

State of Florida



Public Service Commission  
-M-E-M-O-R-A-N-D-U-M-

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**DATE:** July 29, 2003  
**TO:** Bill Feaster, Florida Power & Light Company  
Ken Hoffman, Rutledge Ecenia Purnell & Hoffman, P.A.  
George Brown, Southeastern Utility Services, Inc.  
Charlie Beck, Office of Public Counsel  
**FROM:** Cochran Keating - Economic Regulation Section - Office of the General Counsel *WCK*  
**RE:** Docket No. 030623-EI - Complaints by Southeastern Utility Services, Inc., on behalf of  
Various Customers, against Florida Power & Light Company concerning Thermal  
Demand Meter Error

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VIA ELECTRONIC MAIL

Please find attached a request for additional data concerning the complaints in the above-referenced docket. For the purpose of discussing this data request and providing any necessary clarification, Commission Staff will schedule a conference call to take place within the next week. The time, date, and telephone number for the call will be provided as soon as possible.

If you have any questions, please call me at (850) 413-6193.

WCK/jb

cc: Division of Economic Regulation  
Division of Auditing and Safety  
Division of the Commission Clerk and Administrative Services (Docket File)

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FPSC-COMMISSION CLERK

**COMMISSION STAFF DATA REQUEST**  
**DOCKET NO. 030623-EI**  
**JULY 29, 2003**

1. Please provide all data or analyses, from the meter manufacturer(s) or other sources, that would support the conclusion that the only way thermal demand meters in question may over-register (i.e., read too high) is if the meter was improperly calibrated at initial installation. Alternatively, provide all data or analyses to support the conclusion that such meters may gradually or suddenly read too high over time, even if properly calibrated at the time the meter was set. Include any engineering analyses, articles from journals, trade publications, or expert testimony, including documented experience of other utilities.
2. For Southeastern Utility Services, Inc. (SUSI), please provide the detailed calculations used by SUSI to determine the refund that it thinks is appropriate for each meter for which it seeks a refund under a pending complaint before the Florida Public Service Commission (Commission). Include details of how load factor is used in these calculations.
3. For Florida Power & Light Company (FPL), please provide detailed calculations used by FPL to determine the refund that it thinks is appropriate for each meter for which a refund is sought by SUSI under a pending complaint before the Commission. If billing history was used in any of the calculations, please show how such records were used. If formula was used to estimate months where no billing data was available with the new meter, please explain the method and all assumptions used.
4. For FPL, please identify and describe every known situation in which FPL determined that a refund for a period greater than 12 months was appropriate, regardless of whether the situation relates to a pending SUSI complaint. What specific characteristics or events justified departure from the 12 month limit in Rule 25-6.103(1), Florida Administrative Code?
5. For FPL, please provide the detailed calculations that FPL would use to determine the appropriate refund for each meter for which a refund is sought by SUSI under a pending complaint before the Commission, based on strict application of Commission rules. Please identify all assumptions.