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Timolyn Henry*****1

Timolyn Henry

From: Mike Twomey [miketwomey@talstar.com]
Sent: Wednesday, March 15, 2006 4:25 PM
To: Filings@psc.state.fl.us
Cc: Rhonda Dular; Bryan_Anderson@fpl.com; Natalie_Smith@fpl.com; Patrick_Bryan@fpl.com; Wade_Litchfield@fpl.com; Charles Beck; christensen.patty@leg.state.fl.us; mcglothlin.joseph@leg.state.fl.us; jmcwhirter@mac-law.com; tperry@mac-law.com; Rick Melson; swright@yvlaw.net
Subject: Re: Electronic Filing for Docket 060038-EI
Attachments: AARP 060038 First Interrogatories to FPL.doc



AARP 060038 First Interrogator...

>
>
> Mike Twomey wrote:
>
>> a. Person responsible for this electronic filing:
>>
>>
> Mike Twomey
> Post Office Box 5256
> Tallahassee, Florida 32314-5256
> miketwomey@talstar.com
>
>>
>> b. Docket No. 060038-EI
>> In re: Florida Power & Light Company's Petition for Issuance of a
>> Storm Recovery Financing Order.
>>
>> c. Document being filed on behalf of AARP.
>>
>> d. There are a total of 5 pages.
>>
>> e. The document attached for electronic filing is AARP's First Set
>> of Interrogatories to FPL
>>

CMP>
>> ~~Thank~~ you for your attention and assistance in this matter.

COM>
>> ~~Mike~~ Twomey

CTR>
>> _____

ECR _____

GCL _____

OPC _____

RCA _____

SCR _____

SGA _____

SEC 1

OTH _____

DOCUMENT NUMBER-DATE
02285 MAR 15 08
FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Florida Power and Light Company's)	
Petition for Issuance of a Storm Recovery)	Docket No. 060038-EI
Financing Order)	
_____)	

**AARP'S FIRST SET OF INTERROGATORIES
TO FLORIDA POWER & LIGHT COMPANY (Nos. 1- 6)**

Pursuant to § 350.0611(1), Fla. Stat. (2005), Fla. Admin. Code R. 28-106.206, and Fla. R. Civ. P.1.340, AARP propounds the following interrogatories to Florida Power & Light Company (FPL) to be answered on or before Thursday, March 30, 2006.

1. On page 4 of his direct testimony witness Harris states that the probability of the reserve balance having a negative deficit would be 17 percent in any given year over his five year analysis, provided that the Commission approves FPL's requested storm reserve of \$650 million. Under the same analysis, what level of storm reserve would the Commission have to approve to have a 50 percent probability of having a deficit in the reserve in any given year over the five year analysis? The same question, but what dollar level of a storm reserve to have a 75 percent probability of a deficit in any given year for the five years?

2. Has FPL calculated that there is a quantifiable monetary benefit to the consumers of having a storm reserve of \$650 million? If so, what is the amount of that benefit?

3. Has FPL calculated that there is a quantifiable monetary benefit to its consumers from having a storm reserve of any amount, as opposed to FPL merely seeking a surcharge to recover demonstrable storm costs after they are incurred? If there is a quantifiable monetary benefit from a reserve of any amount, what is the amount of that benefit to the customers?

4. What are the non-monetary benefits to the customers, if any, of having a funded storm reserve?

5. Given the fact that FPL previously recovered its 2004 storm costs through a surcharge approved by the Commission, including a substantial surcharge prior to the evidentiary hearing on the merits, why does FPL believe it is necessary to have a storm reserve?

6. What type of "storms" qualify for expenditures to be charged to the storm reserve fund and does FPL take the position that the Commission has to pre-approve expenditures from the storm reserve fund in all cases?

/s/ Michael B. Twomey
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Attorney for AARP

AFFIDAVIT

STATE OF _____

COUNTY OF _____

BEFORE ME, the undersigned authority, personally appeared

_____, who deposed and stated that he/she

provided the answers to interrogatories _____

served on _____ by _____ on

_____ and that the responses are true and

correct to the best of his/her information and belief.

DATED at _____, _____, this day
of _____, 2006.

Sworn to and subscribed before me this _____ day of
_____, 2006.

NOTARY PUBLIC

State of _____ at Large

My Commission Expires: _____

DOCKET NO. 060038-EI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing First Set of Interrogatories has been furnished by U.S. Mail and electronic mail to the following parties on this 15th day of March, 2006.

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/s/ Michael B. Twomey
Attorney