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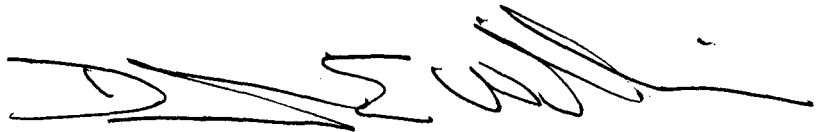
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION OCT 13 AM 9:57

In re: Fuel and Purchased Power)
Cost Recovery Clause with Generating)
Performance Incentive Factor)

COMMISSION CLERK
Docket No: 060001-EI
Filed: October 11, 2006

THE FEDERAL EXECUTIVE AGENCIES
NOTICE OF SERVICE

The Federal Executive Agencies (FEA) hereby gives notice of service of its First Set of Interrogatories to Florida Power & Light (FPL) served on September 11, 2006 by electronic mail to John Butler as counsel for FPL.



DAMUND E. WILLIAMS, Capt, USAF
Utility Litigation and Negotiation Attorney
AL Atty #ASB-9660-W54D

Attorney for the Federal Executive Agencies

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CERTIFICATE OF SERVICE

Docket No. 060001-E1

I HEREBY CERTIFY that a true and correct copy of the foregoing First Set of Interrogatories of FEA to FPL has been furnished by electronic Mail or U.S. Mail this 11th day of October, 2006, to the following:

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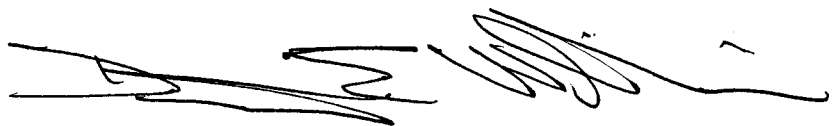
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchased Power)	Docket No: 060001-EI
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Performance Incentive Factor)	

**FIRST SET OF INTEROGATORIES
OF THE FEDERAL EXECUTIVE AGENCIES TO
FLORIDA POWER & LIGHT COMPANY**

The Federal Executive Agencies (FEA), by its attorney, Capt Damund Williams., pursuant to Rule 1.340, Florida Rules of Civil Procedure, and Rule 28-106.206, Florida Administrative Code, propounds the following interrogatories to Florida Power & Light Company (FPL). These interrogatories are to be answered under oath within the timeframe required by Order No. PSC-06-0207-PCO-EI.

GENERAL INSTRUCTIONS

1. Please provide a written response to each discovery request and discovery request subpart and supplement, when appropriate, such responses as required by these rules.
2. For each response, please provide any work papers and other documents used in its preparation.
3. If any of the information sought in a discovery request will not be available by the response date, please state the projected date such information will first become available.
4. If any document or information responsive to a request is withheld for any reason, identify (in accordance with the definition attached) such document or information, and state the legal and factual basis for withholding it. Additionally, furnish all portions of such document or information that are not subject to the claimed reasons for withholding and provide a written description of the documents or information or portions thereof withheld.
5. If any document or information responsive to a discovery request was, but is no longer, in your possession or control, please identify such document or information and explain why it is no longer in your possession or control.
6. If no documents are available in response to a request for documents, please so indicate and, if possible, provide a narrative response to the request.

7. If you encounter any ambiguity in interpreting a discovery request, please identify the language deemed to be ambiguous and the interpretation used in responding to the discovery request.
8. The terms “and” and “or” should be construed either disjunctively or conjunctively in order to bring within the scope of each discovery request any information or document which might otherwise be considered to be beyond its scope.
9. The singular form of a word should be interpreted as plural, and the plural form of a word should be interpreted as singular, in order to bring within the scope of each discovery request any information or document which might otherwise be considered to be beyond its scope.
10. Please identify the preparer or person under whose supervision each response was prepared.
11. For the convenience of the parties, please reiterate each interrogatory prior to your response.

DEFINITIONS

1. “Document” should be interpreted broadly to include, but not be limited to writings, records, memoranda, correspondence, reports, contracts, studies, tabulations, work papers, charts, diagrams, publications, photographs, films, maps, bulletins, minutes, handwritten notes, log sheets, ledgers, microfilm, tapes, computer programs, recordings, printouts, vouchers, accounting statements, and all other retrievable data of any kind. Any document that is not identical to another document for any reason, including but not limited to marginal notations, deletions, attachments, or redrafts, is a separate document.
2. “Correspondence” should be interpreted to include, but not be limited to, letters, facsimiles, telex, telegrams, notes, notices, messages, memoranda, reports, and all other written communications.
3. “Communication” should be interpreted to include, but not be limited to, all forms of communication, whether written, printed, oral, computer generated electronic, pictorial or otherwise.
4. Any request to “identify” should be interpreted to mean:
 - a. With respect to a natural person, their full name, title, business address and telephone number, both currently and for any past period relevant to the request.
 - b. With respect to entity other than a natural person, its full name, address, telephone number, and business or purpose, both currently and for any past period relevant to the request.
 - c. With respect to a document, the nature of the document (e.g., letter, pleading document, its date, preparers, signatories, recipients, and custodians).

- d. "Person" refers to any natural person, corporate entity, partnership, joint venture, cooperative, municipality, commission, governmental body, agency, board, committee, or formal or informal association, club or group.

INTERROGATORIES

- FEA 1. Referring to the rebuttal testimony of Rosemary Morley at 5:1-20:
- a. Specify in detail FPL's cost of serving a kW of nonfirm demand (Load Control On-Peak Demand) under Rate CILC-1.
 - b. Provide all workpapers, studies, analyses, and documents prepared by or on behalf of FPL in the past three years that measure the cost-effectiveness of nonfirm service under Rate CILC-1.
 - c. Provide all workpapers, studies, analyses, and documents supporting and/or underlying Ms. Morley's statement (at 5:19-20) that the discount reflected in Rate CILC-1 "...is based on the avoided *additional* costs that FPL would have to incur if those rates did not allow FPL to limit or interrupt service."
- FEA 2. Referring to the rebuttal testimony of Rosemary Morley at 6:6-13:
- a. Identify by case each witness who specifically addressed the "...two-part treatment for the CILC rate classes..." and provide a copy of the witness' testimony if not available
 - b. For each case cited, specify whether the case was resolved by a stipulated settlement approved by the Commission, and if applicable, provide a copy of the settlement if not available on the Commission's web site.
 - c. For each order cited, identify the specific part of the order that addressed the "...two-part treatment for the CILC rate classes..."
- FEA 3. Referring to the rebuttal testimony of Rosemary Morley at 7:18-21:
- a. Provide all workpapers, studies, analyses, and documents supporting and/or underlying Ms. Morley's statement that the "...avoided costs calculation takes into account total avoided costs, not just base rate costs."
 - b. Provide all workpapers, studies, analyses, and documents supporting and/or underlying Ms. Morley's statement that "...the current level of CILC discounts were deemed to be cost-effective based on avoided base and clause recoverable costs."
- FEA 4. Referring to the rebuttal testimony of Rosemary Morley at 9:15-10:1 and the testimony of Korel M. Dubin at Exhibit KMD-6:4-5:
- a. Provide for each CILC rate class shown on Exhibit KMD-6:4-5 the 2007 monthly and 2007 total Load Control On-Peak Demand and Firm On-Peak Demand.

- b. For each CILC rate class, provide the information specified by each column heading on Exhibit KMD-6:4-5 separately for Load Control On-Peak Demand and Firm On-Peak Demand (for example, projected average 12CP at meter for CILC T Firm On-Peak Demand, average 12CP load factor at meter for CILC T Load Control On-Peak Demand, etc.). Provide all workpapers, studies, analyses, and documents supporting and/or underlying the provided data and information.

FEA 5. With respect to FPL's load forecasts and resource planning processes:

- a. Describe in detail how FPL treats CILC loads.
- b. Is the treatment described in the previous response different from FPL's treatment of other non-CILC interruptible and/or curtailable loads? If the answer is *yes*, describe these differences in detail.
- c. Does FPL's treatment differ if a CILC customer has installed generation to qualify for the rate instead of simply agreeing to curtail load without backup generation during a load control event? If the answer is *yes*, describe these differences in detail.
- d. How many MW of backup generation do CILC customers have available to displace their interruptible service in the event of a load control event?

FEA 6. Referring to the rebuttal testimony of Rosemary Morley at Document No. RM-6, section (3)(c), describe in detail Ms. Morley's interpretation of the following terms and phrases included in the definition of *cost effective*:

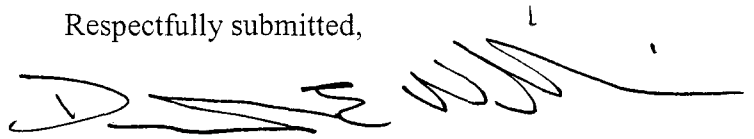
- a. net economic deferral or avoidance.
- b. measurable economic benefits.
- c. relevant costs accruing to the utility's general body of ratepayers.

FEA 7. Referring to the rebuttal testimony of Rosemary Morley at Document No. RM-6, section (5):

- a. Provide a full and complete written copy of the Commission-approved methodology for determining the cost effectiveness of nonfirm load over FPL's generation planning horizon.
- b. Does this section of FAC 25-6.0438 prohibit changes *at any time* to the methodology for determining the cost effectiveness of nonfirm load.

Dated this 11th day of October 2006.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'DAMUND E. WILLIAMS', written in a cursive style.

DAMUND E. WILLIAMS, Capt, USAF
Utility Litigation and Negotiation Attorney
AL Atty #ASB-9660-W54D

Attorney for the Federal Executive Agencies