Eric Fryson

From:

Rhonda Dulgar [rhonda@gbwlegal.com]

Sent:

Monday, September 17, 2012 3:52 PM

To:

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Glen Gibellina; Jessica Cano; John Hendricks; John.Butler@fpl.com; Jon Moyle, Jr.;

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Vicki Kaufman; Wade Litchfield

Subject:

Electronic Filing - Docket 120015-El

Attachments: 120015.FRF1stDataRequests2FPL.9-17-2012.pdf

a. Person responsible for this electronic filing:

Robert Scheffel Wright

Gardner, Bist, Wiener, Wadsworth, Bowden,

Bush, Dee, LaVia & Wright, P.A.

1300 Thomaswood Drive Tallahassee, FL 32308 swright@gbwlegal.com (850) 385-0070

b. 120015-EI

In Re: Petition for Increase in Rates by Florida Power & Light Company.

- c. Document being filed on behalf of the Florida Retail Federation.
- d. There are a total of 4 pages.
- e. The document attached for electronic filing is The Florida Retail Federation's First Data Requests Nos. 1-15 to FPL.

(see attached file: 120015.FRF's1stDataRequests2FPL.9-17-12.pdf)

Thank you for your attention and assistance in this matter.

Rhonda Dulgar

Secretary to Jay LaVia & Schef Wright

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DOCUMENT NUMBER - DATE

06225 SEP 17 º

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September 17, 2012

Jordan A. White, Senior Attorney Florida Power & Light Company 700 Universe Boulevard Juno Beach, Florida 33408-0420 FRF'S FIRST SET OF DATA REQUESTS (NOS. 1-15) TO FPL

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

Pursuant to the Commission's Second Order Revising Order Establishing Procedural Schedule for Commission Consideration of Settlement Agreement (Order PSC-12-0440-PCO-EI), the Florida Retail Federation ("FRF") requests that Florida Power & Light Company ("FPL") provide written responses to the following data requests within five days or less.

- 1. Please identify the date that settlement negotiations commenced with:
 - (a) FIPUG
 - (b) SFHHA
 - (c) FEA
- 2. Please state on what date each of the following first signed the FPL/FIPUG/SFHHA/FEA Settlement:
 - (a) FPL
 - (b) FIPUG
 - (c) SFHHA
 - (d) FEA

DOCUMENT NUMBER-DATE

- 3. Please identify all meetings or any other communications with FIPUG, SFHHA, or FEA at which settlement was discussed.
- 4. What percentage of FPL's total number of customers is represented by members of FIPUG, SFHHA, and FEA?
- 5. What percentage of FPL's total load is represented by members of FIPUG, SFHHA, and FEA?
- 6. Was the Village of Pinecrest provided notice of or otherwise included in any settlement negotiations?
 - If yes, on what date was the notice provided? If no, why not?
- 7. Was John W. Hendricks, an intervenor representing his interests on a *pro se* basis, provided notice of or otherwise included in any settlement negotiations?
 - If yes, on what date was the notice provided? If no, why not?
- 8. In its Data Request No. 22 to the FRF, FPL asserts that "FRF made a public pronouncement in January 2012 that it would not enter into any rate case settlement negotiations with FPL until the conclusion of the final hearings in this proceeding." Please identify and provide any documentation for FPL's assertion.
- 9. Please provide all MFRs that FPL has prepared that reflect the impacts of the FPL/FIPUG/SFHHA/FEA Settlement.
- 10. Please state what FPL's total base rate revenues will be in 2013, if the FPL/FIPUG/SFHHA/FEA Settlement were to be approved, and assuming the exact same sales units that are reflected in FPL's MFR's filed in Docket No. 120015-EI in March 2012, excluding the Cape Canaveral step increase.
- 11. Please provide an MFR Schedule A-1 for the 2013 test year, comparable to that filed for the January 2013 base rate increase, that reflects the base rate increase that would be provided by the FPL/FIPUG/SFHHA/FEA Settlement.

- 12. Please provide an MFR Schedule A-1 for the 2013 test year, comparable to that filed for the Cape Canaveral step increase, that reflects the base rate increase that would be provided by the FPL/FIPUG/SFHHA/FEA Settlement and the Cape Canaveral step increase.
- 13. FPL's MFR Schedule C-1 for the 2013 test year shows projected Revenues from Sales of \$4.266 Billion and Total Operating Revenues of \$4.407 Billion. Please provide a comparable MFR Schedule C-1 that reflects the base rate increase proposed by the FPL/FIPUG/SFHHA/FEA Settlement.
- 14. Please provide any workpapers, spreadsheets, or the like that show the Revenues from Sales that would, assuming the exact same sales/billing units from FPL's MFRs filed in March 2012, be produced by the rates proposed in the tariff sheets appended to the FPL/FIPUG/SFHHA/FEA Settlement.
- 15. Please state what FPL's Capacity Cost Recovery Clause charges will be in 2012 (a) if the FPL/FIPUG/SFHHA/FEA Settlement were to be approved and (b) if the Commission declines to approve the FPL/FIPUG/SFHHA/FEA Settlement and proceeds to decide the rate case as presently scheduled.

Please feel free to call me at (850)385-0070 if you have any questions.

Cordially,

Robert Scheffel Wright

cc: Office of Commission Clerk

All Parties in Docket No. 120015-EI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished

by electronic mail this 17th day of September 2012, to the following:

Keino Young

Florida Public Service Comm'n

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