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July 18, 2008

Via Electronic Mail

Ms. Judy Harlow
Division of Economic Regulation
Florida Public Service Commission
Capital Circle Office Center
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: FPL's Post-Workshop Comments on the Development and
Implementation of A Renewable Portfolio Standard for Florida
Undocketed

Dear Ms. Harlow:

On July 11, 2008, the Florida Public Service Commission ("Commission") convened a rulemaking workshop for the purpose of developing a rule on a Renewable Portfolio Standard ("RPS") for Florida. This rulemaking workshop was a continuation of workshops held last year on the same subject. In its notice of the July 11 workshop, the Commission indicated that "[t]he purpose of the workshop is to provide the Commissioners and interested parties with an opportunity to discuss issues relevant to the development and implementation of a Renewable Portfolio Standard for Florida pursuant to the provisions of House Bill 7135.¹

For its initial post-workshop comments, FPL is filing its proposal for an RPS which sets forth the basic elements and principles for the development of an RPS Rule (see Attachment A). FPL may file Supplemental post-workshop comments addressing additional issues and details for an RPS and a rule related to same, which build on and are consistent with the attached summary, for the Staff and the Commission's consideration in this proceeding.

FPL looks forward to continued participation in this proceeding.

Respectfully submitted,

A handwritten signature in cursive script that reads "Carla G. Pettus".

Carla G. Pettus, Senior Attorney
Florida Power & Light Company
Florida Authorized House Counsel No. 53011
Bar Member: MD and DC

CGP:ec

Attachment

cc: Ms. Cindy Miller, Senior Attorney, Office of the General Counsel

¹ Workshop Agenda.

Attachment- A

Florida Public Service Commission Rulemaking FPL Proposal for a Florida Renewable Portfolio Standard (RPS)

1. In order to best ensure an optimal design and implementation of a Florida RPS, there is a need for more education, information, and analysis.
2. The primary objective of a Florida RPS should be to reduce emissions of Greenhouse Gases from the production of electricity with a focus on solar and wind while increasing energy security, maintaining reliable electric service and reasonable electricity prices for customers.
3. A Florida RPS should foremost value clean/renewable energy sources that have the greatest effect on the objective of reducing Greenhouse Gas emissions. Therefore, clean energy sources such as nuclear, wind, and solar, as well as carbon reductions due to energy efficiency, e.g., modernizations of less fuel efficient plants, should be recognized and play prominent roles in meeting a Florida RPS.
4. To encourage the development of and investment in clean/renewable energy sources, up-front and expedited prudence determinations and cost recovery approvals with administrative finality are essential.
5. Electric customers should be informed of their contribution to meeting a Florida RPS.
6. The Florida Public Service Commission (FPSC) should set and periodically review the RPS targets to ensure they can be met without imposing unacceptable costs or adverse reliability effects on customers.
7. In order to prevent Florida from becoming economically disadvantaged by higher electricity costs, a Florida RPS should be adjusted/harmonized with a Federal standard should one become law.
8. The methods and incentives for complying with a Florida RPS need to be consistent with the objective to reduce emissions of Greenhouse Gases from the production of electricity with a focus on solar and wind while increasing energy security, maintaining reliable electric service and reasonable electricity prices for customers.