

State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE: September 12, 2018
TO: Carlotta S. Stauffer, Commission Clerk, Office of Commission Clerk
FROM: Samantha Cibula, Office of the General Counsel *SMC*
RE: Docket No. 20031029-EI

Please file the attached materials in the docket file listed above.

Thank you.

Attachment

COMMISSION
CLERK

2018 SEP 12 PM 2:41

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Public Service Commission

-M-E-M-O-R-A-N-D-U-M-

DATE: October 15, 2003
TO: Office of the General Counsel (Moore)
FROM: Division of Economic Regulation (Hewitt) *MS* *BT* *JOS* *TJD*
RE: Statement of Estimated Regulatory Costs for Proposed Amendments to Rules 25-6.043, F.A.C., Investor-Owned Electric Utility Minimum Filing Requirements; and Rule 25-6.0435, Interim Rate Relief, F.A.C.

The Minimum Filing Requirements (MFRs) rule contains the requirements for Investor-Owned Electric Utilities (IOUs) to provide data to support an adjustment of rates requested in rate case proceedings. The Interim Rate Relief rule requires an IOU to file the MFRs when seeking rate relief and to derive a percentage increase factor for the increase. A multitude of schedules are included in the MFRs, but some are no longer needed and others are duplicative.

The rule amendments would streamline, update, and, on balance, significantly lessen the total submission requirements of the MFRs to better reflect Commission staff needs. Although there may be some minor costs to revise the MFRs' submissions for a rate case, the reduction in the number of schedules and requirements should result in a net benefit to MFRs filers.

The Administrative Procedures Act encourages an agency to prepare a Statement of Estimated Regulatory Costs (SERC). However, there should be a net decrease in costs to the IOUs and no significant negative impacts on small businesses, small cities, or small counties. Therefore, a SERC will not be prepared for the proposed rule amendments at this time.

cc: Mary Andrews Bane
John Slemkewicz
Hurd Reeves

mfrsercmem.wpd

McWHIRTER REEVES
ATTORNEYS AT LAW

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TALLAHASSEE

TALLAHASSEE OFFICE:
117 SOUTH GADSDEN
TALLAHASSEE, FLORIDA 32301
(850) 222-2525
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April 14, 2003

VIA HAND DELIVERY

Mr. Timothy Devlin, Director
Division of Economic Regulation
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

Re: MFR Review (undocketed)

Dear Tim:

Enclosed are FIPUG's comments as a result of the March 26th workshop. We look forward to continuing to work on this project with you.

Please contact me if you have any questions.

Regards,



Vicki Gordon Kaufman

VGK
Enclosure

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03 APR 14 PM 3:02
Division of
ECONOMIC REGULATION

**Initial Comments of the Florida Industrial Power Users Group Regarding
Review of MFRs for Investor-Owned Utilities**

The Florida Industrial Power Users Group (FIPUG), pursuant to the Staff's request, files these comments as a result of the workshop¹ held on March 26, 2003 regarding a review of the Minimum Filing Requirements (MFRs) for investor-owned utilities.

FIPUG's main concern at this point in the process is that the MFRs contain sufficient and detailed information regarding the utility's proposed rate filing. When a petition for rate increase is filed, critical information concerning the utility, its operations and its earnings is contained in the detailed MFR schedules. This information generally is available only to the utility and is not contained in other readily available sources. It is imperative that consumers have ready and easy access to such information in one filing in one location to analyze the utility's request and determine, at least on an initial basis, its reasonableness.² Thus, the Commission and the Staff should ensure that at the initiation of a rate case pertinent information is filed to enable all parties to meaningfully evaluate the utility's request on an initial basis. The Staff and Commission should bear this goal in mind as they evaluate whether and how to modify the current MFR schedules and should be particularly cautious in deleting information that may be useful.

As a general matter, FIPUG has no objection to the consolidation of schedules and the inclusion of information currently reflected on one schedule on another schedule

¹ It is FIPUG's understanding that Staff is just beginning the MFR revision process. As the process continues, FIPUG may have additional comments on specific MFR schedules.

² While reducing the burden and expense of a utility rate filing (which ratepayers pay for) is a laudable goal, this must be balanced against the fact that the utility has the burden to justify any requested increase. The Commission must also consider the increased burden and expense which ratepayers will experience if they must engage in extensive discovery to secure information which should be contained in the utility's initial filing.

(for example, including information now reflected on E-3a on E-1), so long as the same information appears on the consolidated schedule. In doing such consolidations, Staff should ensure that the same information is simply provided in another location, rather than a truncated or summary form of the previously provided information.

FIPUG specifically comments on two suggestions made at the Staff workshop. First, it was suggested that utilities be permitted to cross-reference (and not include in the MFRs) documents on file elsewhere with the Commission. FIPUG opposes this suggestion. As noted above, it is important that consumers have ready access to materials upon which the company bases its filing. Consumers should not be put to the time, effort and expense of having to track down, request and copy documents upon which the utility relies but which it has chosen not to include in its filing. The Commission should continue to require all pertinent information be included in the MFRs.

Second, it was suggested that parties be prohibited from engaging in discovery regarding information that would have appeared in an MFR that is deleted or modified as a result of this review. Such a suggestion must be rejected. Discovery at the Commission is governed by the Florida Rules of Civil Procedure. Rule 28-106.206, Florida Administrative Code. Those rules, and the case law interpreting the rules, provide for a broad scope of discovery so long as the discovery is relevant or may lead to the discovery of relevant information. Simply because information may no longer be required in an MFR does not mean that discovery on that topic is not relevant, nor could deletion of a particular MFR schedule lead to that conclusion. Any attempt to limit discovery in this manner would be unlawful.



April 11, 2003

Mr. John Slemkewicz
Surveillance Section Supervisor
Division of Economic Regulation
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee FL 32399-0850

RECEIVED
FLORIDA PUBLIC SERVICE
COMMISSION
03 APR 14 AM 10:02
DIVISION OF
ECONOMIC REGULATION

Dear Mr. Slemkewicz:

RE: Revision of the Investor-Owned Electric Utility Minimum Filing Requirements

Attached is Gulf Power Company's Post-Workshop Comments made in response to Staff's Rule Development Workshop concerning the revision of the Minimum Filing Requirements (MFRs). Gulf appreciates the opportunity to provide comments and looks forward to continuing to work with Staff and the other parties on this project.

If you have any questions, please let me know at (850) 444-6231.

Sincerely,

A handwritten signature in cursive script that reads "Susan D. Ritenour".

Susan D. Ritenour
Assistant Secretary and Assistant Treasurer

lw

Enclosure

cc: Beggs and Lane
Jeffrey A. Stone, Esquire
Florida Public Service Commission
Timothy Devlin

Gulf Power Company
Post-Workshop Comments on MFRs

Gulf Power is in agreement with many of Staff's comments on the MFRs provided in John Slemkewicz's March 13, 2003 memo. Specifically, Gulf agrees with all of the deletions proposed by Staff with the exception of MFRs C-53, C-55, C-56, C-57, G-32, G-34 and G-35 which relate to the O&M benchmark. In addition, Gulf is in agreement with many of the modifications proposed by Staff. However, the modifications proposed by Staff on some of the MFRs were not specific, and Gulf would like the opportunity to comment on these as the details are worked out.

Gulf's specific concerns related to Staff's modifications as currently proposed are listed below. The positions we describe below are consistent with and elaborate on the comments filed by Gulf on January 24, 2003.

1. MFRs B-14 and B-15 related to working capital: This working capital information should provide additional details that support the total working capital requested in rate base as shown on MFR B-3 and the working capital adjustments shown on MFRs B-4, B-5 and B-6 (currently proposed to all be combined into B-4). Thirteen-month average detailed working capital information would properly support and tie back to the 13-month average rate base shown on MFR B-3. The monthly balances and jurisdictional calculations currently required by MFR B-15 are not necessary in order to provide the detailed rate base support, and this MFR is quite burdensome to prepare.
2. MFRs B-7 and C-9 related to jurisdictional factors for rate base and net operating income: The requirement for prior year jurisdictional factors should be eliminated. A cost of service study based on the prior year is not prepared, nor is it necessary or appropriate. Only jurisdictional factors based on the test year are relevant in the rate case proceeding. Therefore, the requirement for prior year factors should be eliminated.
3. MFR B-29 related to the historical balance sheet: Gulf agrees with Staff's proposed modification to reduce the number of years required, although Gulf still believes that 5 years is sufficient as opposed to the 6 years proposed by Staff. However, Gulf proposes that the proper information to provide is the year-end balance sheet for each year, rather than a 13-month average balance sheet for each year. Year-end balance sheet data provides sufficient detail for analyzing what constitutes Gulf's assets and liabilities and the trends associated with each line item. Thirteen-month average information is not necessary, and is quite burdensome to calculate for the number of years and line items involved.
4. MFRs C-53, C-55, C-56, C-57, G-32, G-34 and G-35 related to the O&M Benchmark: These MFRs should not be eliminated. To do so would represent a shift in Commission policy as to how O&M expenses are analyzed and justified, and would eliminate the majority of the detailed information supporting a utility's requested O&M expenses. It has been

Gulf Power Company
Post-Workshop Comments on MFRs

the Commission's policy for some time to use the Benchmark as a point of reference for evaluating increases and decreases in O&M expense levels based on the utility's justifications and explanations for these changes. The other MFR modifications that have been proposed by Staff and the utilities do not represent such a shift in policy; rather, the other proposed modifications are aimed at ensuring sufficient, pertinent information is included in the MFR forms and any unnecessary, irrelevant or unduly burdensome information is eliminated. The other proposed MFR modifications do not lead to substantive policy changes in the way the Commission makes decisions in a rate proceeding.

5. MFR C-61 related to performance indices: Staff has proposed modifications to this MFR with the apparent intention of using these statistics to evaluate a utility's costs instead of using the O&M Benchmark calculation. As stated above, elimination of the Benchmark represents a substantial shift in the Commission's established policy of using the Benchmark as a reference point for analyzing changes in a utility's O&M expenses. Gulf does not believe that the use of ratios comparing expenses to such things as mWh of generation, customers, etc. provides an adequate point of reference for evaluating O&M expenses. Any such substantive changes in Commission policy should be evaluated separate and apart from this proceeding.
6. MFR C-65 related to outside professional services: This MFR should be eliminated because the information requested is very time-consuming to develop and includes sensitive information which is more appropriately provided, if necessary, through the discovery process with confidential treatment.

Gulf appreciates the effort that Staff has put into improving the MFRs, and looks forward to continuing to work with Staff and the other parties on this worthwhile project.



April 14, 2003

Mr. Dale N. Mailhot
Bureau Chief
Surveillance & Finance
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Mr. John Slemkewicz
Surveillance Section Supervisor
Division of Economic Regulation
Florida Public Service Commission
2540 Shumard Oaks Boulevard
Tallahassee, Florida 32399-0865

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03 APR 15 PM 1:31
FLA PUBLIC SERVICE COMM.
OFFICE OF THE
GENERAL COUNSEL

Re: Revision of minimum filing requirements (MFRs) for investor-owned utilities

Dear Dale and John:

Thank you for holding the March 26, 2003, workshop (the "Workshop") concerning revisions to the current MFRs that are applicable to investor-owned electric utilities under Rule 25-6.043, F.A.C. The utilities were asked at the end of the Workshop to provide written comments by April 14 on the Staff proposal (the "Staff Proposal"). This is FPL's response to that request.

MFRs which Staff and FPL agree should be deleted (Attachment 1)

With two exceptions discussed with respect to Attachment 4 below, FPL agrees with all of the MFR deletions in the Staff Proposal. There are a total of 110 MFRs, listed in Attachment 1, which both Staff and FPL have agreed to delete. Staff was very receptive to many of FPL's recommendations in this area, and also took the initiative to identify additional MFRs which could be deleted. We are most appreciative of this effort.

MFRs which Staff and FPL agree should be provided (Attachments 2 and 2a)

Staff and FPL have agreed on a total of 98 MFRs, listed in Attachment 2, which would be submitted either in their current format or with some modification. As a supplement to the list provided in Attachment 2, we are also submitting as Attachment 2a the Staff templates for these affected MFRs which were provided following the Workshop and which specify additional detail on how the individual MFRs would be modified. FPL's agreement to the Staff modifications is predicated on the details provided in these templates. FPL recognizes that some of the templates still contain only conceptual descriptions of Staff's proposed modifications, which probably will require further refinement by Staff. Where further refinement of an MFR template is required, FPL's agreement to Staff's proposed modification for that MFR is, of course, contingent upon review and concurrence of the final version of the template.

MFRs which need further review and discussion (Attachment 4)

While we have agreed with many of the MFR modifications and deletions in the Staff Proposal, there remain some additional MFRs that we recommend be deleted, other MFRs that we feel should be modified differently than Staff has proposed, and two MFRs as to which FPL is concerned about the possible ramifications of Staff's proposal for deletion. Those MFRs and FPL's suggestions with respect to each of them are identified on the enclosed Attachment 4 (46 MFRs total).

While all of the proposed deletions and modifications on Attachment 4 are important to FPL, there is one that we would particularly like to bring to your attention. As FPL and the other utilities consistently expressed at the Workshop, the preparation of MFR C-65 (Outside Professional Services) imposes a significant burden on the utilities and appears to yield very little, if any, useful information for the Commission and Staff in return. The fundamental problem is that FPL and the other utilities do not manage their businesses by focusing separately on the level of expenditures for outside professional services. Rather, we are concerned with managing the total cost of accomplishing the tasks necessary to provide high-quality electric service to our customers, regardless of whether those tasks are accomplished by in-house or outside personnel, and regardless of whether they involve the use of "professional" or other types of services. As a result, FPL's accounting system does not focus on tracking and accumulating expenditures in the specific subcategory of "outside professional services." We believe this to be the case for the other IOUs as well. In order to identify the "outside professional services" for an historic year, FPL therefore has to conduct a painstaking review of voluminous source documents such as invoices to ascertain which expenditures are specifically for outside "professional" services, as opposed to other types of outside services. Identifying "outside professional services" expenditures in projected years is even more burdensome because FPL does not budget on that basis.

This problem is compounded since MFR C-65 requires FPL to break down "outside professional services" into different types of activities. A single vendor of "outside professional services" may be involved in several different types of activities. For example, an accounting firm may provide auditing services and also consult on human resources issues. The only way to identify all the different activities in which a vendor has engaged is to go through the detail of each of the vendor's invoices looking for descriptions of the work that was performed. Doing this for an entire company the size of FPL over a period of multiple years becomes a Herculean task.

Beyond the extreme hardship of attempting to capture this information, there is also the question of what purpose is served by doing so. For the same reason that FPL and the other utilities do not track "outside professional services" as a separate subcategory of expenditure, information on that subcategory is, at best, of very limited usefulness to the Commission and Staff. What does it matter that, for example, expenditures for "outside professional services" in Business Unit "A" went up 10% in the test year if the overall budget for that business unit went down by 5%? In this

regard, FPL notes that Staff was asked at the Workshop to identify how it uses the information on MFR C-65 and did not point to a single instance in which it had used that information in evaluating the test year results for FPL or the other utilities that have recently undergone rate reviews. For these reasons, FPL strongly recommends deletion of MFR C-65.¹

We also would like to bring to your attention our concern about Staff's proposal to delete MFRs C-53 and C-56, both of which relate to the existing O&M benchmark (the "Benchmark MFRs"). If Staff's intent in deleting the Benchmark MFRs is to eliminate or reduce the formal role of the O&M benchmark in shaping the Commission's and parties' evaluation of O&M expenses in rate proceedings, this would represent a major, unwarranted and substantive change in policy without adequate attention to its consequences. The utilities understand the current MFR review to be a "content neutral" effort intended to streamline the existing process of generating information needed for rate proceedings, without attempting to change the basic nature of those proceedings. Attempting to effect a major policy change would be inconsistent with that purpose.

Eliminating or reducing the role of the O&M benchmark would be a substantive mistake as well, especially if no suitable and generally accepted substitute were identified. The O&M benchmark has served utilities, the Commission and intervenors effectively over the past 20 years. For the Commission and intervenors, it has provided a meaningful starting point for evaluating the appropriate level of O&M expenses. Recall that the O&M benchmark was borne of Commission frustration with just that issue, when all the Commissioners had before them for decision was a long list of test year activities and a large sum of money projected to be spent on those activities. At the same time, the O&M benchmark has served the utilities' need to have some sort of threshold above which they can focus their explanations of O&M expenses, rather than having to approach every rate proceeding as an exercise in "zero-base budgeting." If Staff or others believe that refinements to the current O&M benchmark are warranted, FPL is prepared to work with them toward that end. Simply deleting the Benchmark MFRs, however, would be throwing out the baby with the bathwater.

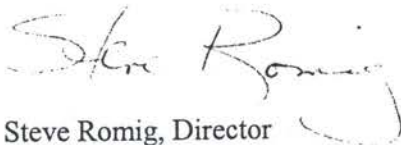
Staff has proposed to modify MFR C-61 to require the calculation of a variety of new performance indices. It appears from comments at the Workshop that Staff may intend these revised performance indices as a substitute for the O&M benchmark. However, FPL does not believe that MFR C-61 would be an adequate substitute. To start with, the indices do not establish benchmarks or thresholds; they merely calculate ratios of expenses or plant in service to particular attributes of a utility's electrical system. These ratios cannot by themselves establish a starting point for targeting the evaluation of O&M expenses. Moreover, there is no track record for the use of the MFR C-61 indices to evaluate the reasonableness of O&M expense levels. Finally, some of the data requested in the revised MFR are not available, and other data

¹ Staff suggested at the Workshop that perhaps MFR C-65 could be modified rather than deleted, so that less detail would be required for "outside professional services." Unfortunately, FPL believes that the burden of preparing this MFR would remain high even if the required detail were reduced. This is because of the fundamental burden of identifying and segregating "outside professional services" expenditures in the first place. As noted above, this process proceeds from the bottom up and necessarily entails a painstaking analysis of detail.

requirements are not clearly defined. Simply put, modification of MFR C-61 as Staff proposes provides no valid justification for deleting the Benchmark MFRs, and if additional indices are to be proposed either as supplements to or replacement for the Benchmark MFRs, a separate proceeding should be conducted to ensure that the revised indicators reflect Commission policy and that the indices selected are appropriate and capable of being prepared without creating unduly burdensome reporting requirements.

On behalf of FPL, I would like to express our sincere appreciation to Staff for their hard work in reevaluating and streamlining the MFRs. It was evident at the workshop that Staff has put considerable thought and effort into their proposals. We recognize that this process must be an iterative one, and hope that the enclosed materials will help Staff to bring this project to a prompt and mutually agreeable conclusion. Toward that end, we believe that it will be important to have a follow-up meeting or meetings with Staff and interested parties to resolve the outstanding issues outlined above and to review Staff's final proposed templates for those MFRs that are to be modified. Please do not hesitate to contact me if you have any questions or need any additional information.

Sincerely,



Steve Romig, Director
Rates and Tariffs

cc: Mr. Timothy Devlin, Director, Division of Economic Regulation,
Florida Public Service Commission

Attachments:

- Attachment 1 – MFRs for which Staff and FPL agree to delete
- Attachment 2 – MFRs for which Staff and FPL will be provided
- Attachment 2a – Staff templates for MFRs in Attachment 2
- Attachment 3 – MFRs for which data can be referenced in other MFRs/Documents
- Attachment 4 – MFRs for further discussion and review

FPL ATTACHMENT 1 - MFRs STAFF AND FPL AGREE TO DELETE

MFR No.	TITLE
A-02	SUMMARY OF RATE CASE
A-03	REASONS FOR REQUESTED RATE INCREASE
A-09	SUMMARY OF JURISDICTIONAL RATE BASE
A-10	SUMMARY OF JURISDICTIONAL NET OPERATING INCOME
A-11	SUMMARY OF ADJUSTMENTS NOT MADE
A-12 a	SUMMARY OF JURISDICTIONAL CAPITAL STRUCTURE
A-12 b	SUMMARY OF JURISDICTIONAL CAPITAL COST RATES
A-12 c	SUMMARY OF FINANCIAL INTEGRITY INDICATORS
A-14	FINANCIAL AND STATISTICAL REPORT
B-01	BALANCE SHEET-JURISDICTIONAL
B-02b	BALANCE SHEET-JURISDICTIONAL LIABILITIES CALCULATION
B-05	COMMISSION RATE BASE ADJUSTMENTS
B-06	COMPANY RATE BASE ADJUSTMENTS
B-11	CAPITAL ADDITIONS AND RETIREMENTS-PROPERTY MERGED OR ACQUIRED FROM OTHER COMPANIES
B-12b	PROPERTY HELD FOR FUTURE USE-MONTHLY BALANCES
B-12c	PROPERTY HELD FOR FUTURE USE-DETAILS
B-12d	PROPERTY HELD FOR FUTURE USE-COLD STANDBY UNITS
B-13a	CONSTRUCTION WORK IN PROGRESS-13 MONTH AVERAGE BALANCE
B-13c	CONSTRUCTION WORK IN PROGRESS-AFUDC
B-14	WORKING CAPITAL-13 MONTH AVERAGE
B-18	CAPACITY FACTORS
B-19	ACCOUNTS PAYABLE-FUEL
B-20	PLANT MATERIALS AND OPERATING SUPPLIES
B-23a	INVESTMENT TAX CREDITS-ANNUAL ANALYSIS
B-24b	STATE ACCUMULATED DEFERRED INCOME TAXES
B-24c	FEDERAL ACCUMULATED DEFERRED INCOME TAXES
B-25	ADDITIONAL RATE BASE COMPONENTS
B-28b	LEASING ARRANGEMENTS (ERTA 1981)
C-01	JURISDICTIONAL NET OPERATING INCOME
C-04	COMMISSION NET OPERATING INCOME ADJUSTMENTS
C-05	COMPANY NET OPERATING INCOME ADJUSTMENTS
C-06	OUT OF PERIOD ADJUSTMENTS TO REVENUES AND EXPENSES
C-07	EXTRAORDINARY REVENUES AND EXPENSES
C-08	REPORT OF OPERATION COMPARED TO FORECAST-REVENUES AND EXPENSES
C-11	UNBILLED REVENUES
C-13	MONTHLY FUEL REVENUES AND EXPENSES
C-14	MONTHLY FUEL EXPENSES
C-15	FUEL REVENUES AND EXPENSES RECONCILIATION
C-16	CONSERVATION GOALS AND PROGRESS
C-17	CONSERVATION REVENUES AND EXPENSES
C-18	CONSERVATION REVENUES AND EXPENSES
C-20	OPERATION AND MAINTENANCE EXPENSES-PRIOR YEAR
C-22	MAINTENANCE ON CUSTOMER FACILITIES, INSTALLATIONS ON CUSTOMER PREMISES AND LEASED PROPERTY ON CUSTOMER FACILITIES
C-24	TOTAL RATE CASE EXPENSES AND COMPARISONS
C-30	CIVIC AND CHARITABLE CONTRIBUTIONS
C-36	CURRENT DEPRECIATION RATES
C-40	FEDERAL DEFERRED INCOME TAXES
C-48	RECONCILIATION OF TOTAL INCOME TAX PROVISION
C-50	REACQUIRED BONDS
C-52	NON-FUEL OPERATION AND MAINTENANCE EXPENSE COMPARED TO CPI
C-55	BENCHMARK YEAR RECOVERABLE O & M EXPENSES BY FUNCTION
C-57	O & M BENCHMARK VARIANCE BY FUNCTION
C-59	ATTRITION ALLOWANCE
C-63	STATEMENT OF CASH FLOWS
D-03b	SHORT-TERM FINANCING POLICY
D-04b	DEBT OUTSTANDING - CALL PROVISIONS AND SPECIAL RESTRICTIONS
D-05	COMMON STOCK ISSUES-ANNUAL DATA
D-06	REPORTS OF OPERATIONS COMPARED TO FORECAST-COST OF CAPITAL
D-10b	FINANCING PLANS-GENERAL ASSUMPTIONS
D-11b	FINANCIAL INDICATORS-CALCULATIONS OF INTEREST AND PREFERRED DIVIDEND COVERAGE RATIOS
D-11c	FINANCIAL INDICATORS-CALCULATIONS AS A PERCENTAGE OF INCOME AVAILABLE FOR COMMON
D-11d	FINANCIAL INDICATORS-CALCULATION OF THE PERCENTAGE OF CONSTRUCTION FUNDS GENERATED INTERNALLY
D-12a	RECONCILIATION OF JURISDICTIONAL RATE BASE AND CAPITAL STRUCTURE
D-12b	SCHEDULE OF PRO-RATA ADJUSTMENTS
E-03a	COST OF SERVICE STUDY-RATES OF RETURN BY RATE SCHEDULE (PRESENT RATES)
E-03b	COST OF SERVICE STUDY-RATES OF RETURN BY RATE SCHEDULE (PROPOSED RATES)
E-04	RECONCILIATION OF CLASS RATE OF RETURN INDICES BETWEEN LAST RATE CASE TEST YEAR TO THE CURRENT CASE
E-09	DETAILED BREAKDOWN OF CUSTOMER UNIT COSTS
E-21a	CORRELATIONS BETWEEN CONTRIBUTIONS TO THE 12 MONTHLY SYSTEM PEAKS AND BILLING KW, KWH, MAXIMUM ON-PEAK DEMAND, AND ON-PEAK KWH FOR ALL DEMAND CLASSES
E-21b	CORRELATIONS BETWEEN CONTRIBUTIONS TO THE CLASS NONCOINCIDENT PEAK AND BILLING KW, KWH, MAXIMUM ON-PEAK DEMAND AND ON-PEAK KWH FOR ALL DEMAND CLASSES
E-22	LOAD DURATION CURVES
E-23	SYSTEM LOAD SHAPES
E-25a	DAYS WITHIN 10% OF MONTHLY PEAKS
E-25b	HOURS WITHIN 10% OF MONTHLY PEAKS
E-28a	INTERRUPTIBLE RATES POLICY
E-28b	CURTAILABLE RATES POLICY
F-02	FINANCIAL STATEMENTS-OPINIONS OF INDEPENDENT CERTIFIED PUBLIC ACCOUNTANTS
F-05	COMPANY DIRECTORS
F-06	OFFICERS OF AFFILIATED COMPANIES OR SUBSIDIARIES
F-12	HEATING DEGREE DAYS
F-13	COOLING DEGREE DAYS
F-14	TEMPERATURE AT TIME OF MONTHLY PEAKS
F-15	FORECASTING MODELS-CONSISTENCY OF DATA
F-16	CONSERVATION ACTIONS
F-18	NUCLEAR PLANTS-DECOMMISSIONS
F-19	NUCLEAR PLANTS-SPENT FUEL AND WASTE STORAGE
F-20	NUCLEAR PLANTS-STORAGE FACILITIES
G-04	INTERIM COMMISSION RATE BASE ADJUSTMENTS
G-05	INTERIM COMPANY RATE BASE ADJUSTMENTS

FPL ATTACHMENT 2 - MFRs STAFF AND FPL AGREE PROVIDE

MFR No.	TITLE	FPSC MODIFICATIONS
A-01 a	FULL REVENUE REQUIREMENTS INCREASE REQUESTED	No change
A-01 b	INTERIM REVENUE REQUIREMENTS INCREASE REQUESTED	No change
A-04a	FULL REVENUE REQUIREMENTS BILL COMPARISON - TYPICAL MONTHLY BILLS	No change
A-04b	INTERIM REVENUE REQUIREMENTS BILL COMPARISON - TYPICAL MONTHLY BILLS	No change
A-05	SUMMARY OF TARIFFS	No change
A-06	REVENUE FROM SALE OF ELECTRICITY BY RATE SCHEDULE	No change
A-07	STATISTICAL INFORMATION	No change
A-08	FIVE YEAR ANALYSIS-CHANGE IN COST	No change
A-13	AFFILIATED COMPANY RELATIONSHIPS	No change
B-02a	BALANCE SHEET-JURISDICTIONAL ASSETS CALCULATION	System basis; include B-2b data
B-03	ADJUSTED RATE BASE	No change
B-04	RATE BASE ADJUSTMENTS	Include B-5 & B-6 data
B-07	JURISDICTIONAL SEPARATION FACTORS-RATE BASE	No change
B-16	NUCLEAR FUEL BALANCES	No change
B-17a	SYSTEM FUEL INVENTORY	Delete monthly data, keep annual and 13 month average data
C-02	ADJUSTED JURISDICTIONAL NET OPERATING INCOME	No change
C-03	JURISDICTIONAL NET OPERATING INCOME ADJUSTMENTS	Include C-4 and C-5 data
C-09	JURISDICTIONAL SEPARATION FACTORS-NET OPERATING INCOME AND EXPENSES	No change
C-23	DETAIL OF RATE CASE EXPENSES FOR OUTSIDE CONSULTANTS	Combine with C-24 without prior case data
C-25	UNCOLLECTIBLE ACCOUNTS	Delete monthly data; 5 yrs annual data Test plus 4 prior years; add calculation of bad debt component of revenue expansion factor
C-26	ADVERTISING EXPENSES	Require only non-cost recovery clause advertising
C-27	INDUSTRY ASSOCIATION DUES	Aggregate dues \$10,000 or less
C-28	ACCUMULATED PROVISION ACCOUNTS-228.1, 228.2 AND 228.4	Require annual data rather than monthly
C-29	LOBBYING AND OTHER POLITICAL EXPENSES	Combine with C-30
C-31	ADMINISTRATIVE EXPENSES	No change
C-32	MISCELLANEOUS GENERAL EXPENSES	No change
C-33	PAYROLL AND FRINGE BENEFIT INCREASES COMPARED TO CPI	Test year plus prior years to include 2 actual historical years
C-35	AMORTIZATION/RECOVERY SCHEDULE-12 MONTHS	Delete monthly data - show only amounts not shown on B-8b
C-37	PROPOSED DEPRECIATION RATES	No change
C-38a	TAXES OTHER THAN INCOME TAXES	Add new column - "Amount Charged to Operating Expense"
C-43	RECONCILIATION OF TAX EXPENSE	No change
C-44	INTEREST IN TAX EXPENSE CALCULATION	Add Historic Year, delete columns - "Amount of Change" and "Reason for Change"
C-45	CONSOLIDATED RETURN	Eliminate requirement for copy of tax sharing agreements
C-47	PARENT(S) DEBT INFORMATION	No change
C-49	MISCELLANEOUS TAX INFORMATION	No change
C-51	GAINS AND LOSSES ON DISPOSITION OF PLANT AND PROPERTY	No change
C-58	REVENUE EXPANSION FACTOR	No change
C-64	EARNINGS TEST	Revise explanation - File MFR only if company seeks additional CWIP in Rate Base
C-66	PENSION COST	No change
D-01	COST OF CAPITAL-13 MONTH AVERAGE	Include D-12a & D-12b data; drop last rate case; add historic (actual) base year
D-03a	SHORT-TERM DEBT	Include D-3b data; add Prior year and historic (actual) base year
D-04a	LONG-TERM DEBT OUTSTANDING	Include C-50 data; include Test, Prior and historic (actual) base year
D-07	PREFERRED STOCK OUTSTANDING	Include prior year and historic (actual) base year
D-08	CUSTOMER DEPOSITS	Delete company policy; add historic (actual) base year
D-10a	FINANCING PLANS-STOCK AND BOND ISSUES	Include D-10b data
D-11a	FINANCIAL INDICATORS-SUMMARY	Drop "Preferred Dividend Coverage"; provide 3 yrs - Test, Prior and Historic (actual) Base Year
E-01	COST OF SERVICE STUDIES	Include E-3a & E-3b data
E-02	EXPLANATION OF VARIATIONS FROM COST OF SERVICE STUDY APPROVED IN COMPANY'S LAST RATE CASE	No change
E-05a	COST OF SERVICE STUDY-ALLOCATION OF RATE BASE COMPONENTS TO RATE SCHEDULE	No change
E-05b	COST OF SERVICE STUDY-ALLOCATION OF EXPENSE COMPONENTS TO RATE SCHEDULE	No change
E-06a	COST OF SERVICE STUDY-FUNCTIONALIZATION AND CLASSIFICATION OF RATE BASE	No change
E-06b	COST OF SERVICE STUDY-FUNCTIONALIZATION AND CLASSIFICATION OF EXPENSES	No change
E-07	SOURCE AND AMOUNT OF REVENUES-AT PRESENT AND PROPOSED RATES	No change
E-08a	COST OF SERVICE STUDY-UNIT COSTS, PRESENT RATES	No change
E-08b	COST OF SERVICE STUDY-UNIT COSTS, PROPOSED RATES	No change

FPL ATTACHMENT 2 - MFRs STAFF AND FPL AGREE TO PROVIDE

MFR No.	TITLE	FPSC MODIFICATIONS
E-10	DEVELOPMENT OF SERVICE CHARGES	No change
E-11	COMPANY-PROPOSED ALLOCATION OF THE RATE INCREASE BY RATE CLASS	No change
E-12	COST OF SERVICE-LOAD DATA	No change
E-13	COST OF SERVICE STUDY-DEVELOPMENT OF ALLOCATION FACTORS	No change
E-14	DEVELOPMENT OF COINCIDENT AND NONCOINCIDENT DEMANDS FOR COST STUDY	No change
E-16a	REVENUE FROM SALE OF ELECTRICITY BY RATE SCHEDULE	Eliminate clause revenues
E-16b	REVENUES BY RATE SCHEDULE-SERVICE CHARGES (ACCOUNT 451)	No change
E-16c	BASE REVENUE BY RATE SCHEDULE-CALCULATIONS	No change
E-16d	REVENUE BY RATE SCHEDULE-LIGHTING SCHEDULE CALCULATION	No change
E-17	PROPOSED TARIFF SHEETS AND SUPPORT FOR CHARGES	No change
E-18d	PROJECTED BILLING DETERMINANTS-DERIVATION	No change
E-20	LOAD RESEARCH DATA	No change
E-26	MONTHLY PEAKS	No change
E-27a	DEMAND AND ENERGY LOSSES	No change
E-27b	ENERGY LOSSES	No change
E-27c	DEMAND LOSSES	No change
F-01	ANNUAL AND QUARTERLY REPORT TO SHAREHOLDERS	No change
F-03	SEC REPORTS	No change
F-04	FERC AUDIT	No change
F-08	NRC SAFETY CITATIONS	No change
F-09	FORECASTING MODELS	Retain first 2 sentences only, delete all other requirements
F-10	FORECASTING MODELS-SENSITIVITY OF OUTPUT TO CHANGES IN INPUT DATA	Retain sales forecasting model requirement only, delete load and fuel cost forecasting model requirements
F-11	FORECASTING MODELS-HISTORICAL DATA	No change
F-17	ASSUMPTIONS	No change
F-21	PUBLIC NOTICE	No change
G-01	INTERIM REVENUE REQUIREMENTS INCREASE REQUESTED	No change
G-02	INTERIM ADJUSTED RATE BASE	No change
G-03	INTERIM RATE BASE ADJUSTMENTS	Include G-4 & G-5 data
G-06	INTERIM JURISDICTIONAL SEPARATION FACTORS - RATE BASE	No change
G-09a	INTERIM SYSTEM FUEL INVENTORY	Delete monthly data, keep annual and 13 month average data
G-14	INTERIM ADJUSTED JURISDICTIONAL NET OPERATING INCOME	No change
G-15	INTERIM JURISDICTIONAL NET OPERATING INCOME ADJUSTMENTS	Include G-16 & G-17 data
G-18	INTERIM JURISDICTIONAL SEPARATION FACTORS-NET OPERATING INCOME	No change
G-27	INTERIM INTEREST IN TAX EXPENSE CALCULATION	Explanation - eliminate changes explanations
G-28	INTERIM PARENT(S) DEBT INFORMATION	No change
G-31	INTERIM GAINS AND LOSSES ON DISPOSITION OF PLANT OR PROPERTY	No change
G-36	INTERIM PENSION COST	No change
G-37	INTERIM REVENUE EXPANSION FACTOR	No change
G-38	INTERIM COST OF CAPITAL - 13 MONTH AVERAGE	Add historic base year; include description of all adjustments; include reconciliation of Rate Base and Capital Structure.
G-45	INTERIM - REVENUE FROM SALE OF ELECTRICITY BY RATE SCHEDULE	No change
G-46	INTERIM - REVENUES FROM SERVICE CHARGES (ACCOUNT 451)	No change
G-47	INTERIM - BASE REVENUE BY RATE SCHEDULE CALCULATIONS	No change
G-48	INTERIM - REVENUE BY LIGHTING SCHEDULE CALCULATION	No change

FPL ATTACHMENT 3 - MFRs FOR WHICH DATA CAN BE REFERENCED TO OTHER MFRs/DOCUMENTS

MFR No.	TITLE	REFERENCE
C-10	OPERATING REVENUES DETAIL	To comply with the requirement of this MFR, FPL proposes to reference MFRs C-9 and C-3 as modified, since they provide substantially duplicative information to that required for this MFR. MFR C-9 provides the same level of detail for revenues (by account) on a total company, jurisdictional and jurisdictional-adjusted basis. While the revenue adjustments are shown on MFR C-9 in the aggregate by revenue account, MFR C-3 provides the breakdown of each revenue adjustment.
C-19	OPERATION AND MAINTENANCE EXPENSES-TEST YEAR	To comply with the requirement of this MFR, FPL proposes to reference and attach pages 320-323 of FPL's FERC Form 1 report for the most recent historical period.
C-38b	REVENUE TAXES	To comply with the requirement of this MFR, FPL proposes to reference MFR C-38a. MFR C-38a provides detail information on Gross Receipts Tax and Regulatory Assessment Fee as well as an explanation describing the bases of the calculations.
C-62	NON-UTILITY OPERATIONS UTILIZING UTILITY ASSETS	If all transactions have been reported on the Annual Diversification Report, attachment of pertinent pages would constitute compliance with MFR requirement.
D-9	COMMON STOCK DATA	To comply with the requirement of this MFR, FPL proposes to reference and attach information contained in FPL Group Annual Report to Shareholders provided in MFR F-1. In FPL's last rate case, for example, reference would have been made to Page 21 of FPL Group 2001 Annual Report which provides 6 years of Common Stock data.
E-15	ADJUSTMENT TO TEST YEAR UNBILLED REVENUE	To comply with the requirement of this MFR, FPL proposes to provide the following reference: "See MFR E-16a, column entitled "Unbilled Base" which provides breakdown of unbilled revenues by rate class and MFR E-16c, line entitled "Non-Fuel Energy" which provides kWh sales by rate class."
F-7	BUSINESS CONTRACTS WITH OFFICERS OR DIRECTORS	If all transactions have been reported on the Annual Diversification Report, attachment of pertinent pages would constitute compliance with MFR requirement.
G-19	INTERIM OPERATING REVENUES DETAIL	To comply with the requirement of this MFR, FPL proposes to reference the information contained in MFRs G-18 and G-15 as modified, since they provide substantially duplicative information to that required for this MFR. MFR G-18 provides the same level of detail for revenues (by account) on a total company, jurisdictional and jurisdictional-adjusted basis. While the revenue adjustments are shown on MFR G-18 in the aggregate by revenue account, MFR G-15 as modified provides the breakdown of each revenue adjustment.

FPL ATTACHMENT 4 - PROPOSED ADDITIONAL MFR MODIFICATIONS AND DELETIONS

MFR No.	TITLE	COMMENTS/PROPOSED CHANGES
B-8a	PLANT BALANCES BY ACCOUNT AND SUB-ACCOUNT	Modify - Add Depreciation Rate requirement proposed by Staff for MFR B-8b.
B-8b	DEPRECIATION RESERVE BALANCES BY ACCOUNT AND SUB-ACCOUNT	Modify - Depreciation Rate requirement proposed by Staff for MFR B-8b is more appropriately included on MFR B-8a.
B-9a	MONTHLY PLANT BALANCES TEST YEAR-13 MONTHS	Delete - The detail information provided in MFR B-8a provides for each account the beginning of year balance, additions, retirements, transfers and the year end balance. MFR B-8a also provides the 13 month average balance for each account. FPL believes this information is sufficient to evaluate its forecast of Plant. By contrast, MFR B-9a provides for each account the monthly plant balances and 13 month average balance. Also, MFR B-9a was waived in FPL's last rate case.
B-9b	MONTHLY RESERVE BALANCES TEST YEAR-13 MONTHS	Delete - The detail information provided in MFR B-8b provides for each account the beginning of year reserve balance, depreciation expense, retirements, net salvage, adjustments or transfers and the year end reserve balance. MFR B-8b also provides the 13 month average reserve balance for each account. FPL believes this information is sufficient to evaluate its forecast of Accumulated Depreciation Reserve. By contrast, MFR B-9b provides for each account the monthly reserve balances and 13 month average balance. Also, MFR B-9b was waived in FPL's last rate case.
B-10	CAPITAL ADDITIONS AND RETIREMENTS	Modify - Threshold for Major Projects should be changed to 0.5% of Gross Plant.
B-12a	PROPERTY HELD FOR FUTURE USE-13 MONTH AVERAGE	Modify - Aggregate properties with a value of less than 10% of total Property Held for Future Use.
B-13b	CONSTRUCTION WORK IN PROGRESS-OTHER DETAILS	Modify - Revise definition of Major Projects to include "projects whose cost of completion exceed 0.5% of Gross Plant".
B-15	WORKING CAPITAL-MONTHLY BALANCES	Modify - Provide 13 Month Average balances rather than monthly balances. In compliance with the modified requirement of this MFR, FPL proposes to reference the pages containing the breakdown by account of working capital assets and liabilities on MFR B-7. MFR B-7 provides detailed identification of working capital assets and liabilities on a total company, jurisdictional and jurisdictional-adjusted basis.
B-17b	FUEL INVENTORY BY PLANT	Delete - Fuel Inventory balances by fuel type provided in MFR B-17a provide sufficient data to evaluate the inventory levels in the forecast.
B-21	OTHER DEFERRED CREDITS	Modify - Aggregate Deferred Credits with a balance of less than 10% of Total Deferred Credits.
B-22	MISCELLANEOUS DEFERRED DEBITS	Modify - Aggregate Deferred Debits with a balance of less than 10% of Total Deferred Debits.
B-23b	INVESTMENT TAX CREDITS-ANNUAL ANALYSIS BY TYPE	Modify - The information should be requested for a 5 year period, including the Test and Prior years, rather than from last rate case. Also, the ITC amounts should be provided in total, not by rate or type of ITC.
B-24a	TOTAL ACCUMULATED DEFERRED INCOME TAXES	Modify - The information should be requested for a 5 year period, including the Test and Prior years, rather than from last rate case.
B-26	ACCOUNTING POLICY CHANGES AFFECTING RATE BASE	Modify - 1st sentence to read: Provide a statement of changes in accounting policy for the test year and prior year.
B-27	DETAIL OF CHANGES IN RATE BASE	Modify - Add \$ amount (based on 0.1% of Total Rate Base) to the current 10% threshold.
B-28a	LEASING ARRANGEMENTS	Modify - Requirement should be limited to capital leases with a capitalized cost exceeding 0.5% of Gross Plant.
B-29	10 YEAR HISTORICAL BALANCE SHEET	Modify - Require 3 years of historical balance sheet data. Balance sheet data for the Test and Prior years is provided in MFR B-2a and should not be duplicated here.
B-30	NET PRODUCTION PLANT ADDITIONS	Modify - The classification of additions by growth category should be limited to additions associated with major projects. Major projects should be defined as projects whose costs of completion exceed 0.5% of Gross Plant. The definition of major projects is consistent with MFRs B-10 and B-13a.
C-12	BUDGETED VERSUS ACTUAL OPERATING REVENUES AND EXPENSES	Modify - Budgeted information should be provided at a level consistent with FPL's budget, to the extent not available at the primary account.
C-21	DETAIL OF CHANGES IN EXPENSES	Modify - Add \$ amount (based on 0.1% of Total Operating Expenses) to the current 10% threshold. Also, if budget data not available by FERC Account, provide variance and explanation at the FERC Function level.
C-34	DEPRECIATION EXPENSE COMPUTED ON PLANT BALANCES TEST YEAR-12 MONTHS	Modify - Information should be provided on an annual basis rather than monthly. This modification is consistent with FPL's last rate case.
C-39	STATE DEFERRED INCOME TAXES	Delete MFR - The information contained in MFR C-9 coupled with MFR C-43 is sufficient to evaluate the accuracy of tax expense in cost of service. MFR C-9 provides the breakdown of current and deferred federal and state income tax expense and the amortization of ITC. MFR C-43 provides the reconciliation and proof of total income tax expense in cost of service.

FPL ATTACHMENT 4 - PROPOSED ADDITIONAL MFR MODIFICATIONS AND DELETIONS

C-41	DEFERRED TAX ADJUSTMENT	Delete MFR - The information required in this MFR is related to the tax law change made in 1986 and its current effects are insignificant. The changes in excess deferred taxes are reported in MFR C-43. MFR C-43 provides the reconciliation and proof of total income tax expense in cost of service.
C-42	STATE AND FEDERAL INCOME TAXES	Delete MFR - The information contained in MFR C-9 coupled with MFR C-43 is sufficient to evaluate the accuracy of tax expense in cost of service. MFR C-9 provides the breakdown of current and deferred federal and state income tax expense and the amortization of ITC. MFR C-43 provides the reconciliation and proof of total income tax expense in cost of service.
C-46	INCOME TAX RETURNS	Modify - Explanation should be worded so as to provide that the tax returns will be made available at the Company's headquarters. This would allow individuals knowledgeable with the return to be present and the review coordinated in order to maintain confidentiality.
C-53	O & M BENCHMARK COMPARISON BY FUNCTION	Retain MFR - See FPL letter of transmittal attached for this filing. Elimination of the O&M Benchmark Comparison represents a significant policy change on the part of the FPSC, and should be considered separate and apart from this current MFR streamlining effort.
C-54	O & M ADJUSTMENTS BY FUNCTION	Delete MFR - Staff has given no indication of how it proposes to modify this MFR. The existing MFR is not very useful by itself or if C-53, O&M Benchmark Comparison, is filed since the data currently required by this MFR is largely duplicative of the data provided on MFR C-53.
C-56	O&M COMPOUND MULTIPLIER CALCULATION	Retain MFR - Information provides essential support to MFR C-53.
C-60	TRANSACTIONS WITH AFFILIATED COMPANIES	Modify - Delete Acct. No. requirement, FPL does not budget by FERC account.
C-61	PERFORMANCE INDICES	Retain MFR - Staff is proposing a number of indices which apparently are intended to replace the O&M Benchmark indicator. Please see FPL letter of transmittal attached for this filing. FPL does not feel that this current MFR streamlining process is the appropriate forum for developing additional indices, and that should be considered separate and apart from this process.
C-65	OUTSIDE PROFESSIONAL SERVICES	Delete MFR - This information is burdensome to prepare and not relevant to the rate setting process. In order to comply with this MFR, FPL must review and research all invoices for outside services to determine the type of service that was provided. FPL estimates it expended in excess of one month of effort to produce this MFR in the last rate case. Reducing the requirement to only report totals by type of service as proposed by Staff does not reduce the amount of effort required since the painstaking task of reviewing and researching invoices must still be performed. The task of classifying outside services by type of service as required by this MFR is further complicated by the fact that the same service provider can provide professional services such as accounting, financial, management, and other services across a multitude of business functions. For example, an accounting firm may provide financial, accounting and other services to several business units, however, classification based on the actual services provided cannot be attained until the invoices are thoroughly reviewed and researched. FPL's cost management focus is "activity" based and, as such, the costs for outside services are captured by budget activity in the aggregate. In a forecast scenario, the classification of professional services by type of service is even more difficult. For example, in the case of a nuclear outage budget activity, the forecast of costs for engineering services, accounting and project management services would be classified in the aggregate as outside services. FPL manages its costs at an activity level that includes all costs, internal (e.g. payroll), outside professional services, contract labor, materials, etc. Focusing on just one cost category such as outside services, whether by service provider or by type of service, is not appropriate and provides no value in evaluating the reasonableness of FPL's overall costs.
C-70a	HEDGING COSTS	Delete MFR - Information not relevant to base rates. FPL presently provides the Commission detailed information on hedging costs via its filings in the Fuel Cost Recovery Clause and Staff's auditing of the same.
C-70b	SECURITY COSTS	Delete MFR - FPL presently provides the Commission detailed information on all security costs (base and incremental) that relate to power supply via its filings in the Capacity Cost Recovery Clause and Staff's auditing of the same. This represents the majority of the security costs that have been significantly impacted by heightened post-9/11 security concerns. FPL does not believe that the additional cost of tracking and reporting other security costs would be warranted.
D-2	COST OF CAPITAL-10 YEAR HISTORY	Modify/Clarify - MFR modifications proposed in the Staff template for this MFR (see Attachment 2a) need to be clarified - 1) what is the definition of the new term "investor" capital and how does it differ from the term "fixed cost" capital used previously. 2) what is being sought by the new requirement to "provide a breakdown of investor capitalization for utility, non-utility and on a consolidated basis for 5 years (through the projected test year)".
E-18a	BILLING DETERMINANTS-NUMBER OF BILLS	Modify - Delete requirement for historical period since it is not relevant.
E-18b	BILLING DETERMINANTS-KW DEMAND	Modify - Delete requirement for historical period since it is not relevant.
E-18c	BILLING DETERMINANTS-MWH SALES	Modify - Delete requirement for historical period since it is not relevant.
E-19	CUSTOMERS BY VOLTAGE LEVEL	Delete MFR - MFRs E-27b and E-27c provide energy and demand breakdowns by customer class by voltage level, which is sufficient for setting rates.
E-24	MONTHLY RESERVE MARGINS AND RELIABILITY INDEXES	Delete MFR - MFR waived in FPL's last rate case. At the 3/26/03 workshop, Staff agreed to delete.

FPL ATTACHMENT 4 - PROPOSED ADDITIONAL MFR MODIFICATIONS AND DELETIONS

G-7	INTERIM WORKING CAPITAL - 13 MONTH AVERAGE	Modify - Provide 13 Month Average balances rather than monthly balances. In compliance with the modified requirement of this MFR, FPL proposes to reference the pages containing the breakdown by account of working capital assets and liabilities on MFR G-18. MFR G-18 provides detailed identification of working capital assets and liabilities on a total company, jurisdictional and jurisdictional-adjusted basis.
G-9b	INTERIM FUEL INVENTORY BY PLANT	Delete - Fuel Inventory balances by fuel type provided in MFR G-9a provide sufficient data to evaluate the inventory levels in the interim period.
G-13	INTERIM ACCOUNTING POLICY CHANGES	Modify - 1st sentence to read: Provide a statement of changes in accounting policy in the interim year.
G-23	INTERIM STATE DEFERRED INCOME TAXES	Delete MFR - The information contained in MFR G-18 coupled with MFR G-26 is sufficient to evaluate the accuracy of income tax expense in cost of service. MFR G-18 provides the breakdown of current and deferred federal and state income tax expense and the amortization of ITC. MFR G-26 provides the reconciliation and proof of total income tax expense in cost of service.
G-25	INTERIM STATE AND FEDERAL INCOME TAXES	Delete MFR - The information contained in MFR G-18 coupled with MFR G-26 is sufficient to evaluate the accuracy of income tax expense in cost of service. MFR G-18 provides the breakdown of current and deferred federal and state income tax expense and the amortization of ITC. MFR G-26 provides the reconciliation and proof of total income tax expense in cost of service.
G-26	INTERIM RECONCILIATION OF TAX EXPENSE	Retain MFR - MFR G-26 provides the reconciliation and tax proof of total income tax expense in cost of service, and it should be retained in lieu of MFRs G-23 and G-25. See comments on G-23 and G-25 above.
G-33	INTERIM O & M ADJUSTMENTS BY FUNCTION	Delete MFR - Staff has given no indication of how it proposes to modify this MFR. The existing MFR is not very useful by itself or if G-32 (Interim O&M Benchmark Comparison) is filed. The data currently required by this MFR is largely duplicative of the data provided on MFR G-32.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of Minimum Filing Requirements)
(MFRs) for Investor-Owned Electric Utilities.)
_____)

UNDOCKETED

FILED: April 14, 2003

**TAMPA ELECTRIC COMPANY'S
POST-WORKSHOP COMMENTS**

Tampa Electric Company ("Tampa Electric" or "the company") offers the following comments as a follow up to matters discussed at the March 26 workshop in the above matter:

1. Tampa Electric would urge that three considerations be incorporated into any revisions to the existing MFR rule. First, the company would urge that the Staff support a rule provision that would allow the investor-owned utilities to substitute relevant and perhaps more readily available information in place of that required on individual MFR forms subject, of course, to the utility fully identifying by line, page number or other easy reference the location of the substituted information or by including an additional document that contains the substituted information. The purpose of this proposal is to ensure that the Commission, its Staff and other participants have full access to relevant information without causing the utility to expend the time, effort and expense of completing MFR forms when the pertinent information is available in another document or other medium. This could be done through a general statement in the rule allowing the substitute information to be provided in place of completing the MFR form so long as the location of the information is clearly cross referenced or otherwise identified or included in a separate document. Allowing the substitution of relevant information in lieu of completing a form that calls for the same type of information would significantly lessen Tampa Electric's concerns about the need for modifications to numerous individual MFR forms.

2. Tampa Electric would also encourage the Staff to support retention of the current O & M benchmark data in the MFRs. The O & M benchmark data provides the Commission and all participants with a good historical perspective and a sanity check on other measures that may be used to evaluate the appropriate level of O & M expense.

3. Tampa Electric would also urge the Staff to support some type of threshold, expressed either in percentage terms or in dollar amounts, depending upon the individual form, to make it more efficient and less costly for the utility to complete the MFR forms. This proposal would apply to the following specific forms:

<u>Form No.</u>	<u>Title</u>
B-10	Capital Additions & Retirements
B-12a	Property Held for Future Use – 13 Month Average
B-13b	Construction Work in Progress – Other Details
B-21	Other Deferred Credits
B-22	Miscellaneous Deferred Debits
B-27	Detail of Changes in Rate Base
B-28a	Leasing Arrangements
B-30	Net Production Plant Additions

The utilization of thresholds in the above forms will enable the Commission to optimize its ability to have access to important information without causing the utilities to incur undue burden or expense in listing every detail of information however small.

3. Tampa Electric continues to urge the Staff to support the deletion of Schedule C-65 (Outside Professional Services), since the preparation of this schedule would be very time

consuming while providing limited or no value to the Commission, its Staff and other participants in a proceeding.

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