

**BEFORE THE FLORIDA
PUBLIC SERVICE COMMISSION**

**DOCKET NO. 09 0172 EI
FLORIDA POWER & LIGHT COMPANY**

**IN RE: FLORIDA POWER & LIGHT COMPANY'S
PETITION TO DETERMINE NEED FOR
FLORIDA ENERGYSECURE LINE**

DIRECT TESTIMONY & EXHIBITS OF:

HEATHER C. STUBBLEFIELD

DOCUMENT NO. DATE

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1 **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

2 **FLORIDA POWER & LIGHT COMPANY**

3 **DIRECT TESTIMONY OF HEATHER C. STUBBLEFIELD**

4 **DOCKET NO. 09 _____-EI**

5
6 **Q. Please state your name and address.**

7 A. My name is Heather C. Stubblefield. My business address is Florida Power and
8 Light Company, 700 Universe Boulevard, Juno Beach, Florida 33408.

9 **Q. By whom are you employed and what is your position?**

10 A. I am employed by Florida Power & Light Company ("FPL" or the "Company")
11 as Manager of Project Development in the Energy Marketing and Trading
12 (EMT) Business Unit.

13 **Q. Please summarize your educational background and professional**
14 **experience.**

15 A. I graduated from Auburn University with a Bachelor of Arts degree in Business
16 Administration in 1986. I joined El Paso Corporation (formerly Sonat
17 Corporation) in 1988, where I held various positions in Human Resources,
18 Internal Auditing and the Sonat Marketing Company. In 2003, I joined FPL
19 Group Resources as the Director of Marketing for liquefied natural gas (LNG)
20 initiatives. In 2005, I transferred to the EMT Business Unit of FPL to support
21 project development activities.

22 **Q. Please describe your duties and responsibilities as they relate to this docket.**

23 A. In my current position, I am responsible for evaluating gas transportation
24 alternatives for FPL's generation expansions. This includes evaluating proposals

1 from pipeline companies, negotiating terms and conditions, and executing
2 transportation agreements that are in the best interest of FPL's customers.

3 **Q. Are you sponsoring any exhibits in this case?**

4 A. Yes. I am sponsoring the following exhibits which are attached to my direct
5 testimony:

- 6 • HCS-1 FPL's Solicitation Letter
- 7 • HCS-2 Summary of Company B, Company E and FPL Florida
8 EnergySecure Line Transportation Rates (Confidential)
- 9 • HCS-3 Letter of Intent with Company E (Confidential)

10 **Q. What is the purpose of your testimony?**

11 A. The purpose of my testimony is to present and explain the natural gas
12 transportation solicitation process that FPL used to solicit proposals for gas
13 transportation to meet, at a minimum, its gas requirements for the Cape
14 Canaveral Next Generation Clean Energy Center (CCEC) and the Riviera Beach
15 Next Generation Clean Energy Center (RBEC) modernization projects and to
16 describe the results of that solicitation process.

17
18 Please note that for purposes of my testimony one (1) million cubic feet per day
19 (MMcf/d) equals 1,000 million British thermal units (Btu) per day (MMBtu/d),
20 assuming a heat content of 1,000 Btu per cubic foot of natural gas. In my
21 testimony, I refer to quantities of gas transportation in MMcf/d and refer to gas
22 transportation costs in dollars per MMBtu/d which is the industry standard unit
23 for expressing gas transportation costs.

1 **Q. Please summarize your testimony.**

2 A. FPL initiated a solicitation process to determine the best transportation
3 alternative to meet the needs of FPL's CCEC and RBEC modernization projects.
4 The process consisted of issuing a Solicitation Letter to seven pipeline
5 companies capable of providing the transportation services that FPL required.
6 FPL initially requested that the respondents consider three potential pipeline
7 alternatives for quantities of 400 MMcf/d, 800 MMcf/d and 1.0 billion cubic feet
8 per day (Bcf/d). FPL followed up the initial solicitation with an additional
9 request that the respondents submit proposals for a quantity of 600 MMcf/d.
10 The first pipeline alternative (Interstate Pipeline) was based on the respondent
11 developing a new pipeline or upgrading an existing pipeline from
12 Transcontinental Pipe Line Company's (Transco) compressor station No. 85 in
13 Choctaw County, Alabama (Transco Station 85) to FPL's CCEC and RBEC
14 facilities. The second alternative (Upstream Pipeline Segment) allowed the
15 parties to submit a proposal based on providing only the segment of the pipeline
16 needed to deliver gas from Transco Station 85 to Florida Gas Transmission,
17 LLC's (FGT) compressor station No. 16 in Bradford County, Florida (FGT
18 Station 16). The third alternative (Florida Pipeline Segment) identified in the
19 solicitation was based on the respondent providing only the segment of the
20 pipeline needed to deliver gas from FGT Station 16 to FPL's CCEC and RBEC
21 facilities. The Solicitation Letter also informed respondents of FPL's intentions
22 to develop an intrastate pipeline as an alternative to the third party proposals.
23 The segments proposed under this alternative could be combined with proposals

1 received from respondents on the Upstream Pipeline Segment to develop a total
2 pipeline project for comparison purposes.

3

4 The Solicitation Letter resulted in a significant number of proposals. Due to
5 various factors, FPL elected to focus on the proposals for 400 MMcf/d and
6 600 MMcf/d. FPL ranked the various proposals and then conducted a life-cycle
7 economic analysis of the two lowest cost proposals to determine which solution
8 offered the lowest cost to customers. The results of FPL's analysis, as confirmed
9 by the independent analysis of FPL witness Sexton, indicated that the pipeline
10 alternative that provided the lowest life-cycle cost to the customer and the
11 greatest supply diversity was a combined project which included an Upstream
12 Pipeline Segment proposed by a third party natural gas transmission company,
13 referred to as Company E for confidentiality purposes (Upstream Pipeline
14 Project), and a Florida Pipeline Segment proposed by FPL (Florida
15 EnergySecure Line).

16 **Q. Please explain the process FPL used to solicit proposals for natural gas**
17 **transportation alternatives for the CCEC and RBEC modernization**
18 **projects.**

19 A. FPL prepared a Solicitation Letter that was distributed to a number of pipeline
20 providers in the Southeast requesting gas transportation proposals to supply
21 FPL's CCEC and RBEC facilities. The Solicitation Letter outlined several
22 requirements but gave respondents the discretion to propose multiple and
23 alternative solutions to meet FPL's objectives. FPL's intent was to meet the gas

1 supply needs of CCEC and RBEC, including the baseload hourly delivery
2 requirements, to provide for increased reliability and supply diversity and to
3 allow for future generation growth in FPL's gas transportation portfolio. The
4 Solicitation Letter was issued on July 17, 2008 and requested that firm proposals
5 be submitted by September 2, 2008. The letter explained that the proposals
6 would be evaluated on overall economics including the value of the supply
7 diversity and delivery flexibility of each project. All prospective respondents
8 were encouraged to contact FPL with any questions regarding the Solicitation
9 Letter and there was significant interaction between FPL and the respondents
10 throughout the solicitation process. The process was sufficiently structured to
11 allow the respondents to understand FPL's needs and receive all the information
12 necessary to prepare their responses, which resulted in a significant number of
13 proposals.

14 **Q. Please describe the different scenarios requested by FPL in the Solicitation**
15 **Letter.**

16 A. To support FPL's desire to access unconventional onshore natural gas supplies,
17 the Company requested that all parties propose a pipeline project that would
18 provide access to natural gas supplies at Transco Station 85. As discussed by
19 FPL witness Sharra, FPL identified Transco Station 85 as the best location to
20 provide access to new natural gas supplies. The Solicitation Letter also informed
21 the respondents that FPL was considering development of an intrastate pipeline
22 (which was later designated the Florida EnergySecure Line) capable of receiving
23 gas at or near FGT Station 16. FPL asked the parties to consider responding to

1 at least one of three pipeline alternatives, but also indicated it was open to
2 evaluating other viable alternatives which might be suggested by the
3 respondents.

4
5 **Interstate Pipeline:** The first pipeline alternative was based on the respondent
6 developing a new pipeline or upgrading an existing pipeline from Transco
7 Station 85 to FPL's CCEC and RBEC facilities. Under this scenario, the
8 respondent could propose a new pipeline originating at Transco Station 85 with
9 delivery capabilities to both CCEC and RBEC. A respondent could also propose
10 an expansion of an existing pipeline system that would allow FPL to access
11 Transco Station 85 with delivery capabilities to CCEC and RBEC.

12
13 **Upstream Pipeline Segment:** The second alternative allowed the parties to
14 submit a proposal based on providing only the segment of the pipeline needed to
15 deliver gas from Transco Station 85 to FGT Station 16. This segment could be
16 combined with other proposals to create a total pipeline project capable of
17 delivering gas from Transco Station 85 to CCEC and RBEC. The proposal
18 could be based on construction of a new pipeline system or an expansion of an
19 existing pipeline system.

20
21 **Florida Pipeline Segment:** The third alternative identified in the solicitation
22 was based on the construction of a new pipeline or the upgrade of an existing
23 pipeline from FGT Station 16 to FPL's CCEC and RBEC facilities. This

1 segment could be combined with proposals received from respondents on the
2 Upstream Pipeline Segment to develop a total pipeline project for comparison
3 purposes.

4
5 In addition, FPL requested respondents consider three different quantity
6 scenarios. FPL requested proposals for 1.0 Bcf/d, 800 MMcf/d and
7 400 MMcf/d. FPL subsequently went back to all of the parties soon after the
8 proposals were received and requested additional proposals based upon a
9 600 MMcf/d scenario, which were provided to FPL by the parties. All proposals
10 were based on the parties having the facilities in service by 2012 or 2013.

11 **Q. Why did FPL go back to the respondents and request additional proposals**
12 **based on a 600 MMcf/d scenario?**

13 A. There were two reasons FPL requested 600 MMcf/d proposals. First, as
14 discussed by FPL witness Morley, FPL was revising the load forecast
15 downward. This resulted in FPL shifting the focus of the solicitation analysis
16 away from the higher quantity scenarios (1.0 Bcf/d and 800 MMcf/d) to the 600
17 MMcf/d and 400 MMcf/d scenarios. Second, FPL received proposals from only
18 a few parties for the initial 400 MMcf/d scenario requested in the Solicitation
19 Letter. Our goal was to increase the pool of responses and to determine the
20 minimum quantity that would be required by the respondents to propose a new
21 pipeline into Florida which could enhance the state's gas transportation
22 infrastructure and increase reliability.

1 **Q. What did FPL determine to be the minimum quantity required to support**
2 **proposals for new pipeline infrastructure into Florida?**

3 A. It was clear from our discussions with the respondents that a minimum quantity
4 of 600 MMcf/d would be necessary for a pipeline company to commit to build
5 new pipeline infrastructure into Florida. We made every attempt to work with
6 the parties to determine if a smaller quantity would be feasible, but all the
7 smaller scale projects resulted in significantly higher transportation costs. In
8 addition, as discussed by FPL witness Sharra, FPL determined that a 30-inch
9 diameter pipeline with an initial capacity of 600 MMcf/d was the optimum size
10 to meet current transportation capacity requirements while providing the
11 capability to economically increase capacity through the addition of
12 compression.

13 **Q. Did all parties who received a Solicitation Letter submit proposals?**

14 A. Yes. All seven parties who received a Solicitation Letter submitted proposals.
15 FPL received numerous proposals for all the volume scenarios as well as
16 multiple proposals on the Interstate Pipeline, the Upstream Pipeline Segment and
17 the Florida Pipeline Segment.

18 **Q. Please summarize the bids received.**

19 A. **Interstate Pipeline:** FPL received proposals from two companies that were
20 proposing a new interstate pipeline or an expansion of an existing pipeline
21 capable of receiving gas at Transco Station 85 and delivering gas to CCEC and
22 RBEC. The proposals ranged from 400 MMcf/d to 1.0 Bcf/d. In addition, two
23 companies submitted proposals that did not conform to the Solicitation Letter

1 because they did not provide reasonably direct access to Transco Station 85.

2
3 **Upstream Pipeline Segment:** FPL received proposals from three companies
4 for the Upstream Pipeline Segment for volumes ranging from 400 MMcf/d to
5 1.5 Bcf/d. In addition, two companies submitted proposals that did not conform
6 to the Solicitation Letter because they did not provide reasonably direct access to
7 Transco Station 85.

8
9 **Florida Pipeline Segment:** In addition to the FPL proposal, FPL received
10 proposals from two companies for the Florida Pipeline Segment. One of these
11 proposals was not considered in the final analysis because FPL was not
12 satisfied that the respondent's cost estimates were consistent with current
13 market conditions. As a result, since the respondent's proposal was based
14 upon these underlying cost estimates, FPL was not convinced that the
15 transportation rate included in the proposal provided a reasonable comparison
16 versus the transportation rates received from other respondents. In addition,
17 this proposal did not include, and the respondent was not willing to provide, a
18 firm transportation rate as requested in the Solicitation Letter and follow-up
19 discussions. Rather, the ultimate transportation rate payable by FPL under
20 this proposal would only be finalized after construction based upon actual
21 costs of project installation. As such, FPL was unwilling to consider this
22 proposal in the final analysis.

1 **Additional Proposals:** FPL also received a number of alternative
2 proposals for consideration.

3 **Q. How did FPL address the issue of non-conforming proposals?**

4 A. FPL received proposals from two companies that did not conform to FPL's
5 request in the Solicitation Letter that the primary receipt point for an Interstate
6 Pipeline proposal or an Upstream Pipeline Segment proposal be located at or
7 near Transco Station 85. This supply point was specifically chosen by FPL to
8 ensure access to onshore natural gas supply. FPL requested the applicable
9 respondents consider revising their proposals to include the incremental cost of
10 extending their proposed pipeline to Transco Station 85, but the respondents
11 declined to resubmit proposals to include this cost. In order to include these
12 proposals in the evaluation, FPL adjusted these proposals to include the
13 estimated incremental cost of accessing Transco Station 85. This cost estimate
14 was based on analysis performed by FPL witness Sexton and confirmed through
15 discussions with a pipeline company with existing infrastructure in the area. As
16 presented in FPL witness Sexton's testimony, the cost assessed to the non-
17 conforming proposals consisted of an incremental \$0.20 per MMBtu/d, which
18 was added as a demand charge, and incremental fuel retention of 0.3% to reflect
19 fuel usage on these facilities.

20 **Q. How did FPL begin the evaluation process?**

21 A. FPL reviewed the proposals individually and then met with each of the
22 respondents to discuss the proposals submitted in order to clarify any
23 outstanding questions. During these discussions, FPL's main goal was to

1 determine the firmness of the proposal, specifically the willingness of the
2 respondent to quote a fixed demand charge not subject to future adjustments.
3 These discussions were an important part of the process and allowed the parties
4 to provide follow-up information to be sure that FPL clearly understood the
5 proposals and could accurately evaluate them.

6 **Q. Did all parties submit a firm gas transportation price as requested by the**
7 **Solicitation Letter?**

8 A. No. In fact, all parties submitted proposals subject to various types of
9 adjustment or true-up factors. The respondents were unwilling to quote a firm
10 demand charge well in advance of ordering materials and hiring contractors.
11 FPL was, however, able to convince several of the respondents to commit to a
12 fixed demand charge subject only to a steel price tracker. This limited FPL's
13 exposure to a commodity risk (steel cost) that could be easily monitored and
14 locked-in once the order for pipe had been placed. The steel price tracker
15 mechanism significantly limited the risk compared to the potential price
16 adjustments originally proposed by many of the parties.

17 **Q. What analysis did FPL perform to determine the best gas transportation**
18 **alternative?**

19 A. FPL took the individual proposals submitted by the respondents and sorted them
20 into categories based on quantity and pipeline alternative (Interstate Pipeline,
21 Upstream Pipeline Segment, Florida Pipeline Segment) proposed. Proposals that
22 did not conform to the Solicitation Letter were put into a separate category to be
23 analyzed. FPL then analyzed the various components of each proposal to

1 determine an overall cost per MMBtu/d. All parties proposed transportation
2 rates based on a demand charge (subject to some type of adjustment or true-up
3 factor) and a variable charge comprised of a fuel charge and, if applicable, a
4 usage or transportation charge. For the initial analysis, these costs were
5 uniformly evaluated assuming a 100% load factor and an estimated natural gas
6 cost of \$8.50 per MMBtu/d which was used to calculate the fuel charge. Once
7 FPL determined a total cost per MMBtu/d for each proposal, the proposals
8 within each category were compared to determine the lowest cost alternative for
9 each quantity and pipeline alternative (Interstate Pipeline, Upstream Pipeline
10 Segment and Florida Pipeline Segment) proposed.

11 **Q. How did FPL evaluate the Florida EnergySecure Line proposal for the**
12 **Florida Pipeline Segment?**

13 A. FPL calculated the annual revenue requirements for the Florida Pipeline
14 Segment based on FPL's estimate of the cost of the Florida EnergySecure Line
15 proposal. The annual revenue requirements were then converted to a fixed cost
16 per MMBtu/d by dividing the annual revenue requirements by the annual
17 quantity of natural gas for each year (600 MMcf/d multiplied by 365 days for
18 year one). The variable cost per MMBtu/d was calculated based on the fuel rate
19 of the Florida EnergySecure Line, which was evaluated using the same
20 methodology utilized to calculate the variable costs for all of the other proposals.
21 Once the cost of the Florida EnergySecure Line was converted to a total cost per
22 MMBtu/d, the Florida EnergySecure Line could then be compared with the other
23 proposals.

1 **Q. What were the initial results of the solicitation analysis?**

2 A. The analysis focused on only those proposals for quantities of 600 MMcf/d and
3 400 MMcf/d, based on FPL's reduced gas transportation needs under the load
4 growth forecast presented by FPL witness Morley. For the Interstate Pipeline
5 alternative, a proposal by one of the respondents, referred to as Company B for
6 confidentiality purposes, for 400 MMcf/d or 600 MMcf/d provided the lowest
7 transportation costs to serve CCEC and RBEC. For the Upstream Pipeline
8 Segment from Transco Station 85 to FGT Station 16, Company E's proposed
9 Upstream Pipeline Project provided the lowest transportation cost for 600
10 MMcf/d. For the Florida Pipeline Segment from FGT Station 16 to CCEC and
11 RBEC, the FPL proposal, the Florida EnergySecure Line, provided the lowest
12 transportation cost for 600 MMcf/d. None of the proposals for 400 MMcf/d was
13 designed to bring new pipeline infrastructure into the state and allow access to
14 supplies at Transco Station 85. A summary of the Company B, Company E and
15 the FPL Florida EnergySecure Line gas transportation costs is provided as
16 Confidential Exhibit HCS-2.

17
18 Once it was determined that Company B provided the lowest overall cost
19 alternative for the required 400 MMcf/d, FPL focused on comparing the
20 Company B proposal to the combined Upstream Pipeline Project (Upstream
21 Pipeline Segment) and the Florida EnergySecure Line (Florida Pipeline
22 Segment) proposal to determine which pipeline solution offered the lowest cost
23 to customers when evaluated over the life-cycle of the project.

1 **Q. How did FPL determine which of the two proposals offered the lowest cost**
2 **to customers?**

3 A. For each of the two proposals FPL calculated the annual gas transportation costs
4 necessary to meet all the gas requirements for FPL's long-term resource plan, as
5 well as two alternate resource plans. The development of FPL's long-term
6 resource plans is described in the testimony of FPL witness Enjamio. The first
7 proposal, which includes the Upstream Pipeline Project and the Florida
8 EnergySecure Line, consists of two cost components: (1) revenue requirements
9 associated with FPL's Florida EnergySecure Line (including applicable fuel
10 retention) and (2) gas transportation costs and applicable fuel retention
11 (Upstream Pipeline Segment and future pipeline expansions required to supply
12 gas to the resource plan through the life of the study). The annual revenue
13 requirements include the cost of the Florida EnergySecure Line as initially
14 configured as well as the cost of additional compression required to boost the
15 capacity of the Florida EnergySecure Line to a maximum capacity of
16 1.25 Bcf/day. The gas transportation costs for the Company B proposal include
17 Company B's annual gas transportation charges (including applicable fuel
18 retention) that will be required to supply gas required by the resource plan
19 through the life of the study.

20

21 FPL witness Enjamio describes how the gas transportation costs for both
22 transportation alternatives, for each of the three resource plans, are incorporated
23 into an overall economic evaluation of both alternatives, resulting in the

1 Cumulative Present Value of Revenue Requirements (CPVRR) and the
2 estimated impact on the average customer bill.

3 **Q. Did FPL evaluate future benefits of the proposals other than cost?**

4 A. Yes. One of the important aspects of the solicitation was to determine if there
5 was an alternative that would allow FPL to access future gas transportation
6 capacity at rates that would be beneficial to our customers. For example, if FPL
7 could support a new pipeline project into Florida, could there be future benefits
8 through reduced pricing for expansions. The existing pipelines in Florida have
9 reached the point that future expansions require extensive facility upgrades that
10 result in increasingly higher transportation costs. As discussed in the testimony
11 of FPL witness Sharra, a new pipeline can be designed in a way that would
12 allow for a certain amount of future expansion at relatively inexpensive pricing.

13 **Q. What recommendation resulted from the solicitation?**

14 A. The Upstream Pipeline Project and the Florida EnergySecure Line combined
15 proposal was the recommended natural gas transportation alternative to serve
16 CCEC and RBEC. This recommendation was based on the following factors.
17 First, the Upstream Pipeline Project and the Florida EnergySecure Line
18 combined proposal provide the lowest cost to customers when evaluated over the
19 life of the project. As presented in the testimony of FPL witness Enjamio and
20 independently corroborated by FPL witness Sexton, the total savings to
21 customers over the 40 year life of the project is estimated to be \$204 to \$513
22 million (CPVRR).

1 In addition, the combined project provides for new pipeline infrastructure in
2 Florida, which will increase the reliability of FPL's gas deliveries. The new
3 pipeline also provides added diversity of supply, in the form of direct access to
4 onshore natural gas supply sources via Transco Station 85. Even though the
5 Company B proposal had the lowest overall initial transportation costs and
6 would meet the immediate needs of CCEC and RBEC, the proposal Company B
7 submitted did not allow for direct access to onshore natural gas supplies via
8 Transco Station 85 (without the addition of additional facilities by either
9 Company B or another pipeline) and would not be able to meet FPL's future
10 growth needs without further expansions. FPL has seen pipeline expansion costs
11 increase significantly over the past few years (e.g., the lowest cost proposal
12 submitted in the solicitation in response to the Interstate Pipeline alternative
13 reflects approximately a 50% increase in demand charge when compared to the
14 demand charge FPL was able to secure under our last transportation agreement
15 executed in early 2008). Given FPL's analysis of these rising expansion
16 transportation costs and the need to continue to increase the reliability of FPL's
17 gas transportation portfolio, the Upstream Pipeline Project and the Florida
18 EnergySecure Line combined project was determined to be the best solution to
19 meet FPL's current and future gas transportation needs. The combined project
20 will also provide additional competition for natural gas transportation within the
21 state that should provide for lower future pricing for all Florida natural gas
22 transporters.

1 **Q. Did FPL also have a third party evaluate the proposals?**

2 A. Yes. FPL engaged Mr. Tim Sexton of Gas Supply Consulting, Inc. to review the
3 results of the analysis. Mr. Sexton is providing testimony analyzing and
4 confirming the results of FPL's conclusion that the combined Upstream Pipeline
5 Project/Florida EnergySecure Line proposal is the best alternative available to
6 meet FPL's future gas needs.

7 **Q. Please describe FPL's planned transportation agreement with Company E**
8 **to serve the Florida EnergySecure Line.**

9 A. FPL has executed a Letter of Intent (LOI) with Company E to negotiate a
10 Precedent Agreement based upon the proposal submitted by Company E in
11 response to the Solicitation Letter. The LOI is attached as Confidential Exhibit
12 HGS-3. It expresses FPL's and Company E's intent to negotiate a Precedent
13 Agreement on or before October 1, 2009 that would provide for 600 MMcf/d of
14 gas transportation from Transco Station 85 to be delivered to the Florida
15 EnergySecure Line at FGT Station 16, beginning on January 1, 2014. The
16 agreement will provide for the necessary access to natural gas supply and
17 delivery rights required to deliver natural gas into the Florida EnergySecure
18 Line. The agreement will be similar to FPL's current firm transportation
19 agreements with FGT and Gulfstream, and FPL would request recovery of all
20 costs associated with the firm transportation on the Upstream Pipeline Project
21 through the Fuel Cost Recovery Clause.

1 **Q. Did FPL receive any additional proposals which it was unable to include in**
2 **the final analysis?**

3 A. Yes. FPL received an additional proposal from one of the respondents while
4 FPL was in the process of finalizing the economic analysis and testimony
5 preparation. This proposal was an unsolicited update from the company that had
6 submitted the next-best alternative (Company B), which would result in a lower
7 proposed gas transportation charge. Based on prior commercial dealings, FPL is
8 skeptical that Company B could or would actually deliver gas at the newly
9 reduced charge. However, even if Company B were willing and able to do so,
10 FPL estimates that the Florida EnergySecure Line/Upstream Pipeline Project
11 proposal would remain the most beneficial alternative for FPL's customers.

12 **Q. Does this conclude your testimony?**

13 A. Yes.

Dear :

As you know, our companies have been in discussions since early 2008 to explore new gas transportation alternatives for Florida. Now that FPL has finalized plans to modernize the Cape Canaveral and Riviera plants, we can begin our formal evaluation process to determine the best solution for gas delivery to these plants. As part of this evaluation, it is FPL's goal that the solution we choose will also increase the reliability and supply diversity of our gas portfolio as we plan for future generation growth. To facilitate these discussions, FPL has prepared the attached summary which outlines our gas transportation needs for the Cape Canaveral and Riviera conversions as well as an indication of future needs.

In keeping with our goal of finding a solution that meets not only our current gas transportation needs but would ensure future gas transportation availability and diversity of supply, FPL is currently evaluating the development of a new intrastate pipeline. This evaluation is being conducted to ensure that FPL has an understanding of the potential issues and costs associated with constructing a new pipeline project in Florida. This is one of the options that will be considered during the overall evaluation of gas transportation alternatives. Parties are invited to work with FPL to provide pricing for gas deliveries into this new intrastate pipeline via a new or existing gas pipeline. Of course, parties may also propose alternatives that would deliver gas only to the Cape Canaveral and Riviera plants using new or existing gas pipeline facilities but any perceived economic advantages of such proposals will be weighed against their more limited role in meeting FPL's long-term needs. FPL is also willing to consider other alternatives if they can provide a similar service for FPL.

Over the next few months, FPL will be working with several parties to determine which party can offer the best economics and delivery flexibility. We are requesting all parties provide firm pricing in the attached format by September 2, 2008 in order for us to have sufficient time to evaluate the alternatives and make a selection in November. In addition, FPL will be sending out a draft Precedent Agreement and Negotiated Rate Letter shortly for your review. Please submit your comments to these agreements in the form of a red-lined document on or before September 2nd. The evaluation process will include an analysis of overall economics including the value of the supply diversity and delivery flexibility of each project. In addition, there will be consideration for parties that can offer solutions for future generation expansions that will reduce FPL's exposure to the increasing cost of gas transportation.

FPL appreciates your participation in this solicitation and will continue to work with all parties to answer questions and provide feedback prior to submittal of the bids.

Sincerely,

Heather Stubblefield

Potential Pipeline Alternatives (other viable proposals will also be considered):

Option 1 – Interstate pipeline from Transco Station 85 area to Cape Canaveral and Riviera

- Primary Receipt Point: Transco Station 85 area (interconnections with Transco, Gulfsouth and Midcontinent Express)
- Primary Delivery Points: Cape Canaveral, Riviera, Martin, future FPL expansions (delivery pressure 650 psig)

Option 2 – A segment of pipeline (interstate or intrastate) which could be combined with other proposals to create a project from the Transco Station 85 area to Cape Canaveral and Riviera

Option 2(a): Interstate pipeline from Transco Station 85 area to FGT Station 16

- Primary Receipt Point: Transco Station 85 area (interconnections with Transco, Gulfsouth and Midcontinent Express)
- Primary Delivery Points: FGT Station 16 & new intrastate pipeline

Option 2(b) – Intrastate pipeline capable of receiving gas originating from the Transco Station 85 area and delivering to Cape Canaveral and Riviera

- Primary Receipt Point: Interconnecting pipeline (FGT Station 16 area) with direct access to Transco Station 85 area
- Primary Delivery Points: Cape Canaveral, Riviera, Martin, future FPL expansions (delivery pressure 650 psig)

Project Management of Intrastate Pipeline:

- Parties proposing to provide gas transportation under Option 2(a) above are asked to consider providing project management services for FPL's proposed intrastate pipeline (Option 2(b)) in the event that, when evaluated against the other alternatives received as a result of this solicitation, FPL's proposal is determined to be the best alternative. These services would include working with FPL personnel through engineering, procurement, and construction activities. The party would also act as operator of the FPL pipeline for a limited period of time.
- Parties should prepare a detailed summary of the services they are willing to provide and the costs of these services.

Transportation Rates Provided in Response to FPL's Solicitation Letter

| | Description | Total Quantity (MMBtu/d) | Demand Charge per MMBtu/d | Cost to Access Transco 85 per MMBtu/d | Total Demand Charge per MMBtu/d | Commodity/ Usage per MMBtu/d | Estimated Fuel Retention | Estimated Fuel Retention Access Transco 85 |
|-----------------|--|--------------------------|---|---------------------------------------|---|------------------------------|----------------------------|--|
| Company B | Interstate Pipeline from Transco 85 to CCEC and RBEC | 400,000 | ■ | \$0.200 | ■ | ■ | ■ | 0.30% |
| Company E | Interstate Pipeline from Transco Station 85 to FGT 16 | 600,000 | ■ | \$0.000 | ■ | ■ | ■ | 0.00% |
| FPL (Base Case) | Intrastate Pipeline from FGT 16 to CCEC, RBEC and Martin | 600,000 | \$1.32 declining to \$0.21 ⁽¹⁾ | \$0.000 | \$1.32 declining to \$0.21 ⁽¹⁾ | \$0.000 | 0.55 -1.69% ⁽²⁾ | 0.00% |

⁽¹⁾ Assumes the Demand Charges for the Base Case declines over time due to depreciation, recovery of initial capital costs, and incremental low cost compression expansions.

⁽²⁾ Estimated annual Fuel Retention percentages based on proposed compression expansions are included in this Exhibit.

Abbreviations Used

CCEC: FPL's Cape Canaveral Next Generation Clean Energy Center
 RBEC: FPL's Riviera Beach Next Generation Clean Energy Center
 Martin: FPL's Martin Plant
 FGT 16: Florida Gas Transmission Company's compressor station No. 16 in Bradford County, Florida
 Transco 85: Transcontinental Pipe Line's compressor station No. 85 in Choctaw County, Alabama
 MMBtu/d: Million British thermal units per day (1 MMBtu/d is equivalent to 1 Mcf/d assuming a natural gas heating value of 1,000 British thermal units per Mcf)

Calculation of Florida EnergySecure Line Daily Demand Charge (Base Case)

| Revenues Requirements* | | | | | Revenues Requirements ==> | | | | |
|---|------------------------|----------------------|------------------------|------------------------|---------------------------|----------------------|----------------------|----------------------|----------------------|
| Option | Capital | AFUDC | Total Investment | PVRR | 2014 | 2015 | 2016 | 2017 | 2018 |
| 30" - 600 MMcf/d | \$1,475,000,000 | \$112,648,743 | \$1,587,648,743 | \$2,331,184,952 | \$ 288,374,607 | \$ 278,493,512 | \$ 267,187,914 | \$ 256,609,825 | \$ 246,685,353 |
| Expand to 800 MMcf/d | \$109,708,738 | \$8,392,251 | \$118,100,989 | \$85,728,698 | \$ - | \$ - | \$ - | \$ - | \$ - |
| Expand to 1 Bcf/d | \$74,757,282 | \$5,718,614 | \$80,475,895 | \$55,249,119 | \$ - | \$ - | \$ - | \$ - | \$ - |
| Expand to 1.25 Bcf/d | \$270,873,786 | \$20,720,691 | \$291,594,477 | \$173,078,889 | \$ - | \$ - | \$ - | \$ - | \$ - |
| Total | \$1,930,339,806 | \$147,480,298 | \$2,077,820,104 | \$2,645,241,658 | \$288,374,607 | \$278,493,512 | \$267,187,914 | \$256,609,825 | \$246,685,353 |
| * Revenue requirements include property taxes, property insurance and annual O&M costs. | | | | | | | | | |
| Gas Requirements Based on Long-term Resource Plan - Base Case | | | | | 400,000 | - | - | - | - |
| Mcf/d | | | | | 600,000 | 600,000 | 600,000 | 600,000 | 600,000 |
| Days per year | | | | | 365 | 365 | 366 | 365 | 365 |
| Annual Mcf | | | | | 219,000,000 | 219,000,000 | 219,600,000 | 219,000,000 | 219,000,000 |
| \$/Mcf/d (or \$/MMBtu/d) | | | | | \$ 1.3168 | \$ 1.2717 | \$ 1.2167 | \$ 1.1717 | \$ 1.1264 |
| Fuel Retention | | | | | 0.55% | 0.55% | 0.55% | 0.55% | 0.55% |

Abbreviations Used

| | |
|---------|--|
| Mcf/d: | Thousand cubic feet per day (1 Mcf/d is equivalent to 1 MMBtu/d assuming a natural gas heating value of 1,000 British thermal units (Btu) per Mcf) |
| MMcf/d: | Million cubic feet per day |
| Bcf/d: | Billion cubic feet per day |
| MMBtu/d | Million British thermal units per day (1 MMBtu/d is equivalent to 1 Mcf/d assuming a natural gas heating value of 1,000 Btu per Mcf) |

Calculation of Florida EnergySecure Line Daily Demand Charge (Base Case)

| Revenues Requirements* | | | | | | | | | |
|---|------------------------|----------------------|------------------------|------------------------|----------------------|----------------------|----------------------|----------------------|----------------------|
| Option | Capital | AFUDC | Total Investment | PVRR | 2019 | 2020 | 2021 | 2022 | 2023 |
| 30" - 600 MMcf/d | \$1,475,000,000 | \$112,648,743 | \$1,587,648,743 | \$2,331,184,952 | \$237,347,420 | \$228,424,559 | \$219,638,646 | \$210,855,067 | \$202,075,471 |
| Expand to 800 MMcf/d | \$109,708,738 | \$8,392,251 | \$118,100,989 | \$85,728,698 | \$ - | \$ - | \$ - | \$ - | \$ 21,875,500 |
| Expand to 1 Bcf/d | \$74,757,282 | \$5,718,614 | \$80,475,895 | \$55,249,119 | \$ - | \$ - | \$ - | \$ - | \$ - |
| Expand to 1.25 Bcf/d | \$270,873,786 | \$20,720,691 | \$291,594,477 | \$173,078,889 | \$ - | \$ - | \$ - | \$ - | \$ - |
| Total | \$1,930,339,806 | \$147,480,298 | \$2,077,820,104 | \$2,645,241,658 | \$237,347,420 | \$228,424,559 | \$219,638,646 | \$210,855,067 | \$223,950,971 |
| * Revenue requirements include property taxes, property insurance and annual O&M costs. | | | | | | | | | |
| Gas Requirements Based on Long-term Resource Plan - Base Case | | | | | | | | | |
| Mcf/d | | | | | 600,000 | 600,000 | 600,000 | 600,000 | 750,000 |
| Days per year | | | | | 365 | 366 | 365 | 365 | 365 |
| Annual Mcf | | | | | 219,000,000 | 219,600,000 | 219,000,000 | 219,000,000 | 273,750,000 |
| \$/Mcf/d (or \$/MMBtu/d) | | | | | \$ 1.0838 | \$ 1.0402 | \$ 1.0029 | \$ 0.9628 | \$ 0.8181 |
| Fuel Retention | | | | | 0.55% | 0.55% | 0.55% | 0.55% | 0.93% |

Abbreviations Used

Mcf/d: Thousand cubic feet per day (1 Mcf/d is equivalent to 1 MMBtu/d assuming a natural gas heating value of 1,000 British thermal units (Btu) per Mcf)
 MMcf/d: Million cubic feet per day
 Bcf/d: Billion cubic feet per day
 MMBtu/d: Million British thermal units per day (1 MMBtu/d is equivalent to 1 Mcf/d assuming a natural gas heating value of 1,000 Btu per Mcf)

Calculation of Florida EnergySecure Line Daily Demand Charge (Base Case)

| Revenues Requirements* | | | | | | | | |
|---|------------------------|----------------------|------------------------|------------------------|----------------------|----------------------|----------------------|----------------------|
| Option | Capital | AFUDC | Total investment | PVRR | 2024 | 2025 | 2026 | 2027 |
| 30" - 600 MMcf/d | \$1,475,000,000 | \$112,648,743 | \$1,587,648,743 | \$2,331,184,952 | \$ 193,305,960 | \$ 184,528,763 | \$ 175,753,685 | \$ 166,987,977 |
| Expand to 800 MMcf/d | \$109,708,738 | \$8,392,251 | \$118,100,989 | \$85,728,698 | \$ 21,150,716 | \$ 20,320,426 | \$ 19,544,229 | \$ 18,816,817 |
| Expand to 1 Bcf/d | \$74,757,282 | \$5,718,614 | \$80,475,895 | \$55,249,119 | \$ 15,165,124 | \$ 14,676,491 | \$ 14,115,940 | \$ 13,592,349 |
| Expand to 1.25 Bcf/d | \$270,873,786 | \$20,720,691 | \$291,594,477 | \$173,078,889 | \$ - | \$ 52,916,981 | \$ 51,106,274 | \$ 49,034,239 |
| Total | \$1,930,339,806 | \$147,480,298 | \$2,077,820,104 | \$2,645,241,658 | \$229,621,800 | \$272,442,660 | \$260,520,128 | \$248,431,383 |
| * Revenue requirements include property taxes, property insurance and annual O&M costs. | | | | | | | | |
| Gas Requirements Based on Long-term Resource Plan - Base Case | | | | | 87,500 | 175,000 | 175,000 | N/A |
| Mcf/d | | | | | 837,500 | 1,012,500 | 1,187,500 | 1,187,500 |
| Days per year | | | | | 366 | 365 | 365 | 365 |
| Annual Mcf | | | | | 306,525,000 | 369,562,500 | 433,437,500 | 433,437,500 |
| \$/Mcf/d (or \$/MMBtu/d) | | | | | \$ 0.7491 | \$ 0.7372 | \$ 0.6011 | \$ 0.5732 |
| Fuel Retention | | | | | 1.07% | 1.69% | 1.69% | 1.69% |

Abbreviations Used

| | |
|---------|--|
| Mcf/d: | Thousand cubic feet per day (1 Mcf/d is equivalent to 1 MMBtu/d assuming a natural gas heating value of 1,000 British thermal units (Btu) per Mcf) |
| MMcf/d: | Million cubic feet per day |
| Bcf/d: | Billion cubic feet per day |
| MMBtu/d | Million British thermal units per day (1 MMBtu/d is equivalent to 1 Mcf/d assuming a natural gas heating value of 1,000 Btu per Mcf) |

Calculation of Florida EnergySecure Line Daily Demand Charge (Base Case)

| Revenues Requirements* | | | | | | | | |
|------------------------|------------------------|----------------------|------------------------|------------------------|----------------------|----------------------|----------------------|----------------------|
| Option | Capital | AFUDC | Total Investment | PVRR | 2028 | 2029 | 2030 | 2031 |
| 30" - 600 MMcf/d | \$1,475,000,000 | \$112,648,743 | \$1,587,648,743 | \$2,331,184,952 | \$ 158,216,083 | \$ 150,639,751 | \$ 145,440,009 | \$ 141,415,780 |
| Expand to 800 MMcf/d | \$109,708,738 | \$8,392,251 | \$118,100,989 | \$85,728,698 | \$ 18,133,385 | \$ 17,481,281 | \$ 16,839,533 | \$ 16,197,317 |
| Expand to 1 Bcf/d | \$74,757,282 | \$5,718,614 | \$80,475,895 | \$55,249,119 | \$ 13,101,860 | \$ 12,641,757 | \$ 12,203,094 | \$ 11,771,073 |
| Expand to 1.25 Bcf/d | \$270,873,786 | \$20,720,691 | \$291,594,477 | \$173,078,889 | \$ 47,095,055 | \$ 45,276,030 | \$ 43,566,009 | \$ 41,931,659 |
| Total | \$1,930,339,806 | \$147,480,298 | \$2,077,820,104 | \$2,645,241,658 | \$236,546,383 | \$226,038,819 | \$218,048,644 | \$211,315,829 |

* Revenue requirements include property taxes, property insurance and annual O&M costs.

| Gas Requirements Based on Long-term Resource Plan - Base Case | | | | |
|---|------------------|------------------|------------------|------------------|
| | N/A | N/A | N/A | N/A |
| Mcf/d | 1,187,500 | 1,187,500 | 1,187,500 | 1,187,500 |
| Days per year | 366 | 365 | 365 | 365 |
| Annual Mcf | 434,625,000 | 433,437,500 | 433,437,500 | 433,437,500 |
| \$/Mcf/d (or \$/MMBtu/d) | \$ 0.5443 | \$ 0.5215 | \$ 0.5031 | \$ 0.4875 |
| Fuel Retention | 1.69% | 1.69% | 1.69% | 1.69% |

Abbreviations Used

| | |
|---------|--|
| Mcf/d: | Thousand cubic feet per day (1 Mcf/d is equivalent to 1 MMBtu/d assuming a natural gas heating value of 1,000 British thermal units (Btu) per Mcf) |
| MMcf/d: | Million cubic feet per day |
| Bcf/d: | Billion cubic feet per day |
| MMBtu/d | Million British thermal units per day (1 MMBtu/d is equivalent to 1 Mcf/d assuming a natural gas heating value of 1,000 Btu per Mcf) |

Calculation of Florida EnergySecure Line Daily Demand Charge (Base Case)

| Revenues Requirements* | | | | | | | | |
|------------------------|------------------------|----------------------|------------------------|------------------------|----------------------|----------------------|----------------------|----------------------|
| Option | Capital | AFUDC | Total Investment | PVRR | 2032 | 2033 | 2034 | 2035 |
| 30" - 600 MMcf/d | \$1,475,000,000 | \$112,648,743 | \$1,587,648,743 | \$2,331,184,952 | \$ 137,395,051 | \$ 133,352,995 | \$ 129,346,563 | \$ 125,344,295 |
| Expand to 800 MMcf/d | \$109,708,738 | \$8,392,251 | \$118,100,989 | \$85,728,698 | \$ 15,555,673 | \$ 14,913,481 | \$ 14,272,710 | \$ 13,632,543 |
| Expand to 1 Bcf/d | \$74,757,282 | \$5,718,614 | \$80,475,895 | \$55,249,119 | \$ 11,339,421 | \$ 10,907,496 | \$ 10,476,582 | \$ 10,046,252 |
| Expand to 1.25 Bcf/d | \$270,873,786 | \$20,720,691 | \$291,594,477 | \$173,078,889 | \$ 40,322,224 | \$ 38,710,902 | \$ 37,101,888 | \$ 35,493,567 |
| Total | \$1,930,339,806 | \$147,480,298 | \$2,077,820,104 | \$2,645,241,658 | \$204,612,370 | \$197,884,875 | \$191,197,743 | \$184,516,658 |

* Revenue requirements include property taxes, property insurance and annual O&M costs.

| Gas Requirements Based on Long-term Resource Plan - Base Case | | | | |
|---|------------------|------------------|------------------|------------------|
| | 2032 | 2033 | 2034 | 2035 |
| Mcf/d | 1,187,500 | 1,187,500 | 1,187,500 | 1,187,500 |
| Days per year | 366 | 365 | 365 | 365 |
| Annual Mcf | 434,625,000 | 433,437,500 | 433,437,500 | 433,437,500 |
| \$/Mcf/d (or \$/MMBtu/d) | \$ 0.4708 | \$ 0.4565 | \$ 0.4411 | \$ 0.4257 |
| Fuel Retention | 1.69% | 1.69% | 1.69% | 1.69% |

Abbreviations Used

Mcf/d: Thousand cubic feet per day (1 Mcf/d is equivalent to 1 MMBtu/d assuming a natural gas heating value of 1,000 British thermal units (Btu) per Mcf)
 MMcf/d: Million cubic feet per day
 Bcf/d: Billion cubic feet per day
 MMBtu/d: Million British thermal units per day (1 MMBtu/d is equivalent to 1 Mcf/d assuming a natural gas heating value of 1,000 Btu per Mcf)

Calculation of Florida EnergySecure Line Daily Demand Charge (Base Case)

| Revenues Requirements* | | | | | | | | | |
|------------------------|------------------------|----------------------|------------------------|------------------------|----------------------|----------------------|----------------------|----------------------|----------------------|
| Option | Capital | AFUDC | Total Investment | PVRR | 2036 | 2037 | 2038 | 2039 | 2040 |
| 30" - 600 MMcf/d | \$1,475,000,000 | \$112,648,743 | \$1,587,648,743 | \$2,331,184,952 | \$ 121,372,748 | \$ 117,365,763 | \$ 113,374,223 | \$ 109,386,378 | \$ 105,402,308 |
| Expand to 800 MMcf/d | \$109,708,738 | \$8,392,251 | \$118,100,989 | \$85,728,698 | \$ 12,994,011 | \$ 12,354,627 | \$ 11,804,224 | \$ 11,430,802 | \$ 11,145,968 |
| Expand to 1 Bcf/d | \$74,757,282 | \$5,718,614 | \$80,475,895 | \$55,249,119 | \$ 9,617,191 | \$ 9,187,781 | \$ 8,759,065 | \$ 8,390,834 | \$ 8,143,339 |
| Expand to 1.25 Bcf/d | \$270,873,786 | \$20,720,691 | \$291,594,477 | \$173,078,889 | \$ 33,887,854 | \$ 32,280,059 | \$ 30,673,637 | \$ 29,067,781 | \$ 27,680,036 |
| Total | \$1,930,339,806 | \$147,480,298 | \$2,077,820,104 | \$2,645,241,658 | \$177,871,805 | \$171,188,230 | \$164,611,149 | \$158,275,795 | \$152,371,651 |

* Revenue requirements include property taxes, property insurance and annual O&M costs.

| Gas Requirements Based on Long-term Resource Plan - Base Case | 2036 | 2037 | 2038 | 2039 | 2040 |
|---|------------------|------------------|------------------|------------------|------------------|
| Mcf/d | 1,187,500 | 1,187,500 | 1,187,500 | 1,187,500 | 1,187,500 |
| Days per year | 366 | 365 | 365 | 365 | 366 |
| Annual Mcf | 434,625,000 | 433,437,500 | 433,437,500 | 433,437,500 | 434,625,000 |
| \$/Mcf/d (or \$/MMBtu/d) | \$ 0.4093 | \$ 0.3950 | \$ 0.3798 | \$ 0.3652 | \$ 0.3506 |
| Fuel Retention | 1.69% | 1.69% | 1.69% | 1.69% | 1.69% |

Abbreviations Used

| | |
|---------|--|
| Mcf/d: | Thousand cubic feet per day (1 Mcf/d is equivalent to 1 MMBtu/d assuming a natural gas heating value of 1,000 British thermal units (Btu) per Mcf) |
| MMcf/d: | Million cubic feet per day |
| Bcf/d: | Billion cubic feet per day |
| MMBtu/d | Million British thermal units per day (1 MMBtu/d is equivalent to 1 Mcf/d assuming a natural gas heating value of 1,000 Btu per Mcf) |

Calculation of Florida EnergySecure Line Daily Demand Charge (Base Case)

| Revenues Requirements* | | | | | | | | | |
|---|------------------------|----------------------|------------------------|------------------------|----------------------|----------------------|----------------------|----------------------|----------------------|
| Option | Capital | AFUDC | Total Investment | PVRR | 2041 | 2042 | 2043 | 2044 | 2045 |
| 30" - 600 MMcf/d | \$1,475,000,000 | \$112,648,743 | \$1,587,648,743 | \$2,331,184,952 | \$ 101,422,096 | \$ 97,445,825 | \$ 93,473,584 | \$ 89,505,459 | \$ 85,541,541 |
| Expand to 800 MMcf/d | \$109,708,738 | \$8,392,251 | \$118,100,989 | \$85,728,698 | \$ 10,861,627 | \$ 10,577,789 | \$ 10,294,464 | \$ 10,011,664 | \$ 9,729,399 |
| Expand to 1 Bcf/d | \$74,757,282 | \$5,718,614 | \$80,475,895 | \$55,249,119 | \$ 7,956,348 | \$ 7,769,835 | \$ 7,583,810 | \$ 7,398,283 | \$ 7,213,264 |
| Expand to 1.25 Bcf/d | \$270,873,786 | \$20,720,691 | \$291,594,477 | \$173,078,889 | \$ 26,728,687 | \$ 25,995,474 | \$ 25,262,878 | \$ 24,530,912 | \$ 23,799,589 |
| Total | \$1,930,339,806 | \$147,480,298 | \$2,077,820,104 | \$2,645,241,658 | \$146,968,757 | \$141,788,923 | \$136,614,736 | \$131,446,318 | \$126,283,794 |
| * Revenue requirements include property taxes, property insurance and annual O&M costs. | | | | | | | | | |
| Gas Requirements Based on Long-term Resource Plan - Base Case | | | | | N/A | N/A | N/A | N/A | N/A |
| Mcf/d | | | | | 1,187,500 | 1,187,500 | 1,187,500 | 1,187,500 | 1,187,500 |
| Days per year | | | | | 365 | 365 | 365 | 366 | 365 |
| Annual Mcf | | | | | 433,437,500 | 433,437,500 | 433,437,500 | 434,625,000 | 433,437,500 |
| \$/Mcf/d (or \$/MMBtu/d) | | | | | \$ 0.3391 | \$ 0.3271 | \$ 0.3152 | \$ 0.3024 | \$ 0.2914 |
| Fuel Retention | | | | | 1.69% | 1.69% | 1.69% | 1.69% | 1.69% |

Abbreviations Used

| | |
|---------|--|
| Mcf/d: | Thousand cubic feet per day (1 Mcf/d is equivalent to 1 MMBtu/d assuming a natural gas heating value of 1,000 British thermal units (Btu) per Mcf) |
| MMcf/d: | Million cubic feet per day |
| Bcf/d: | Billion cubic feet per day |
| MMBtu/d | Million British thermal units per day (1 MMBtu/d is equivalent to 1 Mcf/d assuming a natural gas heating value of 1,000 Btu per Mcf) |

Calculation of Florida EnergySecure Line Daily Demand Charge (Base Case)

| Revenues Requirements* | | | | | | | | | |
|---|------------------------|----------------------|------------------------|------------------------|----------------------|----------------------|----------------------|----------------------|----------------------|
| Option | Capital | AFUDC | Total Investment | PVRR | 2046 | 2047 | 2048 | 2049 | 2050 |
| 30" - 600 MMcf/d | \$1,475,000,000 | \$112,648,743 | \$1,587,648,743 | \$2,331,184,952 | \$ 82,320,588 | \$ 79,104,029 | \$ 75,891,961 | \$ 72,684,480 | \$ 69,481,689 |
| Expand to 800 MMcf/d | \$109,708,738 | \$8,392,251 | \$118,100,989 | \$85,728,698 | \$ 9,447,681 | \$ 9,166,520 | \$ 8,885,930 | \$ 8,605,920 | \$ 8,326,505 |
| Expand to 1 Bcf/d | \$74,757,282 | \$5,718,614 | \$80,475,895 | \$55,249,119 | \$ 7,028,764 | \$ 6,844,794 | \$ 6,661,364 | \$ 6,478,486 | \$ 6,296,171 |
| Expand to 1.25 Bcf/d | \$270,873,786 | \$20,720,691 | \$291,594,477 | \$173,078,889 | \$ 23,068,924 | \$ 22,338,931 | \$ 21,609,624 | \$ 20,881,018 | \$ 20,153,129 |
| Total | \$1,930,339,806 | \$147,480,298 | \$2,077,820,104 | \$2,645,241,658 | \$121,865,958 | \$117,454,275 | \$113,048,878 | \$108,649,904 | \$104,257,493 |
| * Revenue requirements include property taxes, property insurance and annual O&M costs. | | | | | | | | | |
| Gas Requirements Based on Long-term Resource Plan - Base Case | | | | | N/A | N/A | N/A | N/A | N/A |
| Mcf/d | | | | | 1,187,500 | 1,187,500 | 1,187,500 | 1,187,500 | 1,187,500 |
| Days per year | | | | | 365 | 365 | 366 | 365 | 365 |
| Annual Mcf | | | | | 433,437,500 | 433,437,500 | 434,625,000 | 433,437,500 | 433,437,500 |
| \$/Mcf/d (or \$/MMBtu/d) | | | | | \$ 0.2812 | \$ 0.2710 | \$ 0.2601 | \$ 0.2507 | \$ 0.2405 |
| Fuel Retention | | | | | 1.69% | 1.69% | 1.69% | 1.69% | 1.69% |

Abbreviations Used

| | |
|---------|--|
| Mcf/d: | Thousand cubic feet per day (1 Mcf/d is equivalent to 1 MMBtu/d assuming a natural gas heating value of 1,000 British thermal units (Btu) per Mcf) |
| MMcf/d: | Million cubic feet per day |
| Bcf/d: | Billion cubic feet per day |
| MMBtu/d | Million British thermal units per day (1 MMBtu/d is equivalent to 1 Mcf/d assuming a natural gas heating value of 1,000 Btu per Mcf) |

Calculation of Florida EnergySecure Line Daily Demand Charge (Base Case)

| Revenues Requirements* | | | | | | | | |
|------------------------|------------------------|----------------------|------------------------|------------------------|---------------------|---------------------|---------------------|-------------------------|
| Option | Capital | AFUDC | Total Investment | PVRR | 2051 | 2052 | 2053 | Total |
| 30" - 600 MMcf/d | \$1,475,000,000 | \$112,648,743 | \$1,587,648,743 | \$2,331,184,952 | \$ 66,120,453 | \$ 62,760,842 | \$ 59,402,900 | \$ 5,879,476,153 |
| Expand to 800 MMcf/d | \$109,708,738 | \$8,392,251 | \$118,100,989 | \$85,728,698 | \$ 8,021,615 | \$ 7,716,822 | \$ 7,412,127 | \$ 407,521,308 |
| Expand to 1 Bcf/d | \$74,757,282 | \$5,718,614 | \$80,475,895 | \$55,249,119 | \$ 6,088,351 | \$ 5,880,594 | \$ 5,672,903 | \$ 283,008,615 |
| Expand to 1.25 Bcf/d | \$270,873,786 | \$20,720,691 | \$291,594,477 | \$173,078,889 | \$ 19,399,892 | \$ 18,646,881 | \$ 17,894,101 | \$ 926,454,237 |
| Total | \$1,930,339,806 | \$147,480,298 | \$2,077,820,104 | \$2,645,241,658 | \$99,630,311 | \$95,005,139 | \$90,382,030 | \$ 7,496,460,313 |

* Revenue requirements include property taxes, property insurance and annual O&M costs.

| Gas Requirements Based on Long-term Resource Plan - Base Case | | | |
|---|------------------|------------------|------------------|
| | N/A | N/A | N/A |
| Mcf/d | 1,187,500 | 1,187,500 | 1,187,500 |
| Days per year | 365 | 366 | 365 |
| Annual Mcf | 433,437,500 | 434,625,000 | 433,437,500 |
| \$/Mcf/d (or \$/MMBtu/d) | \$ 0.2299 | \$ 0.2186 | \$ 0.2085 |
| Fuel Retention | 1.69% | 1.69% | 1.69% |

Abbreviations Used

Mcf/d: Thousand cubic feet per day (1 Mcf/d is equivalent to 1 MMBtu/d assuming a natural gas heating value of 1,000 British thermal units (Btu) per Mcf)
 MMcf/d: Million cubic feet per day
 Bcf/d: Billion cubic feet per day
 MMBtu/d: Million British thermal units per day (1 MMBtu/d is equivalent to 1 Mcf/d assuming a natural gas heating value of 1,000 Btu per Mcf)

Calculation of Florida EnergySecure Line Daily Demand Charge (RPS)

| Revenues Requirements* | | | | | Revenues Requirements ==> | | | | |
|---|------------------------|----------------------|------------------------|------------------------|---------------------------|----------------------|----------------------|----------------------|----------------------|
| Option | Capital | AFUDC | Total Investment | PVRR | 2014 | 2015 | 2016 | 2017 | 2018 |
| 30" - 600 MMcf/d | \$1,475,000,000 | \$112,648,743 | \$1,587,648,743 | \$2,331,184,952 | \$ 288,374,607 | \$ 278,493,512 | \$ 267,187,914 | \$ 256,609,825 | \$ 246,685,353 |
| Expand to 800 MMcf/d | \$109,708,738 | \$8,392,251 | \$118,100,989 | \$85,728,698 | \$ - | \$ - | \$ - | \$ - | \$ - |
| Expand to 1 Bcf/d | \$74,757,282 | \$5,718,614 | \$80,475,895 | \$55,249,119 | \$ - | \$ - | \$ - | \$ - | \$ - |
| Expand to 1.25 Bcf/d | \$270,873,786 | \$20,720,691 | \$291,594,477 | \$173,078,889 | \$ - | \$ - | \$ - | \$ - | \$ - |
| Total | \$1,930,339,806 | \$147,480,298 | \$2,077,820,104 | \$2,645,241,658 | \$288,374,607 | \$278,493,512 | \$267,187,914 | \$256,609,825 | \$246,685,353 |
| * Revenue requirements include property taxes, property insurance and annual O&M costs. | | | | | | | | | |
| Gas Requirements Based on Long-term Resource Plan - RPS Case | | | | | 400,000 | - | - | - | - |
| Mcf/d | | | | | 600,000 | 600,000 | 600,000 | 600,000 | 600,000 |
| Days per year | | | | | 365 | 365 | 366 | 365 | 365 |
| Annual Mcf | | | | | 219,000,000 | 219,000,000 | 219,600,000 | 219,000,000 | 219,000,000 |
| \$/Mcf/d (or \$/MMBtu/d) | | | | | \$ 1.3168 | \$ 1.2717 | \$ 1.2167 | \$ 1.1717 | \$ 1.1264 |
| Fuel Retention | | | | | 0.55% | 0.55% | 0.55% | 0.55% | 0.55% |

Abbreviations Used

Mcf/d: Thousand cubic feet per day (1 Mcf/d is equivalent to 1 MMBtu/d assuming a natural gas heating value of 1,000 British thermal units (Btu) per Mcf)
MMcf/d: Million cubic feet per day
Bcf/d: Billion cubic feet per day
MMBtu/d: Million British thermal units per day (1 MMBtu/d is equivalent to 1 Mcf/d assuming a natural gas heating value of 1,000 Btu per Mcf)

Calculation of Florida EnergySecure Line Daily Demand Charge (RPS)

| Revenues Requirements* | | | | | | | | | |
|---|------------------------|----------------------|------------------------|------------------------|----------------------|----------------------|----------------------|----------------------|----------------------|
| Option | Capital | AFUDC | Total Investment | PVRR | 2019 | 2020 | 2021 | 2022 | 2023 |
| 30" - 600 MMcf/d | \$1,475,000,000 | \$112,648,743 | \$1,587,648,743 | \$2,331,184,952 | \$ 237,347,420 | \$ 228,424,559 | \$ 219,638,646 | \$ 210,855,067 | \$ 202,075,471 |
| Expand to 800 MMcf/d | \$109,708,738 | \$8,392,251 | \$118,100,989 | \$85,728,698 | \$ - | \$ - | \$ - | \$ - | \$ 21,875,500 |
| Expand to 1 Bcf/d | \$74,757,282 | \$5,718,614 | \$80,475,895 | \$55,249,119 | \$ - | \$ - | \$ - | \$ - | \$ - |
| Expand to 1.25 Bcf/d | \$270,873,786 | \$20,720,691 | \$291,594,477 | \$173,078,889 | \$ - | \$ - | \$ - | \$ - | \$ - |
| Total | \$1,930,339,806 | \$147,480,298 | \$2,077,820,104 | \$2,645,241,658 | \$237,347,420 | \$228,424,559 | \$219,638,646 | \$210,855,067 | \$223,950,971 |
| * Revenue requirements include property taxes, property insurance and annual O&M costs. | | | | | | | | | |
| Gas Requirements Based on Long-term Resource Plan - RPS Case | | | | | - | - | 87,500 | 87,500 | 175,000 |
| Mcf/d | | | | | 600,000 | 600,000 | 600,000 | 600,000 | 750,000 |
| Days per year | | | | | 365 | 366 | 365 | 365 | 365 |
| Annual Mcf | | | | | 219,000,000 | 219,600,000 | 219,000,000 | 219,000,000 | 273,750,000 |
| \$/Mcf/d (or \$/MMBtu/d) | | | | | \$ 1.0838 | \$ 1.0402 | \$ 1.0029 | \$ 0.9628 | \$ 0.8181 |
| Fuel Retention | | | | | 0.55% | 0.55% | 0.55% | 0.55% | 0.93% |

Abbreviations Used

| | |
|---------|--|
| Mcf/d: | Thousand cubic feet per day (1 Mcf/d is equivalent to 1 MMBtu/d assuming a natural gas heating value of 1,000 British thermal units (Btu) per Mcf) |
| MMcf/d: | Million cubic feet per day |
| Bcf/d: | Billion cubic feet per day |
| MMBtu/d | Million British thermal units per day (1 MMBtu/d is equivalent to 1 Mcf/d assuming a natural gas heating value of 1,000 Btu per Mcf) |

Calculation of Florida EnergySecure Line Daily Demand Charge (RPS)

| Revenues Requirements* | | | | | | | | |
|---|------------------------|----------------------|------------------------|------------------------|----------------------|----------------------|----------------------|----------------------|
| Option | Capital | AFUDC | Total Investment | PVRR | 2024 | 2025 | 2026 | 2027 |
| 30" - 600 MMcf/d | \$1,475,000,000 | \$112,648,743 | \$1,587,648,743 | \$2,331,184,952 | \$ 193,305,960 | \$ 184,528,763 | \$ 175,753,685 | \$ 166,987,977 |
| Expand to 800 MMcf/d | \$109,708,738 | \$8,392,251 | \$118,100,989 | \$85,728,698 | \$ 21,150,716 | \$ 20,320,426 | \$ 19,544,229 | \$ 18,816,817 |
| Expand to 1 Bcf/d | \$74,757,282 | \$5,718,614 | \$80,475,895 | \$55,249,119 | \$ 15,165,124 | \$ 14,676,491 | \$ 14,115,940 | \$ 13,592,349 |
| Expand to 1.25 Bcf/d | \$270,873,786 | \$20,720,691 | \$291,594,477 | \$173,078,889 | \$ - | \$ 52,916,981 | \$ 51,106,274 | \$ 49,034,239 |
| Total | \$1,930,339,806 | \$147,480,298 | \$2,077,820,104 | \$2,645,241,658 | \$229,621,800 | \$272,442,660 | \$260,520,128 | \$248,431,383 |
| * Revenue requirements include property taxes, property insurance and annual O&M costs. | | | | | | | | |
| Gas Requirements Based on Long-term Resource Plan - RPS Case | | | | | 87,500 | 175,000 | 175,000 | N/A |
| Mcf/d | | | | | 837,500 | 1,012,500 | 1,187,500 | 1,187,500 |
| Days per year | | | | | 366 | 365 | 365 | 365 |
| Annual Mcf | | | | | 306,525,000 | 369,562,500 | 433,437,500 | 433,437,500 |
| \$/Mcf/d (or \$/MMBtu/d) | | | | | \$ 0.7491 | \$ 0.7372 | \$ 0.6011 | \$ 0.5732 |
| Fuel Retention | | | | | 1.07% | 1.69% | 1.69% | 1.69% |

Abbreviations Used

| | |
|---------|--|
| Mcf/d: | Thousand cubic feet per day (1 Mcf/d is equivalent to 1 MMBtu/d assuming a natural gas heating value of 1,000 British thermal units (Btu) per Mcf) |
| MMcf/d: | Million cubic feet per day |
| Bcf/d: | Billion cubic feet per day |
| MMBtu/d | Million British thermal units per day (1 MMBtu/d is equivalent to 1 Mcf/d assuming a natural gas heating value of 1,000 Btu per Mcf) |

Calculation of Florida EnergySecure Line Daily Demand Charge (RPS)

| Revenues Requirements* | | | | | | | | |
|---|------------------------|----------------------|------------------------|------------------------|----------------------|----------------------|----------------------|----------------------|
| Option | Capital | AFUDC | Total Investment | PVRR | 2028 | 2029 | 2030 | 2031 |
| 30" - 600 MMcf/d | \$1,475,000,000 | \$112,648,743 | \$1,587,648,743 | \$2,331,184,952 | \$ 158,216,083 | \$ 150,639,751 | \$ 145,440,009 | \$ 141,415,780 |
| Expand to 800 MMcf/d | \$109,708,738 | \$8,392,251 | \$118,100,989 | \$85,728,698 | \$ 18,133,385 | \$ 17,481,281 | \$ 16,839,533 | \$ 16,197,317 |
| Expand to 1 Bcf/d | \$74,757,282 | \$5,718,614 | \$80,475,895 | \$55,249,119 | \$ 13,101,860 | \$ 12,641,757 | \$ 12,203,094 | \$ 11,771,073 |
| Expand to 1.25 Bcf/d | \$270,873,786 | \$20,720,691 | \$291,594,477 | \$173,078,889 | \$ 47,095,055 | \$ 45,276,030 | \$ 43,566,009 | \$ 41,931,659 |
| Total | \$1,930,339,806 | \$147,480,298 | \$2,077,820,104 | \$2,645,241,658 | \$236,546,383 | \$226,038,819 | \$218,048,644 | \$211,315,829 |
| * Revenue requirements include property taxes, property insurance and annual O&M costs. | | | | | | | | |
| Gas Requirements Based on Long-term Resource Plan - RPS Case | | | | | N/A | N/A | N/A | N/A |
| Mcf/d | | | | | 1,187,500 | 1,187,500 | 1,187,500 | 1,187,500 |
| Days per year | | | | | 366 | 365 | 365 | 365 |
| Annual Mcf | | | | | 434,625,000 | 433,437,500 | 433,437,500 | 433,437,500 |
| \$/Mcf/d (or \$/MMBtu/d) | | | | | \$ 0.5443 | \$ 0.5215 | \$ 0.5031 | \$ 0.4875 |
| Fuel Retention | | | | | 1.69% | 1.69% | 1.69% | 1.69% |

Abbreviations Used

| | |
|---------|--|
| Mcf/d: | Thousand cubic feet per day (1 Mcf/d is equivalent to 1 MMBtu/d assuming a natural gas heating value of 1,000 British thermal units (Btu) per Mcf) |
| MMcf/d: | Million cubic feet per day |
| Bcf/d: | Billion cubic feet per day |
| MMBtu/d | Million British thermal units per day (1 MMBtu/d is equivalent to 1 Mcf/d assuming a natural gas heating value of 1,000 Btu per Mcf) |

Calculation of Florida EnergySecure Line Daily Demand Charge (RPS)

| Revenues Requirements ⁺ | | | | | | | | |
|---|------------------------|----------------------|------------------------|------------------------|----------------------|----------------------|----------------------|----------------------|
| Option | Capital | AFUDC | Total Investment | PVRR | 2032 | 2033 | 2034 | 2035 |
| 30" - 600 MMcf/d | \$1,475,000,000 | \$112,648,743 | \$1,587,648,743 | \$2,331,184,952 | \$ 137,395,051 | \$ 133,352,995 | \$ 129,346,563 | \$ 125,344,295 |
| Expand to 800 MMcf/d | \$109,708,738 | \$8,392,251 | \$118,100,989 | \$85,728,698 | \$ 15,555,673 | \$ 14,913,481 | \$ 14,272,710 | \$ 13,632,543 |
| Expand to 1 Bcf/d | \$74,757,282 | \$5,718,614 | \$80,475,895 | \$55,249,119 | \$ 11,339,421 | \$ 10,907,496 | \$ 10,476,582 | \$ 10,046,252 |
| Expand to 1.25 Bcf/d | \$270,873,786 | \$20,720,691 | \$291,594,477 | \$173,078,889 | \$ 40,322,224 | \$ 38,710,902 | \$ 37,101,888 | \$ 35,493,567 |
| Total | \$1,930,339,806 | \$147,480,298 | \$2,077,820,104 | \$2,645,241,658 | \$204,612,370 | \$197,884,875 | \$191,197,743 | \$184,516,658 |
| * Revenue requirements include property taxes, property insurance and annual O&M costs. | | | | | | | | |
| Gas Requirements Based on Long-term Resource Plan - RPS Case | | | | | N/A | N/A | N/A | N/A |
| Mcf/d | | | | | 1,187,500 | 1,187,500 | 1,187,500 | 1,187,500 |
| Days per year | | | | | 366 | 365 | 365 | 365 |
| Annual Mcf | | | | | 434,625,000 | 433,437,500 | 433,437,500 | 433,437,500 |
| \$/Mcf/d (or \$/MMBtu/d) | | | | | \$ 0.4708 | \$ 0.4565 | \$ 0.4411 | \$ 0.4257 |
| Fuel Retention | | | | | 1.69% | 1.69% | 1.69% | 1.69% |

Abbreviations Used

Mcf/d: Thousand cubic feet per day (1 Mcf/d is equivalent to 1 MMBtu/d assuming a natural gas heating value of 1,000 British thermal units (Btu) per Mcf)
 MMcf/d: Million cubic feet per day
 Bcf/d: Billion cubic feet per day
 MMBtu/d: Million British thermal units per day (1 MMBtu/d is equivalent to 1 Mcf/d assuming a natural gas heating value of 1,000 Btu per Mcf)

Calculation of Florida EnergySecure Line Daily Demand Charge (RPS)

| Revenues Requirements* | | | | | | | | | |
|---|------------------------|----------------------|------------------------|------------------------|----------------------|----------------------|----------------------|----------------------|----------------------|
| Option | Capital | AFUDC | Total Investment | PVRR | 2036 | 2037 | 2038 | 2039 | 2040 |
| 30" - 600 MMcf/d | \$1,475,000,000 | \$112,648,743 | \$1,587,648,743 | \$2,331,184,952 | \$ 121,372,748 | \$ 117,365,763 | \$ 113,374,223 | \$ 109,386,378 | \$ 105,402,308 |
| Expand to 800 MMcf/d | \$109,708,738 | \$8,392,251 | \$118,100,989 | \$85,728,698 | \$ 12,994,011 | \$ 12,354,627 | \$ 11,804,224 | \$ 11,430,802 | \$ 11,145,968 |
| Expand to 1 Bcf/d | \$74,757,282 | \$5,718,614 | \$80,475,895 | \$55,249,119 | \$ 9,617,191 | \$ 9,187,781 | \$ 8,759,065 | \$ 8,390,834 | \$ 8,143,339 |
| Expand to 1.25 Bcf/d | \$270,873,786 | \$20,720,691 | \$291,594,477 | \$173,078,889 | \$ 33,887,854 | \$ 32,280,059 | \$ 30,673,637 | \$ 29,067,781 | \$ 27,680,036 |
| Total | \$1,930,339,806 | \$147,480,298 | \$2,077,820,104 | \$2,645,241,658 | \$177,871,805 | \$171,188,230 | \$164,611,149 | \$158,275,795 | \$152,371,651 |
| * Revenue requirements include property taxes, property insurance and annual O&M costs. | | | | | | | | | |
| Gas Requirements Based on Long-term Resource Plan - RPS Case | | | | | N/A | N/A | N/A | N/A | N/A |
| Mcf/d | | | | | 1,187,500 | 1,187,500 | 1,187,500 | 1,187,500 | 1,187,500 |
| Days per year | | | | | 366 | 365 | 365 | 365 | 366 |
| Annual Mcf | | | | | 434,625,000 | 433,437,500 | 433,437,500 | 433,437,500 | 434,625,000 |
| \$/Mcf/d (or \$/MMBtu/d) | | | | | \$ 0.4093 | \$ 0.3950 | \$ 0.3798 | \$ 0.3652 | \$ 0.3506 |
| Fuel Retention | | | | | 1.69% | 1.69% | 1.69% | 1.69% | 1.69% |

Abbreviations Used

| | |
|---------|--|
| Mcf/d: | Thousand cubic feet per day (1 Mcf/d is equivalent to 1 MMBtu/d assuming a natural gas heating value of 1,000 British thermal units (Btu) per Mcf) |
| MMcf/d: | Million cubic feet per day |
| Bcf/d: | Billion cubic feet per day |
| MMBtu/d | Million British thermal units per day (1 MMBtu/d is equivalent to 1 Mcf/d assuming a natural gas heating value of 1,000 Btu per Mcf) |

Calculation of Florida EnergySecure Line Daily Demand Charge (RPS)

| Revenues Requirements* | | | | | | | | | |
|------------------------|------------------------|----------------------|------------------------|------------------------|----------------------|----------------------|----------------------|----------------------|----------------------|
| Option | Capital | AFUDC | Total Investment | PVRR | 2041 | 2042 | 2043 | 2044 | 2045 |
| 30" - 600 MMcf/d | \$1,475,000,000 | \$112,648,743 | \$1,587,648,743 | \$2,331,184,952 | \$ 101,422,096 | \$ 97,445,825 | \$ 93,473,584 | \$ 89,505,459 | \$ 85,541,541 |
| Expand to 800 MMcf/d | \$109,708,738 | \$8,392,251 | \$118,100,989 | \$85,728,698 | \$ 10,861,627 | \$ 10,577,789 | \$ 10,294,464 | \$ 10,011,664 | \$ 9,729,399 |
| Expand to 1 Bcf/d | \$74,757,282 | \$5,718,614 | \$80,475,895 | \$55,249,119 | \$ 7,956,348 | \$ 7,769,835 | \$ 7,583,810 | \$ 7,398,283 | \$ 7,213,264 |
| Expand to 1.25 Bcf/d | \$270,873,786 | \$20,720,691 | \$291,594,477 | \$173,078,889 | \$ 26,728,687 | \$ 25,995,474 | \$ 25,262,878 | \$ 24,530,912 | \$ 23,799,589 |
| Total | \$1,930,339,806 | \$147,480,298 | \$2,077,820,104 | \$2,645,241,658 | \$146,968,757 | \$141,788,923 | \$136,614,736 | \$131,446,318 | \$126,283,794 |

* Revenue requirements include property taxes, property insurance and annual O&M costs.

| Gas Requirements Based on Long-term Resource Plan - RPS Case | | | | | |
|--|------------------|------------------|------------------|------------------|------------------|
| | N/A | N/A | N/A | N/A | N/A |
| Mcf/d | 1,187,500 | 1,187,500 | 1,187,500 | 1,187,500 | 1,187,500 |
| Days per year | 365 | 365 | 365 | 366 | 365 |
| Annual Mcf | 433,437,500 | 433,437,500 | 433,437,500 | 434,625,000 | 433,437,500 |
| \$/Mcf/d (or \$/MMBtu/d) | \$ 0.3391 | \$ 0.3271 | \$ 0.3152 | \$ 0.3024 | \$ 0.2914 |
| Fuel Retention | 1.69% | 1.69% | 1.69% | 1.69% | 1.69% |

Abbreviations Used

Mcf/d: Thousand cubic feet per day (1 Mcf/d is equivalent to 1 MMBtu/d assuming a natural gas heating value of 1,000 British thermal units (Btu) per Mcf)
 MMcf/d: Million cubic feet per day
 Bcf/d: Billion cubic feet per day
 MMBtu/d: Million British thermal units per day (1 MMBtu/d is equivalent to 1 Mcf/d assuming a natural gas heating value of 1,000 Btu per Mcf)

Calculation of Florida EnergySecure Line Daily Demand Charge (RPS)

| Revenues Requirements* | | | | | | | | | |
|------------------------|------------------------|----------------------|------------------------|------------------------|----------------------|----------------------|----------------------|----------------------|----------------------|
| Option | Capital | AFUDC | Total Investment | PVRR | 2046 | 2047 | 2048 | 2049 | 2050 |
| 30" - 600 MMcf/d | \$1,475,000,000 | \$112,648,743 | \$1,587,648,743 | \$2,331,184,952 | \$ 82,320,588 | \$ 79,104,029 | \$ 75,891,961 | \$ 72,684,480 | \$ 69,481,689 |
| Expand to 800 MMcf/d | \$109,708,738 | \$8,392,251 | \$118,100,989 | \$85,728,698 | \$ 9,447,681 | \$ 9,166,520 | \$ 8,885,930 | \$ 8,605,920 | \$ 8,326,505 |
| Expand to 1 Bcf/d | \$74,757,282 | \$5,718,614 | \$80,475,895 | \$55,249,119 | \$ 7,028,764 | \$ 6,844,794 | \$ 6,661,364 | \$ 6,478,486 | \$ 6,296,171 |
| Expand to 1.25 Bcf/d | \$270,873,786 | \$20,720,691 | \$291,594,477 | \$173,078,889 | \$ 23,068,924 | \$ 22,338,931 | \$ 21,609,624 | \$ 20,881,018 | \$ 20,153,129 |
| Total | \$1,930,339,806 | \$147,480,298 | \$2,077,820,104 | \$2,645,241,658 | \$121,865,958 | \$117,454,275 | \$113,048,878 | \$108,649,904 | \$104,257,493 |

* Revenue requirements include property taxes, property insurance and annual O&M costs.

| Gas Requirements Based on Long-term Resource Plan - RPS Case | | | | | |
|--|--|-------------|-------------|-------------|-------------|
| | | N/A | N/A | N/A | N/A |
| Mcf/d | | 1,187,500 | 1,187,500 | 1,187,500 | 1,187,500 |
| Days per year | | 365 | 365 | 366 | 365 |
| Annual Mcf | | 433,437,500 | 433,437,500 | 434,625,000 | 433,437,500 |
| \$/Mcf/d (or \$/MMBtu/d) | | \$ 0.2812 | \$ 0.2710 | \$ 0.2601 | \$ 0.2507 |
| Fuel Retention | | 1.69% | 1.69% | 1.69% | 1.69% |

Abbreviations Used

Mcf/d: Thousand cubic feet per day (1 Mcf/d is equivalent to 1 MMBtu/d assuming a natural gas heating value of 1,000 British thermal units (Btu) per Mcf)
 MMcf/d: Million cubic feet per day
 Bcf/d: Billion cubic feet per day
 MMBtu/d: Million British thermal units per day (1 MMBtu/d is equivalent to 1 Mcf/d assuming a natural gas heating value of 1,000 Btu per Mcf)

Calculation of Florida EnergySecure Line Daily Demand Charge (RPS)

| Revenues Requirements* | | | | | | | | |
|------------------------|------------------------|----------------------|------------------------|------------------------|---------------------|---------------------|---------------------|-------------------------|
| Option | Capital | AFUDC | Total Investment | PVRR | 2051 | 2052 | 2053 | Total |
| 30" - 600 MMcf/d | \$1,475,000,000 | \$112,648,743 | \$1,587,648,743 | \$2,331,184,952 | \$ 66,120,453 | \$ 62,760,842 | \$ 59,402,900 | \$ 5,879,476,153 |
| Expand to 800 MMcf/d | \$109,708,738 | \$8,392,251 | \$118,100,989 | \$85,728,698 | \$ 8,021,615 | \$ 7,716,822 | \$ 7,412,127 | \$ 407,521,308 |
| Expand to 1 Bcf/d | \$74,757,282 | \$5,718,614 | \$80,475,895 | \$55,249,119 | \$ 6,088,351 | \$ 5,880,594 | \$ 5,672,903 | \$ 283,008,615 |
| Expand to 1.25 Bcf/d | \$270,873,786 | \$20,720,691 | \$291,594,477 | \$173,078,889 | \$ 19,399,892 | \$ 18,646,881 | \$ 17,894,101 | \$ 926,454,237 |
| Total | \$1,930,339,806 | \$147,480,298 | \$2,077,820,104 | \$2,645,241,658 | \$99,630,311 | \$95,005,139 | \$90,382,030 | \$ 7,496,460,313 |

* Revenue requirements include property taxes, property insurance and annual O&M costs.

| Gas Requirements Based on Long-term Resource Plan - RPS Case | | | |
|--|--|------------------|------------------|
| | | N/A | N/A |
| Mcf/d | | 1,187,500 | 1,187,500 |
| Days per year | | 365 | 366 |
| Annual Mcf | | 433,437,500 | 434,625,000 |
| \$/Mcf/d (or \$/MMBtu/d) | | \$ 0.2299 | \$ 0.2186 |
| Fuel Retention | | 1.69% | 1.69% |

Abbreviations Used

| | |
|---------|--|
| Mcf/d: | Thousand cubic feet per day (1 Mcf/d is equivalent to 1 MMBtu/d assuming a natural gas heating value of 1,000 British thermal units (Btu) per Mcf) |
| MMcf/d: | Million cubic feet per day |
| Bcf/d: | Billion cubic feet per day |
| MMBtu/d | Million British thermal units per day (1 MMBtu/d is equivalent to 1 Mcf/d assuming a natural gas heating value of 1,000 Btu per Mcf) |

Calculation of Florida EnergySecure Line Daily Demand Charge (Nuclear Delay)

| Revenues Requirements* | | | | | Revenues Requirements ==> | | | | | | |
|------------------------|------------------------|----------------------|------------------------|------------------------|---------------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|
| Option | Capital | AFUDC | Total Investment | PVRR | 2014 | 2015 | 2016 | 2017 | 2018 | 2019 | 2020 |
| 30" - 600 MMcf/d | \$1,475,000,000 | \$112,648,743 | \$1,587,648,743 | \$2,331,184,952 | \$ 288,374,607 | \$ 278,493,512 | \$ 267,187,914 | \$ 256,609,825 | \$ 246,685,353 | \$ 237,347,420 | \$ 228,424,559 |
| Expand to 800 MMcf/d | \$101,941,748 | \$7,798,109 | \$109,739,857 | \$102,272,178 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ 20,338,606 |
| Expand to 1 Bcf/d | \$73,786,408 | \$5,644,346 | \$79,430,754 | \$59,274,969 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Expand to 1.25 Bcf/d | \$279,902,913 | \$21,411,381 | \$301,314,293 | \$164,320,734 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Total | \$1,930,631,068 | \$147,502,579 | \$2,078,133,647 | \$2,657,052,834 | \$288,374,607 | \$278,493,512 | \$267,187,914 | \$256,609,825 | \$246,685,353 | \$237,347,420 | \$248,763,165 |

* Revenue requirements include property taxes, property insurance and annual O&M costs.

| Gas Requirements Based on Long-term Resource Plan - Nuclear Delay Case | | | | | | | |
|--|-------------|-------------|-------------|-------------|-------------|-------------|-------------|
| Mcf/d | 400,000 | - | - | - | 200,000 | - | 200,000 |
| Days | 600,000 | 600,000 | 600,000 | 600,000 | 600,000 | 600,000 | 800,000 |
| Annual Mcf | 365 | 365 | 366 | 365 | 365 | 365 | 366 |
| | 219,000,000 | 219,000,000 | 219,600,000 | 219,000,000 | 219,000,000 | 219,000,000 | 292,800,000 |
| \$/Mcf/d (or \$/MMBtu/d) | \$ 1.3168 | \$ 1.2717 | \$ 1.2167 | \$ 1.1717 | \$ 1.1264 | \$ 1.0838 | \$ 0.8496 |
| Fuel Retention | 0.55% | 0.55% | 0.55% | 0.55% | 0.55% | 0.55% | 0.93% |

Abbreviations Used

Mcf/d: Thousand cubic feet per day (1 Mcf/d is equivalent to 1 MMBtu/d assuming a natural gas heating value of 1,000 British thermal units (Btu) per Mcf)
 MMcf/d: Million cubic feet per day
 Bcf/d: Billion cubic feet per day
 MMBtu/d: Million British thermal units per day (1 MMBtu/d is equivalent to 1 Mcf/d assuming a natural gas heating value of 1,000 Btu per Mcf)

Calculation of Florida EnergySecure Line Daily Demand Charge (Nuclear Delay)

| Revenues Requirements* | | | | | | | | | | | |
|------------------------|------------------------|----------------------|------------------------|------------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|
| Option | Capital | AFUDC | Total Investment | PVRR | 2021 | 2022 | 2023 | 2024 | 2025 | 2026 | 2027 |
| 30" - 600 MMcf/d | \$1,475,000,000 | \$112,648,743 | \$1,587,648,743 | \$2,331,184,952 | \$ 219,638,646 | \$ 210,855,067 | \$ 202,075,471 | \$ 193,305,960 | \$ 184,528,763 | \$ 175,753,685 | \$ 166,987,977 |
| Expand to 800 MMcf/d | \$101,941,748 | \$7,798,109 | \$109,739,857 | \$102,272,178 | \$ 19,665,014 | \$ 18,893,206 | \$ 18,171,859 | \$ 17,496,152 | \$ 16,861,540 | \$ 16,255,844 | \$ 15,659,811 |
| Expand to 1 Bcf/d | \$73,786,408 | \$5,644,346 | \$79,430,754 | \$59,274,969 | \$ - | \$ - | \$ 14,963,382 | \$ 14,480,804 | \$ 13,927,432 | \$ 13,410,545 | \$ 12,926,550 |
| Expand to 1.25 Bcf/d | \$279,902,913 | \$21,411,381 | \$301,314,293 | \$164,320,734 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ 54,670,100 | \$ 52,798,798 |
| Total | \$1,930,631,068 | \$147,502,579 | \$2,078,133,647 | \$2,657,052,834 | \$239,303,660 | \$229,748,273 | \$235,210,713 | \$225,282,916 | \$215,317,735 | \$260,090,174 | \$248,373,136 |

* Revenue requirements include property taxes, property insurance and annual O&M costs.

| Gas Requirements Based on Long-term Resource Plan - Nuclear Delay Case | | | | | | | |
|--|-------------|-------------|-------------|-------------|-------------|-------------|-------------|
| | - | - | 87,500 | - | 87,500 | 262,500 | N/A |
| Mcf/d | 800,000 | 800,000 | 887,500 | 887,500 | 975,000 | 1,237,500 | 1,237,500 |
| Days | 365 | 365 | 365 | 366 | 365 | 365 | 365 |
| Annual Mcf | 292,000,000 | 292,000,000 | 323,937,500 | 324,825,000 | 355,875,000 | 451,687,500 | 451,687,500 |
| \$/Mcf/d (or \$/MMBtu/d) | \$ 0.8195 | \$ 0.7868 | \$ 0.7261 | \$ 0.6936 | \$ 0.6050 | \$ 0.5758 | \$ 0.5499 |
| Fuel Retention | 0.93% | 0.93% | 1.07% | 1.07% | 1.07% | 1.69% | 1.69% |

Abbreviations Used

- Mcf/d: Thousand cubic feet per day (1 Mcf/d is equivalent to 1 MMBtu/d assuming a natural gas heating value of 1,000 British thermal units (Btu) per Mcf)
- MMcf/d: Million cubic feet per day
- Bcf/d: Billion cubic feet per day
- MMBtu/d: Million British thermal units per day (1 MMBtu/d is equivalent to 1 Mcf/d assuming a natural gas heating value of 1,000 Btu per Mcf)

Calculation of Florida EnergySecure Line Daily Demand Charge (Nuclear Delay)

| Revenues Requirements* | | | | | | | | | | | |
|---|------------------------|----------------------|------------------------|------------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|--|
| Option | Capital | AFUDC | Total Investment | PVRR | 2028 | 2029 | 2030 | 2031 | 2032 | 2033 | |
| 30" - 600 MMcf/d | \$1,475,000,000 | \$112,648,743 | \$1,587,648,743 | \$2,331,184,952 | \$ 158,216,083 | \$ 150,639,751 | \$ 145,440,009 | \$ 141,415,780 | \$ 137,395,051 | \$ 133,352,995 | |
| Expand to 800 MMcf/d | \$101,941,748 | \$7,798,109 | \$109,739,857 | \$102,272,178 | \$ 15,063,466 | \$ 14,467,789 | \$ 13,872,609 | \$ 13,277,147 | \$ 12,682,255 | \$ 12,086,603 | |
| Expand to 1 Bcf/d | \$73,786,408 | \$5,644,346 | \$79,430,754 | \$59,274,969 | \$ 12,472,191 | \$ 12,039,016 | \$ 11,612,946 | \$ 11,186,576 | \$ 10,760,777 | \$ 10,334,655 | |
| Expand to 1.25 Bcf/d | \$279,902,913 | \$21,411,381 | \$301,314,293 | \$164,320,734 | \$ 50,657,197 | \$ 48,653,375 | \$ 46,773,605 | \$ 45,005,650 | \$ 43,316,762 | \$ 41,652,025 | |
| Total | \$1,930,631,068 | \$147,502,579 | \$2,078,133,647 | \$2,657,052,834 | \$236,408,936 | \$225,799,931 | \$217,699,168 | \$210,885,153 | \$204,154,846 | \$197,426,278 | |
| * Revenue requirements include property taxes, property insurance and annual O&M costs. | | | | | | | | | | | |
| Gas Requirements Based on Long-term Resource Plan - Nuclear Delay Case | | | | | N/A | N/A | N/A | N/A | N/A | N/A | |
| Mcf/d | | | | | 1,237,500 | 1,237,500 | 1,237,500 | 1,237,500 | 1,237,500 | 1,237,500 | |
| Days | | | | | 366 | 365 | 365 | 365 | 366 | 365 | |
| Annual Mcf | | | | | 452,925,000 | 451,687,500 | 451,687,500 | 451,687,500 | 452,925,000 | 451,687,500 | |
| \$/Mcf/d (or \$/MMBtu/d) | | | | | \$ 0.5220 | \$ 0.4999 | \$ 0.4820 | \$ 0.4669 | \$ 0.4507 | \$ 0.4371 | |
| Fuel Retention | | | | | 1.69% | 1.69% | 1.69% | 1.69% | 1.69% | 1.69% | |

Abbreviations Used

| | |
|---------|--|
| Mcf/d: | Thousand cubic feet per day (1 Mcf/d is equivalent to 1 MMBtu/d assuming a natural gas heating value of 1,000 British thermal units (Btu) per Mcf) |
| MMcf/d: | Million cubic feet per day |
| Bcf/d: | Billion cubic feet per day |
| MMBtu/d | Million British thermal units per day (1 MMBtu/d is equivalent to 1 Mcf/d assuming a natural gas heating value of 1,000 Btu per Mcf) |

Calculation of Florida EnergySecure Line Daily Demand Charge (Nuclear Delay)

| Revenues Requirements* | | | | | | | | | | |
|------------------------|------------------------|----------------------|------------------------|------------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|
| Option | Capital | AFUDC | Total Investment | PVRR | 2034 | 2035 | 2036 | 2037 | 2038 | 2039 |
| 30" - 600 MMcf/d | \$1,475,000,000 | \$112,648,743 | \$1,587,648,743 | \$2,331,184,952 | \$ 129,346,563 | \$ 125,344,295 | \$ 121,372,748 | \$ 117,365,763 | \$ 113,374,223 | \$ 109,386,378 |
| Expand to 800 MMcf/d | \$101,941,748 | \$7,798,109 | \$109,739,857 | \$102,272,178 | \$ 11,492,690 | \$ 10,981,242 | \$ 10,635,649 | \$ 10,370,743 | \$ 10,106,810 | \$ 9,843,351 |
| Expand to 1 Bcf/d | \$73,786,408 | \$5,644,346 | \$79,430,754 | \$59,274,969 | \$ 9,909,620 | \$ 9,485,169 | \$ 9,062,039 | \$ 8,638,479 | \$ 8,274,893 | \$ 8,030,472 |
| Expand to 1.25 Bcf/d | \$279,902,913 | \$21,411,381 | \$301,314,293 | \$164,320,734 | \$ 39,988,601 | \$ 38,325,876 | \$ 36,665,613 | \$ 35,003,505 | \$ 33,342,701 | \$ 31,682,463 |
| Total | \$1,930,631,068 | \$147,502,579 | \$2,078,133,647 | \$2,657,052,834 | \$190,737,474 | \$184,136,582 | \$177,738,050 | \$171,378,489 | \$165,098,628 | \$158,942,664 |

* Revenue requirements include property taxes, property insurance and annual O&M costs.

| Gas Requirements Based on Long-term Resource Plan - Nuclear Delay Case | | | | | | |
|--|------------------|------------------|------------------|------------------|------------------|------------------|
| | 2034 | 2035 | 2036 | 2037 | 2038 | 2039 |
| Mcf/d | 1,237,500 | 1,237,500 | 1,237,500 | 1,237,500 | 1,237,500 | 1,237,500 |
| Days | 365 | 365 | 366 | 365 | 365 | 365 |
| Annual Mcf | 451,687,500 | 451,687,500 | 452,925,000 | 451,687,500 | 451,687,500 | 451,687,500 |
| \$/Mcf/d (or \$/MMBtu/d) | \$ 0.4223 | \$ 0.4077 | \$ 0.3924 | \$ 0.3794 | \$ 0.3655 | \$ 0.3519 |
| Fuel Retention | 1.69% | 1.69% | 1.69% | 1.69% | 1.69% | 1.69% |

Abbreviations Used

- Mcf/d: Thousand cubic feet per day (1 Mcf/d is equivalent to 1 MMBtu/d assuming a natural gas heating value of 1,000 British thermal units (Btu) per Mcf)
- MMcf/d: Million cubic feet per day
- Bcf/d: Billion cubic feet per day
- MMBtu/d: Million British thermal units per day (1 MMBtu/d is equivalent to 1 Mcf/d assuming a natural gas heating value of 1,000 Btu per Mcf)

Calculation of Florida EnergySecure Line Daily Demand Charge (Nuclear Delay)

| Revenues Requirements* | | | | | | | | | | | | |
|------------------------|------------------------|----------------------|------------------------|------------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|--|
| Option | Capital | AFUDC | Total Investment | PVRR | 2040 | 2041 | 2042 | 2043 | 2044 | 2045 | 2046 | |
| 30" - 600 MMcf/d | \$1,475,000,000 | \$112,648,743 | \$1,587,648,743 | \$2,331,184,952 | \$ 105,402,308 | \$ 101,422,096 | \$ 97,445,825 | \$ 93,473,584 | \$ 89,505,459 | \$ 85,541,541 | \$ 82,320,588 | |
| Expand to 800 MMcf/d | \$101,941,748 | \$ 7,798,109 | \$109,739,857 | \$102,272,178 | \$ 9,580,374 | \$ 9,317,890 | \$ 9,055,909 | \$ 8,794,442 | \$ 8,533,500 | \$ 8,273,094 | \$ 8,013,234 | |
| Expand to 1 Bcf/d | \$73,786,408 | \$5,644,346 | \$79,430,754 | \$59,274,969 | \$ 7,845,767 | \$ 7,661,531 | \$ 7,477,774 | \$ 7,294,506 | \$ 7,111,736 | \$ 6,929,474 | \$ 6,747,733 | |
| Expand to 1.25 Bcf/d | \$279,902,913 | \$21,411,381 | \$301,314,293 | \$164,320,734 | \$ 30,022,805 | \$ 28,588,523 | \$ 27,605,178 | \$ 26,847,236 | \$ 26,089,924 | \$ 25,333,257 | \$ 24,577,250 | |
| Total | \$1,930,631,068 | \$147,502,579 | \$2,078,133,647 | \$2,657,052,834 | \$152,851,254 | \$146,990,040 | \$141,584,687 | \$136,409,767 | \$131,240,619 | \$126,077,366 | \$121,658,805 | |

* Revenue requirements include property taxes, property insurance and annual O&M costs.

| Gas Requirements Based on Long-term Resource Plan - Nuclear Delay Case | | | | | | | |
|--|------------------|------------------|------------------|------------------|------------------|------------------|------------------|
| | 2040 | 2041 | 2042 | 2043 | 2044 | 2045 | 2046 |
| Mcf/d | N/A |
| Days | 366 | 365 | 365 | 365 | 366 | 365 | 365 |
| Annual Mcf | 452,925,000 | 451,687,500 | 451,687,500 | 451,687,500 | 452,925,000 | 451,687,500 | 451,687,500 |
| \$/Mcf/d (or \$/MMBtu/d) | \$ 0.3375 | \$ 0.3254 | \$ 0.3135 | \$ 0.3020 | \$ 0.2898 | \$ 0.2791 | \$ 0.2693 |
| Fuel Retention | 1.69% | 1.69% | 1.69% | 1.69% | 1.69% | 1.69% | 1.69% |

Abbreviations Used

| | |
|---------|--|
| Mcf/d: | Thousand cubic feet per day (1 Mcf/d is equivalent to 1 MMBtu/d assuming a natural gas heating value of 1,000 British thermal units (Btu) per Mcf) |
| MMcf/d: | Million cubic feet per day |
| Bcf/d: | Billion cubic feet per day |
| MMBtu/d | Million British thermal units per day (1 MMBtu/d is equivalent to 1 Mcf/d assuming a natural gas heating value of 1,000 Btu per Mcf) |

Calculation of Florida EnergySecure Line Daily Demand Charge (Nuclear Delay)

| Revenues Requirements* | | | | | | | | | | | | |
|------------------------|------------------------|----------------------|------------------------|------------------------|----------------------|----------------------|----------------------|----------------------|---------------------|---------------------|---------------------|--|
| Option | Capital | AFUDC | Total Investment | PVRR | 2047 | 2048 | 2049 | 2050 | 2051 | 2052 | 2053 | |
| 30" - 600 MMcf/d | \$1,475,000,000 | \$112,648,743 | \$1,587,648,743 | \$2,331,184,952 | \$ 79,104,029 | \$ 75,891,961 | \$ 72,684,480 | \$ 69,481,689 | \$ 66,120,453 | \$ 62,760,842 | \$ 59,402,900 | |
| Expand to 800 MMcf/d | \$101,941,748 | \$7,798,109 | \$109,739,857 | \$102,272,178 | \$ 7,753,932 | \$ 7,495,200 | \$ 7,237,050 | \$ 6,979,494 | \$ 6,696,465 | \$ 6,463,601 | \$ 6,230,835 | |
| Expand to 1 Bcf/d | \$73,786,408 | \$5,644,346 | \$79,430,754 | \$59,274,969 | \$ 6,566,522 | \$ 6,385,851 | \$ 6,205,734 | \$ 6,026,180 | \$ 5,821,121 | \$ 5,616,128 | \$ 5,411,200 | |
| Expand to 1.25 Bcf/d | \$279,902,913 | \$21,411,381 | \$301,314,293 | \$164,320,734 | \$ 23,821,915 | \$ 23,067,268 | \$ 22,313,324 | \$ 21,560,099 | \$ 20,781,527 | \$ 20,003,182 | \$ 19,225,070 | |
| Total | \$1,930,631,068 | \$147,502,579 | \$2,078,133,647 | \$2,657,052,834 | \$117,246,398 | \$112,840,280 | \$108,440,588 | \$104,047,461 | \$99,419,566 | \$94,843,753 | \$90,270,005 | |

* Revenue requirements include property taxes, property insurance and annual O&M costs.

| Gas Requirements Based on Long-term Resource Plan - Nuclear Delay Case | | | | | | | | |
|--|-------------|-------------|-------------|-------------|-------------|-------------|-------------|--|
| | 2047 | 2048 | 2049 | 2050 | 2051 | 2052 | 2053 | |
| Mcf/d | N/A | |
| Days | 1,237,500 | 1,237,500 | 1,237,500 | 1,237,500 | 1,237,500 | 1,237,500 | 1,237,500 | |
| Annual Mcf | 365 | 366 | 365 | 365 | 365 | 366 | 365 | |
| | 451,687,500 | 452,925,000 | 451,687,500 | 451,687,500 | 451,687,500 | 452,925,000 | 451,687,500 | |
| \$/Mcf/d (or \$/MMBtu/d) | \$ 0.2596 | \$ 0.2491 | \$ 0.2401 | \$ 0.2304 | \$ 0.2201 | \$ 0.2094 | \$ 0.1999 | |
| Fuel Retention | 1.69% | 1.69% | 1.69% | 1.69% | 1.69% | 1.69% | 1.69% | |

Abbreviations Used

- Mcf/d: Thousand cubic feet per day (1 Mcf/d is equivalent to 1 MMBtu/d assuming a natural gas heating value of 1,000 British thermal units (Btu) per Mcf)
- MMcf/d: Million cubic feet per day
- Bcf/d: Billion cubic feet per day
- MMBtu/d: Million British thermal units per day (1 MMBtu/d is equivalent to 1 Mcf/d assuming a natural gas heating value of 1,000 Btu per Mcf)

Calculation of Florida EnergySecure Line Daily Demand Charge (Nuclear Delay)

| Revenues Requirements* | | | | | |
|------------------------|------------------------|----------------------|------------------------|------------------------|-------------------------|
| Option | Capital | AFUDC | Total Investment | PVRR | Total |
| 30" - 600 MMcf/d | \$1,475,000,000 | \$112,648,743 | \$1,587,648,743 | \$2,331,184,952 | \$ 5,879,476,153 |
| Expand to 800 MMcf/d | \$101,941,748 | \$7,798,109 | \$109,739,857 | \$102,272,178 | \$ 398,647,407 |
| Expand to 1 Bcf/d | \$73,786,408 | \$5,644,346 | \$79,430,754 | \$59,274,969 | \$ 284,616,803 |
| Expand to 1.25 Bcf/d | \$279,902,913 | \$21,411,381 | \$301,314,293 | \$164,320,734 | \$ 938,372,829 |
| Total | \$1,930,631,068 | \$147,502,579 | \$2,078,133,647 | \$2,657,052,834 | \$ 7,501,113,192 |

* Revenue requirements include property taxes, property insurance and annual O&M costs.

| Gas Requirements Based on Long-term Resource Plan - Nuclear Delay Case |
|--|
| Mcf/d |
| Days |
| Annual Mcf |
| |
| \$/Mcf/d (or \$/MMBtu/d) |
| Fuel Retention |

Abbreviations Used

Mcf/d: Thousand cubic feet per day (1 Mcf/d is equivalent to 1 MMBtu/d assuming a natural gas heating value of 1,000 British thermal units (Btu) per Mcf)
 MMcf/d: Million cubic feet per day
 Bcf/d: Billion cubic feet per day
 MMBtu/d: Million British thermal units per day (1 MMBtu/d is equivalent to 1 Mcf/d assuming a natural gas heating value of 1,000 Btu per Mcf)

LETTER OF INTENT

This Letter of Intent (the "Letter of Intent") is entered into as of April 2, 2009 (the "Effective Date") by and between [REDACTED] or "Transporter"), a [REDACTED] and Florida Power & Light Company, a Florida corporation ("FPL" or "Shipper"). Transporter and Shipper are jointly referred to as the "Parties" and individually as a "Party".

Shipper solicited competitive proposals from multiple parties pursuant to a Solicitation Letter dated July 17, 2008 (the "Solicitation Letter"), to provide Shipper firm transportation service from Transcontinental Gas Pipe Line Company LLC's ("Transco") compressor station No. 85 in Choctaw County, Alabama to a pipeline interconnection in Bradford County, Florida (hereafter referred to as the "Upstream Pipeline Project"). In response to the Solicitation Letter, Transporter proposed to construct, own, and operate the Upstream Pipeline Project and to provide to Shipper the firm transportation service detailed herein (the "FT Service").

Shipper proposes to construct, own, operate, and maintain a Hinshaw-exempt intrastate pipeline system (the "Florida EnergySecure Line") from an interconnection to be constructed with the pipeline facilities of Transporter in Bradford County, Florida (the "Interconnection") to terminate at or near the FPL Martin Energy Center power plant site. Shipper intends that the initial transportation capacity of the Florida EnergySecure Line would be approximately 600 million cubic feet per day with the ability to expand using additional compression up to approximately 1.2 billion cubic feet per day, which would be supplied entirely or substantially by the Upstream Pipeline Project. Shipper intends to use the Florida EnergySecure Line to transport natural gas required to operate its modernized electric generation facilities at the FPL Cape Canaveral Energy Center and the FPL Riviera Beach power plant sites (hereinafter referred to, individually, as the "Canaveral Modernization Project" and the "Riviera Modernization Project" and, jointly, as the "Modernization Projects"). The Canaveral Modernization Project is currently scheduled to go into service in the Summer of 2013, and the Riviera Modernization Project is scheduled to go into service in the Summer of 2014. The Upstream Pipeline Project will be the principal source of upstream supply for Shipper's Florida EnergySecure Line and the Modernization Projects. The Parties intend that the date (the "Commencement Date") for the commencement of the FT Service would be January 1, 2014, targeted to be coincident with Shipper's requirements.

The following lettered and numbered paragraphs set forth below reflect our current understanding of the matters described and in particular the intent of the Parties to seek the requisite approvals and agreed upon milestones for the construction of the Upstream Pipeline Project.

PART I

A. Transporter Approvals.

Transporter intends to obtain, from all governmental and regulatory authorities having jurisdiction over the Upstream Pipeline Project, including, but not limited to, the Federal Energy

Regulatory Commission (the "FERC"), the authorizations and/or exemptions (the "Transporter Approvals"), including, a certificate of public convenience and necessity related to the Upstream Pipeline Project (the "FERC Certificate") that Transporter determines are necessary for Transporter to construct, own, operate, and maintain the Upstream Pipeline Project facilities required to provide the FT Service for the Shipper. Transporter intends to pursue the Transporter Approvals in a timeframe to enable Transporter to complete the Upstream Pipeline Project and for Transporter to begin making deliveries pursuant to the FT Service on or before the Commencement Date.

Shipper intends to support and cooperate with Transporter to obtain all Transporter Approvals and exemptions and supplements and amendments thereto necessary for Transporter to construct, own, operate, and maintain the Upstream Pipeline Project and to provide the FT Service. Shipper also agrees to provide, in a timely manner, all necessary information that may be requested by any governmental and regulatory authorities in connection with the Transporter Approvals.

B. FPL Plant and Pipeline Approvals.

Shipper intends, (i) to obtain from all governmental and regulatory authorities having jurisdiction over the proposed modernization of the Cape Canaveral Plant and Riviera Plant, including, but not limited to, the State of Florida Power Plant Siting Board, all necessary approvals for Shipper to construct, own, operate, and maintain the new generation units at the Cape Canaveral and Riviera Plants (the "FPL Plant Approvals") and (ii) to obtain from all governmental and regulatory authorities having jurisdiction over the proposed Florida EnergySecure Line, including, but not limited to, the Florida Public Service Commission (the "FPSC") and the State of Florida Natural Pipeline Siting Board, all necessary approvals for Shipper to construct, own, operate and maintain the Florida EnergySecure Line (the "Florida EnergySecure Line Approvals", the FPL Plant Approvals and the Florida EnergySecure Line Approvals jointly, the "FPL Approvals").

Shipper intends to pursue the FPL Approvals in a timeframe to enable Shipper to complete the new generation units at the Cape Canaveral and Riviera Plants and to complete the Florida EnergySecure Line and for Shipper to begin taking deliveries pursuant to the FT Service on or before the Commencement Date. Shipper agrees to provide periodic reports and/or have periodic meetings to update Transporter, (i) regarding the status of the FPL Approvals, (ii) of Shipper's planned community and public relations activities related to the Cape Canaveral and Riviera Plants and the Florida EnergySecure Line, and (iii) regarding the status of the modernization of the Cape Canaveral and Riviera Plants and construction of the Florida EnergySecure Line.

Transporter agrees not to oppose the efforts of Shipper and will reasonably cooperate with Shipper by providing all necessary information that Shipper reasonably requests regarding the Upstream Pipeline Project in relation to Shipper's efforts to obtain the necessary approvals for Shipper to construct, own, operate, and maintain the Florida EnergySecure Line.

C. Service Agreement.

The Parties intend to enter into a Service Agreement (hereinafter defined) to effectuate the transportation service to be provided by Transporter on the Upstream Pipeline Project. To this end, the Shipper and Transporter intend to execute, within thirty (30) days of acceptance by Transporter of a FERC Certificate without material modification, a firm transportation service agreement under Transporter's Rate Schedule FT (the "Service Agreement"). The Service Agreement will specify a maximum daily quantity of 600,000 MMBtu and a primary term of twenty (20) years. The transportation rate applicable under the Service Agreement will reflect the rate structure and other terms and conditions proposed by Transporter in response to Shipper's Solicitation Letter, and subsequent discussions between the Parties.

PART II

ARTICLE 1. GOOD FAITH NEGOTIATIONS

Section 1.1 Good Faith Negotiations. Subject to the conditions set forth in this Letter of Intent, Transporter and Shipper agree in good faith to attempt to execute and deliver an agreement (the "Precedent Agreement") no later than October 1, 2009, providing binding terms and conditions in advance of the Transporter filing its FERC Certificate Application. During the period of such good faith negotiations with Transporter, Shipper and its affiliates shall not engage in any negotiations or discussions or enter into any contracts or agreements with any other entity to provide upstream transportation service to the Florida EnergySecure Line.

ARTICLE 2. TERMINATION

Section 2.1 This Letter of Intent shall terminate on the earlier of (i) the date of execution of the Precedent Agreement or (ii) upon written notice by either Party to the other Party if the Parties have not executed the Precedent Agreement prior to October 1, 2009, and be of no further force and effect.

Section 2.2 Upon the termination of this Letter of Intent, the Parties shall have no further obligation hereunder, other than for any breach of the binding provisions of Section 1.1 of Article 1 of Part II and Article 7 of this Letter of Intent.

ARTICLE 3. EFFECT OF THIS LETTER OF INTENT

Section 3.1 Other than the provisions of Section 1.1 of Article 1 of Part II and Article 7 hereof, this Letter of Intent:

- (a) does not constitute a legally binding agreement;
- (b) does not constitute an offer open for acceptance;
- (c) does not contain all of the material terms of the Precedent Agreement; and

(d) shall not constitute the basis for an agreement by estoppel or otherwise.

Rather, the Parties hereby agree that this Letter of Intent is intended as a statement of the Parties' good faith, mutual intent and understanding as of the date hereof to proceed with the negotiation of the terms of the Precedent Agreement.

ARTICLE 4. LIMITATION ON LIABILITY.

Section 4.1 IN NO EVENT SHALL EITHER PARTY BE LIABLE TO THE OTHER PARTY OR ITS REPRESENTATIVES FOR ANY SPECIAL, INDIRECT, NON-COMPENSATORY, CONSEQUENTIAL, INCIDENTAL, PUNITIVE OR EXEMPLARY DAMAGES OF ANY TYPE, INCLUDING LOST PROFITS, LOSS OF BUSINESS OPPORTUNITY OR BUSINESS INTERRUPTIONS WHETHER ARISING IN CONTRACT OR TORT (INCLUDING NEGLIGENCE, WHETHER SOLE, JOINT OR CONCURRENT OR STRICT LIABILITY) OR OTHERWISE, ARISING OUT OF THIS LETTER OF INTENT (COLLECTIVELY, "CONSEQUENTIAL DAMAGES").

Section 4.2 TO THE EXTENT PERMITTED BY LAW, EACH PARTY SHALL DEFEND, PROTECT, INDEMNIFY, AND HOLD HARMLESS ("INDEMNIFYING PARTY"), EACH OTHER PARTY AND ITS AFFILIATES (THE "INDEMNIFIED PARTIES"), FROM AND AGAINST ANY AND ALL CLAIMS MADE BY EACH INDEMNIFYING PARTY OR ITS AFFILIATES AGAINST SUCH INDEMNIFIED PARTIES FOR ANY CONSEQUENTIAL DAMAGES.

ARTICLE 5. NO THIRD-PARTY BENEFICIARIES

Section 5.1 This Letter of Intent is intended for the benefit of the Parties hereto and is not intended to and does not confer any benefit on third parties.

ARTICLE 6. CHOICE OF LAW AND JURISDICTION

Section 6.1 THIS AGREEMENT SHALL BE INTERPRETED IN ACCORDANCE WITH THE LAWS OF THE STATE OF NEW YORK, EXCLUDING ANY CONFLICT OF LAW RULES THAT MAY REQUIRE THE APPLICATION OF THE LAWS OF ANOTHER JURISDICTION. EACH PARTY IRREVOCABLY SUBMITS TO THE EXCLUSIVE JURISDICTION OF THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK LOCATED IN THE BOROUGH OF MANHATTAN, NEW YORK, OR, IF SUCH COURT DECLINES TO EXERCISE OR DOES NOT HAVE JURISDICTION, IN ANY NEW YORK STATE COURT IN THE BOROUGH OF MANHATTAN, AND TO SERVICE OF PROCESS BY CERTIFIED MAIL. IN ADDITION, EACH PARTY IRREVOCABLY WAIVES ANY OBJECTION WHICH IT MAY HAVE AT ANY TIME TO THE LAYING OF VENUE FOR ANY SUCH SUIT, ACTION OR PROCEEDING RELATING TO THIS PRECEDENT AGREEMENT, WAIVES ANY CLAIM THAT SUCH SUIT, ACTION OR PROCEEDING RELATING TO THIS PRECEDENT AGREEMENT HAS BEEN BROUGHT IN AN INCONVENIENT FORUM, AND FURTHER WAIVES THE RIGHT TO OBJECT, WITH RESPECT TO SUCH SUIT, ACTION OR

PROCEEDING RELATING TO THIS PRECEDENT AGREEMENT, THAT SUCH COURT DOES NOT HAVE JURISDICTION OVER IT.

Section 6.2 IN ANY LITIGATION ARISING FROM OR RELATED TO THIS LETTER OF INTENT, THE PARTIES HERETO EACH HEREBY KNOWINGLY, VOLUNTARILY AND INTENTIONALLY WAIVE THE RIGHT EACH MAY HAVE TO A TRIAL BY JURY WITH RESPECT TO ANY LITIGATION BASED HEREON, OR ARISING OUT OF, UNDER OR IN CONNECTION WITH THIS LETTER OR INTENT, OR ANY COURSE OF CONDUCT, COURSE OF DEALING, STATEMENTS (WHETHER ORAL OR WRITTEN) OR ACTIONS OF EITHER PARTY TO THIS LETTER OF INTENT. THIS PROVISION IS A MATERIAL INDUCEMENT FOR THE PARTIES TO ENTER INTO THIS LETTER OF INTENT.

ARTICLE 7. CONFIDENTIALITY

Section 7.1 The terms and conditions of Transporter's response to Shipper's Solicitation Letter (the "Confidential Information") are confidential and proprietary and shall not be disclosed to any third parties; provided, that Shipper may disclose such portion of the Confidential Information that is necessary to seek and obtain the FPL Approvals to the extent that Shipper takes all reasonable steps to obtain protective orders, reasonable assurances that confidential treatment will be accorded the Confidential Information, or otherwise prevent the public disclosure of the Confidential Information. In accordance with applicable law, Shipper shall promptly notify Transporter of any requests or demands for the Confidential Information from the applicable governmental agency with jurisdiction over the FPL Approvals and will cooperate reasonably with Transporter in seeking to obtain such protective measures for the Confidential Information.

Section 7.2 Subject to securities laws and applicable stock exchange requirements, no Party shall issue any press release or make a public statement or disclosure concerning the transactions contemplated by this Letter of Intent without the prior written consent of the other Party as to the form and the manner of presentation and publication thereof.

ARTICLE 8. COUNTERPARTS

This Letter of Intent may be executed in counterparts, each of which shall have the effect of and be considered as an original of this Letter of Intent.

IN WITNESS WHEREOF, the Parties have caused this Letter of Intent to be executed by their duly authorized representatives on the first date written above.

By: _____
Name: _____
Title: _____

Florida Power & Light Company
By: 
Name: Sam Forrest
Title: Vice President - Energy Marketing & Trading

LEGAL
8/1/09
NCB