

**Eric Fryson**

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**From:** Springer, Pamela [Pamela.Springer@fpl.com] on behalf of White, Jordan [Jordan.White@fpl.com]  
**Sent:** Thursday, December 20, 2012 9:18 AM  
**To:** Filings@psc.state.fl.us  
**Subject:** Electronic Filing / Dkt 110303-OT / FPL's Responses to Industry Survey Questions Regarding Rule 25-6.043, F.A.C.  
**Attachments:** Rule 25-6.043 Survey Transmittal to PSC.pdf  
Electronic Filing

a. Person responsible for this electronic filing:

Jordan A. White  
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b. Docket No. 110303-OT

c. The Document is being filed on behalf of Florida Power & Light Company.

d. There are a total of 9 pages in the attached document.

e. The document attached for electronic filing is Florida Power & Light Company's Responses to Industry Survey Questions Regarding Rule 25-6.043, F.A.C. (Docket No. 110303-OT).

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December 20, 2012

John Slemkewicz  
c/o Ann Cole  
Commission Clerk  
Office of Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

**Re: FPL's Responses to Industry Survey Questions Regarding Rule 25-6.043,  
F.A.C. (Docket No. 110303-OT)**

Dear Mr. Slemkewicz:

Enclosed please find Florida Power & Light Company's ("FPL") responses to Staff's survey questions regarding Rule 25-6.043.

If there are any questions regarding this transmittal, please contact me.

Sincerely,

A handwritten signature in black ink, appearing to be 'Jordan A. White', written over a horizontal line.

Jordan A. White

Encls:

**Q.**

What are the Company's estimated transactional costs (as defined in Subparagraph 120.541(2)(d), F.S.) resulting from the Company's compliance with Rule 25-6.043, F.A.C., for the five year period beginning July 1, 2011. Include, for example, the following items separated between internal and external costs:

- a. The costs of preparing the minimum filing requirements.
- b. Witness preparation and appearance before the Commission
- c. Petition and testimony filings.
- d. Legal Costs
- e. Consultant Costs
- f. Other costs associated with the required filings – please identify each.

**A.**

Although FPL does not specifically track internal costs and associated activities related to rate case proceedings, FPL's good-faith estimate of internal costs resulting from compliance with Rule 25-6.043 in connection with the Company's March 19, 2012 rate request is approximately \$1,400,000. See also FPL's response to Question 2.

Through March 19, 2012, FPL incurred the following external costs related to compliance with Rule 25-6.043:

Description	Cost
Legal Costs	\$ 67,000
Consultant Costs	291,000
Travel	23,000
Temporary Labor	79,000
Printing and Supplies	70,000
TOTAL	\$ 530,000

The estimates above are derived based on costs incurred in connection with FPL's March 19, 2012 rate petition. As rate case costs are unique to each proceeding, FPL is unable to project rate case cost data.

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**Q.**

Of the costs provided in response to question 1 above, which, if any, would be incurred by the Company if Rule 25-6.043, F.A.C., were not in effect?

**A.**

FPL believes that the majority of the costs provided in response to question 1 would be incurred by the Company, regardless of whether Rule 25-6.043, F.A.C. was in effect. It should also be noted that the FPL employees involved in the preparation of rate case filings work in numerous departments throughout the Company, with the primary responsibility of efficiently operating the utility. As such, rate case proceedings require these employees to spend significant additional time (including unpaid overtime) and divert their focus from the chief objective of providing safe and reliable electric service to customers. See also FPL's response to question 8.

**Q.**

What is the Company's estimate of the likely impact, stated in terms of costs and/or benefits on small businesses (as defined by Section 288.703, F.S.) located in the Company's service territory, resulting from the implementation of Rule 25-6.043, F.A.C., for the five year period beginning July 1, 2011?

**A.**

The estimated costs identified in Question 1, spread across the more than 4.5 million FPL customers, has a minimal impact on individual customer bills, including small businesses and small counties/cities. While FPL is unable to quantify the dollar value of the associated benefits, FPL believes that, in general, Rule 25-6.043 adds to the overall efficiency of rate case proceedings. See also FPL's response to Question Nos. 2 and 8.

**Q.**

What is the Company's estimate of the likely impact, stated in terms of costs and/or benefits on small counties and small cities (as defined in Section 120.52, F.S.) located in the Company's service territory, resulting from the implementation of Rule 25-6.043, F.A.C., for the five year period beginning July 1, 2011?

**A.**

See FPL's responses to Question Nos. 2, 3 and 8.

**Q.**

What is the Company's estimate of the likely impact, stated in terms of costs and/or benefits on entities located in the Company's service territory other than those specifically identified in questions 3 and 4, resulting from the implementation of Rule 25-6.043, F.A.C., for the five year period beginning July 1, 2011?

**A.**

See FPL's responses to Question Nos. 2, 3 and 8.

**Q.**

What does the Company believe is the expected impact of Rule 25-6.043, F.A.C., on economic growth, private sector job creation or employment, and private sector investment for the five-year period beginning July 1, 2011?

**A.**

FPL does not project, capture or track economic growth, private sector job creation or employment, or private sector investment resulting from the impact of Rule 25-6.043, F.A.C. Additionally, FPL does not presently have the means to accurately estimate this information.



**Q.**

What does the Company believe is the expected impact of Rule 25-6.043, F.A.C., on business competitiveness, productivity, and innovation, including the ability of persons doing business in the Company's service territory to compete with persons doing business in states other than Florida or other domestic markets for the five-year period beginning July 1, 2011?

**A.**

FPL does not project, capture or track business competitiveness, including the ability of persons doing business in the state to compete with persons doing business in other states or domestic markets, productivity, and innovation resulting from the impact of Rule 25-6.043, F.A.C. Additionally, FPL does not presently have the means to accurately estimate this information.

**Q.**

What does the Company believe are the benefits associated with Rule 25-6.043, F.A.C.?

**A.**

See FPL's response to Question Nos. 2 and 3.