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May 9, 2002

Ms. Blanca S. Bayo, Director Commission Clerk and Administrative Services Florida Public Service Commission 2540 Shumard Oak Boulevard Betty Easley Conference Center, Room 110 Tallahassee, Florida 32399-0850

Re:

Docket No. 011351-EI

Dear Ms. Bayo:

Enclosed herewith for filing on behalf of Florida Power & Light Company, Florida Power Corporation, Tampa Electric Company and Gulf Power Company are an original and fifteen copies of Responses to the Staff Data Requests served by Staff Memorandum dated April 9, 2002 and related to the Statement of Estimated Regulatory Costs to be prepared by Staff in connection with proposed amendments to Rules 25-6.044 and 25-6.0455, Florida Administrative Code.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the copy to me.

Thank you for your assistance with this filing.

Sincerely,

Kenneth A. Hoffman

CAF CMP COM CTR KAH/rl ECR

AUS

- Enclosures

OPC C: Christiana Moore, Esq., with enclosure

Robert Vandiver, Esq., with enclosure

SEC FPL\Bayo.506

MM SUPEAU OF RECORD

DOCUMENT NUMBER-DATE

05045 MAY-98

FPSC-COMMISSION CLERK

Docket No. 011351-EI Responses of Florida Power & Light Company, Florida Power Corporation, Tampa Electric Company and Gulf Power Company to Staff Data Requests served April 9, 2002

- 1. All can comply with the proposed rule requirements with minimal incremental costs. While all utilities are able to provide and comply with the proposed requirements, it is important to note that the level of accuracy for each utility could differ as a result of the various systems and processes utilized by each utility to capture and report outage information. These differences could result from things such as each utility's system capabilities, the utilization of those capabilities, estimating methods and techniques used by each utility, etc. While acknowledging that these differences exist, the utilities believe that the reported results would not be materially affected. However, if additional levels of detail or more accurate levels of information are determined necessary, significant modifications to existing systems and processes could be required that would result in incremental costs (one-time as well as recurring) for all utilities. The extent of the incremental costs would depend on the required level of accuracy.
 - 2. There are no identified additional benefits from the proposed rule.
- 3. The "strawman" proposal submitted by the IOU's in November 2000 continues to represent a lower cost alternative method of accomplishing the requirements of the proposed rule.
 - 4. No additional comments or cost estimates.

DOCUMENT NUMBER-DATE