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**-VIA ELECTRONIC FILING -**

Mr. Adam Teitzman  
Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

**Re: Docket 20190081-EI - Petition for Approval of 2019 Revisions to Florida Power & Light Company's Underground Residential and Commercial Differential Tariffs – FPL's Revised Pages for Petition**

Dear Mr. Teitzman:

Pursuant to a June 28, 2019 conversation between Commission Staff and representatives of FPL's Power Delivery Business Unit, I am submitting this letter to provide the attached documents which should be substituted for three pages that were included within the appendices to the Petition for Approval of 2019 Revisions to Florida Power & Light Company's Underground Residential and Commercial Differential Tariffs filed with the Commission on April 1, 2019. Unfortunately, the pages that make up the appendices are not numbered so I will describe each requested substitution with specificity. The three requested substitutions are as follows:

1. Appendix 4 (URD) – the 10<sup>th</sup> page of this appendix (also the 41<sup>st</sup> page of the pdf of the Petition on file with the Commission) with a title "OPERATIONAL COSTS DIFFERENTIAL – LOW DENSITY" should be removed and the attached sheet with the same title should be inserted in its place.
2. Appendix 4 (URD) – the 19<sup>th</sup> page of this appendix (also the 50<sup>th</sup> page of the pdf of the Petition on file with the Commission) with a title "OPERATIONAL COSTS DIFFERENTIAL – HIGH DENSITY" should be removed and the attached sheet with the same title should be inserted in its place.
3. Appendix 4 (URD) – the 28<sup>th</sup> page of this appendix (also the 59<sup>th</sup> page of the pdf of the Petition on file with the Commission) with a title "OPERATIONAL COSTS DIFFERENTIAL – METER PEDESTAL" should be removed and the attached sheet with the same title should be inserted in its place.

If you or Commission Staff would like us to refile the entire Petition with these changes included, please let me know and we will proceed accordingly.

Please contact me at (561) 691-2512 should you or your Staff have any questions or concerns regarding this filing.

Sincerely,

/s/Kenneth M. Rubin  
Kenneth M. Rubin

Enclosure

Cc: Walt Trierweiler, Esq. with enclosures

OPERATIONAL COSTS DIFFERENTIAL - LOW DENSITY

<u>Low Density</u>	<u>30-Year NPV (\$ per pole-line mile)</u>			<u>Cost per Lot</u>
	<u>O&amp;M</u>	<u>Capital</u>	<u>Total</u>	
Differential (Non-Storm)	(\$7,529)	(\$173,711)	(\$181,240)	(\$2,103)
<u>Avoided Storm Restoration</u>				
Tier 1 (Full GAF) - 200 or more lots	(\$71,224)		(\$71,224)	(\$827)
Tier 2 (40% GAF) - 85 to 199 lots	(\$28,490)		(\$28,490)	(\$331)
Tier 3 (20% GAF) - less than 85 lots	(\$14,245)		(\$14,245)	(\$165)
<u>Low Density</u>				<u>Cost Differential</u>
Pre-Operational Cost				\$210.53
Post-Operational Cost				
Tier 1 (Full GAF) - 200 or more lots	-----		Note 1	\$0.00
Tier 2 (40% GAF) - 85 to 199 lots	-----			\$0.00
Tier 3 (20% GAF) - less than 85 lots	-----			\$0.00

Note 1: Where the "Post-Operational" Costs are negative, the differentials have been set to \$0.

OPERATIONAL COSTS DIFFERENTIAL - HIGH DENSITY

<u>High Density</u>	<u>30-Year NPV (\$ per pole-line mile)</u>			<u>Cost</u>
	<u>O&amp;M</u>	<u>Capital</u>	<u>Total</u>	<u>per Lot</u>
Differential (Non-Storm)	(\$7,427)	(\$172,407)	(\$179,834)	(\$1,796)
<u>Avoided Storm Restoration</u>				
Tier 1 (Full GAF) - 300 or more lots	(\$82,766)		(\$82,766)	(\$827)
Tier 2 (40% GAF) - 100 to 299 lots	(\$33,106)		(\$33,106)	(\$331)
Tier 3 (20% GAF) - less than 100 lots	(\$16,553)		(\$16,553)	(\$165)
<u>High Density</u>				<u>Cost</u>
Pre-Operational Cost				<u>Differential</u>
Post-Operational Cost				
Tier 1 (Full GAF) - 300 or more lots	-----			Note 1 \$0.00
Tier 2 (40% GAF) - 100 to 299 lots	-----			Note 2 \$0.00
Tier 3 (20% GAF) - less than 100 lots	-----			Note 2 \$0.00

Note 1: The "Pre-Operational Cost" differential has been set to \$0 since it is a negative amount.  
 Note 2: Where the "Post-Operational Costs" are negative, the differentials have been set to \$0.

OPERATIONAL COSTS DIFFERENTIAL - METER PEDESTAL

<u>Meter Pedestal</u>	<u>30-Year NPV (\$ per pole-line mile)</u>			<u>Cost</u>
	<u>O&amp;M</u>	<u>Capital</u>	<u>Total</u>	<u>per Lot</u>
Differential (Non-Storm)	(\$7,427)	(\$172,407)	(\$179,834)	(\$1,796)
<u>Avoided Storm Restoration</u>				
Tier 1 (Full GAF) - 300 or more lots	(\$82,766)		(\$82,766)	(\$827)
Tier 2 (40% GAF) - 100 to 299 lots	(\$33,106)		(\$33,106)	(\$331)
Tier 3 (20% GAF) - less than 100 lots	(\$16,553)		(\$16,553)	(\$165)
<u>Meter Pedestal</u>				
Pre-Operational Cost				Note 1 \$0.00
Post-Operational Cost				
Tier 1 (Full GAF) - 300 or more lots	-----			\$0.00
Tier 2 (40% GAF) - 100 to 299 lots	-----			\$0.00
Tier 3 (20% GAF) - less than 100 lots	-----			\$0.00

Note 1: The "Pre-Operational Cost" differential has been set to \$0 since it is a negative amount.  
 Note 2: Where the "Post-Operational Costs" are negative, the differentials have been set to \$0.