

Eric Fryson

From: Kim Hancock [khancock@moylelaw.com]
Sent: Friday, August 31, 2012 2:11 PM
To: Filings@psc.state.fl.us
Cc: Keino Young; John.Butler@fpl.com; kwiseman@andrewskurth.com; wrappolt@andrewskurth.com; lpurdy@andrewskurth.com; kelly.jr@leg.state.fl.us; mcglathlin.joseph@leg.state.fl.us; Rehwinkel.charles@leg.state.fl.us; Christensen.Patty@leg.state.fl.us; Noriega.tarik@leg.state.fl.us; Merchant.Tricia@leg.state.fl.us; schef@gbwlegal.com; karen.white@tyndall.af.mil; jwhendricks@sti2.com; saporito3@gmail.com; danlarsen@bellsouth.net; bgarner@ngnlaw.com; barmstrong@ngnlaw.com; karen.white@tyndall.af.mil; Intervenor-proceeding@algenol.com; seahorseshores1@gmail.com; glenfede@yahoo.com; martin.hayes@akerman.com; jason.lichtstein@akerman.com; Vicki Kaufman; Jon Moyle
Subject: Docket No. 120015-EI
Attachments: FIPUG Response to Staff letter data request 8.31.12.pdf

In accordance with the electronic filing procedures of the Florida Public Service Commission, the following filing is made:

- a. The name, address, telephone number and email for the person responsible for the filing is:

Jon C. Moyle, Jr.
 Moyle Law Firm, P.A.
 The Perkins House
 118 North Gadsden Street
 Tallahassee, FL 32301
 (850) 681-3828
jmoyle@moylelaw.com

- b. This filing is made in Docket No. 120015-EI.
 c. The document is filed on behalf of Florida Industrial Power Users Group.
 d. The total pages in the document are 2 pages.
 e. The attached document is FIPUG's Response to Staff letter data request.

Kim Hancock
khancock@moylelaw.com



The Perkins House
 118 North Gadsden Street
 Tallahassee, Florida 32301
 850-681-3828 (Voice)
 850-681-8788 (Fax)
www.moylelaw.com

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August 31, 2012

Via Email and U. S. Mail

Keino Young
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

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

Dear Mr. Young:

In response to the data request below, the Florida Industrial Power Users Group (FIPUG) responds as follows:

Staff Data Request:

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?

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FIPUG Response:

The above quoted position was FIPUG's view in the context of a fully-litigated rate case, such as the one from which this quote was taken. In the context of the settlement in this case, there are many compromises and "gives and takes." As such, the settlement, taken as a whole, is fair to FPL ratepayers for a number of reasons. Those reasons include, but are not limited to, the fact that the settlement provides rate stability for four years and provides appropriate incentives and signals to encourage the maintenance and development of jobs and economic growth as Florida attempts to emerge from a deep recession.

Sincerely,

s/ Jon C. Moyle, Jr.

Jon C. Moyle, Jr.

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