

**Ruth Nettles**

080407-EG

**From:** Cano, Jessica [Jessica.Cano@fpl.com]  
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**Subject:** Electronic Filing / Docket No. 080407-EG, et. al.  
**Attachments:** FPL's Supplement to Prehearing Statement.doc; FPL's Supplement to Prehearing Statement.pdf

**Electronic Filing**

a. Person responsible for this electronic filing:

Jessica A. Cano, Esq.  
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b. Docket No. 080407-EG, et al.

In re: Commission review of numeric conservation goals (Florida Power & Light Company, et al.).

c. The documents are being filed on behalf of Florida Power & Light Company.

d. There are a total of seven (7) pages.

e. The document attached for electronic filing is: Florida Power & Light Company's Supplement to Prehearing Statement

Sincerely,

Jessica A. Cano  
 Attorney

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DOCUMENT NUMBER-DATE  
 7868 JUL 31 8  
 FPSC-COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Commission review of numeric conservation goals (Florida Power & Light Company)	Docket No. 080407-EG
In re: Commission review of numeric Conservation goals (Progress Energy Florida, Inc.)	Docket No. 080408-EG
In re: Commission review of numeric conservation goals (Tampa Electric Company)	Docket No. 080409-EG
In re: Commission review of numeric Conservation goals (Gulf Power Company)	Docket No. 080410-EG
In re: Commission review of numeric conservation goals (Florida Public Utilities Company)	Docket No. 080411-EG
In re: Commission review of numeric conservation goals (Orlando Utilities Commission)	Docket No. 080412-EG
In re: Commission review of numeric conservation goals (JEA)	Docket No. 080413-EG
	Filed: July 31, 2009

**FLORIDA POWER & LIGHT COMPANY'S  
SUPPLEMENT TO PREHEARING STATEMENT**

Florida Power & Light Company ("FPL" or the "Company"), pursuant to Order No. PSC-08-0816-PCO-EI as revised, filed its Prehearing Statement in the above consolidated dockets on July 27, 2009. Rebuttal testimony and exhibits were subsequently filed. Accordingly, FPL hereby supplements its Prehearing Statement with the following information:

DOCUMENT NUMBER-DATE  
07868 JUL 31 09  
FPSC-COMMISSION CLERK

I. FPL WITNESSES

B. Rebuttal Testimony

Witness	Subject Matter	Issues
Mike Rufo Managing Director, Itron, Inc. (on behalf of the Collaborative)	Responds to assertions made by NRDC/SACE and GDS regarding the technical potential and achievable potential analyses, explains the flaws and errors in those assertions, and supports the technical potential and achievable potential analyses performed in this docket.	1, 2
Eric Silagy Vice President and Chief Development Officer	Addresses the fact that the proposals made by GDS and NRDC/SACE are a radical departure from the Commission's well-reasoned and thoughtful practices and are analytically baseless, while in contrast, FPL's goals are based on utility resource planning and fully comply with the DSM Goals Rule, FEECA and many years of well established FPSC and Florida Supreme Court precedent.	8, 9
John R. Haney Director, Demand Side Management	Demonstrates GDS's inaccuracies and the lack of merit in its critique of the technical potential Study, the two-year payback criterion, FPL's program performance and DSM achievements, and the FEECA requirements. Rebutts GDS's unsupported and analytically unsound goals recommendations. Responds to NRDC/SACE's repudiation of decisions they made as part of the Collaborative, criticism of including program costs in analysis, misunderstanding of DSM program initiatives, and misunderstanding of load control program benefits.	1, 2, 8, 9, 10, 15
Steven R. Sim Senior Manager, Integrated Resource Planning	Invalidates GDS's extreme and unsupported goals recommendations, responds to the misleading statements regarding the RIM Test and presents errors made in its analyses. Discusses how the NRDC/SACE objectives statement causes bias in their recommendations and how their recommendations fail to consider resource planning. Describes the problems with the TRC Test, highlights the errors made by NRDC/SACE witnesses and	2, 3, 4, 5, 7, 8, 9, 15

	discusses issues with NRDC/SACE's "economic analysis."	
James W. Dean Principal and Owner, Weldon-Dean Associates (on behalf of FPL, Progress Energy Florida, Gulf Power Company, and Tampa Electric Company)	Responds to the extreme goals proposed by GDS, disputes NRDC/SACE's criticism of the Collaborative's goal setting methodology, discusses how the self-acknowledged narrow interest of NRDC and SACE of reducing greenhouse gas emissions causes them to disregard the DSM Goals Rule and FEECA statute, rebuts NRDC/SACE's testimony that the new language in the Florida Statutes has superimposed a new Total Resource Cost ("TRC") standard, and responds to criticism of the use of the two year payback criterion.	3, 4, 7, 15

## II. EXHIBITS

### B. Rebuttal Exhibits

Exhibits	Witness	Sponsor	Description
MR-12	Mike Rufo	FPL	Progress Energy Florida's Responses to Staff's Third Set of Interrogatories (questions 12, 13, 14, 16, and 18)
MR-13	Mike Rufo	FPL	Email Exchanges with GDS
MR-14	Mike Rufo	FPL	Florida Power & Light's Response to Staff's Fifth Set of Interrogatories (question 20)
MR-15	Mike Rufo	FPL	GDS Agenda for Staff's First Request for Production of Documents to Itron
MR-16	Mike Rufo	FPL	Florida Public Utilities Company's Response to Staff's Sixth Set of Interrogatories (questions 20 and 21)
MR-17	Mike Rufo	FPL	Table Documenting Calculation Error in Exhibit RFS-9
MR-18	Mike Rufo	FPL	JEA's Response to NRDC/SACE's Second Request for Production of Documents (questions 5, 6, and 7)
MR-19	Mike Rufo	FPL	Itron's Response to NRDC/SACE's First Set of Interrogatories (question 2)
MR-20	Mike Rufo	FPL	JEA's Responses to NRDC/SACE's First Request for Production of

			Documents (questions 1 and 2)
MR-21	Mike Rufo	FPL	Progress Energy Florida's Response to NRDC/SACE's First Set of Interrogatories (question 5)
MR-22	Mike Rufo	FPL	Florida Power & Light's Response to NRDC/SACE's Second Set of Interrogatories (question 26)
MR-23	Mike Rufo	FPL	Orlando Utilities Commission's Response to Staff's Seventh Set of Interrogatories (question 43)
MR-24	Mike Rufo	FPL	Table of weighted-average measure penetration rate calculations
JRH-19	John R. Haney	FPL	FPL's Responses to Staff's Third Set of Interrogatories, Nos. 13 and 14
SRS-13	Steven R. Sim	FPL	Comparison of Projected CO <sub>2</sub> Allowance Costs: FPL and Congressional Budget Office (CBO) Projections
SRS-14	Steven R. Sim	FPL	Screening Curve Results for a 2019 CC Unit: With No System Impacts (2009\$)
SRS-15	Steven R. Sim	FPL	Screening Curve Results for a 2019 CC Unit: With Only Two System Impacts (2009\$)
JWD-2	James W. Dean	FPL	Rate Impacts of GDS Proposal
JWD-3	James W. Dean	FPL	Tax Impacts of GDS Proposal
JWD-4	James W. Dean	FPL	Comparison of FPL's Systems and Planning Methodologies

Respectfully submitted this 31st day of July, 2009.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished electronically and by U.S. mail this 31st day of July, 2009, to the following:

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