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October 24, 2008

**-VIA OVERNIGHT DELIVERY -**

Ms. Ann Cole  
 Commission Clerk  
 Florida Public Service Commission  
 2540 Shumard Oak Blvd.  
 Tallahassee, FL 32399-0850

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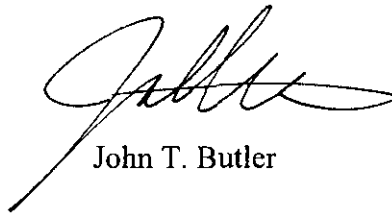
**Re: Docket Nos. 070231-EI and 080244-EI**

Dear Ms. Cole:

I am enclosing for filing in the above dockets the original and five (5) copies of Florida Power & Light Company's response to the Commission Staff's Third Data Request in Docket No. 080244-IE and Fourth Data Request in Docket No. 070231-EI, dated October 21, 2008. A copy of FPL's responses will be served electronically today on counsel for the parties of record in these dockets.

If there are any questions regarding this transmittal, please contact me at 561-304-5639.

Sincerely,



John T. Butler

COM \_\_\_\_\_  
 ECR \_\_\_\_\_  
 GCL   I   Enclosure  
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 CLK \_\_\_\_\_

cc: Counsel for parties of record (w/enclosure)

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**RESPONSE TO 3<sup>RD</sup> DATA REQUEST (DOCKET NO. 080244-EI)/  
4<sup>TH</sup> DATA REQUEST (DOCKET NO. 070231-EI)**

As requested, FPL has re-run the Operational Cost NPV analyses for the URD and Underground Conversion tariffs using the after-tax discount rate. The results of these revised analyses are shown on the following pages.

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10148 OCT 27 8  
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**URD (070231-EI):** The URD results are summarized in the table on the following page. The results show relatively small changes in the NPV. For example, the Low Density change is \$8-\$16 per lot (depending on the Tier) which translates to 2% of the proposed Tariff charges.

**URD Tariff per Lot Charges - Impact of Operational Costs NPV with After-Tax Discount Rate**

	Low Density (per Lot)				High Density (per Lot)				Meter Pedestal (per Lot)			
	Proposed	After-Tax Discount Rate	Change	% Change	Proposed	After-Tax Discount Rate	Change	% Change	Proposed	After-Tax Discount Rate	Change	% Change
1 Pre-Operational Costs	563.23	563.23			140.19	140.19			(43.85)	(43.85)		
2 Operational Costs												
3 Tier 1:												
4 Non-Storm	223	245	22	10%	197	217	20	10%	197	217	20	10%
5 Storm	(354)	(384)	(30)	8%	(354)	(384)	(30)	8%	(354)	(384)	(30)	8%
6 Total	(131)	(139)	(8)	6%	(157)	(167)	(10)	6%	(157)	(167)	(10)	6%
7 Tier 2:												
8 Non-Storm	223	245	22	10%	197	217	20	10%	197	217	20	10%
9 Storm	(142)	(154)	(12)	8%	(142)	(154)	(12)	8%	(142)	(154)	(12)	8%
10 Total	81	91	10	12%	55	63	8	15%	55	63	8	15%
11 Tier 3:												
12 Non-Storm	223	245	22	10%	197	217	20	10%	197	217	20	10%
13 Storm	(71)	(77)	(6)	8%	(71)	(77)	(6)	8%	(71)	(77)	(6)	8%
14 Total	152	168	16	11%	126	140	14	11%	126	140	14	11%
15 Tariff Charges												
16 Tier 1:	432.23	424.23	(8.00)	-2%	0.00	0.00	0.00	0%	0.00	0.00	0.00	0%
17 Tier 2:	644.23	654.23	10.00	2%	195.19	203.19	8.00	4%	11.15	19.15	8.00	72%
18 Tier 3:	715.23	731.23	16.00	2%	266.19	280.19	14.00	5%	82.15	96.15	14.00	17%

**Notes:**

- Tariff Charges (lines 16-18) = Pre-Operational Costs (Line 1) + respective Operational Costs (lines 6, 10 or 14).

DOCUMENT NUMBER-DATE  
 10148 OCT 27 8  
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**Overhead to Underground Conversions (080244-EI):** As shown below, the change for conversions is \$900 per pole-line mile. Similar to the URD, this amount represents a very small impact relative to overall cost for converting facilities.

Current Proposed	\$10,400
After-Tax Discount Rate	<u>\$11,300</u>
Change	\$900