

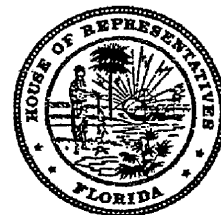
ORIGINAL

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March 31, 2006

Blanca S. Bayo, Director
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Florida Public Service Commission
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Re: Docket No. 060038-EI

Dear Ms. Bayo:

Enclosed for filing, on behalf of the Citizens of the State of Florida, are the original and 15 copies of the Direct Testimony of Hugh Larkin, Jr., CPA.

Please indicate the time and date of receipt on the enclosed duplicate of this letter and return it to our office.

Sincerely,

Charles J. Beck
Deputy Public Counsel

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Florida Power & Light Company's)
Petition for Issuance of a Storm Recovery)
Financing Order)
_____)

DOCKET NO. 060038-EI
Filed: March 31, 2006

DIRECT TESTIMONY

OF

HUGH LARKIN, JR., CPA

On Behalf of the Citizens of the State of Florida

Harold McLean
Public Counsel

Office of Public Counsel
c/o The Florida Legislature
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DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

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1 DIRECT TESTIMONY OF HUGH LARKIN, JR.
2 ON BEHALF OF THE CITIZENS OF FLORIDA
3 BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
4 FLORIDA POWER & LIGHT COMPANY
5 DOCKET NO. 060038-EI

6 I. INTRODUCTION

7 Q. WHAT IS YOUR NAME, OCCUPATION AND BUSINESS ADDRESS?

8 A. My name is Hugh Larkin, Jr. I am a Certified Public Accountant licensed in the
9 States of Michigan and Florida and the senior partner in the firm Larkin &
10 Associates, PLLC, Certified Public Accountants, with offices at 15728
11 Farmington Road, Livonia, Michigan 48154.

12
13 Q. PLEASE DESCRIBE THE FIRM LARKIN & ASSOCIATES, PLLC.

14 A. Larkin & Associates, PLLC, is a Certified Public Accounting and Regulatory
15 Consulting Firm. The firm performs independent regulatory consulting primarily
16 for public service/utility commission staffs and consumer interest groups (public
17 counsels, public advocates, consumer counsels, attorneys general, etc.) Larkin &
18 Associates, PLLC has extensive experience in the utility regulatory field as expert
19 witnesses in over 600 regulatory proceedings, including numerous electric, water
20 and wastewater, gas and telephone utility cases.

21
22 Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE FLORIDA PUBLIC
23 SERVICE COMMISSION?

1 A. Yes. I have testified before the Florida Public Service Commission on numerous
2 occasions during the past 30 years. I have also testified before Public
3 Service/Utility Commissions in 35 state jurisdictions, United States District
4 Courts, the Federal Energy Regulatory Commission and the Canadian Natural
5 Energy Board.

6

7 Q. HAVE YOU PREPARED AN EXHIBIT DESCRIBING YOUR
8 QUALIFICATIONS AND EXPERIENCE?

9 A. Yes. I have attached Appendix I, which is a summary of my regulatory
10 experience and qualifications.

11

12 Q. ON WHOSE BEHALF ARE YOU APPEARING?

13 A. Larkin & Associates, PLLC, was retained by the Florida Office of Public Counsel
14 (OPC) to review and comment on Florida Power & Light Company (FPL or
15 Company) request for recovery of storm restoration costs, and to address the
16 appropriate methodology for determining the amount to be recovered from
17 customers. Accordingly, I am appearing on behalf of the Citizens of Florida
18 (Citizens).

19

20 Q. ARE ANY ADDITIONAL WITNESSES APPEARING ON BEHALF OF THE
21 FLORIDA OFFICE OF PUBLIC COUNSEL IN THIS CASE?

22 A. Yes. Donna M. DeRonne, of my firm, is also presenting testimony, as well as
23 James Byerley of R.W. Beck.

24

1 II PURPOSE OF TESTIMONY

2 Q. WHAT IS THE PURPOSE OF THE TESTIMONY YOU ARE FILING IN THIS
3 CASE?

4 A. The purpose of my testimony is to set forth the principles which should underlie
5 the cost recovery for storm damages that the Commission should authorize in this
6 docket. These principles set forth a policy which the Florida Office of Public
7 Counsel and I feel are appropriate for establishing the basis for cost recovery in
8 this docket and all subsequent dockets related to the recovery of storm damage
9 costs.

10
11 Q. THE BASIS ON WHICH FLORIDA UTILITIES RECOVER MAJOR STORM
12 DAMAGE COSTS IS OFTEN DESCRIBED AS "SELF INSURANCE." DO
13 YOU AGREE WITH THAT DESCRIPTION?

14 A. No, I do not. The proper description for the recovery of storm costs under the
15 present method used by the Florida Public Service Commission is "Customer
16 Supplied Insurance." In other words, utility customers have been assigned the
17 risk of compensating utilities for major components of storm damage costs. It is
18 the Office of the Public Counsel's and my opinion that the risk shouldered by
19 ratepayers in compensating companies for storm damage costs should be limited
20 to the incremental costs incurred by utilities in restoring service to ratepayers.
21 That incremental cost should reflect only those additional costs incurred by the
22 company in restoring service which exceed costs already considered and reflected
23 in rates.

1 The incremental cost approach is vastly different from the approach being set
2 forth by FPL. The FPL approach essentially is asking the Florida Public Service
3 Commission to hold the Company harmless from all business risk. In other
4 words, if the Company can establish any tangential association with the storm
5 then the Company claims that these costs are recoverable from ratepayers. On the
6 other hand, the OPC and myself, on behalf of the customers who really are the
7 insurance carrier, claim that in order for a cost to be recovered, it must be
8 incremental. In other words, over and above what is reflected in base rates.

9
10 It should be kept in mind that the purpose of regulation is to substitute for
11 competition. The Public Service Commission should look to the business risk
12 which was borne by FPL's customers in regard to the storm damage they incurred
13 as a proxy for the business risk which FPL should bear. Those customers were
14 not able to make claims for items such as lost revenue, backfill, employee
15 assistance, advertising, etc. Because of the tremendous strain that the storms have
16 placed on southern Florida and the Florida economy in general, the Commission
17 must spread the burden of storm restoration costs in a fair and equitable manner
18 and not attempt to remove the business risk that is compensated for in the rate of
19 return provided to electric utilities. FPL's petition states: "In addition to the
20 damage to FPL's infrastructure, Hurricane Wilma caused significant damage to
21 the communities that the Company serves." These communities must refurbish
22 their own infrastructure and do not have the ability to turn to insurance carriers or
23 governmental agencies to hold them harmless from the effects of severe storms.

1 III. COMPANY'S ACCOUNTING FOR STORM DAMAGE COSTS

2 Q. IN MR. DAVIS' TESTIMONY, FPL CONTENDS THAT THE
3 METHODOLOGY THAT IT IS PROPOSING FOR STORM DAMAGE COSTS
4 RESULTS IN THE "MOST ACCURATE WAY TO ACCOUNT FOR ALL
5 FPL'S STORM RESTORATION COSTS BECAUSE IT PROPERLY UTILIZES
6 THE NORMAL COST ACCOUNTING PRACTICES, PROCESSES AND
7 PROCEDURES THAT ARE RELIED UPON BY THE COMPANY IN THE
8 ORDINARY COURSE OF ITS BUSINESS." DO YOU AGREE WITH THAT
9 STATEMENT?

10 A. No. Clearly, the Company's accumulation of cost related to storm restoration is
11 not a daily, recurring practice in the Company's accounting procedures. If that
12 were the case, the Company would not have to issue special accounting
13 instructions and special work order numbers to accumulate storm damage costs in
14 separate work orders and accounts. It is not a correct or accurate statement to say
15 that the cost accumulated under the Company's storm cost accounting method
16 results in an accurate, reliable accounting methodology which will result in the
17 proper recovery of cost from ratepayers.

18
19 Q. WHY IS THAT SO?

20 A. The Company's cost accumulation under storm damage work orders results in the
21 accumulation of all payroll and all materials, supplies and other costs charged to
22 the work order being accumulated as storm damage costs. This is so even though
23 some of the payroll costs and some material and other costs are reflected in rates

1 and collected from ratepayers during the normal course of business or are costs
2 that are part of the business risk which the Company should bear.

3
4 Q. CAN YOU GIVE EXAMPLES OF SUCH COSTS?

5 A. Yes. As an example, meter readers and budgeted amounts of overtime for those
6 meter readers are reflected in O&M costs and are recovered in rates. During
7 storms most, if not all, meter readers are assigned to storm recovery activities,
8 either as part of the restoration process (guiding contractor to damaged sites) or
9 for safety or damage assessment duties. This would be so even though the areas
10 where they might be reading meters have not been damaged as a result of the
11 storm. Their payroll and overtime associated with the storm recovery process are
12 charged to storm recovery work orders. The meters which they would have read
13 are either estimated or are read in the next month after they return to meter
14 reading duties. The billings associated with subsequent meter reads recover the
15 costs of these meter readers along with other employees who might be assigned to
16 storm restoration activities during the storm recovery period. The accounting
17 methodology utilized by the Company charges total payroll and overtime during
18 the period that the employee is engaged in storm recovery activity even though
19 part or all of his payroll would be recovered through rates in the current or
20 subsequent months. The methodology offered as accurate and infallible by the
21 Company cannot and does not differentiate between incremental payroll and
22 payroll which the Company would recover through the normal rate recovery
23 method. In other words, the Company is asking to recover the total cost of the
24 employee involved in the restoration even though part or all of his hourly rate and
25 overtime costs may already be recovered in base rates.

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This methodology of total recovery of storm costs instead of incremental costs results in charging ratepayers twice for the same payroll dollars, once through base rates and a second time through storm related work orders. The same would be true of line crews and other personnel whose time would generally be charged to O&M expense and who now are working on storm restoration. The cost would be accumulated in the storm work orders and not charged to O&M accounts, even though certain levels of payroll and overtime costs are reflected in base rates associated with maintenance of lines, transformers and other distribution and transmission system equipment.

Q. WOULD THE SAME BE TRUE OF MATERIALS AND SUPPLIES?

A. Yes. A certain level of materials and supplies have been included in base rates and recovered from ratepayers in the normal course of billing customers for electric services.

Q. ARE ALL OF THE COSTS FOR PAYROLL AND MAINTENANCE AND SUPPLIES COSTS INCREMENTAL TO THE COMPANY'S NORMAL OPERATING AND MAINTENANCE EXPENSES?

A. First, let me define incremental. Kohler's Dictionary for Accountants defines incremental as follows: "An increase over some base value expressed as a difference between the new value and the base value." FPL storm accounting system does not account for only incremental costs. It accounts for total cost of any employee, material, contract cost, supplies, etc. charged to a storm work order. The accounting process utilized by FPL does not account or attempt to

1 account for the portion of the cost charged to storm work orders that are
2 incremental to the Company's normal operating expense. The accounting
3 process, which FPL labels as accurate, merely charges every cost associated with
4 employees work on the storm rather than trying to segregate only that cost which
5 is incremental to normal payroll, maintenance and other expense.
6

7 IV. THE USE OF VARIANCES OR ESTIMATES OF COST INCLUDED IN
8 BASE RATES

9 Q. MR. DAVIS' TESTIMONY CRITICIZES THE INCREMENTAL COST
10 APPROACH BECAUSE IT ANALYZES DIFFERENCES BETWEEN
11 BUDGETED AND ACTUAL NUMBERS AND CONCLUDES THAT THESE
12 AMOUNTS RESULT FROM COST BEING CHARGED TO STORM COST. IS
13 HIS CRITISISM A VALID CRITISISM?

14 A. Hardly. Mr. Davis, in describing the process that the Company uses, states:
15 "Also, it avoids the necessity of making estimates for year-end budget
16 variances..." However, the Company's process is replete with estimates.

17
18 The Company states that it will remove from the storm restoration work orders
19 those costs which should be capitalized. However, the Company is not relying on
20 the accumulation of cost in the storm work orders to determine what costs should
21 be capitalized, but are making estimates of those costs by using what Mr. Davis
22 calls "normal costs." This is stated on page 15 of his testimony. However,
23 normal costs are not defined in the testimony until page 26, where it is stated by
24 Mr. Davis that "Each business unit is responsible for preparing an estimate of

1 capital work as a result of storm damage to its assets. FPL estimates storm
2 damage related to transmission and distribution assets at normal cost utilizing the
3 Company's estimating system."

4
5 In other words, the work orders that accumulate costs for the storm damage is not
6 accurate enough to determine what costs should be capitalized. In that instance
7 the Company feels it is okay to use the Company's own "estimating system."

8 Again, on the same page, Mr. Davis states: "Storm damages to all other assets are
9 estimated individually by each Business Unit." If, as Mr. Davis states, the
10 method recommended by the Company results in accounting and recovery of
11 actual costs incurred to restore electric service, why would the Company find it
12 necessary to use any estimates? Also, on page 22, when asked to describe the
13 unrecovered pre-tax 2005 storm recovery costs, Mr. Davis lists the following:
14 "An estimate for storm restoration activities not yet completed; and an estimate
15 for completed activities where the final costs are not yet known."

16
17 Mr. Davis states that these costs will be trued-up at a later date. A significant
18 portion of the 2005 storm costs contained in the filing are based on estimates.
19 Obviously the Company feels it is okay to use estimates only when it benefits the
20 Company.

21
22 Q. FPL HAS CLAIMED THAT IT IS NOT PROPER ACCOUNTING TO UTILIZE
23 THE INCREMENTAL APPROACH IN DETERMINING STORM
24 RESTORATION COST THAT SHOULD BE CHARGED TO THE STORM
25 RESERVE AND RECOVERED FROM RATEPAYERS THROUGH A

1 SURCHARGE OR THROUGH SECURITIZATION. HAS FPL ITSELF
2 UTILIZED AN INCREMENTAL APPROACH IN DETERMINING ANY
3 PORTION OF THE COSTS THAT ARE REFLECTED IN THE STORM
4 RECOVERY BALANCE THAT IT WISHES TO CHARGE RATEPAYERS IN
5 THIS MANNER?

6 A. Yes, they have. A bit of background is necessary to explain my answer. In
7 Docket No. 041291-EI (the docket involving FPL's request to recover costs of
8 restoring its system after the 2004 storm season), FPL asserted that all costs
9 associated with the storm, including those associated with the replacement of
10 poles and wires that ordinarily would be capitalized, were storm-related and
11 properly charged to the storm reserve. OPC argued that the amount that would be
12 spent on capital items under normal conditions should be capitalized and placed in
13 rate base, and only the increment above the normal amount should be treated as
14 extraordinary O&M and charged to the storm reserve. The Commission ruled in
15 OPC's favor.

16
17 OPC's proposed treatment of capital items in that case was a part of its overall
18 incremental approach to the accounting for storm-related costs. It is analogous to
19 OPC's position on the expense side, in that, In the incremental approach, the
20 proposition that normal amounts should be filtered out of the amounts charged to
21 the storm reserve is common to both the treatment of capital items and expense
22 items.

23
24 In this case, FPL has treated capital costs in accordance with the Commission's
25 decision in Docket No.041291-EI; that is to say, it quantified the "normal capital

1 costs” associated with replacing facilities that would be capitalized under ordinary
2 circumstances and segregated those from the increment above normal costs that
3 were occasioned by 2005 storm conditions. It proposes to place the “normal
4 costs” in rate base, and to charge only the extraordinary increment to the reserve
5 and recover that amount from customers. In doing so, FPL adopted an
6 incremental approach on the capital side of the storm cost equation, but
7 inconsistently advanced its non-incremental, “actual cost” approach to the
8 accounting of expense items. In other words, at the same time that FPL advocates
9 its “actual cost” approach (and resists the application of an incremental approach)
10 to expense items, it proposes to employ a form of an incremental approach to the
11 capital cost side of the same storm accounting exercise. FPL’s proposed
12 treatment of capital costs in this case belies its claim that an incremental approach
13 to the accounting for storm costs is inappropriate.

14
15 V. FINANCIAL STATEMENTS NOT AFFECTED BY USE OF
16 INCREMENTAL COST APPROACH

17 Q. ONE OF THE ARGUMENTS SET FORTH IN MR. DAVIS’ TESTIMONY IS
18 THAT “USING ESTIMATES IN PREPARING THOSE FINANCIAL
19 STATEMENTS IS NOT PERMITTED.” IS THAT A CORRECT
20 STATEMENT?

21 A. No, it is not. Financial statements are based on estimates of many components
22 which are not actually known at the time the financial statements are prepared.
23 For instance, pension accruals are based on estimates of future liabilities for
24 employee benefits. Unbilled revenue is based on a calculation of the estimate of

1 what revenues will be billed in a subsequent month. Accruals of payroll,
2 expenses, and other liabilities are made at the end of each month in order to
3 reflect on the financial statements estimates of liabilities incurred or revenues
4 earned which are not known in their exact amount. The 2004 storm cost on the
5 Company's books includes the total estimated amount even though the Company
6 knew some cost would not be approved by the Commission. In any case, the use
7 of incremental costs which utilizes projections or estimates of what cost the
8 Company would recover through base rates is clearly within the ratemaking
9 process and is based on the Commission's past practices of using future budgeted
10 test years in setting base rates. It would be inconsistent for the Commission to
11 conclude that it would be inaccurate to utilize budget variances in determining
12 what incremental storm cost restoration is recoverable from ratepayers when the
13 Commission has utilized budgeted test years which have been projected at least
14 two years into the future in establishing base rates. Clearly, the Commission has
15 been comfortable with the budgeting process and analysis of variances from the
16 budget in establishing base rates. Consistency would require that the Commission
17 follow a similar process in establishing incremental cost for storm restoration
18 recoverable from ratepayers.

19
20 Q. MR. DAVIS, ON PAGE 16, STATES THAT SOMEHOW THE USE OF
21 BUDGET VARIANCES IN DETERMINING RECOVERABLE STORM
22 DAMAGE COSTS FROM RATEPAYERS IS "INCONSISTENT WITH THE
23 STRINGENT FINANCIAL REPORTING REQUIREMENTS IMPOSED ON
24 PUBLIC COMPANIES BY THE SARBANES OXLEY ACT OF 2000." IS
25 THAT CORRECT?

1 A. No, a Public Service Commission can use any reasonable methodology in
2 determining what costs are recoverable from ratepayers. The Sarbanes Oxley Act
3 cannot override a Commission's regulatory authority, nor does it attempt to.

4

5 VI. COMPANY'S METHODOLOGY DOES NOT REPLICATE COST
6 RECOVERY UNDER THIRD PARTY REPLACEMENT COST
7 INSURANCE POLICY

8 Q. MR. DAVIS HAS STATED THAT HIS METHODOLOGY WOULD
9 REPLICATE INSURANCE RECOVERY UNDER THIRD PARTY
10 REPLACEMENT COSTS. DO YOU AGREE WITH THAT ANALYSIS?

11 A. No, I do not. First of all, most insurance policies have a deductible. In the
12 instance of public utilities, that deductible is generally fairly substantial and could
13 amount to millions of dollars. The Company's methodology does not duplicate
14 an insurance policy's deductible component. Additionally, insurance policies
15 generally would not cover the recovery of costs which the Company is attempting
16 to recover if the incremental approach is used, such as, backfill, catch up, or
17 incremental work not directly related to storm restoration. Insurance policies also
18 would not generally allow for the recovery of advertisements and communication
19 costs, employee assistance costs or employee bonuses which the Company is
20 seeking to recover.

21

1 VII. FPL HAS ALWAYS TOUTED ITS BUDGET PROCESS AS BEING
2 EXTREMELY ACCURATE

3 Q. IN FPL'S LAST RATE CASE, HOW DID THE COMPANY CHARACTERIZE
4 ITS BUDGETING PROCESS?

5 A. The Company characterized its budgeting process as being extremely reliable and
6 that the Commission could utilized it in establishing base rates even though its
7 budgets and projections were projected for periods up to 24 months. Clearly, if it
8 is appropriate and reasonable to utilize budgets to establish base rates, then it is
9 also reasonable and appropriate to utilize budget variances to determine what
10 level of storm restoration cost should be recovered from ratepayers.

11 Budget Variance Analysis

12 Q. MR. DAVIS STATES, ON PAGE 19 OF HIS DIRECT TESTIMONY, THAT
13 COMPARISON OF BUDGETS AND ACTUAL EXPENDITURES ARE NOT A
14 VALID APPROACH AND "...IT IS NOT A TYPICAL, COMMON OR EVEN
15 ACCEPTED ACCOUNTING METHOD FOR COST ACCOUNTING." IS
16 THAT CORRECT?

17 A. No, it is not. In fact, cost accounting is generally based on an analysis of
18 variances from budgeted or standard costs. It is the analysis of the difference
19 between what is utilized as standard or budgeted cost and actual costs, which is
20 termed a "variance," which most manufacturers use in analyzing and evaluating
21 their manufacturing process. Any standard cost accounting textbook will have a
22 chapter on the analysis and control of standard cost variances.

1 Q. IT HAS BEEN SUGGESTED IN MR. DAVIS' TESTIMONY THAT UTILITY
2 ACCOUNTING DOES NOT UTILIZE INCREMENTAL COSTS IN
3 RECORDING TRANSACTIONS FOR RATEMAKING OR REGULATORY
4 PURPOSES. IS THAT A CORRECT SUGGESTION?

5 A. No, it is not. The Uniform System of Accounts has specific instructions which
6 indicate that only incremental costs should be recorded in plant accounts when a
7 construction project results in "a betterment" of a minor item of property. Electric
8 Plant Instructions which direct utilities on how costs are to be recorded in electric
9 plant-in-service has the following instructions:

10 When a minor item of depreciable property is replaced
11 independent of the retirement unit . . . if the replacement effects a
12 substantial betterment (the primary aim of which is to make the
13 property effected more useful, more efficient, of greater durability,
14 or greater capacity), the excess cost of the replacement over the
15 estimated cost at current prices of the replacement without
16 betterment shall be charged to the appropriate electric plant
17 account.¹
18

19 Plant Instructions for the recording of a betterment to utility plant allows only the
20 recording of incremental costs over the current price of the replacement, the
21 difference is charged to O&M expense. This is the same procedure which I am
22 recommending the Commission follow in this case, that is, in calculating
23 restoration costs the Commission should allow for the recovery of only that
24 component of the cost which exceeds normal O&M costs.
25

¹ 18CFR, Ch 1, PT 101, Plant Instruction 10, p. 302.

1 Q. THE COMPANY'S TESTIMONY IMPLIES THAT CALCULATING
2 RECOVERABLE STORM COSTS USING AN INCREMENTAL APPROACH
3 IS IMPROPER OR INACCURATE ACCOUNTING, IS THAT CORRECT?

4 A. No, it is not. As I have previously stated in the above paragraphs, cost accounting
5 is a discipline within the overall accounting process which is designed to measure
6 the cost of individual processes, products or events. The USOA also follows this
7 process in accounting for certain plant additions. In this case, the Commission
8 should be concerned with measuring only the incremental effect of storm
9 restoration cost on FPL. In order to accomplish that task, it is necessary to
10 segregate those costs during a storm period which would have been incurred by
11 the Company absent the storm. FPL's methodology of accumulating every
12 payroll, material, contract or other cost in storm related work orders without
13 segregating that component of those costs which would otherwise still be incurred
14 by FPL absent the storm results in a double recovery from ratepayers. The
15 appropriate procedure is to utilize budgets and other available data to segregate
16 from the total storm work orders those components which FPL would have
17 incurred absent the storm. By doing so, the incremental cost of the storm is
18 segregated, and the resulting amount is, in general, the appropriate amount to
19 recover from ratepayers.

20

21 Budgeting Process in Determining Variances

22 Q. FPL WITNESS DAVIS CLAIMS THAT THE USE OF THE BUDGETING
23 PROCESS IS NOT A RELIABLE METHOD FOR DETERMINING STORM
24 COSTS. WOULD YOU PLEASE DISCUSS HIS CONTENTION?

1 A. It is interesting to note that the Company has claimed that its budgeting process is
2 extremely accurate. In FPL's last petition for a rate increase, Docket No. 050078-
3 EI, which was filed in March 2005, FPL projected every income and expense
4 account through the year ended December 31, 2006. FPL projected every balance
5 of every rate base account, including plant in service, accumulated depreciation,
6 plant held for future use and working capital over a two year period. The
7 Company contended in that case that the use of these budgets and projections
8 were accurate enough that the Florida Public Service Commission should raise
9 base rates to ratepayers by \$384.6 million. Now in the storm restoration case,
10 FPL contends that the budgets and budget variances are not useful in determining
11 what costs are incremental storm costs. It appears to be disingenuous for the
12 Company to claim that it can project budgets for each and every account for a two
13 year period, but that such budgets are useless when compared to actual expenses
14 over a relatively short period of time. The Commission has consistently over the
15 last 20 years, or more, used projections, budgets and forecasts to determine the
16 proper level of rates, fuel costs and other components of rates. The Commission
17 should follow its prior practices and utilize budgets and budget variances in order
18 to determine the proper level of incremental storm restoration costs to be
19 recovered from ratepayers.

20
21 Q. MR. DAVIS CLAIMS THAT: "... THE IMPACT OF A HURRICANE,
22 WHICH, AMONG OTHER THINGS, RESULTS IN NORMALLY
23 SCHEDULED WORK AND THE RELATED COST BEING DEFERRED OR
24 DELAYED TO SUBSEQUENT PERIOD, ..." DO YOU AGREE WITH
25 THAT STATEMENT?

1 A. No. Obviously, there are certain functions that were delayed and it may be
2 necessary to complete at a later date. However, the effects of a storm on electric
3 utility distribution and transmission system is to exploit the points of the electric
4 system which are weak or would have been the subject of maintenance projects.
5 Items such as repairs to poles, cross-arm braces, replacing guys, or braces, all of
6 which would have been maintenance items, are now included within the storm
7 restoration costs. The trimming of trees and brush which would have been
8 maintenance have now been accomplished as part of the storm restoration costs.

9
10 In many instances after a major hurricane, utilities will do extra tree trimming and
11 brush removal because customers are more receptive to cutting back trees and
12 shrubbery because they are anxious for power to be restored. Additionally, the
13 2005 storms affected heavily populated areas of FPL's service territory.

14 Company Witness Geisha J. Williams stated:

15 In 2005, FPL and its customers were affected by 4 hurricanes --
16 Dennis, Katrina, Rita and Wilma. All four of the hurricanes
17 impacted the most densely populated areas in FPL's service
18 territory, Palm Beach, Broward and Miami-Dade counties, where
19 60% of FPL's customers reside.²
20

21 The hardest hit areas were Miami-Dade, Broward, and Palm Beach
22 counties. This tri-county area also contains the greatest number of
23 electrical facilities, many of which are located in areas with
24 difficult access such as alley ways and behind homes, and includes
25 areas with very dense vegetation.³
26

² Geisha J. Williams' Testimony, p. 16, lines 17-20.

³ Geisha J. Williams' Testimony, p. 19, lines 6-9.

1 The Company would have the Commission and OPC believe that the storm
2 restoration costs, which was major and impacted most of the Company's service
3 area, could not and did not affect any routine maintenance project. The Company
4 implies that all of the routine maintenance, which is included in the Company's
5 base rates and budgets, would have been spent on other areas of the Company's
6 service territory or on other projects within the storm area, but not on any of the
7 transmission or distribution which was restored during the restoration period.
8

9 VIII. LOST REVENUE

10 Q. IF THE COMMISSION USES YOUR RECOMMENDED INCREMENTAL
11 APPROACH TO THE DETERMINING STORM RESTORATION COSTS
12 RECOVERABLE FROM RATEPAYERS, DOES FPL STATE THAT
13 ADDITIONAL ADJUSTMENTS ARE NECESSARY TO THE
14 INCREMENTAL APPROACH?

15 A. Yes. FPL would add to recoverable storm costs if the incremental approach is
16 used a number of costs. Part of those costs are backfill and catch-up work,
17 vacation buy back, uncollectibles, and other costs that according to the Company
18 are "Amounts not recovered in base rates due to storm related outages of
19 \$51,354,000 were used to offset adjustments for base operating expense included
20 in storm reserve charges." In addition to the items I have listed above, FPL would
21 add a dollar amount of \$7,068,200 which, in effect, is a plug amount in order to
22 zero out any difference between the incremental approach and the cost approach
23 recommended by FPL. Essentially, these items are lost revenues.
24

1 Q. WHAT ARE LOST REVENUES?

2 A. Lost revenues are an estimate of what the Company, in theory, would have
3 collected from ratepayers through revenues absent the outages caused by the
4 storms. The calculation of this estimate is based on calculating an average
5 consumption by customers for a prior period and then applying that average to the
6 days of outages times the number of customer outages during the restoration
7 period. This consumption is then multiplied by a revenue factor.

8

9 Q. WOULD YOU AGREE WITH THE COMPANY'S CONTENTION THAT IT
10 SHOULD RECEIVE RECOVERY OF LOST REVENUES IF THE
11 COMMISSION WERE TO USE THE INCREMENTAL APPROACH TO
12 CALCULATE STORM RESTORATION COSTS?

13 A. No, I do not. Lost revenues are not a cost of restoring service. There is no
14 expenditure of funds or outflow of cash represented by a so called "lost revenue."
15 It is a calculated number based on estimates of possible sales during the storm
16 outage period. While it is reasonable to assume that the Company could have
17 billed customers during this period but for the storm outage, it is not reasonable to
18 assume that these revenues are linked to, or result from, restoring service to
19 customers.

20

21 When utility rates are set, the rate of return allowed the Company on equity
22 provides for the assumption of risk. Part of that risk is the effects of weather on
23 sales. A projected test year, which is used by this Commission in establishing
24 base rates, does not utilize kilowatt hour sale assumptions which take into effect
25 variances from "normal" weather. That is, the assumptions utilized in calculating

1 both the number of customers and the consumption per customer is based on
2 normal weather, i.e., weather is neither colder than normal or warmer than
3 normal, or that there are storm related outages. If, in fact, weather is warmer than
4 normal during the cooling season and colder than normal during the heating
5 season, the Company receives the benefit of those increased sales because they
6 were not taken into account in establishing base rates. On the reverse side, if the
7 weather is colder than normal during the cooling season and warmer than normal
8 during the heating season the Company would suffer the detriment of those
9 reduced sales. The same is true regarding other weather effects; that is, the
10 number of outages are not factored into the billing determinants used to establish
11 base rates. If storm activity is less than average, the Company benefits because
12 fewer outages will both increase consumption and reduce maintenance costs. If
13 there is more activity, including major storms, then the Company would bear the
14 consequences of the lower sales as a result of a more active storm period. The
15 effect of weather on sales consumption has always been a benefit/risk assigned to
16 stockholders through the determination of the fair and reasonable rate of return. It
17 should never be a factor in establishing incremental costs to be borne by
18 ratepayers as a result of hurricane activity.

19
20 Q. HAVE YOU MADE A COMPARISON OF FPL'S ACTUAL KILOWATT
21 HOUR SALES AS REPORTED IN THE FUEL DOCKET TO THE
22 ESTIMATED KILOWATT HOUR SALES REPORTED IN THE FUEL
23 DOCKET?

24 A. Yes, I have. Exhibit ___(HL-1), Schedule 1, shows a comparison of the actual
25 kilowatt hour sales reported in the fuel docket to estimate sales for the months of

1 January 2005 through December 2005 and the total actual for 2005 to the
2 estimated sales for that same period. The schedule shows that in months when the
3 hurricane occurred, July, August, September and October, the Company's actual
4 sales reported in the fuel docket exceeded the estimated sales by almost 1.4 billion
5 kilowatt hours.

6
7 Q. WHAT DID THE COMPANY CLAIM AS LOST SALES DURING THAT
8 SAME PERIOD AMOUNT?

9 A. That amount is shown in column (f) of Exhibit ___(HL-1), Schedule 1. During
10 this same period, Company Witness Green calculated the Company's lost storm
11 related sales of approximately 1.4 million megawatt hours. In other words, the
12 Company's actual sales, which included storm lost sales, were actually higher
13 than estimated by 1.4 billion kWh.

14
15 Q. HOW DID THE COMPANY'S SALES FOR THE TOTAL YEAR 2005
16 COMPARE TO THE ESTIMATED AMOUNT?

17 A. That is shown on line 13 of Schedule 1, which shows that the Company, during
18 2005, experienced sales which were about 560 million kilowatt hours less than the
19 estimated amount. The reductions in sales below the estimated amounts occurred
20 in months where there were no hurricanes. The month of November 2005 shows
21 a sales decline of over 676 million kilowatt hours below estimated. Possibly 30%
22 of this sales decline may be attributable to outages which continued from storm
23 damage in October 2005. Thus, even though the Company's sales were less than
24 estimated for 2005, it appears that the sales declines were not caused by hurricane

1 related outages during 2005, but were related to other weather issues, i.e., colder
2 or warmer than normal weather during non-hurricane months.

3
4 Q. WHAT WOULD BE THE RESULT IF THE COMMISSION ALLOWED FOR
5 LOST REVENUE AS A HYPOTHETICAL COST FOR STORM
6 RESTORATION?

7 A. The net effect would be to shift part of the risk that the stockholders are
8 compensated for in the rate of return from the stockholders to the ratepayers.
9 Obviously, a substantial portion of risk that is accounted for in the rate of return
10 has to do with the effect of weather on sales. If the Commission were to allow for
11 the recovery by FPL of lost revenue, then the Commission would, in effect, be
12 allowing that risk to be shifted from stockholders to ratepayers without a
13 reduction in the authorized rate of return on equity included in base rates. From a
14 ratemaking standpoint, it would be improper for the Commission to allow for the
15 recovery of weather related sales reductions in a docket designed to compensate
16 the Company for storm related restoration costs. Especially since the weather
17 related kWh sales gains exceeded the kWh storm related sales losses by about 1.2
18 billion kWh in months where storms occurred.

19
20 Q. IN THE AGENDA CONFERENCE CONDUCTED ON JULY 19, 2005
21 CONCERNING THE 2004 STORM RESTORATION COSTS,
22 COMMISSIONER DEASON EXPRESSED SOME CONCERN RELATED TO
23 THE RECOVERY OF LOST REVENUE. HE INDICATED THAT IT MIGHT
24 BE APPROPRIATE FOR THE COMPANY TO RECOVER LOST REVENUE
25 IF IT AFFECTED THE COMPANY'S FINANCIAL INTEGRITY AND

1 JEOPARDIZED THEIR ABILITY TO RESPOND TO FUTURE STORMS.

2 WHAT EFFECT WOULD NOT RECOVERING THE 2004 LOST REVENUE,
3 ALLOWED BY THE COMMISSION IN THAT DOCKET, HAVE ON THE
4 COMPANY'S EARNINGS?

5 A. The Commission allowed \$33,814,297 of what it termed "normal O&M cost
6 offset" which was, in affect, lost revenue in that docket. If the Commission had
7 not allowed that dollar amount as part of the recovery of storm cost, earnings
8 would have been reduced by the net after tax effect of that dollar amount, or
9 \$20,770,432. ($\$33,814,297 \times [1 - .38575] = \$20,770,432$) In other words, net
10 income would be reduced by the approximate \$20.8 million. Based on amounts
11 contained in the December 2004 surveillance report, FPL's Florida Public Service
12 Commission adjusted average jurisdictional return on common equity would be
13 reduced from 12.68% to 12.30%. This is still a substantial return on equity and
14 greater than the amount agreed to in the settlement in the Company's last rate
15 case, Docket No. 050045-EI, for other regulatory purposes, which was 11.75%.

16
17 Q. IN THE COMPANY'S LAST DOCKET REGARDING THE RECOVERY OF
18 2004 STORM RESTORATION COSTS, THE COMMISSION'S
19 ADJUSTMENT WAS LABELED "NORMAL O&M COSTS OFFSET." HOW
20 DOES THAT RELATE TO LOST REVENUE?

21 A. This is a surrogate for lost revenue which presumably reflects the lost revenue
22 associated with only operation and maintenance costs which the Commission had
23 allowed as a deduction from the 2004 storm costs. This amount, however, is
24 substantially all of the lost revenue since the Company calculated lost revenue for

1 that period to be \$38.2 million and the “normal O&M cost offset” was \$33.8
2 million.

3
4 Q. HAS FPL ASKED FOR LOST REVENUE IN THIS CASE?

5 A. Not directly. The adjustment they propose to the incremental approach is an
6 attempt to obtain lost revenue through adding additional cost to storm recovery
7 cost which are not expenditures on the storm recovery process. However, if the
8 Commission were to allow “normal O&M cost offset” as they did in the last case,
9 they would be allowing lost revenues.

10
11 IX. OTHER COSTS WHICH SHOULD BE EXCLUDED FROM STORM
12 COST RECOVERY

13 Q. ARE THERE OTHER COSTS WHICH ARE APPROPRIATELY EXCLUDED
14 FROM STORM COST RECOVERY ACCRUALS EVEN IF THEY ARE NOT
15 LABELED ON LOST REVENUES?

16 A. Yes. Only those costs that are directly related to restoring facilities should be
17 included in the storm restoration cost accruals and recovered from ratepayers.
18 Other costs that the Company may claim to be related to storm recovery should be
19 excluded. These costs include payroll and overtime in work areas not directly
20 affected by the storm, such costs are sometimes labeled as “backfill” work. Costs
21 associated with work postponed due to the employees working on storm
22 restoration are not directly related to restoring facilities, these costs which are
23 called “catch-up” costs should be excluded from recovery as storm costs. Costs
24 associated with uncollectible receivable write-offs should also be excluded from

1 storm recovery costs. Costs associated with advertising, communications, and
2 employee assistance should be excluded. Finally, incremental contract costs,
3 outside professional service, and temporary labor costs due to work postponed as
4 a result of the urgency of storm restoration costs should not be included as items
5 recoverable under storm restoration costs.

6
7 Q. WOULD YOU LIST AND EXPLAIN WHAT CATEGORIES OF COSTS
8 SHOULD BE EXCLUDED FROM STORM COST RECOVERY?

9 A. Yes. The following costs at a minimum should be excluded:

10
11 Vacation Buy-Backs

12 Q. THE COMPANY IS REQUESTING THAT VACATION BUY-BACKS BE
13 CONSIDERED FOR RECOVERY IF THE COMMISSION WERE TO ADOPT
14 AN INCREMENTAL APPROACH TO STORM COST RECOVERY. DO YOU
15 AGREE WITH THE COMPANY'S CONTENTION?

16 A. No. Vacation Buy-Backs are generated by the Company's vacation policy and
17 not as a direct result of storm restoration activities. FPL's response to the OPC's
18 7th Request for Production of Documents, Request No. 88, provides the
19 Company's vacation policy for the year 2005. In that policy it is stated:

20 In addition, for calendar year 2005 only, employees will be paid
21 for any remaining unused vacation in excess of 120 hours. You
22 will receive payment for your unused vacation in excess of the
23 carryover limit (120 hours) in your January 26 paycheck.
24

25 FPL could have changed its carryover policy and allowed employees to carryover
26 any and all vacation which could not be taken in 2005. Instead, the Company

1 chose to limit the carryover hours to 120 and reimburse employees for any
2 vacation which could not be taken in 2005. This is a management decision.
3 These costs are not directly related to the restoration of service, but are directly
4 related to FPL's vacation policy.

5
6 In addition, part of this cost may be the result of buy-backs from employees who
7 have purchased additional vacation hours and were unable to take those hours as
8 vacation in 2005 because of restoration activities. In the same POD response, it is
9 stated that the Company would buy back vacation hours which could not be taken
10 because of legitimate business reasons. The POD states:

11 To sell back your purchased 2005 vacation hours, complete this
12 form and return it to HRP/JB by December 9.
13

14 Regardless of whether the Vacation Buy-Back is a result of unused vacation or
15 vacation which the Company is purchasing back from employees who had
16 previously purchased those vacation hours, it is not a legitimate cost to be
17 recovered from ratepayers.
18

19 Utility Employee Assistance Cost

20 Q. SHOULD THE COMPANY RECEIVE AS PART OF STORM RECOVERY
21 COSTS UTILITY EMPLOYEE ASSISTANCE EXPENDITURES?

22 A. No. Utility employees who receive assistance from the Company in securing
23 their damaged property after a storm occurrence are no different then any other
24 customer or employee of a non-utility company. Each customer, whether they are
25 an employee or employee of a non-regulated company, is responsible for the

1 restoration or protection of his own property. He cannot pass that cost onto a
2 third party. Emergency employees, such as, police officers, firemen and road
3 maintenance employees of cities and counties cannot ask their employer to
4 reimburse them or take over the responsibility of protecting their property before
5 responding to their job requirement. Police officers and firemen must respond
6 immediately to calls from the State, city or county authority to provide the
7 services they have been trained to perform. They cannot ask that their employer
8 first assist them or pay for the cost of protecting their property before reporting
9 for duty.

10

11 Uncollectible Accounts

12 Q. SHOULD UNCOLLECTIBLE ACCOUNTS BE RECOVERED THROUGH
13 STORM RECOVERY COSTS?

14 A. No. It would be difficult, if not impossible, to relate uncollectible accounts
15 directly to the effects of a storm. Even if it could be done, these expenses are not
16 directly related to the restoration of service. They are in the nature of risk, which
17 the Company is compensated for through the rate of return on equity. These types
18 of business risks should not be compensated for through the storm recovery costs.

19

20 Exempt Employee Overtime Incentives

21 Q. SHOULD FPL BE COMPENSATED FOR ADDITIONAL COMPENSATION
22 GIVEN TO EMPLOYEE WHO ARE NOT ELIGIBLE FOR OVERTIME?

1 A. No. Salaried employees are just that. They receive their compensation for the
2 level of work that is required of them. They are not compensated for based on
3 fixed number of hours of work. When overtime is required of these employees,
4 they are responsible for providing that additional work for the salary they agreed
5 to accept. The Company does not compensate these employees for additional
6 time they might put in when work requirements require that they spend additional
7 hours, such as, month end accounting closings, or special projects with short due
8 dates. The storm recovery cost is not a basis on which to provide extra
9 compensation to employees who are salaried and have accepted that salary as full
10 compensation for all time that they are required to put in.

11

12 X. STORM RESTORATION COSTS REQUEST BY GULF POWER

13 Q. ARE YOU FAMILIAR WITH THE RESENT REQUEST BY GULF POWER
14 COMPANY FOR RECOVERY OF STORM RESTORATION COSTS?

15 A. Yes, I am.

16

17 Q. HAS GULF POWER FOLLOWED THE SAME APPROACH AS FPL TO
18 STORM RESTORATION COST RECOVERY?

19 A. No, they have not. Gulf Power's filing generally follows the approach that I am
20 recommending, that is, the incremental cost approach. Gulf Power's witness, R.J.
21 McMillan, shows the Company's total request for storm restoration costs. His
22 testimony states, on page 8, that the total amount of recoverable cost charged to
23 the reserve is net of "...estimated insurance reimbursements, normal capital cost
24 including cost of removal, and operating and maintenance expense normally

1 recovered through base rates as shown on Schedule 2 of my exhibit.” Gulf Power
2 is essentially saying that there are costs which the Company recovers through
3 base rates which should not be also included as part of the storm restoration cost
4 recovery. This is exactly opposite of what FPL is claiming. It is my opinion that
5 the Gulf Power general approach is correct and is the one the Commission should
6 adopt.

7

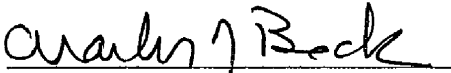
8 Q. DOES THAT CONCLUDE YOUR TESTIMONY?

9 A. Yes, it does.

**DOCKET NO. 060038-EI
CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S.

Mail or hand-delivery to the following parties on this 31st day of March, 2006.


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APPENDIX I

QUALIFICATIONS OF HUGH LARKIN, JR., CPA.

CURRICULUM VITAE OF HUGH LARKIN, JR.

Q. WHAT IS YOUR OCCUPATION?

A. I am a certified public accountant and a partner in the firm of Larkin & Associates, Certified Public Accountants, with offices at 15728 Farmington Road, Livonia, Michigan.

Q. PLEASE DESCRIBE YOUR EDUCATION AND EXPERIENCE.

A. I graduated from Michigan State University in 1960. During 1961 and 1962, I fulfilled my military obligations as an officer in the United States Army.

In 1963 I was employed by the certified public accounting firm of Peat, Marwick, Mitchell & Co., as a junior accountant. I became a certified public accountant in 1966.

In 1968 I was promoted to the supervisory level at Peat, Marwick, Mitchell & Co. As such, my duties included the direction and review of audits of various types of business organizations, including manufacturing, service, sales and regulated companies.

Through my education and auditing experience of manufacturing operations, I obtained an extensive background of theoretical and practical cost accounting.

I have audited companies having job cost systems and those having process cost systems, utilizing both historical and standard costs.

I have a working knowledge of cost control, budgets and reports, the accumulation of overheads and the application of same to products on the various recognized methods.

Additionally, I designed and installed a job cost system for an automotive parts manufacturer.

I gained experience in the audit of regulated companies as the supervisor in charge of all railroad audits for the Detroit office of Peat, Marwick, including audits of the Detroit, Toledo and Ironton Railroad, the Ann Arbor Railroad, and portions of the Penn Central Railroad Company. In 1967, I was the supervisory senior accountant in charge of the audit of the Michigan State Highway Department, for which Peat, Marwick was employed by the State Auditor General and the Attorney General.

In October of 1969, I left Peat, Marwick to become a partner in the public accounting firm of Tischler & Lipson of Detroit. In April of 1970, I left the latter firm to form the certified public accounting firm of Larkin, Chapski & Company. In September 1982 I re-organized the firm into Larkin & Associates, a certified public accounting firm. The firm of Larkin & Associates performs a wide variety of auditing and accounting services, but concentrates in the area of utility regulation and ratemaking. I am a member of the Michigan Association of Certified Public Accountants and the American Institute of Certified Public Accountants. I testified before the Michigan Public Service Commission and in other states in the following cases:

- | | |
|-------------|----------------------------------------------------------------------------------------------------------|
| U-3749 | Consumers Power Company - Electric
Michigan Public Service Commission |
| U-391 | Detroit Edison Company
Michigan Public Service Commission |
| U-4331 | Consumers Power Company - Gas
Michigan Public Service Commission |
| U-4332 | Consumers Power Company - Electric
Michigan Public Service Commission |
| U-4293 | Michigan Bell Telephone Company
Michigan Public Service Commission |
| U-4498 | Michigan Consolidated Gas sale to Consumers Power
Company
Michigan Public Service Commission |
| U-4576 | Consumers Power Company - Electric
Michigan Public Service Commission |
| U-4575 | Michigan Bell Telephone Company
Michigan Public Service Commission |
| U-4331R | Consumers Power Company - Gas - Rehearing
Michigan Public Service Commission |
| 6813 | Chesapeake and Potomac Telephone Company of
Maryland, Public Service Commission, State of
Maryland |
| Formal Case | New England Telephone and Telegraph Co. |

No. 2090	State of Maine Public Utilities Commission
Dockets 574, 575, 576	Sierra Pacific Power Company, Public Service Commission, State of Nevada
U-5131	Michigan Power Company Michigan Public Service Commission
U-5125	Michigan Bell Telephone Company Michigan Public Service Commission
R-4840 & U-4621	Consumers Power Company Michigan Public Service Commission
U-4835	Hickory Telephone Company Michigan Public Service Commission
36626	Sierra Pacific Power Company v. Public Service Commission, et al, First Judicial District Court of the State of Nevada
American Arbitration Association	City of Wyoming v. General Electric Cable TV
760842-TP	Southern Bell Telephone and Telegraph Company, Florida Public Service Commission
U-5331	Consumers Power Company Michigan Public Service Commission
U-5125R	Michigan Bell Telephone Company Michigan Public Service Commission
770491-TP	Winter Park Telephone Company, Florida Public Service Commission
77-554-EL-AIR	Ohio Edison Co., Public Utility Commission of Ohio
78-284-EL-AEM	Dayton Power and Light Co., Public Utility Commission of Ohio
OR78-1	Trans Alaska Pipeline, Federal Energy Regulatory Commission (FERC)

78-622-EL-FAC	Ohio Edison Co., Public Utility Commission of Ohio
U-5732	Consumers Power Company - Gas, Michigan Public Service Commission
77-1249-EL-AIR, et al	Ohio Edison Co., Public Utility Commission of Ohio
78-677-EL-AIR	Cleveland Electric Illuminating Co., Public Utility Commission of Ohio
U-5979	Consumers Power Company, Michigan Public Service Commission
790084-TP	General Telephone Company of Florida, Florida Public Service Commission
79-11-EL-AIR	Cincinnati Gas and Electric Co., Public Utilities Commission of Ohio
790316-WS	Jacksonville Suburban Utilities Corp., Florida Public Service Commission
790317-WS	Southern Utility Company, Florida Public Service Commission
U-1345	Arizona Public Service Company, Arizona Corporation Commission
79-537-EL-AIR	Cleveland Electric Illuminating Co., Public Utilities Commission of Ohio
800011-EU	Tampa Electric Company, Florida Public Service Commission
800001-EU	Gulf Power Company, Florida Public Service Commission
U-5979-R	Consumers Power Company, Michigan Public Service Commission
800119-EU	Florida Power Corporation, Florida Public Service Commission

810035-TP	Southern Bell Telephone and Telegraph Company, Florida Public Service Commission
800367-WS	General Development Utilities, Inc., Port Malabar, Florida Public Service Commission
TR-81-208**	Southwestern Bell Telephone Company, Missouri Public Service Commission
810095-TP	General Telephone Company of Florida, Florida Public Service Commission
U-6794	Michigan Consolidated Gas Company, 16 refunds Michigan Public Service Commission
U-6798	Cogeneration and Small Power Production -PURPA, Michigan Public Service Commission
0136-EU	Gulf Power Company, Florida Public Service Commission
E-002/GR-81-342	Northern State Power Company Minnesota Public Utilities Commission
820001-EU	General Investigation of Fuel Cost Recovery Clauses, Florida Public Service Commission
810210-TP	Florida Telephone Corporation, Florida Public Service Commission
810211-TP	United Telephone Co. of Florida, Florida Public Service Commission
810251-TP	Quincy Telephone Company, Florida Public Service Commission
810252-TP	Orange City Telephone Company, Florida Public Service Commission
8400	East Kentucky Power Cooperative, Inc., Kentucky Public Service Commission
U-6949	Detroit Edison Company - Partial and Immediate Rate Increase Michigan Public Service Commission

18328	Alabama Gas Corporation, Alabama Public Service Commission
U-6949	Detroit Edison Company - Final Rate Recommendation Michigan Public Service Commission
820007-EU	Tampa Electric Company, Florida Public Service Commission
820097-EU	Florida Power & Light Company, Florida Public Service Commission
820150-EU	Gulf Power Company, Florida Public Service Commission
18416	Alabama Power Company, Public Service Commission of Alabama
820100-EU	Florida Power Corporation, Florida Public Service Commission
U-7236	Detroit Edison-Burlington Northern Refund Michigan Public Service Commission
U-6633-R	Detroit Edison - MRCS Program, Michigan Public Service Commission
U-6797-R	Consumers Power Company - MRCS Program, Michigan Public Service Commission
82-267-EFC	Dayton Power & Light Company, Public Utility Commission of Ohio
U-5510-R	Consumers Power Company - Energy Conservation Finance Program, Michigan Public Service Commission
82-240-E	South Carolina Electric & Gas Company, South Carolina Public Service Commission
8624 8625	Kentucky Utilities, Kentucky Public Service Commission

8648	East Kentucky Power Cooperative, Inc., Kentucky Public Service Commission
U-7065	The Detroit Edison Company (Fermi II) Michigan Public Service Commission
U-7350	Generic Working Capital Requirements, Michigan Public Service Commission
820294-TP	Southern Bell Telephone Company, Florida Public Service Commission
Order RH-1-83	Westcoast Gas Transmission Company, Ltd., Canadian National Energy Board
8738	Columbia Gas of Kentucky, Inc., Kentucky Public Service Commission
82-168-EL-EFC	Cleveland Electric Illuminating Company, Public Utility Commission of Ohio
6714	Michigan Consolidated Gas Company Phase II, Michigan Public Service Commission
82-165-EL-EFC	Toledo Edison Company, Public Utility Commission of Ohio
830012-EU	Tampa Electric Company, Florida Public Service Commission
ER-83-206**	Arkansas Power & Light Company, Missouri Public Service Commission
U-4758	The Detroit Edison Company (Refunds), Michigan Public Service Commission
8836	Kentucky American Water Company, Kentucky Public Service Commission
8839	Western Kentucky Gas Company, Kentucky Public Service Commission
83-07-15	Connecticut Light & Power Company, Department of Utility Control State of Connecticut

81-0485-WS	Palm Coast Utility Corporation, Florida Public Service Commission
U-7650	Consumers Power Company - (Partial and Immediate), Michigan Public Service Commission
83-662**	Continental Telephone Company, Nevada Public Service Commission
U-7650	Consumers Power Company – Final Michigan Public Service Commission
U-6488-R	Detroit Edison Co. (FAC & PIPAC Reconciliation), Michigan Public Service Commission
Docket No. 15684	Louisiana Power & Light Company, Public Service Commission of the State of Louisiana
U-7650	Consumers Power Company (Reopened Reopened Hearings) Michigan Public Service Commission
38-1039**	CP National Telephone Corporation Nevada Public Service Commission
83-1226	Sierra Pacific Power Company (Re application to form holding company) Nevada Public Service Commission
U-7395 & U-7397	Campaign Ballot Proposals Michigan Public Service Commission
820013-WS	Seacoast Utilities Florida Public Service Commission
U-7660	Detroit Edison Company Michigan Public Service Commission
U-7802	Michigan Gas Utilities Company Michigan Public Service Commission
830465-EI	Florida Power & Light Company Florida Public Service Commission

U-7777	Michigan Consolidated Gas Company Michigan Public Service Commission
U-7779	Consumers Power Company Michigan Public Service Commission
U-7480-R	Michigan Consolidated Gas Company Michigan Public Service Commission
U-7488-R	Consumers Power Company – Gas Michigan Public Service Commission
U-7484-R	Michigan Gas Utilities Company Michigan Public Service Commission
U-7550-R	Detroit Edison Company Michigan Public Service Commission
U-7477-R	Indiana & Michigan Electric Company Michigan Public Service Commission
U-7512-R	Consumers Power Company – Electric Michigan Public Service Commission
18978	Continental Telephone Company of the South - Alabama, Alabama Public Service Commission
9003	Columbia Gas of Kentucky, Inc. Kentucky Public Service Commission
R-842583	Duquesne Light Company Pennsylvania Public Utility Commission
9006*	Big Rivers Electric Corporation Kentucky Public Service Commission *Company withdrew filing
U-7830	Consumers Power Company - Electric (Partial and Immediate) Michigan Public Service Commission
7675	Consumers Power Company - Customer Refunds Michigan Public Service Commission

5779	Houston Lighting & Power Company Texas Public Utility Commission
U-7830	Consumers Power Company - Electric – "Financial Stabilization" Michigan Public Service Commission
U-4620	Mississippi Power & Light Company (Interim) Mississippi Public Service Commission
U-16091	Louisiana Power & Light Company Louisiana Public Service Commission
9163	Big Rivers Electric Corporation Kentucky Public Service Commission
U-7830	Consumers Power Company - Electric - (Final) Michigan Public Service Commission
U-4620	Mississippi Power & Light Company - (Final) Mississippi Public Service Commission
76-18788AA & 76-18788AA	Detroit Edison (Refund - Appeal of U-4807) Ingham County Circuit Court Michigan Public Service Commission
U-6633-R	Detroit Edison (MRCS Program Reconciliation) Michigan Public Service Commission
19297	Continental Telephone Company of the South - Alabama, Alabama Public Service Commission
9283	Kentucky American Water Company Kentucky Public Service Commission
850050-EI	Tampa Electric Company Florida Public Service Commission
R-850021	Duquesne Light Company Pennsylvania Public Service Commission
TR-85-179**	United Telephone Company of Missouri Missouri Public Service Commission

6350	El Paso Electric Company The Public Utility Board of the City of El Paso
6350	El Paso Electric Company Public Utility Commission of Texas
85-53476AA & 85-534855AA	Detroit Edison-refund-Appeal of U-4758 Ingham County Circuit Court Michigan Public Service Commission
U-8091/ U-8239	Consumers Power Company-Gas Michigan Public Service Commission
9230	Leslie County Telephone Company, Inc. Kentucky Public Service Commission
85-212	Central Maine Power Company Maine Public Service Commission
850782-EI & 850783-EI	Florida Power & Light Company Florida Public Service Commission
ER-85646001 & ER-85647001	New England Power Company Federal Energy Regulatory Commission
Civil Action * No. 2:85-0652	Allegheny & Western Energy Corporation, Plaintiff, - against – The Columbia Gas System, Inc. Defendent
Docket No. 850031-WS	Orange Osceola Utilities, Inc. Before the Florida Public Service Commission
Docket No. 840419-SU	Florida Cities Water Company South Ft. Myers Sewer Operations Before the Florida Public Service Commission
R-860378	Duquesne Light Company Pennsylvania Public Service Commission
R-850267	Pennsylvania Power Company Pennsylvania Public Service Commission
R-860378	Duquesne Light Company - Surrebuttal Testimony - OCA Statement No. 2D Pennsylvania Public Service Commission

Docket No. 850151	Marco Island Utility Company Before the Florida Public Service Commission
Docket No. 7195 (Interim)	Gulf States Utilities Company Public Utility Commission of Texas
R-850267 Reopened	Pennsylvania Power Company Pennsylvania Public Service Commission
Docket No. 87-01-03	Connecticut Natural Gas Corporation Connecticut Department of Public Utility Control
Docket No. 5740	Hawaiian Electric Company Hawaii Public Utilities Commission
1345-85-367	Arizona Public Service Company Arizona Corporation Commission
Docket 011	Tax Reform Act of 1986 - California No. 86-11-019 California Public Utilities Commission
Case No. 29484	Long Island Lighting Company New York Department of Public Service
Docket No. 7460	El Paso Electric Company Public Utility Commission of Texas
Docket No. 870092-WS*	Citrus Springs Utilities Before the Florida Public Service Commission
Case No. 9892	Dickerson Lumber EP Company - Complainant vs. Farmers Rural Electric Cooperative and East Kentucky Power Cooperative – Defendants Before the Kentucky Public Service Commission
Docket No. 3673-U	Georgia Power Company Before the Georgia Public Service Commission
Docket No. U-8747	Anchorage Water and Wastewater Utility Report on Management Audit
Docket No. 861564-WS	Century Utilities Before the Florida Public Service Commission

Docket No. FA86-19-001	Systems Energy Resources, Inc. Federal Energy Regulatory Commission
Docket No. 870347-TI	AT&T Communications of the Southern States, Inc. Florida Public Service Commission
Docket No. 870980-WS	St. Augustine Shores Utilities Inc. Florida Public Service Commission
Docket No. 870654-WS*	North Naples Utilities, Inc. Florida Public Service Commission
Docket No. 870853	Pennsylvania Gas & Water Company Pennsylvania Public Utility Commission
Civil Action* No. 87-0446-R	Reynolds Metals Company, Plaintiff, v. The Columbia Gas System, Inc., Commonwealth Gas Services, Inc., Commonwealth Gas Pipeline Corporation, Columbia Gas Transmission Corporation, Columbia Gulf Transmission Company, Defendants - In the United States District Court for the Eastern District of Virginia - Richmond Division
Docket No. E-2, Sub 537	Carolina Power & Light Company North Carolina Utilities Commission
Case No. U-7830	Consumers Power Company - Step 2 Reopened Michigan Public Service Commission
Docket No. 880069-TL	Southern Bell Telephone & Telegraph Florida Public Service Commission
Case No. U-7830	Consumers Power Company - Step 3B Michigan Public Service Commission
Docket No. 880355-EI	Florida Power & Light Company Florida Public Service Commission
Docket No. 880360-EI	Gulf Power Company Florida Public Service Commission
Docket No. FA86-19-002	System Energy Resources, Inc. Federal Energy Regulatory Commission

Docket Nos. 83-0537-Remand & 84-0555-Remand	Commonwealth Edison Company Illinois Commerce Commission
Docket Nos. 83-0537 Remand & 84-0555 Remand	Commonwealth Edison Company Surrebuttal Illinois Commerce Commission
Docket No. 880537-SU	Key Haven Utility Corporation Florida Public Service Commission
Docket No. 881167-EI***	Gulf Power Company Florida Public Service Commission
Docket No. 881503-WS	Poinciana Utilities, Inc. Florida Public Service Commission
Cause No. U-89-2688-T	Puget Sound Power & Light Company Washington Utilities & Transportation Committee
Docket No. 89-68	Central Maine Power Company Maine Public Utilities Commission
Docket No. 861190-PU	Proposal to Amend Rule 25-14.003, F.A.C. Florida Public Service Commission
Docket No. 89-08-11 Control	The United Illuminating Company State of Connecticut, Department of Public Utility
Docket No. R-891364	The Philadelphia Electric Company Pennsylvania Public Utility Commission
Formal Case No. 889	Potomac Electric Power Company Public Service Company of the District of Columbia
Case No. 88/546*	Niagara Mohawk Power Corporation, et al Plaintiffs, v. Gulf+Western, Inc. et al, defendants (In the Supreme Court County of Onondaga, State of New York)
Case No. 87-11628*	Duquesne Light Company, et al, plaintiffs, against Gulf + Western, Inc. et al, defendants (In the Court of the Common Pleas of Allegheny County, Pennsylvania Civil Division)

Case No. 89-640-G-42T*	Mountaineer Gas Company West Virginia Public Service Commission
Docket No. 890319-EI	Florida Power & Light Company Florida Public Service Commission
Docket No. EM-89110888	Jersey Central Power & Light Company Board of Public Utilities Commissioners
Docket No. 891345-EI	Gulf Power Company Florida Public Service Commission
BPU Docket No. ER 8811 0912J	Jersey Central Power & Light Company Board of Public Utilities Commissioners
Docket No. 6531	Hawaiian Electric Company Hawaii Public Utilities Commissioners
Docket No. 890509-WU	Florida Cities Water Company, Golden Gate Division Florida Public Service Commission
Docket No. 880069-TL	Southern Bell Telephone Company Florida Public Service Commission
Docket Nos. F-3848, F-3849, and F-3850	Northwestern Bell Telephone Company South Dakota Public Utilities Commission
Docket Nos. ER89-* 678-000 & EL90-16-000	System Energy Resources, Inc. Federal Energy Regulatory Commission
Docket No. 5428	Green Mountain Power Corporation Vermont Department of Public Service
Docket No. 90-10	Artesian Water Company, Inc. Delaware Public Service Commission
Case No. 90-243-E-42T*	Wheeling Power Company West Virginia Public Service Commission
Docket No. 900329-WS	Southern States Utilities, Inc. Florida Public Service Commission
Docket Nos. ER89-* 678-000 & EL90-16-000	System Energy Resources, Inc. (Surrebuttal) Federal Energy Regulatory Commission

Application No. 90-12-018	Southern California Edison Company California Public Utilities Commission
Docket No. 90-0127	Central Illinois Lighting Company Illinois Commerce Commission
Docket No. FA-89-28-000	System Energy Resources, Inc. Federal Energy Regulatory Commission
Docket No. U-1551-90-322	Southwest Gas Corporation Before the Arizona Corporation Commission
Docket No. R-911966	Pennsylvania Gas & Water Company The Pennsylvania Public Utility Commission
Docket No. 176-717-U	United Cities Gas Company Kansas Corporation Commission
Docket No. 860001-EI-G	Florida Power Corporation Florida Public Service Commission
Docket No. 6720-TI-102	Wisconsin Bell, Inc. Wisconsin Citizens' Utility Board
(No Docket No.)	Southern Union Gas Company Before the Public Utility Regulation Board of the City of El Paso
Docket No. 6998	Hawaiian Electric Company, Inc. Before the Public Utilities Commission of the State of Hawaii
Docket No. TC91-040A	In the Matter of the Investigation into the Adoption of a Uniform Access Methodology Before the Public Utilities Commission of the State of South Dakota
Docket Nos. 911030-WS & 911067-WS	General Development Utilities, Inc. Before the Florida Public Service Commission
Docket No. 910890-EI	Florida Power Corporation Before the Florida Public Service Commission
Docket No. 910890-EI	Florida Power Corporation, Supplemental Before the Florida Public Service Commission

Case No. 3L-74159	Idaho Power Company, an Idaho corporation In the District Court of the Fourth Judicial District of the State of Idaho, In and For the County of Ada - Magistrate Division
Cause No. 39353*	Indiana Gas Company Before the Indiana Utility Regulatory Commission
Docket No. 90-0169 (Remand)	Commonwealth Edison Company Before the Illinois Commerce Commission
Docket No. 92-06-05	The United Illuminating Company State of Connecticut, Department of Public Utility Control
Cause No. 39498	PSI Energy, Inc. Before the State of Indiana - Indiana Utility Regulatory Commission
Cause No. 39498	PSI Energy, Inc. - Surrebuttal testimony Before the State of Indiana - Indiana Utility Regulatory Commission
Docket No. 7287	Public Utilities Commission - Instituting a Proceeding to Examine the Gross-up of CIAC Before the Public Utilities Commission of the State of Hawaii
Docket No. 92-227-TC	US West Communications, Inc. Before the State Corporation Commission of the State of New Mexico
Docket No. 92-47	Diamond State Telephone Company Before the Public Service Commission of the State of Delaware
Docket Nos. 920733-WS & 920734-WS	General Development Utilities, Inc. Before the Florida Public Service Commission
Docket No. 92-11-11	Connecticut Light & Power Company State of Connecticut, Department of Public Utility Control
Docket Nos. EC92-21-000 & ER92-806-000	Entergy Corporation Before the Federal Energy Regulatory Commission

Docket No. 930405-EI	Florida Power & Light Company Before the Florida Public Service Commission
Docket No. UE-92-1262	Puget Sound Power & Light Company Before the Washington Utilities & Transportation Commission
Docket No. 93-02-04	Connecticut Natural Gas Corporation State of Connecticut, Department of Public Utility Control
Docket No. 93-02-04	Connecticut Natural Gas Corporation, Supplemental State of Connecticut, Department of Public Utility Control
Docket No. 93-057-01	Mountain Fuel Supply Company Before the Utah Public Service Commission
Cause No. 39353 (Phase II)	Indiana Gas Company Before the Indiana Utility Regulatory Commission
PU-314-92-1060	US West Communications, Inc. Before the North Dakota Public Service Commission
Cause No. 39713	Indianapolis Water Company Before the Indiana Utility Regulatory Commission
93-UA-0301*	Mississippi Power & Light Company Before the Mississippi Public Service Commission
Docket No. 93-08-06	SNET America, Inc. State of Connecticut, Department of Public Utility Control
Docket No. 93-057-01	Mountain Fuel Supply Company - Rehearing on Unbilled Revenues - Before the Utah Public Service Commission
Case No. 78-T119-0013-94	Guam Power Authority vs. U.S. Navy Public Works Center, Guam - Assisting the Department of Defense in the investigation of a billing dispute. Before the American Arbitration Association

Application No. 93-12-025 - Phase I	Southern California Edison Company Before the California Public Utilities Commission
Case No. 94-0027-E-42T	Potomac Edison Company Before the Public Service Commission of West Virginia
Case No. 94-0035-E-42T	Monongahela Power Company Before the Public Service Commission of West Virginia
Docket No. 930204-WS**	Jacksonville Suburban Utilities Corporation Before the Florida Public Service Commission
Docket No. 5258-U	Southern Bell Telephone and Telegraph Company Before the Georgia Public Service Commission
Case No. 95-0011-G-42T*	Mountaineer Gas Company Before the West Virginia Public Service Commission
Case No. 95-0003-G-42T*	Hope Gas, Inc. Before the West Virginia Public Service Commission
Docket No. 95-02-07	Connecticut Natural Gas Corporation State of Connecticut, Department of Public Utility Control
Docket No. 95-057-02*	Mountain Fuel Supply Before the Utah Public Service Commission
Docket No. 95-03-01	Southern New England Telephone Company State of Connecticut, Department of Public Utility Control
BRC Docket No. EX93060255 OAL Docket PUC96734-94	Generic Proceeding Regarding Recovery of Capacity Costs Associated with Electric Utility Power Purchases from Cogenerators and Small Power Producers Before the New Jersey Board of Public Utilities
Docket No. U-1933-95-317	Tucson Electric Power Before the Arizona Corporation Commission
Docket No. 950495-WS	Southern States Utilities Before the Florida Public Service Commission

Docket No. 960409-EI	Prudence Review to Determine Regulatory Treatment of Tampa Electric Company's Polk Unit 1
Docket No. 960451-WS	United Water Florida Before the Florida Public Service Commission
Docket No. 94-10-05	Southern New England Telephone Company State of Connecticut Department of Public Utility Control
Docket No. 96-UA-389	Generic Docket to Consider Competition in the Provision of Retail Electric Service Before the Public Service Commission of the State of Mississippi
Docket No. 970171-EU	Determination of appropriate cost allocation and regulatory treatment of total revenues associated with wholesale sales to Florida Municipal Power Agency and City of Lakeland by Tampa Electric Company Before the Florida Public Service Commission
Case No. PUE960296 *	Virginia Electric and Power Company Before the Commonwealth of Virginia State Corporation Commission
Docket No. 97-035-01	PacifiCorp, dba Utah Power & Light Company Before the Public Service Commission of Utah
Docket No. G-03493A-98-0705*	Black Mountain Gas Division of Northern States Power Company, Page Operations Before the Arizona Corporation Commission
Docket No. 98-10-07	United Illuminating Company State of Connecticut Department of Public Utility Control
Docket No. 98-10-07	Connecticut Light & Power Company State of Connecticut Department of Public Utility Control
Docket NO. 99-02-05	Connecticut Light & Power Company State of Connecticut Department of Public Utility Control
Docket No. 99-03-36	Connecticut Light & Power Company

	State of Connecticut Department of Public Utility Control
Docket No. 99-03-35	United Illuminating Company State of Connecticut Department of Public Utility Control
Docket No. 99-03-04	United Illuminating Company State of Connecticut Department of Public Utility Control
Docket No. 99-08-02	Yankee Energy System, Inc. State of Connecticut Department of Public Utility Control
Docket No. 99-08-09	CTG Resources, Inc. State of Connecticut Department of Public Utility Control
Docket No. 99-07-20	Connecticut Energy Corporation / Energy East State of Connecticut Department of Public Utility Control
Docket No. 99-09-03 Phase II	Connecticut Natural Gas State of Connecticut Department of Public Utility Control
Docket No. 99-09-03 Phase III	Connecticut Natural Gas State of Connecticut Department of Public Utility Control
Docket No. 99-04-18 Phase II	Southern Connecticut Gas Company State of Connecticut Department of Public Utility Control
Docket No. 99-057-20*	Questar Gas Company Public Service Commission of Utah
Docket No. 99-035-10	PacifiCorp dba Utah Power & Light Company Public Service Commission of Utah
Docket No. T-1051B-99-105	U.S. West Communications, Inc. Arizona Corporation Commission
Docket No. 01-035-10*	PacifiCorp dba Utah Power & Light Company Public Service Commission of Utha

Docket No. 991437-WU	Wedgefield Utilities, Inc. Before the Florida Public Service Commission
Docket No. 991643-SU	Seven Springs Before the Florida Public Service Commission
Docket No. 98P55045	General Telephone and Electronics of California California Public Utilities Commission
Docket No. 00-01-11	Consolidated Edison, Inc. and Northeast Utilities Merger State of Connecticut Before the Department of Public Utility Control
Docket No. 00-12-01	Connecticut Light & Power Company State of Connecticut Before the Department of Public Utility Control
Docket No. 000737-WS	Aloha Utilities/Seven Springs Utilities Before the Florida Public Service Commission
Consolidated Docket Nos. EL00-66-000 ER00-2854-000 EL95-33-000	Entergy Services, Inc. Before the Federal Energy Regulatory Commission
Docket No. 950379-EI	Tampa Electric Company Before the Florida Public Service Commission
Docket No. 010503-WU	Aloha Utilities, Inc. – Seven Springs Water Division Before the Florida Public Service Commission
Docket No. 01-07-06*	The Towns of Durham and Middlefield State of Connecticut Before the Department of Public Utility Control
Docket No. 99-09-12-RE-02	Connecticut Light & Power/Millstone State of Connecticut Before the Department of Public Utility Control
Civil Action No. C2-99-1181	The United States et al v. Ohio Edison et al U.S. District Court, S.D. Ohio

Docket No .001148-ET****	Florida Power & Light Company Before the Florida Public Service Commission
Civil Action No. 99-833-Per	The United States et al v. Illinois Power Company U.S. District Court, S.D. Illinois
Civil Action No . IP99-1692-C-M/s	The United States et al v. Southern Indiana Gas and Electric Company U.S. District Court, S.D. Indiana
Docket No. 02-057-02*	Questar Gas Company Public Service Commission of Utah
Docket No. EL01-88-000	Entergy Services, Inc. et. al. Mississippi Public Service Commission
Docket No. 9355-U	Georgia Power Company Before the Georgia Public Service Commission
Case No. 1016	Washington Gas Light Company Before the Public Service Commission of the District of Columbia
Civil Action Nos. C2 99-1182 C2 99-1250 (Consolidated)	The United States et al v. American Electric Power Company, ET, AL
Docket No. 030438-EI *	Florida Public Utilities Company Before the Florida Public Service Commission
Docket No. EL01-88-000	Entergy Services, Inc., et al Before the Federal Energy Regulatory Commission
Civil Action No. 1:00 CV1262	The United States et al v. Duke Energy Company
Docket No. 050045-EI	Florida Power & Light Corporation Before the Florida Public Service Commission
Docket No. 050078-EI	Progress Energy Florida, Inc. Before the Florida Public Service Commission
Civil Action No. 1P99-1693 C-M/S	The United States et al. v. Cinergy Corporation, ET AL.
Civil Action No.	The United States et al. v. East Kentucky Power

04-34-KSF

Cooperative, Inc. ET AL.

Case No.
05-0304-G-42T

Hope Gas, Inc. d/b/a Dominion Hope
Consumer Advocate Division of the Public
Service Commission of West Virginia

Case No.
05-E-1222

New York State Electric & Gas Corporation
Before the New York Public Service Commission

Case Nos.
05-E-0934
05-G-0935

Central Hudson Gas & Electric Corporation
Before the New York Public Service Commission

*Case Settled

**Issues Stipulated

***Testimony Withdrawn

****Case Settled, Testimony Not Filed

EXHIBITS

Florida Power & Light Company
 Comparison of Monthly Actual Sales to Estimated

Docket No. 060038-EI
 Hugh Larkin, Jr. Exhibit No. ___(HL-1)
 Schedule 1
 Page 1 of 1

Jurisdictional KWH Sales

Line No.	Month	Actual KWH Sales Reported in Fuel Docket (1)	Estimated KWH Sales Reported in Fuel Docket (1)	KWH Difference Between Estimated and Actual (1)	% Difference Between Estimated and Actual	Storm Calculated Lost Sales in MWH (2)	
	(a)	(b)	(c)	(d)	(e)	(f)	
1	January	7,987,484,286	7,832,484,000	155,000,286	2.0	0	
2	February	7,234,353,278	7,605,503,000	(371,149,722)	4.9	0	
3	March	7,116,992,947	7,286,304,000	(169,311,053)	(2.3)	0	
4	April	7,318,195,385	7,467,823,000	(149,627,615)	(2.0)	0	
5	May	7,690,879,523	7,822,305,000	(131,425,477)	(1.7)	0	
6	June	9,177,534,931	9,332,539,000	(155,004,069)	(1.7)	0	
7	July	10,068,713,531	9,745,627,000	323,086,531	(3)	52,642	(4)
8	August	10,431,104,880	10,147,335,339	283,769,541	(3)	248,007	(4)
9	September	10,421,080,406	10,089,199,319	331,881,087	(3)	14,443	(4)
10	October	9,586,084,260	9,135,044,501	451,039,759	(3)	1,048,655	(4)
11	November	7,420,068,938	8,096,395,035	(676,326,097)	(8.4)	202,594	
12	December	7,843,945,575	8,178,759,208	(334,813,633)	(4.1)	0	
13	Total 2005	102,296,437,940	102,856,537,911	(560,099,971)	(0.5)		
14	Total Storm Calculated Lost Sales					1,566,341	

(1) See Schedule A-1, line 26, Fuel Docket No. 050001-EI

(2) See Leo Green Exhibits LEG-11 - LEG-14

(3) Total actual over estimated 1,389,776,638 Kwh

(4) 1,363,747,000 kWh

(5) The total of these columns are taken from Schedule A1 in the fuel docket, January 2005-December 2005 and do not represent the actual total of the numbers above.