospitals. Backup generation investment is thus made significantly less efficient and, from a societal perspective, FPL's approach produces additional investment in generation capacity that is under-utilized.

Q. Does FPL's existing tariff arrangement make sense?

A. No. As in the case of the CILC program, it makes sense for FPL to permit its customers to utilize backup generation in lieu of load reductions to meet the requirements for this tariff. To the extent that customers, such as the hospitals, have existing backup generation already in service and on-site, it is wasteful and

inappropriate for the Company to exclude this capacity from participating in Rider CDR.

Q. What would happen under FPL's tariff if the hospitals were to start up their existing backup generation, in lieu of actually reducing load under Rider CDR?

A. The tariff language arguably authorizes FPL to impose a standby reservation charge associated with this backup generation, if it exceeded 20% of a customer's load (which, in all likelihood, it would).[2] As a result, although the hospitals have sufficient generating capacity to provide peaking service to FPL, in exchange for a CDR credit pursuant to the tariff, the hospitals arguably are precluded from operating their backup generation in this manner because of the provisions of the CDR tariff and the standby rate.

Given the substantial amount of generating capacity being added by FPL over the next 10 years, as well as a requirement for a substantial increase in DSM to meet the Company's expected peak demands, FPL should be required to modify its commercial industrial demand reduction rider to permit customers to utilize backup generation in lieu of actual load curtailments to meet the Company's needs. FPL is requesting approval in this case for substantial increases in its rate base associated

[2] Rate Schedule SST-1 (Standby and Supplemental Service) states as follows: "A customer is required to take service under this rate schedule if the Customer's total generation capacity is more than 20% of the Customer's total electrical load and the Customer's generators are not for emergency purposes only."

with new generating capacity that, in the Company's opinion, is necessary to meet customer needs.

The Commission should require FPL to offer to utilize existing generating capacity in South Florida to meet (in part) the Company's future requirements. By excluding this existing generating capacity from the commercial industrial load reduction rider, FPL is failing to utilize existing resources that can meet its future needs. This is clearly uneconomic and potentially wasteful. By recognizing the existing backup generation available at South Florida hospitals, the Company can provide cost-effective reliable service to all of its customers.

Q. Does that complete your testimony?

A. Yes.

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Expert Testimony Appearances of Stephen J. Baron As of January 2002

Date	Case	Jurisdict.	Party	Utility	Subject
4/81	203(B)	KY	Louisville Gas & Electric Co.	Louisville Gas & Electric Co.	Cost-of-service.
4/81	ER-81-42	MO	Kansas City Power & Light Co.	Kansas City Power & Light Co.	Forecasting.
6/81	U-1933	AZ	Arizona Corporation Commission	Tucson Electric Co.	Forecasting planning.
2/84	8924	KY	Airco Carbide	Louisville Gas & Electric Co.	Revenue requirements, cost-of-service, forecasting, weather normalization.
3/84	84-038-U	AR	Arkansas Electric Energy Consumers	Arkansas Power & Light Co.	Excess capacity, cost-of-service, rate design.
5/84	830470-EI	FL	Florida Industrial Power Users' Group	Florida Power Corp.	Allocation of fixed costs, load and capacity balance, and reserve margin. Diversification of utility.
10/84	84-199-U	AR	Arkansas Electric Energy Consumers	Arkansas Power and Light Co.	Cost allocation and rate design.
11/84	R-842651	PA	Lehigh Valley Power Committee	Pennsylvania Power & Light Co.	Interruptible rates, excess capacity, and phase-in.
1/85	85-65	ME	Airco Industrial Gases	Central Maine Power Co.	Interruptible rate design.
2/85	I-840381	PA	Philadelphia Area Industrial Energy Users' Group	Philadelphia Electric Co.	Load and energy forecast.
3/85	9243	KY	Alcan Aluminum Corp., et al.	Louisville Gas & Electric Co.	Economics of completing fossil generating unit.
3/85	3498-U	GA	Attorney General	Georgia Power Co.	Load and energy forecasting, generation planning economics.
3/85	R-842632	PA	West Penn Power Industrial Intervenors	West Penn Power Co.	Generation planning economics, prudence of a pumped storage hydro unit.
5/85	84-249	AR	Arkansas Electric Energy Consumers	Arkansas Power & Light Co.	Cost-of-service, rate design return multipliers.
5/85		City of Santa Clara	Chamber of Commerce	Santa Clara Municipal	Cost-of-service, rate design.

Expert Testimony Appearances
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As of January 2002

Date	Case	Jurisdict.	Party	Utility	Subject
6/85	84-768-E-42T	WV	West Virginia Industrial Intervenors	Monongahela Power Co.	Generation planning economics, prudence of a pumped storage hydro unit.
6/85	E-7 Sub 391	NC	Carolina Industrials (CIGFUR III)	Duke Power Co.	Cost-of-service, rate design, interruptible rate design.
7/85	29046	NY	Industrial Energy Users Association	Orange and Rockland Utilities	Cost-of-service, rate design.
10/85	85-043-U	AR	Arkansas Gas Consumers	Arkla, Inc.	Regulatory policy, gas cost-of-service, rate design.
10/85	85-63	ME	Airco Industrial Gases	Central Maine Power Co.	Feasibility of interruptible rates, avoided cost.
2/85	ER-8507698	NJ	Air Products and Chemicals	Jersey Central Power & Light Co.	Rate design.
3/85	R-850220	PA	West Penn Power Industrial Intervenors	West Penn Power Co.	Optimal reserve, prudence, off-system sales guarantee plan.
2/86	R-850220	PA	West Penn Power Industrial Intervenors	West Penn Power Co.	Optimal reserve margins, prudence, off-system sales guarantee plan.
3/86	85-299U	AR	Arkansas Electric Energy Consumers	Arkansas Power & Light Co.	Cost-of-service, rate design, revenue distribution.
3/86	85-726-EL-AIR	OH	Industrial Electric Consumers Group	Ohio Power Co.	Cost-of-service, rate design, interruptible rates.
5/86	86-081-E-GI	WV	West Virginia Energy Users Group	Monongahela Power Co.	Generation planning economics, prudence of a pumped storage hydro unit.
8/86	E-7 Sub 408	NC	Carolina Industrial Energy Consumers	Duke Power Co.	Cost-of-service, rate design, interruptible rates.
10/86	U-17378	LA	Louisiana Public Service Commission	Gulf States Utilities Staff	Excess capacity, economic analysis of purchased power.
12/86	38063	IN	Industrial Energy Consumers	Indiana & Michigan Power Co.	Interruptible rates.

Expert Testimony Appearances of Stephen J. Baron As of January 2002

Date	Case	Jurisdict.	Party	Utility	Subject
3/87	EL-86-53-001 EL-86-57-001	Federal Energy Regulatory Commission (FERC)	Louisiana Public Service Commission Staff	Gulf States Utilities, Southern Co.	Cost/benefit analysis of unit power sales contract.
4/87	U-17282	LA	Louisiana Public Service Commission	Gulf States Utilities Staff	Load forecasting and imprudence damages, River Bend Nuc. Unit
5/87	87-023-E-C	WV	Airco Industrial Gases	Monongahela Power Co.	Interruptible rates.
5/87	87-072-E-GI	WV	West Virginia Energy Users' Group	Monongahela Power Co.	Analyze Mon Power's fuel filing and examine the reasonableness of MP's claims.
5/87	86-524-E-SC	WV	West Virginia Energy Users' Group	Monongahela Power Co.	Economic dispatching of pumped storage hydro unit.
5/87	9781	KY	Kentucky Industrial Energy Consumers	Louisville Gas & Electric Co.	Analysis of impact of 1986 Tax Reform Act.
6/87	3673-U	GA	Georgia Public Service Commission	Georgia Power Co.	Economic prudence, evaluation of Vogtle nuclear unit - load forecasting, planning.
6/87	U-17282	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Phase-in plan for River Bend Nuclear unit.
7/87	85-10-22	CT	Connecticut Industrial Energy Consumers	Connecticut Light & Power Co.	Methodology for refunding rate moderation fund.
8/87	3673-U	GA	Georgia Public Service Commission	Georgia Power Co	Test year sales and revenue forecast.
9/87	R-850220	PA	West Penn Power Industrial Intervenors	West Penn Power Co.	Excess capacity, reliability of generating system.
10/87	R-870651	PA	Duquesne Industrial Intervenors	Duquesne Light Co.	Interruptible rate, cost-of-service, revenue allocation, rate design.
10/87	I-860025	PA	Pennsylvania Industrial Intervenors		Proposed rules for cogeneration, avoided cost, rate recovery.

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As of January 2002

Date	Case	Jurisdict.	Party	Utility	Subject
10/87	E-015/ GR-87-223	MN	Taconite Intervenors	Minnesota Power & Light Co.	Excess capacity, power and cost-of-service, rate design.
10/87	8702-EI	FL	Occidental Chemical Corp.	Florida Power Corp.	Revenue forecasting, weather normalization.
12/87	87-07-01	CT	Connecticut Industrial Energy Consumers	Connecticut Light Power Co.	Excess capacity, nuclear plant phase-in.
3/88	10064	KY	Kentucky Industrial Energy Consumers	Louisville Gas & Electric Co.	Revenue forecast, weather normalization rate treatment of cancelled plant.
3/88	87-183-TF	AR	Arkansas Electric Consumers	Arkansas Power & Light Co.	Standby/backup electric rates.
5/88	870171C001	PA	GPU Industrial	Metropolitan Edison Co.	Cogeneration deferral mechanism, modification of energy cost recovery (ECR).
6/88	870172C005	PA	GPU Industrial Intervenors	Pennsylvania Electric Co.	Cogeneration deferral mechanism, modification of Energy cost recovery (ECR).
7/88	88-171-EL-AIR 88-170-EL-AIR Interim Rate Case	OH	Industrial Energy Consumers	Cleveland Electric/ Toledo Edison	Financial analysis/need for interim rate relief.
7/88	Appeal of PSC	19th Judicial Docket U-17282	Louisiana Public Service Commission Circuit Court of Louisiana	Gulf States Utilities	Load forecasting, imprudence damages.
11/88	R-880989	PA	United States Steel	Carnegie Gas	Gas cost-of-service, rate design.
11/88	88-171-EL-AIR 88-170-EL-AIR	OH	Industrial Energy Consumers	Cleveland Electric/ Toledo Edison. General Rate Case.	Weather normalization of peak loads, excess capacity, regulatory policy.
3/89	870216/283 284/286	PA	Armco Advanced Materials Corp., Allegheny Ludlum Corp.	West Penn Power Co.	Calculated avoided capacity, recovery of capacity payments.
8/89	8555	TX	Occidental Chemical Corp.	Houston Lighting & Power Co.	Cost-of-service, rate design.

Expert Testimony Appearances
of
Stephen J. Baron
As of January 2002

Date	Case	Jurisdict.	Party	Utility	Subject
8/89	3840-U	GA	Georgia Public Service Commission	Georgia Power Co.	Revenue forecasting, weather normalization.
9/89	2087	NM	Attorney General of New Mexico	Public Service Co. of New Mexico	Prudence - Palo Verde Nuclear Units 1, 2 and 3, load forecasting.
10/89	2262	NM	New Mexico Industrial Energy Consumers	Public Service Co. of New Mexico	Fuel adjustment clause, off-system sales, cost-of-service, rate design, marginal cost.
11/89	38728	IN	Industrial Consumers for Fair Utility Rates	Indiana Michigan Power Co.	Excess capacity, capacity equalization, jurisdictional cost allocation, rate design, interruptible rates.
1/90	U-17282	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Jurisdictional cost allocation, O&M expense analysis.
5/90	890366	PA	GPU Industrial Intervenors	Metropolitan Edison Co.	Non-utility generator cost recovery.
6/90	R-901609	PA	Armco Advanced Materials Corp. Allegheny Ludlum Corp.	West Penn Power Co.	Allocation of QF demand charges in the fuel cost of service, rate design.
9/90	8278	MD	Maryland Industrial Group	Baltimore Gas & Electric Co.	Cost-of-service, rate design, revenue allocation.
12/90	U-9346 Rebuttal	MI	Association of Businesses Advocating Tariff Equity	Consumers Power Co.	Demand-side management, environmental externalities.
12/90	U-17282 Phase IV	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Revenue requirements, jurisdictional allocation.
12/90	90-205	ME	Airco Industrial Gases	Central Maine Power Co.	Investigation into interruptible service and rates.
1/91	90-12-03 Interim	CT	Connecticut Industrial Energy Consumers	Connecticut Light & Power Co.	Interim rate relief, financial analysis, class revenue allocation.
5/91	90-12-03 Phase II	CT	Connecticut Industrial Energy Consumers	Connecticut Light & Power Co.	Revenue requirements, cost-of-service, rate design, demand-side management.
8/91	E-7, SUB SUB 487	NC	North Carolina Industrial Energy Consumers	Duke Power Co.	Revenue requirements, cost allocation, rate design, demand-side management.

Expert Testimony Appearances of Stephen J. Baron As of January 2002

Date	Case	Jurisdict.	Party	Utility	Subject
8/91	8341 Phase I	MD	Westvaco Corp.	Potomac Edison Co.	Cost allocation, rate design, 1990 Clean Air Act Amendments.
8/91	91-372 EL-UNC	OH	Armco Steel Co., L.P.	Cincinnati Gas & Electric Co.	Economic analysis of cogeneration, avoid cost rate.
9/91	P-910511 P-910512	PA	Allegheny Ludlum Corp., Armco Advanced Materials Co., The West Penn Power Industrial Users' Group	West Penn Power Co.	Economic analysis of proposed CWIP Rider for 1990 Clean Air Act Amendments expenditures.
9/91	91-231 -E-NC	WV	West Virginia Energy Users' Group	Monongahela Power Co.	Economic analysis of proposed CWIP Rider for 1990 Clean Air Act Amendments expenditures.
10/91	8341 - Phase II	MD	Westvaco Corp.	Potomac Edison Co.	Economic analysis of proposed CWIP Rider for 1990 Clean Air Act Amendments expenditures
10/91	U-17282	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Results of comprehensive management audit.
Note: No testimony was prefiled on this.					
11/91	U-17949 Subdocket A	LA	Louisiana Public Service Commission Staff	South Central Bell Telephone Co.	Analysis of South Central Bell's restructuring and and proposed merger with Southern Bell Telephone Co.
12/91	91-410-EL-AIR	OH	Armco Steel Co., Air Products & Chemicals, Inc.	Cincinnati Gas & Electric Co.	Rate design, interruptible rates.
12/91	P-880286	PA	Armco Advanced Materials Corp., Allegheny Ludlum Corp.	West Penn Power Co.	Evaluation of appropriate avoided capacity costs - QF projects.
1/92	C-913424	PA	Duquesne Interruptible Complainants	Duquesne Light Co.	Industrial interruptible rate.
6/92	92-02-19	CT	Connecticut Industrial Energy Consumers	Yankee Gas Co.	Rate design.
8/92	2437	NM	New Mexico Industrial Intervenors	Public Service Co. of New Mexico	Cost-of-service.
8/92	R-00922314	PA	GPU Industrial Intervenors	Metropolitan Edison Co.	Cost-of-service, rate design, energy cost rate.

Expert Testimony Appearances
of
Stephen J. Baron
As of January 2002

Date	Case	Jurisdict.	Party	Utility	Subject
9/92	39314	ID	Industrial Consumers for Fair Utility Rates	Indiana Michigan Power Co.	Cost-of-service, rate design, energy cost rate, rate treatment.
10/92	M-00920312 C-007	PA	The GPU Industrial Intervenors	Pennsylvania Electric Co.	Cost-of-service, rate design, energy cost rate, rate treatment.
12/92	U-17949	LA	Louisiana Public Service Commission Staff	South Central Bell Co.	Management audit.
12/92	R-00922378	PA	Armco Advanced Materials Co. The WPP Industrial Intervenors	West Penn Power Co.	Cost-of-service, rate design, energy cost rate, SO_2 allowance rate treatment.
1/93	8487	MD	The Maryland Industrial Group	Baltimore Gas & Electric Co.	Electric cost-of-service and rate design, gas rate design (flexible rates).
2/93	E002/GR-92-1185	MN	North Star Steel Co. Praxair, Inc.	Northern States Power Co.	Interruptible rates.
4/93	EC92 21000 ER92-806-000 (Rebuttal)	Federal Energy Regulatory Commission	Louisiana Public Service Commission Staff	Gulf States Utilities/Entergy	Merger of GSU into Entergy System; impact on system agreement.
7/93	93-0114-E-C	WV	Airco Gases	Monongahela Power Co.	Interruptible rates.
8/93	930759-EG	FL	Florida Industrial Power Users' Group	Generic - Electric Utilities	Cost recovery and allocation of DSM costs.
9/93	M-009 30406	PA	Lehigh Valley Power Committee	Pennsylvania Power & Light Co.	Ratemaking treatment of off-system sales revenues.
11/93	346	KY	Kentucky Industrial Utility Customers	Generic - Gas Utilities	Allocation of gas pipeline transition costs - FERC Order 36.
12/93	U-17735	LA	Louisiana Public Service Commission Staff	Cajun Electric Power Cooperative	Nuclear plant prudence, forecasting, excess capacity.
4/94	E-015/ GR-94-001	MN	Large Power Intervenors	Minnesota Power Co.	Cost allocation, rate design, rate phase-in plan.
5/94	U-20178	LA	Louisiana Public Service Commission	Louisiana Power & Light Co.	Analysis of least cost integrated resource plan and demand-side management program.

Expert Testimony Appearances of Stephen J. Baron As of January 2002

Date	Case	Jurisdict.	Party	Utility	Subject
7/94	R-00942986	PA	Armco, Inc.; West Penn Power Industrial Intervenors	West Penn Power Co.	Cost-of-service, allocation of rate increase, rate design, emission allowance sales, and operations and maintenance expense.
7/94	94-0035-E-42T	WV	West Virginia Energy Users Group	Monongahela Power Co.	Cost-of-service, allocation of rate increase, and rate design.
8/94	EC94 13-000	Federal Energy Regulatory Commission	Louisiana Public Service Commission	Gulf States Utilities/Entergy	Analysis of extended reserve shutdown units and violation of system agreement by Entergy.
9/94	R-00943 081 R-00943 081C0001	PA	Lehigh Valley Power Committee	Pennsylvania Public Utility Commission	Analysis of interruptible rate terms and conditions, availability.
9/94	U-17735	LA	Louisiana Public Service Commission	Cajun Electric	Evaluation of appropriate avoided cost rate.
9/94	U-19904	LA	Louisiana Public Service Commission	Gulf States Utilities	Revenue requirements.
10/94	5258-U	GA	Georgia Public Service Commission	Southern Bell Telephone & Telegraph Co.	Proposals to address competition in telecommunication markets.
11/94	EC94-7-000 ER94-898-000	FERC	Louisiana Public Service Commission	El Paso Electric and Central and Southwest	Merger economics, transmission equalization hold harmless proposals.
2/95	941-430EG	CO	CF&I Steel, L.P.	Public Service Company of Colorado	Interruptible rates, cost-of-service.
4/95	R-00943271	PA	PP&L Industrial Customer Alliance	Pennsylvania Power & Light Co.	Cost-of-service, allocation of rate increase, rate design, interruptible rates.
6/95	C-00913424 C-00946104	PA	Duquesne Interruptible Complainants	Duquesne Light Co.	Interruptible rates.
8/95	ER95-112 -000	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Open Access Transmission Tariffs - Wholesale.
10/95	U-21485	LA	Louisiana Public Service Commission	Gulf States Utilities Company	Nuclear decommissioning, revenue requirements, capital structure.

Expert Testimony Appearances
of
Stephen J. Baron
As of January 2002

Date	Case	Jurisdict.	Party	Utility	Subject
10/95	ER95-1042 -000	FERC	Louisiana Public Service Commission	System Energy Resources, Inc.	Nuclear decommissioning, revenue requirements.
10/95	U-21485	LA	Louisiana Public Service Commission	Gulf States Utilities Co.	Nuclear decommissioning and cost of debt capital, capital structure.
11/95	I-940032	PA	Industrial Energy Consumers of Pennsylvania	State-wide - all utilities	Retail competition issues.
7/96	U-21496	LA	Louisiana Public Service Commission	Central Louisiana Electric Co.	Revenue requirement analysis.
7/96	8725	MD	Maryland Industrial Group	Baltimore Gas & Elec. Co., Potomac Elec. Power Co., Constellation Energy Co.	Ratemaking issues associated with a Merger.
8/96	U-17735	LA	Louisiana Public Service Commission	Cajun Electric Power Cooperative	Revenue requirements.
9/96	U-22092	LA	Louisiana Public Service Commission	Entergy Gulf States, Inc.	Decommissioning, weather normalization, capital structure.
2/97	R-973877	PA	Philadelphia Area Industrial Energy Users Group	PECO Energy Co.	Competitive restructuring policy issues, stranded cost, transition charges.
6/97	Civil Action No. 94-11474	US Bank-ruptcy Court Middle District of Louisiana	Louisiana Public Service Commission	Cajun Electric Power Cooperative	Confirmation of reorganization plan; analysis of rate paths produced by competing plans.
6/97	R-973953	PA	Philadelphia Area Industrial Energy Users Group	PECO Energy Co.	Retail competition issues, rate unbundling, stranded cost analysis.
6/97	8738	MD	Maryland Industrial Group	Generic	Retail competition issues
7/97	R-973954	PA	PP&L Industrial Customer Alliance	Pennsylvania Power & Light Co.	Retail competition issues, rate unbundling, stranded cost analysis.
10/97	97-204	KY	Alcan Aluminum Corp. Southwire Co.	Big River Electric Corp.	Analysis of cost of service issues - Big Rivers Restructuring Plan

Expert Testimony Appearances
of
Stephen J. Baron
As of January 2002

Date	Case	Jurisdict.	Party	Utility	Subject
10/97	R-974008	PA	Metropolitan Edison Industrial Users	Metropolitan Edison Co.	Retail competition issues, rate unbundling, stranded cost analysis.
10/97	R-974009	PA	Pennsylvania Electric Industrial Customer	Pennsylvania Electric Co.	Retail competition issues, rate unbundling, stranded cost analysis.
11/97	U-22491	LA	Louisiana Public Service Commission	Entergy Gulf States, Inc.	Decommissioning, weather normalization, capital structure.
11/97	P-971265	PA	Philadelphia Area Industrial Energy Users Group	Enron Energy Services Power, Inc./ PECO Energy	Analysis of Retail Restructuring Proposal.
12/97	R-973981	PA	West Penn Power Industrial Intervenors	West Penn Power Co.	Retail competition issues, rate unbundling, stranded cost analysis.
12/97	R-974104	PA	Duquesne Industrial Intervenors	Duquesne Light Co.	Retail competition issues, rate unbundling, stranded cost analysis.
3/98 (Allocated Stranded Cost Issues)	U-22092	LA	Louisiana Public Service Comission	Gulf States Utilities Co.	Retail competition, stranded cost quantification.
3/98	U-22092		Louisiana Public Service Commission	Gulf States Utilities, Inc.	Stranded cost quantification, restructuring issues.
9/98	U-17735	LA	Louisiana Public Service Commission	Cajun Electric Power Cooperative, Inc.	Revenue requirements analysis, weather normalization.
12/98	8794	MD	Maryland Industrial Group and Millennium Inorganic Chemicals Inc.	Baltimore Gas and Electric Co.	Electric utility restructuring, stranded cost recovery, rate unbundling.
12/98	U-23358	LA	Louisiana Public Service Commission	Entergy Gulf States, Inc.	Nuclear decommissioning, weather normalization, Entergy System Agreement.
5/99 (Cross-Answering Testimony)	EC-98-40-000	FERC	Louisiana Public Service Commission	American Electric Power Co. & Central South West Corp.	Merger issues related to market power mitigation proposals.

Expert Testimony Appearances
of
Stephen J. Baron
As of January 2002

Date	Case	Jurisdict.	Party	Utility	Subject
5/99 (Response Testimony)	98-426	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas & Electric Co.	Performance based regulation, settlement proposal issues, cross-subsidies between electric. gas services.
6/99	98-0452	WV	West Virginia Energy Users Group	Appalachian Power, Monongahela Power, & Potomac Edison Companies	Electric utility restructuring, stranded cost recovery, rate unbundling.
7/99	99-03-35	CT	Connecticut Industrial /Energy Consumers	United Illuminating Company	Electric utility restructuring, stranded cost recovery, rate unbundling.
7/99	Adversary Proceeding No. 98-1065	U.S. Bankruptcy Court	Louisiana Public Service Commission	Cajun Electric Power Cooperative	Motion to dissolve preliminary injunction.
7/99	99-03-06	CT	Connecticut Industrial Energy Consumers	Connecticut Light & Power Co.	Electric utility restructuring, stranded cost recovery, rate unbundling.
10/99	U-24182	LA	Louisiana Public Service Commission.	Entergy Gulf States, Inc.	Nuclear decommissioning, weather normalization, Entergy System Agreement.
12/99	U-17735	LA	Louisiana Public Service Commission	Cajun Electric Power Cooperative, Inc.	Ananlysi of Proposed Contract Rates, Market Rates.
03/00	U-17735	LA	Louisiana Public Service Commission	Cajun Electric Power Cooperative, Inc.	Evaluation of Cooperative Power Contract Elections
03/00	99-1658-EL-ETP	OH	AK Steel Corporation	Cincinnati Gas & Electric Co.	Electric utility restructuring, stranded cost recovery, rate Unbundling.
08/00	98-0452 E-GI 98-0452 E-GI	WVA	West Virginia Energy Users Group	Appalachian Power Co. American Electric Co.	Electric utility restructuring rate unbundling.
08/00	00-1050 E-T 00-1051-E-T	WVA	West Virginia Energy Users Group	Mon Power Co. Potomac Edison Co.	Electric utility restructuring rate unbundling.
10/00	SOAH 473-00-1020 PUC 2234	TX	The Dallas-Fort Worth Hospital Council and The Coalition of Independent Colleges And Universities	TXU, Inc.	Electric utility restructuring rate unbundling.

Expert Testimony Appearances
of
Stephen J. Baron
As of January 2002

Date	Case	Jurisdict.	Party	Utility	Subject
12/00	U-24993	LA	Louisiana Public Service Commission	Entergy Gulf States, Inc.	Nuclear decommissioning, revenue requirements.
12/00	EL00-66-000 & ER-2854-000 EL95-33-002	LA	Louisiana Public Service Commission	Entergy Services Inc.	Inter-Company System Agreement: Modifications for retail competition, interruptible load.
04/01	U-21453, U-20925, U-22092 (Subdocket B) Addressing Contested Issues	LA	Louisiana Public Service Commission	Entergy Gulf States, Inc.	Jurisdictional Business Sep. - Texas Restructuring Plan
10/01	14000-U	GA	Georgia Public Service Commission Adversary Staff	Georgia Power Co.	Revenue forecasting.
11/01	U-25687	LA	Louisiana Public Service Commission	Entergy Gulf	Nuclear decommissioning requirements transmission revenues.
11/01	U-25965	LA	Louisiana Public Service Commission	Generic	Independent Transmission Co. "Transco"), RTO rate design.

Florida Power & Light Company
Nuclear Operations Expenses vs. Nuclear Mwh Output 1994 - 2000

Regression Statistics	
Multiple R	0.71509387
R Square	0.511359243
Adjusted R Square	0.413631091
Standard Error	16502.38188
Observations	7

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	1424950216	1424950216	5.232466133	0.070874102
Residual	5	1361643038	272328607.6		
Total	6	2786593254			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*
Intercept	357362.0315	91545.85964	3.903639475	0.011367538	122036.2921	592687.7709
Nuclear Mwh	-0.009184063	0.004014964	-2.287458444	0.070874102	-0.01950484	0.001136713

Docket No. 001148-EI
Stephen J. Baron Exhibit No. ____
Nuclear O&M Statistical Analysis
Exhibit_(SJB-2)

Florida Power & Light Company
Nuclear Maintenance Expenses vs. Nuclear Mwh Output 1994 - 2000

Regression Statistics	
Multiple R	0.469206397
R Square	0.220154643
Adjusted R Square	0.064185571
Standard Error	20312.08935
Observations	7

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	582369414.3	582369414.3	1.411527558	0.288155723
Residual	5	2062904869	412580973.8		
Total	6	2645274283			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*
Intercept	247690.6346	112679.957	2.198178284	0.079275575	-41961.94286	537343.2121
Nuclear Mwh	-0.0058713	0.004941851	-1.188077252	0.288155723	-0.018574711	0.00683211

Docket No. 001148-EI
Stephen J. Baron Exhibit No. ____
Nuclear O&M Statistical Analysis
Exhibit_(SJB-3)

Florida Power & Light Company
Nuclear O&M Expenses vs. Nuclear Mwh Output 1994 - 2000

Regression Statistics	
Multiple R	0.853798089
R Square	0.728971176
Adjusted R Square	0.674765411
Standard Error	16874.22318
Observations	7

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	3829238863	3829238863	13.44822232	0.014485887
Residual	5	1423697040	284739408		
Total	6	5252935903			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*
Intercept	605052.6661	93608.62442	6.463642317	0.001319858	364424.4297	845680.9025
Nuclear Mwh	-0.015055364	0.004105431	-3.667181796	0.014485887	-0.025608694	-0.004502033

Docket No. 001148-EI
Stephen J. Baron Exhibit No. _____
Nuclear O&M Statistical Analysis
Exhibit_(SJB-4)