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Public Service Commission

September 11, 2013

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COMMISSION
CLERK

Kenneth Hoffman
Florida Power & Light Company
215 S. Monroe Street
Suite 810
Tallahassee, FL 32301

STAFF'S SECOND DATA REQUEST

RE: Docket No. 130198-EI- Petition for prudence determination regarding new pipeline system by Florida Power & Light Company.

Dear Mr. Hoffman,

By this letter, the Commission staff requests that Florida Power & Light Company (FPL), provide responses to the following data requests.

1. Please refer to FPL's response to Staff's First Data Request No. 1. Explain what software/statistical tool FPL used to derive the customer model.
2. Please refer to FPL's response to Staff's First Data Request No. 3. Explain what software/statistical tool FPL used to derive the summer peak demand per customer model.
3. Please refer to FPL's response to Staff's First Data Request No. 6. Explain what software/statistical tool FPL used to derive the net energy for load model.
4. Please refer to the net energy for load model (electronic format) FPL provided in its response to Staff's First Data Request No. 6. Explain why FPL did not use the independent variables shown on rows 11, 16, and 18 in calculating the values of the dependent variable, given that the coefficient of each of these independent variables are larger than some other independent variables which FPL did use in calculating the values of the dependent variable.
5. In Docket No. 090172-EI, Petition to determine need for Florida EnergySecure Pipeline by Florida Power & Light Company, the initial quantity of gas transportation capacity was 600 MMcf/d, and FPL proposed to sell the excess capacity and refund the proceeds to its customers until such time as that capacity was needed for its own use.

Please compare and contrast the percentage of excess gas that is expected under the current project to the Florida EnergySecure Pipeline, and discuss how FPL plans to dispose of any excess gas that may not be needed immediately.

6. Staff's First Data Request No. 39 presents an example in which an insufficient amount of gas is available to meet peak load. Please discuss how the opposite situation would be handled; i.e., what happens when too much gas is available? Is the excess gas sold, stored, or dispensed of in a specific manner?
7. FPL's response to Staff's First Data Request No. 41 indicates that FPL did not use the risk-adjusted load forecast in its Florida EnergySecure Line. What type of load forecast was used for the Florida EnergySecure Line? Please elaborate.
8. Please refer to Staff's First Data Request No. 44. Please expand upon the previous answers by providing a table showing the annual difference in fixed costs and in variable costs between each of the alternate proposals and the selected combined proposal.
9. Please refer to staff's First Data Request No. 55. Please expand upon the answers provided by including annual data for each of the categories below for the period 2013 through 2057, as information is available.

Include the following scenarios: a base case, the risk adjusted case discussed in the company's petition, the risk adjusted nuclear delay case discussed in FPL's petition, the base case from FPL's EnergySecure petition, and the nuclear delay case from the EnergySecure petition. Please include the effects of cumulative and incremental energy efficiency and load management activities for each scenario.

- a. Net Firm Summer Peak Demand (MW)
- b. Net Firm Winter Peak Demand (MW)
- c. Installed Capacity (MW) – Summer Rating
- d. Installed Capacity dependent upon natural gas (MW) – Summer Rating
- e. Annual Natural Gas Usage (1000 MCF)
- f. Peak Day Natural Gas Usage (1000 MCF)
- g. Reserved Natural Gas Capacity (1000 MCF)

Category (Unit)					
Year	Base Case	Risk Adjusted Case	Risk Adjusted Nuclear Delay	Energy Secure Base Case	Energy Secure Nuclear Delay
2013					
2014					
2015					
2016					
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2018					
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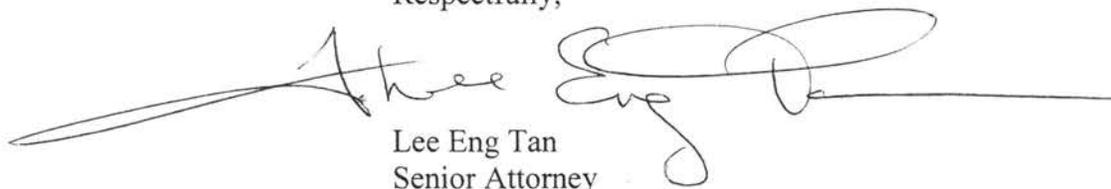
Hoffman, Florida Power & Light Company

Docket No. 130198-EI

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Please file the original and five copies of the requested information no later than Thursday, September 26, 2013, 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) 413-6185 if you have any questions.

Respectfully,

A handwritten signature in black ink, appearing to read "Lee Eng Tan", with a long horizontal line extending to the right.

Lee Eng Tan
Senior Attorney

TLT/dmw

cc: Office of Commission Clerk