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Public Service Commission

August 23, 2012

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COMMISSION  
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Mr. Jon C. Moyle, Jr.  
Moyle Law Firm, P.A.  
The Perkins House  
118 North Gadsden Street  
Tallahassee, FL 32301

STAFF'S FIRST DATA REQUEST

**Re: Docket No. 120015-EI - Petition for increase in rates by Florida Power & Light Company.**

Dear Mr. Moyle:

By this letter, the Commission staff requests that Florida Industrial Power Users Group (FIPUG or utility) provide responses to the following data requests.

1. In Docket No. 080677-EI, FPIUG took the following position to Issue #8 (Should FPL be allowed to implement a GBRA mechanism, see page 31 of Order No. PSC-09-0573-PHO-EI)

"No. Capital additions, such as new generating plants, should not be automatically recovered through yet another recovery clause. If FPL believes that the addition of generating plant necessitates a rate change, it may petition the Commission for such a change in a full rate case where the Commission and the parties may examine all of FPL's revenues and expenses, rather than giving FPL guaranteed recovery of new plant in isolation from other factors that affect rates. This issue should not be considered in this rate case, but should be the subject of a generic docket or rulemaking."


Does FIPUG still support this position? If so, please explain how the incorporation of a GBRA mechanism that is part of the proposed settlement is in the best interest of FPL's ratepayers at this time. If not, what is the rationale for the change in FIPUG's position?

DOCUMENT NUMBER - DATE  
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Please file the original and five copies of the requested information by Friday, August 31, 2012, with Ms. Ann Cole, Commission Clerk, Office of Commission Clerk, 2540 Shumard Oak Boulevard, Tallahassee, Florida, 32399-0850. Please feel free to call me at (850) 413-6226 if you have any questions.

Sincerely,

  
for Keino Young  
Senior Attorney

KY:th

cc: Office of Commission Clerk  
All Parties in Docket No. 120015-EI