BEFORE THE FLORIDA
PUBLIC SERVICE COMMISSION

DOCKET NO. 120015-EI
FLORIDA POWER & LIGHT COMPANY

IN RE: PETITION FOR RATE INCREASE BY
FLORIDA POWER & LIGHT COMPANY

COM 5
APA 1
ECR 10
GCL 1
RAD 1
SRC 1
ADM
OPC
CLK 1
Crt Rep 1

TESTIMONY & EXHIBITS OF:

MANUEL B. MIRANDA

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

FLORIDA POWER & LIGHT COMPANY

DIRECT TESTIMONY OF MANUEL B. MIRANDA

DOCKET NO. 120015-EI

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I. INTRODUCTION

Q. Please state your name and business address.

A. My name is Manuel B. Miranda. My business address is Florida Power & Light Company, 700 Universe Boulevard, Juno Beach, Florida 33408.

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

A. I am employed by Florida Power & Light Company ("FPL" or the "Company") as Vice President of Transmission and Substation.

Q. Please describe your duties and responsibilities in that position.

A. I am responsible for FPL's bulk and regional transmission planning, operations, maintenance, engineering and construction activities, including ensuring the reliability and security of the FPL transmission and substation facilities in a safe and effective manner, consistent with the applicable reliability standards.

Q. Please describe your educational background and professional experience.

A. I joined FPL in 1982 and have served in a variety of positions within Customer Service, Distribution and Transmission. These positions include engineering, dispatch operations, commercial and industrial manager, Director of Distribution Operations and Vice President of Distribution System Performance, responsible for FPL's Storm Secure initiative to substantially strengthen the distribution infrastructure against future hurricanes. My current position is Vice President of Transmission & Substation.

I have a Bachelor of Science in Mechanical Engineering from the University of Miami and a Master's in Business Administration from Nova Southeastern University.

Q. Are you sponsoring any exhibits in this case?

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

- MM-1, Summary of Sponsored MFRs
- MM-2, 2011 SGS Statistical Services ("SGS") Transmission Reliability Benchmarking Study All Voltages 2008-2010 (3 years)

Q. Are you sponsoring or co-sponsoring any Minimum Filing Requirements ("MFRs") filed in this case?

A. Yes. Exhibit MM-1 shows my co-sponsorship of MFRs.

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to: (1) describe the solid track record of the Transmission and Substation Business Unit ("Transmission"), based on system performance and reliability, including the programs that help to provide FPL customers with a high level of reliable service in a cost-effective manner; (2) address the initiatives that improve the storm resiliency of the transmission system's infrastructure; (3) explain the ongoing need for capital investments required to maintain FPL's high level of reliability for customers; (4) describe how Transmission effectively manages Operations & Maintenance ("O&M") expenses for the 2013 test period compared to the Commission Benchmark; and

(5) discuss FPL's efforts to meet its commitments to customers and to ensure compliance with all applicable regulatory and reliability standards.

Q. Please summarize your testimony.

A. Transmission provides a high level of reliable service through a proactive approach to reliability. Transmission has consistently provided customers with a superior level of reliable service in a cost-effective manner. The requested base rate increase will permit FPL to maintain this level of reliability for customers while promoting compliance with all applicable regulatory commitments.

In a 2011 industry transmission reliability benchmarking study conducted by SGS Statistical Services ("SGS"), FPL's System Average Interruption Duration Index ("SAIDI") for 2010 data and for aggregate data from 2008 through 2010 was in the top 10% of survey participants. In 2010, FPL's Transmission SAIDI was 3.99, improving in 2011 to a SAIDI of 3.17 (21% improvement from 2010). During the five years ending with 2010, Transmission had the best average Transmission SAIDI of the Florida investor-owned utilities. This overall performance is a direct result of the commitment of FPL's management and employees to providing superior reliability and service at a reasonable cost.

The foundation of Transmission's reliability program is condition-based maintenance which is used to evaluate equipment and determine remaining useful life. Combining equipment assessment with a comprehensive risk management approach leads to the development of an appropriate, cost-effective plan to extend

the life of FPL's transmission and substation assets and replace those assets only when appropriate. An important part of this process involves the Company's use of both FPL and industry experience to focus on predictive maintenance and prevention of recurrence of events to reduce the frequency and duration of customer outages.

Notwithstanding these programs, Transmission will require funding to maintain the level of system stability and service reliability that customers expect. The required capital expenditures are driven by the need for transmission infrastructure improvements, storm hardening efforts, and regulatory commitments. While FPL must continue to refurbish or replace aging facilities, the Company also must invest in transmission system expansion projects and added capacity where technology improvements and equipment upgrades already have maximized the efficiency of the existing infrastructure. Given current capacity limitations and FPL's assessment of its system, the Company has developed a sound plan to replace infrastructure and add new capacity through projects that I will describe later in my testimony. FPL must responsibly move forward with this work to maintain a safe and reliable system for the benefit of its current and future customers.

II. RELIABILITY

Q. Please describe the FPL transmission and substation system.

A. As of January 1, 2012, the FPL transmission and substation system was comprised of 6,721 circuit miles of transmission lines operating at voltages from 69 kiloVolt ("kV") to 500 kV, 518 distribution substations and 98 transmission substations. The FPL transmission system is designed to integrate all of FPL's generation resources in a reliable and cost-effective manner to serve FPL's customers. FPL is required to plan, design, construct, operate and maintain its transmission and substation system to meet all applicable reliability standards.

Q. How is Transmission's reliability performance measured, and how does FPL compare to other electric utilities?

A. To evaluate reliability performance, FPL uses standard industry measures for frequency and duration of outages such as SAIDI. These standard industry measurements provide a comprehensive and useful indication of the level of reliability FPL provides to its customers.

In a 2011 industry transmission reliability benchmarking study conducted by SGS, FPL's SAIDI for 2010 data and for aggregate data from 2008 through 2010 was in the top 10% of survey participants. In 2010, FPL's Transmission SAIDI was 3.99, improving in 2011 to a SAIDI of 3.17 (21% improvement from 2010). During the five years ending with 2010, Transmission had the best average Transmission SAIDI of the Florida investor-owned utilities. This overall

performance is a direct result of the commitment of FPL's management and employees to providing superior reliability and service at a reasonable cost.

Q. Please describe Transmission's reliability programs.

A. Transmission reliability programs are Facility/System Assessments, Targeted Maintenance, Prevention through Prediction, Prevention of Recurrence, Vegetation Management, and Smart Grid Technology. These programs utilize diagnostic tools to assess equipment and facility conditions. The information obtained from these assessments is used to develop a plan for maintenance and replacement. Resulting processes and initiatives are executed in a cost-effective manner that maintains grid reliability and reduces the frequency and duration a customer is without electricity due to transmission and substation events. The two main processes used to execute these programs are the Condition Assessment Process and Event Response Process.

The Condition Assessment Process has three main components that involve transmission line and substation assessments, remaining useful life determination for assets, and risk management. The second key process, Event Response Process, is designed to determine the root cause for every unplanned outage of transmission and substation equipment. Each event is recorded, classified and analyzed. The results of each outage cause analysis are then used in the Condition Assessment Process and incorporated into the design and engineering of future facilities. This approach supports prevention of recurrence and mitigation of future events, together with a resulting reduction in the frequency

and duration of customer outages. These two processes support Transmission's reliability programs.

Q. Please provide some examples of Transmission's reliability programs and explain how these programs benefit FPL's customers.

A. The following are some examples of Transmission's reliability programs:

- **Facility/System Assessments** – Transmission line and substation assessments are conducted using equipment diagnostics and both on-site and remote system surveillance. The assessments include oil sampling and testing, equipment and protective system testing, thermal imaging of components, and climbing inspections and station assessments, all of which provide information used to prevent or predict equipment or facility failures. Part of system surveillance is accomplished through equipment performance monitoring and diagnostics, consistent with Smart Grid initiatives, using remote monitoring tools and analysis programs which are deployed in the Transmission and Performance Diagnostic Center ("TPDC").

- **Targeted Maintenance** – Information obtained during condition assessment is evaluated using predictive models. A plan is then developed to replace or conduct targeted maintenance on major equipment and facilities. Targeted maintenance for equipment and facilities extends the useful life of the equipment while minimizing cost and significantly deferring the need for substantial investment in new equipment and capital projects.

- **Prevention through Prediction** – By combining remaining useful life determination with risk assessment of the transmission system, a plan is developed to replace major equipment and facilities in a predictive manner. Predictive replacements minimize customer impact and cost while maximizing asset utilization. When predictive replacements are made, customers benefit from FPL's use of technological advances and design improvements. These improvements reduce the likelihood of interruptions and mitigate the effects on customers when interruptions do occur.

- **Prevention of Recurrence** – Through the use of the Event Response Process described above, Transmission develops countermeasures to prevent the recurrence of similar events that could cause outages.

- **Smart Grid Technology** – FPL is incorporating intelligent technology into the substation systems to improve reliability and to better anticipate and respond to system disturbances. For example, Distribution Substation Transformer Relay Scheme upgrades will utilize microprocessor–based systems to gather power system data, assess equipment operating conditions and enable the use of auto-restoration and self-healing systems. In addition to improvements in reliability, the project aims to increase the situational awareness of grid operations and optimize asset utilization.

- **Vegetation Management** – The growth of vegetation into overhead power lines represents a major challenge to electric utilities. This is particularly true in much of Florida with the year-round growing season. Transmission's Vegetation Management Program involves trimming and right-of-way clearance and has two main focuses: System Stability and Customer Impact Reliability. From the perspective of System Stability, this work focuses on preserving right-of-way requirements for higher voltage transmission lines (500 kV and 230 kV) that can affect the entire system. The Customer Impact Reliability work includes condition assessments of the lower voltage transmission lines, in order to determine appropriate maintenance trimming requirements.

In summary, FPL's reliability initiatives significantly contribute to the prevention and minimization of outages and customer inconvenience, while at the same time extending the life of equipment and infrastructure in an appropriate and cost-effective manner.

Q. How has FPL used technology to improve the monitoring and control of its transmission system?

A. FPL is implementing the following initiatives to improve the overall reliability of the transmission system:

- **FPL System Control Center** – The FPL System Control Center ("SCC") is a state-of-the-art facility that plays a key role in the efficient operation of FPL's

transmission and substation systems. The quality and availability of tools and information on the status of FPL's system are hallmarks of FPL's SCC. Coordination among FPL and the other members of the Florida Reliability Coordinating Council to improve system management demonstrates FPL's continuous commitment to the reliable operation of the electric system.

FPL operates its transmission system in full compliance with all applicable standards. The North American Electric Reliability Corporation ("NERC") Critical Infrastructure Protection ("CIP") standards provide a cyber security framework for the identification and protection of critical cyber assets to support the reliable operation of the Bulk Electric System ("BES"). The CIP standards include controlling and monitoring both physical and electronic access to the related cyber asset in support of the SCC. The CIP standards also require procedures for securing these cyber assets and training programs to instruct operations employees on expectations. Transmission has implemented cyber security measures to fully comply with the NERC CIP standards.

- **Transmission and Performance Diagnostic Center** – Another example of a major transmission reliability initiative is the creation of the TPDC. The TPDC is a center for monitoring the critical operating parameters of transmission equipment and performing analyses. Current and near-future assessment methods provide early prediction of asset failures by monitoring

and using real-time statistical analysis of equipment performance to identify abnormal conditions. Through the use of dashboards and other informational displays, the health of transmission and substation equipment is continuously monitored. The TPDC also provides analyses of system events and acts as a transmission and substation support team.

The TPDC enhances FPL's predictive capabilities by providing remote analysis of transmission and substation asset performance. The actual performance of equipment is compared to various equipment technical operating parameters to determine the present condition of installed equipment. Deviations from the technical operating parameters of the equipment can then be further assessed and investigated to minimize impacts on the system.

The TPDC also coordinates with the SCC and Distribution Dispatch to respond with analyses of system events. TPDC personnel gather relay targets, sequence of events from the Supervisory Control and Data Acquisition system and other pertinent forensic information immediately following an outage, all while the first responder is still in route to the site of the event. Armed with this information upon arrival, first responders are able to perform the restoration more quickly than in the past. In fact, for feeder breaker failures, the contributions from TPDC have resulted in an improvement in restoration times.

III. INFRASTRUCTURE IMPROVEMENTS – STORM RESILIENCY

Q. Please provide an update on efforts to improve the strength and resiliency of FPL transmission infrastructure in the event of a major storm.

A. In April of 2006, the Florida Public Service Commission issued Order No. PSC-06-0351-PAA-EI, requiring investor-owned electric utilities to file plans for ten (10) ongoing storm preparedness initiatives. As a result of initiative four (4) in this order, FPL accelerated two (2) programs for strengthening and improving resiliency of existing transmission structures in the event of a major storm. These programs are described as follows:

- **Replacement of Wood Transmission Structures:** FPL has implemented plans to replace all wood transmission structures throughout its service territory. New structures are made from engineered materials (such as concrete or steel). FPL transmission line structural designs are governed by Florida Statute Section 366.04. Under this Statute, all high voltage transmission structures must satisfy the requirements as specified by the National Electrical Safety Code ("NESC", an American National Standard Institute ("ANSI") publication, C 2). The ANSI C 2 document addresses extreme wind load criteria (Rule 250 C) which covers all wind sensitive factors and wind related effects that need to be considered in the design calculations. Between January 1, 2006 and December 31, 2011, the number of wood transmission structures at FPL decreased from 26,147 to 15,542.

FPL has committed to replace all wood structures. As of December 31, 2011, over 75% of the transmission structures at FPL are made from either concrete or steel.

- **Replacement of Ceramic Post Insulators on Concrete Structures**: FPL is also replacing ceramic post insulators on concrete structures. New insulators are made from polymer materials, meet current design standards, and minimize cascading type events. Between January 1, 2006 and December 31, 2011, the number of concrete transmission structures with ceramic post insulators at FPL decreased from 5,562 to 2,139. As of December, 31 2011, less than 4% of FPL's transmission structures are concrete with ceramic post insulators.

IV. REGULATORY COMPLIANCE

Q. Please describe how federal regulations impact FPL's transmission business.

A. Transmission is a heavily regulated sector of the electric utility industry. Under the direction of the Federal Energy Regulatory Commission ("FERC"), NERC has developed and issued 116 reliability standards, of which 104 standards, containing 1,080 requirements and sub-requirements govern FPL's Transmission operation and maintenance of the BES. NERC's purpose for implementing these standards is to ensure the provision of reliable electric service while allowing for planned and unplanned contingencies. Compliance with these enforceable

standards and requirements incrementally increases both capital and O&M expenditures for new and existing assets, the institution of enhanced processes and related training. Additionally, new NERC CIP standards, dealing with cyber security of the BES, are requiring significant incremental resources to protect FPL's most critical transmission assets from malicious cyber attack. NERC also imposes initiatives, for example, the recent Facilities Ratings, which further impacts the resource requirements of the Transmission business unit. For example, NERC's Facilities Rating Alert involves verification of transmission line compliance with NERC's method of determining electrical ratings. FPL is contracting aircraft to fly 6,721 miles of transmission lines from 2011 through 2013 while utilizing Light Detection and Ranging ("LiDAR") technology to capture the actual location of the lines. Conflicts identified from the LiDAR assessment are followed up to verify any NERC defined discrepancies. Should any NERC defined discrepancies be verified, FPL has one year, from the date of identification, to remediate. The projected incremental cost for this remediation through 2014 is $26 million.

These mandatory reliability measures, administrative requirements, associated processes and required training associated with compliance to NERC Reliability Standards place an ongoing and incremental resource impact on Transmission which will continue to evolve as NERC's compliance enforcement program grows.

V. TRANSMISSION O&M EXPENSE

Q. Comparing the 2013 Test Year to the 2012 Prior Year, are there any accounts in which the change to Transmission's non-fuel O&M expenses exceeds the threshold defined in MFR C-8?

A. No. Transmission has no accounts where the change in non-fuel expenses exceeds the threshold as defined on MFR C-8.

Q. What are some of the major components associated with Transmission O&M expense actual and projected costs?

A. In order to maintain FPL's high level of reliable service while at the same time addressing aging infrastructure, Transmission engages in a number of initiatives which impact Transmission O&M expenses. These initiatives generally fall into the following categories:

- **Enhanced Transmission and Substation Maintenance and Condition Assessment Activities:** As transmission and substation facilities age, the maintenance costs increase. In order to maximize the life of major transmission and substation equipment, proper and timely maintenance is required. Transmission's Condition Assessment Program uses risk assessments, life-cycle projections and predictive techniques to prioritize maintenance activities and equipment repair on an appropriate schedule to extend the life of the equipment. Without this program, FPL's costs would be

greater because equipment replacement costs are higher than life extension costs.

- **System Control Center**: SCC operations require around the clock support of major computer systems, complex technical applications, infrastructure and a team of control center operators and computer systems support personnel. The SCC operators are required to have certification from the NERC and annual training is required as part of the NERC operator certification. The SCC computer system support personnel are highly skilled in power system operation tools, infrastructure support and NERC CIP requirements.

- **Regulatory:** Regulatory commitments include compliance oversight and computer enhancements, vegetation management programs, training certification and re-certification programs, and storm hardening and pole inspection programs.

Q. How do FPL's projected 2013 O&M expenses for the Transmission functional area compare to the Commission Benchmark (MFR C-41; using the 2010 rate case decision adjusted for inflation and customer growth)?

A. FPL's projected 2013 O&M expenses for the Transmission functional area are below the Commission Benchmark. FPL's O&M expenses for the Transmission functional area result from aggressively managing operating cost.

VI. TRANSMISSION CAPITAL EXPENDITURES

Q. What are Transmission's capital expenditures for 2013.

A. Transmission's capital expenditures for the 2013 test year are projected to be $183 million.

Q. What are the major cost drivers for Transmission's capital expenditures?

A. The major cost drivers associated with Transmission's capital expenditures are:

- **Infrastructure replacement refurbishment and reliability, $53 million:** As substation equipment such as transformers, breakers, capacitor banks and other associated equipment approach the end of their useful life, FPL optimizes the replacement process with respect to interruption avoidance, resource allocation, and asset utilization. Replacement and refurbishment of substation equipment will minimize service interruptions to customers. The opportunities to improve transmission line reliability are identified through an analysis of existing system performance. Based on the analysis, reliability improvement projects are developed to reduce the major cause of poor reliability on the worst performing facilities.

The Substation Reliability Improvement program uses innovative technology and systems upgrades to enhance and improve the reliability experienced by our customers and simultaneously reduces the reliability exposure of our critical multi-million dollar transformer fleet. Through this program,

imminent issues are either identified early to preempt occurrence of an event, or in the occurrence of an event, the upgrades significantly improve restoration time and thereby reduce customer outage and dissatisfaction.

- **Projects to meet transmission system requirements, $35 million:** While load growth has slowed recently, over the next several years load is forecasted to increase again. NERC reliability standards mandate minimum requirements to accommodate system load growth. To meet these requirements, FPL has developed a phased-in plan to expand facilities and add new capacity through system expansion requiring capital expenditures in 2013 of $35 million, $29 million of which is the Bobwhite-Manatee 230 kV Line, as described below.
    - **Bobwhite-Manatee 230 kV Line, $29 million:** Additional capability of the transmission network serving the Southwest area is needed to comply with NERC standards and provide transmission customer service connection requests. This project was subject to the Florida Transmission Line Siting Act guidelines, which provides for certification of electrical transmission lines which are 230 kV or larger; cross a county line; and are 15 miles or longer. Prior to issuance of a corridor certification, the Department of Environmental Protection, Fish and Wildlife Conservation Commission, Department of Community Affairs, Public Service Commission, local governments, water management districts, and regional planning

councils through the jurisdiction in which the corridor would pass are required to assess the potential effects of the proposed transmission lines to ensure through available and reasonable methods that the location of transmission line corridors and construction and maintenance of transmission lines will produce minimal adverse effects on the environment and public health, safety, and welfare.

Bobwhite-Manatee was certified by the Siting Board (Governor and Cabinet) on November 6, 2008. This project will improve the reliability as well as serve local and wholesale transmission customers in the Manatee-Sarasota area. The total cost of the project is estimated at $47.6 million, $29 million in the test year, and it is scheduled to be completed in 2014.

- **FPSC mandated programs, $31 million:** The transmission infrastructure requires refurbishment to keep the facilities serviceable and to maintain reliability. The replacement of all wooden transmission structures over the next 25 – 30 years is in progress to address Transmission's storm hardening. Inspections of transmission facilities through reliability programs or following an outage event have identified the need for follow-up refurbishment work. These refurbishments are major cost drivers which involve all types of components associated with the transmission system such as cross arms, insulators, overhead ground wires, poles and splices with a capital expenditure

of $26 million in 2013. In addition, in order to maintain our long term hardening goal, capital expenditures of $2.0 million to replace wooden transmission structures and $1.7 million to replace ceramic post insulators on concrete poles are projected for 2013. Capital expenditures of $0.8 million in 2013 are projected for substation insulator replacement to reduce failures due to windblown salt and other contaminants.

- **Projects to meet distribution system requirements, $23 million:** As part of its annual capacity planning process, FPL examines existing and projected loading conditions and evaluates the need for additional distribution substations, expansion and/or modification of existing distribution substations, and the need for additional feeders to ensure that increased capacity requirements are met and reliable electric service is maintained. FPL's plans for 2013 may include the site preparation of one new distribution substation, increasing capacity and/or modifying 11 existing distribution substations, and adding six new feeders.

- **Projects resulting from revisions to FERC/NERC standards, $19 million**: These projects are improvements to FPL's system to meet NERC and FERC standards in addition to projects planned to meet transmission system requirements. They include protection redundancy, Digital Fault Recorders, Breaker/Bus Rating and Coupling Capacitor Voltage Transformer

replacements. They also include projects resulting from the recent NERC initiative Facilities Rating alerts previously discussed.

- **Projects related to technology upgrades to FPL's SCC, $8 million**: Technology capital budget and plan is driven by three main factors: (1) replacement and/or upgrade of technology components for FPL's SCC due to obsolescence or end-of-life; (2) major technology upgrades to add or improve functionality for SCC applications; infrastructure, and associated communication systems and networks; and (3) other technology projects that support the business unit mission in improving its operational efficiency. The technology budget for 2013 includes the following major projects: (1) SCC equipment replacements and/or upgrades due to end-of-life (e.g., network infrastructure equipment and application servers); (2) replacement for the Unit Commitment application; (3) cyber security enhancements; and (4) the conversion of the substation communications infrastructure from a Frame Relay technology to either the Multiprotocol Label switching or fiber optic technology.

- **Transmission 500 kV System Program, $8 million**

  FPL will continue its reliability initiatives on the 500 kV transmission line system. Replacement of insulators and vibration spacer-damper systems are planned for 2013 with a projected expenditure of $4.4 million. Replacement of structures and structural components are also planned for 2013 with a

projected expenditure of $3.6 million. FPL requires a reliable 500 kV system for bulk transmission power flow within its service area and to meet regulatory commitments and maintain transmission grid stability. These replacements are part of FPL's ongoing 500 kV reliability plan which is based on the previously described Condition Assessment Process.

- **Non-Reimbursable Relocations, $6 million:** Forced relocations are the result of siting transmission facilities in right-of-ways where FPL does not have a compensable interest, most common being road rights-of-way. FPL has the legal obligation to State and county governments to relocate facilities located in road right-of-way when these facilities are in conflict with proposed road improvements. Failure to execute projects as scheduled may result in road contractor delay claims.

Q. Please summarize Transmission's accomplishments.

A. In summary, Transmission's accomplishments and operations are an example to the industry. We work hard every day to maintain the current high level of reliability our customers expect and deserve while promoting compliance with all applicable regulatory commitments. We have maintained this excellent record while carefully selecting where we must expand, replace, and refurbish the transmission system for the benefit of our customers now and in the future. Finally, we have accomplished the results and implemented the initiatives, processes and procedures described in my testimony while minimizing the costs for our customers.

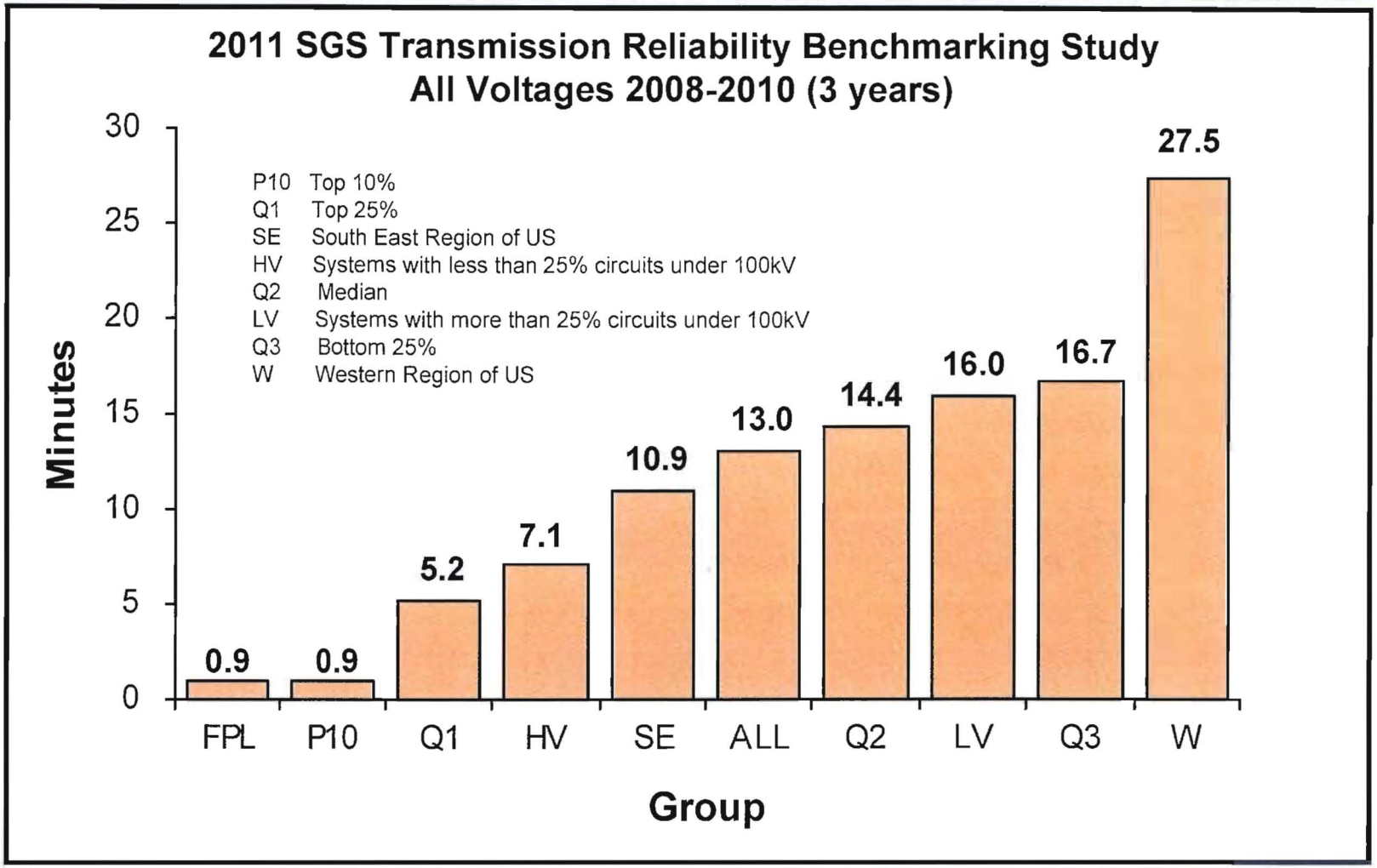
Q. Does this conclude your direct testimony?

A. Yes.

MFRs SPONSORED AND CO-SPONSORED BY MANUEL MIRANDA

MFR #	PERIOD	TITLE
CO-SPONSOR		
B-13	Test	Construction Work in Progress
B-15	Test Prior	Property Held for Future Use – 13 Month Average
C-8	Prior Test	Detail of Changes in Expenses
C-15	Test	Industry Association Dues
C-16	Prior Test	Outside Professional Services
C-34	Historic 5 years	Statistical Information
C-41	Test Benchmark	O&M Benchmark Variance by Function

The FPL Transmission SAIDI compares favorably in recent industry benchmarking studies.



For industry comparisons, SAIDI is calculated for outages greater than or equal to five minutes versus FPSC definition of SAIDI of greater than or equal to one minute.

Docket No. 120015- EI
2011 SGS Transmission Reliability Benchmarking Study All Voltages 2008-2010 (3 years)
Exhibit MM-2, Page 1 of 1