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Sent: Monday, November 16, 2009 4:29 PM
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Cc: McNeill, Shayla L Capt USAF AFLOA JACL-ULT/AFCESA/CENL
Subject: FEA Statement of Position in Docket 080677

Attachments: FEA Statement of Position in Docket 080677.pdf



FEA Statement
of Position in D..

1. Captain Shayla L. McNeill, 139 Barnes Ave, Suite 1, Tyndall AFB, FL 32403 is the person responsible for this electronic filing;
2. The filing is to be made in Docket 080677, In re: petition for increase in rates by Florida Power & Light Company;
3. The filing is made on behalf of the Federal Executive Agencies (FEA);
4. The total number of pages is 5; and
5. The attached document is The FEA' Statement of Position in docket 080677

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DOCUMENT NUMBER DATE

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FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

* * * * *

In Re: Petition for increase in rates by) DOCKET NO.: 080677
Florida Power & Light Company) FILED: November 16, 2009

FEDERAL EXECUTIVE AGENCIES' STATEMENT OF POSITION

COMES NOW Federal Executive Agencies (FEA), by and through their attorney Captain Shayla L. McNeill, argues the following statement of position in the aforementioned docket.

The FEA consist of certain agencies of the United States Government which have offices, facilities, and/or installations in the service area of the utility, Florida Power & Light (FPL), which has filed for recovery of costs in this docket. The Department of Defense has been delegated authority by the General Services Administration to represent, through Department of the Air Force counsel, the consumer interest of the FEA in this proceeding under 40 U.S.C.A. 481(a)(4) and 486(d).

Chief among these Federal customers in this case, in terms of customer load, are Patrick Air Force Base, Cape Canaveral, and Kennedy Space Center, which are all served by FPL. Electricity costs represent one of the largest variable expenses of operating the Federal offices, facilities, and installations on whose behalf intervention was sought because of the significant impact that may occur by actions taken in this Docket.

The FEA recommends that the Commission continue to follow the longstanding rate principle of limiting the base rate increase of any customer class to no more than 1.5 times (1.5x) the system average increase. Both the Florida Industrial Power User Group (FIPUG) through their consultant, Jeff Polluck, and the South Florida Hospitals and Healthcare Association

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(SFHHA) through their consultant, Steve Barron, also recommend that that Commission continue to follow this longstanding rate principle.

Although FPL witness, Renae Deaton, recommends ignoring the longstanding rate principle and moving most major classes to what she calls "parity" in order to spread the proposed base rate increase such that FPL earns the same rate of return from each customer class. The FEA strongly disagrees with the distribution of FPL's proposed rate increase among customer classes. The FEA recommends that the Commission continue to limit the base increase of any customer class to no more than 1.5x the system average increase.

The counsel filing this petition is a duly authorized representative of the FEA in FPL's service area. The name, address, telephone number, and other relevant information pertaining to FEA counsel of record for purposes of service and correspondence during the course of this proceeding is listed below.

Respectfully submitted this 16th day of November, 2009.



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CERTIFICATE OF SERVICE

Docket No. 080677

I HEREBY CERTIFY that a true and correct copy of the foregoing Statement of Position has been furnished by electronic mail (e-mail) this 16th day of November, 2009, to the following:

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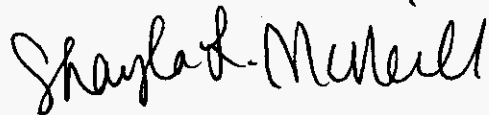
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