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OF COUNSEL

ORIGINAL
FILE COPY

January 24, 1995

VIA FEDERAL EXPRESS

Florida Public Service Commission
Division of Records & Recording
101 East Gaines Street, Room 107
Tallahassee, FL 32399-0850

Re: Docket No. 950001-E1

In Re: Fuel and Purchased Power Cost Recovery Clause and
Generating Performance Incentive Factor

Dear Sir or Madam:

Enclosed herewith please find the original and fifteen copies of the direct testimony of Steven M. Fietek which is being filed in conjunction with the Petition for Leave to Intervene of Florida Steel Corporation which was previously filed with this Commission. Also enclosed herewith is a diskette of this testimony.

ACK ✓

(AFA) Very truly yours,

APP — SALEM, SAXON & NIELSEN, P.A.

CAF — *Marian B. Rush*

CRJ — Marian B. Rush

EAS *Dudley 5*

LEA 1 MBR/nr

LEB 4 Enclosure

OPC —

RON cc: Peter J.P. Brickfield, Esq.

SEC 1

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OTH —

RECEIVED & FILED
MBR
EPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

00918 JAN 25 95

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: FUEL AND PURCHASED POWER)
COST RECOVERY CLAUSE AND) DOCKET NO. 950001-E1
GENERATING PERFORMANCE INCENTIVE)
FACTOR)

NOTICE OF FILING OF TESTIMONY
OF STEVEN M. FIETEK

Florida Steel Corporation hereby files the attached testimony of Steven M. Feitek in support of the Petition for Leave to Intervene of Florida Steel Corporation.

Respectfully submitted,

FLORIDA STEEL CORPORATION

By: Marian B Rush

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Dated: January 24, 1995

CERTIFICATE OF SERVICE
DOCKET NO. 950001-E1

I HEREBY CERTIFY that a true and correct copy of the Notice of Filing of Testimony of Steven M. Fietek has been furnished via U.S. Mail this 24th day of January 1995, to the following:

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OF COUNSEL

RECEIVED
JAN 26 1995
FPSC-RECORDS/REPORTING

January 24, 1995

VIA FEDERAL EXPRESS

Florida Public Service Commission
Division of Records & Recording
101 East Gaines Street, Room 107
Tallahassee, FL 32399-0850

Re: Docket No. 950001-E1

In Re: Fuel and Purchased Power Cost Recovery Clause and
Generating Performance Incentive Factor

Dear Sir or Madam:

Enclosed herewith please find the original and fifteen copies of
the reformatted testimony of Steven M. Pietek, to be substituted
for the testimony filed on January 24, 1994.

Very truly yours,

SALEM, SAXON & NIELSEN, P.A.

Marian B. Rush

Marian B. Rush

MBR/nr

Enclosure

cc: Peter J.P. Brickfield, Esq.

82\florida\fpasc2

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DIRECT TESTIMONY OF

STEVEN M. FIETEK

FLORIDA POWER & LIGHT COMPANY

DOCKET NUMBER 950001-EI

BEFORE THE

FLORIDA PUBLIC SERVICE COMMISSION

ON BEHALF OF

FLORIDA STEEL CORPORATION

JANUARY 24, 1995

DOCUMENT NUMBER-DATE
00918 JAN 25 88
FPSC-RECORDS/REPORTING

1 I. PURPOSE OF TESTIMONY

2 Q. Would you please state your name, address, and occupation?

3 A. My name is Steven M. Fietek. My business address is 2150 Dain Bosworth Plaza,
4 60 South Sixth Street, Minneapolis, Minnesota. I am a consultant with Dahlen,
5 Berg & Co., a consulting firm specializing in energy-related matters.

6 Q. What is the purpose of your testimony?

7 A. The purpose of my testimony is to address deficiencies in Florida Power & Light
8 (FPL) Company's petition for approval of fuel cost recovery factors and capacity
9 cost recovery factors as filed by FPL in Docket No. 950001-EI, dated January 17,
10 1995.

11 Q. By whom were you engaged?

12 A. Dahlen, Berg & Co. was engaged by Florida Steel Corporation (Florida Steel) who
13 operates a steel recycling and manufacturing plant in Jacksonville, Florida. Florida
14 Steel is a customer of FPL who purchases electric power pursuant to FPL's
15 Commercial/Industrial Load Control Program (CILC-1) tariff. Florida Steel's
16 Jacksonville facility is one of FPL's largest industrial customers, with a peak load
17 of nearly 45 mW and annual energy consumption of nearly 220,000 mWh. The
18 cost of doing business for Florida Steel is directly and substantially affected by
19 FPL's electric rates. Therefore, Florida Steel is interested in assuring that rates
20 charged by FPL are reasonable.

21 Q. What is the scope of work you performed in this case?

22 A. I reviewed FPL's petition, direct testimony, and exhibits filed in this case.

23 Q. How is your testimony organized?

24 A. My testimony is presented in the following sections.

25 • Section III, Natural gas costs are overstated by \$65.5 million

- 1 • Section IV, Equipment modifications should be capitalized and depreciated
- 2 • Section V, Purchased power capacity cost allocations should be reviewed

3

4 **II. STATEMENT OF QUALIFICATIONS**

5 Q. Please summarize your experience in the area of public utility regulation.

6 A. I conducted discovery, performed analyses and prepared testimony on behalf of the
7 Iowa Energy Consumers related to Midwest Power Systems' filing for a general
8 rate increase in Iowa State Utilities Board Docket No. RPU-94-4.

9

10 I conducted discovery, performed analyses and prepared testimony on behalf of the
11 Coalition of Industrial Energy Users related to IES Utilities, Inc.'s filing for a
12 general rate increase in Iowa State Utilities Board Docket No. RPU-94-2.

13

14 I conducted discovery, performed analyses and prepared testimony on behalf of the
15 Minnesota Alliance for Fair Competition related to subsidization and cost
16 allocation issues in the matter of its complaint against Minnegasco, a Division of
17 Arkla, Inc., in Minnesota Public Utilities Commission Docket No. G-008/C-91-
18 942.

19

20 I conducted discovery, performed analyses and prepared a class cost of service
21 study on behalf of the Minnesota Energy Consumers related to Minnegasco's filing
22 for a general rate increase in Minnesota Public Utilities Commission Docket No.
23 G-008/GR-93-1090.

24

25 I conducted discovery, performed analyses and prepared testimony on behalf of the

1 Northern Illinois Committee for Fair Competition related to cost allocation and
2 subsidization issues in the matter of its complaint against Northern Illinois Gas
3 Company, NICOR, and NICOR Energy Services in Illinois Commerce
4 Commission Docket No. 93-0111.

5
6 I conducted discovery, performed analyses and prepared testimony on behalf of the
7 Minnesota Alliance for Fair Competition on the value of Minnegasco's name and
8 reputation in Minnesota Public Utilities Commission Docket No. G-008/GR-93-
9 1090.

10
11 I conducted discovery, performed analyses and prepared testimony on behalf of the
12 Independent Heating Contractors Association of Wisconsin related to cost
13 allocation and subsidization issues in Wisconsin Power & Light Company's filing
14 for a general rate increase in Public Service Commission of Wisconsin Docket No.
15 6680-UR-109.

16
17 I conducted discovery, performed analysis and prepared a report on behalf of
18 Nebraska Municipalities in KN Energy, Inc.'s 1993 filing for a gas rate increase in
19 Nebraska.

20 Q. Do you have any additional experience evaluating company filings to determine if
21 proposed costs to provide a service are necessary, prudent, allowable according to
22 applicable regulation, and properly allocated to customers?

23 A. Yes. I have extensive experience in evaluating company cost proposals as an
24 Auditor and Supervisory Auditor with the Department of Defense, Defense
25 Contract Audit Agency. I have performed and supervised the performance of

1 audits to determine if the costs allocated to a service are necessary, prudent,
2 allowable according to applicable regulation, and properly allocated to customers
3 for each service. These audits are performed based on the principles contained in
4 the Cost Accounting Standards, the cost principles contained in the Federal
5 Acquisition Regulations, and the cost principles of the Office of Management and
6 Budget.

7 Q. Would you outline your educational background?

8 A. In 1981, I graduated *cum laude* with a B.A. degree in business administration,
9 major emphasis in professional accounting, from Eastern Washington University,
10 Cheney, Washington. In May 1985, I successfully completed the Certified Public
11 Accountant examination and received certification in November 1985.

12 Q. Please describe your professional background.

13 A. From 1982 to 1983, I worked as a staff auditor with Lincoln Mutual Savings Bank.
14 From 1983 to 1984, I was a staff accountant, also with Lincoln Mutual Savings
15 Bank. From 1984 to 1989, I served as an auditor and a senior auditor with the
16 Department of Defense, Defense Contract Audit Agency. From 1989 to 1993, I
17 was a Supervisory Auditor, also with the Agency. In 1986 and 1987, I also taught
18 a principles of cost accounting course at Highline Community College. In
19 February 1993, I joined Dahlen, Berg & Co. as a consultant.

20

21 **SECTION III. NATURAL GAS COSTS ARE OVERSTATED BY \$65.5 MILLION**

22 Q. What is FPL's projected total cost of fuel for the period April 1995 through
23 September 1995?

24 A. FPL has included in its Fuel Cost Recovery filing a projected total cost of fuel of
25 \$544,755,274 for the period April 1995 through September 1995, as shown in FPL.

1 Appendix II, Schedule E3, page 1, line 6.

2 Q. How many types of fuel has FPL included in its projected total fuel cost of
3 \$544,755,274 for the period April 1995 through September 1995?

4 A. As shown on Exhibit ____ (SMF-1), Schedule 1, FPL has included five types of
5 fuel in its total fuel cost of \$544.8 million for the period April 1995 through
6 September 1995: Heavy Oil (\$150.1 million), Light Oil (\$0.9 million), Coal
7 (\$51.2 million), Natural Gas (\$287.7 million) and Nuclear (\$54.9 million).

8 Q. Based on FPL's projected fuel mix, which type of fuel will have the greatest effect
9 on FPL's total projected cost of fuel?

10 A. Because natural gas represents 52.8% of FPL's total projected fuel cost from April
11 1995 through September 1995, the cost of natural gas will have the greatest effect
12 on FPL's total fuel costs during this period.

13 Q. Have you reviewed FPL's natural gas cost projections?

14 A. Yes. I have reviewed FPL's natural gas cost projections and have found several
15 facts in FPL's filing which demonstrate that FPL's natural gas cost projection is
16 overstated by at least \$65.5 million.

17 Q. What facts in FPL's filing support this conclusion?

18 A. First, FPL's filing of its actual October 1994 and November 1994 fuel costs shows
19 that FPL overestimated its natural gas costs by more than 31%, when the actual
20 average cost of \$1.7392 per Mcf is compared to the estimated average cost of
21 \$2.5349 per Mcf (FPL Appendix III, Schedule A6, line 45). Second, FPL
22 admitted that its original fuel cost estimate for October 1994 through March 1995
23 was overstated and reduced its estimate by 18.8% stating:

24 The originally projected average unit cost of natural gas generation for the
25 six month period [October 1994 through March 1995] was \$20.130/Mwh

1 and the updated estimated average unit cost is \$16.343 per mWh. This
2 18.8% decrease in the average unit cost of natural gas is primarily due to
3 higher than projected U.S. supply of natural gas resulting from increased
4 domestic deliverability, Canadian imports and storage capability. (FPL
5 Appendix III, Exhibit BTB-6, page 6, note 6)

6 Third, FPL admitted in the direct testimony of Rene Silva that "it is projected that
7 these factors will result in 1995 average natural gas prices remaining essentially the
8 same as 1994 average natural gas prices." (Page 8, lines 17 through 19)

9 Q. Did FPL recognize this lower average cost of natural gas when it projected its
10 natural gas cost for the period April 1995 through September 1995?

11 A. No. FPL did not recognize this lower actual average cost of natural gas when it
12 projected its natural gas costs for the period April 1995 through September 1995
13 but instead continued to use its higher original estimate for October 1994 through
14 March 1995 as the starting point for projecting its future gas costs.

15 Q. What is the average cost of natural gas included in FPL's fuel cost projection for
16 the period April 1995 through September 1995?

17 A. The average cost of natural gas included in FPL's fuel cost projection for the
18 period April 1995 through September 1995 is \$21.16 per mWh as shown in
19 Exhibit ___ (SMF-1), Schedule 2, or 29.5% greater than FPL's revised estimated
20 cost of natural gas of \$16.343 per mWh for the period October 1994 through
21 March 1995.

22 Q. Has the cost of natural gas increased since FPL revised its natural gas cost
23 estimates for the period October 1994 through March 1995?

24 A. No. The cost of natural gas has not increased since FPL revised its natural gas
25 cost estimates for the period October 1994 through March 1995. In fact, the cost

- 1 should be capitalized and depreciated over the remaining useful life of each plant.
- 2 Q. How should FPL's proposed equipment modifications be recovered from FPL's
- 3 ratepayers?
- 4 A. FPL's proposed equipment modifications should be recovered from FPL's
- 5 ratepayers in the same manner as other investments in plant and equipment are
- 6 recovered. FPL should include the cost of the modifications in its rate base and
- 7 the related depreciation cost in its O&M expenses. FPL can file a general rate case
- 8 to recover these costs from ratepayers whenever FPL believes it has an overall
- 9 revenue deficiency.
- 10 Q. What treatment has FPL requested for its proposed \$2.8 million of equipment
- 11 modifications?
- 12 A. On page 19 through 21 of Rene Silva's direct testimony, FPL requested that the
- 13 Commission allow it to expense the entire \$2.8 million of proposed equipment
- 14 modifications and include the entire cost in FPL's fuel cost recovery factor for the
- 15 period of April through September 1995.
- 16 Q. Should the Commission approve FPL's proposal to recover this type of cost
- 17 through the fuel cost recovery factor in this case?
- 18 A. No. The Commission should not approve FPL's proposal to recover this type of
- 19 cost through the fuel cost recovery factor in this case because FPL's proposal
- 20 requires current ratepayers to pay more than those costs which are required for
- 21 providing them service.
- 22 Q. How does FPL's proposal result in a mismatch of revenues and expenses?
- 23 A. FPL's proposal to expense all of the equipment modification costs in a six month
- 24 period results in a mismatch of revenues and expenses because FPL's equipment
- 25 modifications will be used for providing utility services over the remaining life of

1 each plant, not just for providing service during the period of April through
2 September 1995.

3 Q. Does FPL's proposal result in current ratepayers paying more costs than those
4 which are required for providing them service?

5 A. Yes. FPL's proposal results in current ratepayers paying more costs than those
6 which are required for providing them service because the cost of the equipment
7 modifications are used and useful for providing service in current and future
8 periods, not just the six month period proposed by FPL. Approving FPL's
9 proposal will result in current ratepayers subsidizing the cost of equipment which
10 will be used in providing service to future ratepayers

11

12 **Recommendation**

13 Q. What do you recommend regarding FPL's proposal?

14 A. The Commission should require FPL to capitalize and depreciate its investment in
15 plant and equipment. To do otherwise requires current ratepayers to pay for more
16 costs than those which are used for providing current service.

17 Q. How should the recovery of these costs be determined if the Commission chooses
18 to allow FPL to recover these costs through the fuel cost recovery factor?

19 A. The Commission should require FPL to capitalize and depreciate the equipment
20 modifications over the remaining useful life of each plant and include in the fuel
21 cost recovery factor only those costs necessary in providing electric service during
22 the period in which the fuel cost recovery factor is in effect.

23

24 **V. CAPACITY COST ALLOCATION SHOULD BE REVIEWED**

25 Q. What allocation factor does FPL use to allocate its purchased power capacity costs

1 to customer classes under its proposed capacity cost recovery (CCR) factor for the
2 period April through September 1995?

3 A. FPL uses a 12 CP allocation factor to allocate its purchased power capacity costs to
4 customers under its proposed CCR factor for the period April through September
5 1995.

6 Q. Does this allocation factor reflect how these costs are incurred?

7 A. No. This allocation factor may not reflect how FPL's purchased power capacity
8 costs are incurred because this factor may not recognize the difference in capacity
9 cost causation between firm and interruptible customers and the voltage level at
10 which customers are served.

11 Q. What is the effect of FPL not recognizing these differences?

12 A. The effect of FPL not recognizing these differences in the development of its 12
13 CP allocation factor would result in FPL's interruptible customers who receive
14 electric service at transmission voltages being assigned more capacity costs than
15 they cause to be incurred.

16

17 **Recommendation**

18 Q. What do you recommend?

19 A. Because of the short procedural schedule in this proceeding, I have not had time to
20 conduct discovery or to perform the analyses necessary to make a specific
21 recommendation. I do, however, recommend that the Commission require FPL to
22 justify that its proposed capacity cost allocation factor is based on cost causation
23 and recognizes the differences between firm customers and interruptible customers
24 who receive electric service at transmission voltage levels.

25 Q. Are there any other issues that the Commission should consider before changing

1 FPL's rates in this proceeding ?

2 A. Yes. Before the Commission changes FPL's rates in this proceeding, the
3 Commission should address whether FPL is earning an excessive return on
4 common equity resulting in unjust and unreasonable rates. However, because of
5 the short procedural schedule in this proceeding, Florida Steel has not had time to
6 perform the analyses necessary to make specific recommendations on this issue.

7 Q. Does this conclude your direct testimony?

8 A. Yes. It does.

<u>Type of Fuel</u>	<u>Total Cost</u>	<u>Percent of Total</u>
Heavy Oil	\$150,079,914	27.5%
Light Oil	890,702	0.2%
Coal	51,180,204	9.4%
Natural Gas	287,711,489	52.8%
Nuclear	<u>54,892,965</u>	10.1%
Total	<u>\$544,755,274</u>	

Source: Exhibit ____ (SMF-1), Schedule 2, Page 2 of 2

Florida Power & Light Company
Docket No. 950001-EI

<u>Line</u>		<u>Amounts</u>
1	Total projected natural gas cost for April through September 1995	\$ 287,711,489
2	System Generation (mWh) from natural gas for April through September 1995	13,594,687
3	Projected natural gas cost per mWh	<u>\$ 21.16</u>

References:

Line 1: FPL Appendix II, Schedule E3, page 1, line 4
Line 2: FPL Appendix II, Schedule E3, page 1, line 10
Line 3: Line 4 / Line 10

DATE: 13/DEC/94
COMPANY: FLORIDA POWER & LIGHT

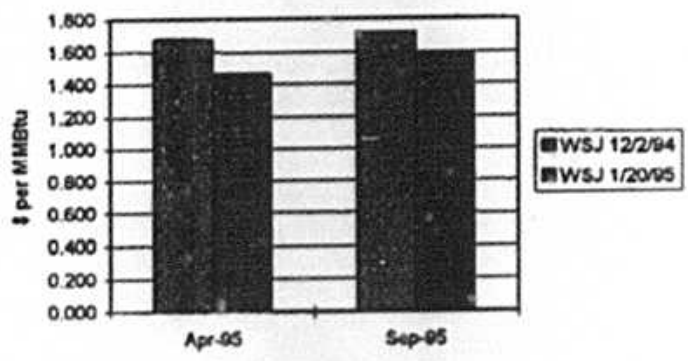
PAGE
SCHEDULE B

GENERATING SYSTEM COMPARATIVE DATA BY FUEL TYPE

ESTIMATED FOR THE PERIOD OF: APRIL, 1995 THRU SEPTEMBER, 1995

	APRIL 1995	MAY 1995	JUNE 1995	JULY 1995	AUGUST 1995	SEPTEMBER 1995	TOTAL
FUEL COST OF SYSTEM NET GENERATION (\$)							
1	13,507,765	17,449,908	26,755,371	31,398,425	31,940,236	29,028,209	150,079,914
2	9,385	17,981	27,213	102,302	147,326	136,295	590,702
3	6,671,782	7,561,818	9,039,830	9,205,373	9,232,058	9,478,467	51,180,204
4	38,005,426	45,694,164	47,589,475	47,448,220	58,208,666	54,767,438	387,711,489
5	9,466,472	9,181,499	9,479,825	9,056,372	9,361,337	8,347,610	54,892,565
6	67,660,830	79,915,390	92,921,714	97,410,702	105,088,523	101,758,115	544,755,274
SYSTEM NET GENERATION (MWH)							
7	682,021	847,750	1,320,511	1,526,199	1,487,444	1,310,638	7,174,564
8	138	442	1,062	4,777	5,488	2,124	14,878
9	394,931	455,137	550,941	565,616	569,168	587,339	3,123,718
10	1,900,994	2,221,062	2,391,790	2,350,833	2,433,033	2,392,934	13,338,887
11	2,048,081	1,982,790	2,048,883	1,982,790	2,048,883	1,814,281	11,946,509
12	5,026,977	5,509,181	6,315,186	6,430,215	6,544,014	6,027,574	35,853,147
UNITS OF FUEL BURNED							
13	1,017,741	1,265,228	1,962,388	2,266,729	2,232,013	1,954,122	10,678,713
14	131	587	2,371	10,467	12,251	4,121	27,858
15	190,428	211,557	269,556	277,549	278,154	288,093	1,515,358
16	15,891,419	18,926,871	20,472,510	20,186,007	20,882,834	19,557,258	125,317,600
17	21,997,856	21,330,342	22,041,354	21,330,342	22,041,354	19,719,645	128,460,891
BTU BURNED (MMBTU)							
18	6,481,386	8,058,954	12,496,362	14,420,147	14,081,723	12,441,272	67,989,954
19	1,921	5,733	13,772	61,983	97,123	41,748	182,506
20	3,891,939	4,461,322	5,402,408	5,542,732	5,571,355	5,756,932	30,626,069
21	15,891,419	18,926,871	20,472,510	20,186,007	20,882,834	19,557,258	125,317,600
22	21,997,856	21,330,342	22,041,354	21,330,342	22,041,354	19,719,645	128,460,891
23	48,264,582	52,783,223	60,426,406	61,551,231	62,648,443	57,502,915	343,176,621

Natural Gas Futures



Florida Power & Light
 Docket No. 950001-EI

Natural Gas Futures

Futures Date	Wall Street Journal Publication Date	
	12/2/94	1/20/95
	\$ per MMBtu	
Feb-95	1.694	1.359
Mar-95	1.697	1.410
Apr-95	1.674	1.460
May-95	1.679	1.493
Jun-95	1.689	1.523
Jul-95	1.699	1.558
Aug-95	1.709	1.573
Sep-95	1.716	1.588
Oct-95	1.756	1.653
Nov-95	1.851	1.753
Dec-95	1.939	1.828
Jan-96	1.969	1.848
Feb-96	1.899	1.798
Mar-96	1.844	1.746
Apr-96	1.796	1.694
May-96	1.799	1.695
Jun-96	N/A	1.696
Jul-96	N/A	1.702

Source: Wall Street Journal

FLORIDA POWER & LIGHT COMPANY
EXPLANATION OF TOTAL SYSTEM FUEL COSTS VARIANCES
ESTIMATED/ACTUAL TRUE-UP
FOR THE PERIOD OCTOBER 1994 THROUGH MARCH 1995

Ref.	Variance Explanation:
1	
2	1. Generation from heavy oil is now estimated to be higher than originally
3	projected as a result of higher than originally projected system load.
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5	2. The originally projected average unit cost of heavy oil generation for the six
6	month period was \$21.408/MWh and the updated estimate of average unit cost
7	is \$21.894/MWh. This 2.3% increase in the average unit cost of heavy oil is
8	primarily due to a lower than expected supply of heavy oil resulting from a
9	change in the quality of crude oil produced by Saudi Arabia.
10	
11	3. Generation by coal is now estimated to be lower than originally projected due
12	to increased availability of lower price economy energy expected during the
13	period.
14	
15	4. The originally projected average unit cost of coal generation for the six month
16	period was \$16.076/MWh and the updated estimated average unit cost is
17	\$16.857/MWh. This 4.9% increase in the average unit cost of coal is primarily
18	due to a higher than originally projected spot coal prices at SJRPP.
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20	5. Generation by natural gas is now estimated to be lower than originally
21	projected due to a delay in the gas pipeline expansion which was originally
22	projected to occur in early 1995.
23	
24	6. The originally projected average unit cost of natural gas generation for the six
25	month period was \$20.130/MWh and the updated estimated average unit cost
26	is \$16.343/MWh. This 18.8% decrease in the average unit cost of natural gas
27	is primarily due to higher than projected U. S. supply of natural gas resulting
28	from increased domestic deliverability, Canadian imports and storage
29	capability.
30	
31	7. Generation by nuclear fuel is now estimated to be higher than originally
32	projected due to changes to the plant operating schedule. St. Lucie Unit 1
33	operated 26 days beyond it's originally projected shutdown date, and Turkey
34	Point Unit 4's refueling outage took 13 days less than originally projected.
35	
36	8. The decrease in the fuel cost of power sold is primarily due to mild weather in
37	the Southeast and heavy rainfall associated with Tropical Storm Gordon.
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39	9. The decrease in the fuel cost of purchased power is primarily due to the
40	expected Higher availability of lower cost non-Florida economy energy.
41	
42	10. Energy Payments to Qualifying Facilities is now estimated to be lower than
43	originally projected due to lower than projected energy deliveries in the month
44	of November from Cedar Bay, Downtown Government Center and Broward
45	North. In addition, the revised projections for December 1994 - March 1995
46	lowers the expected deliveries from Downtown Government Center and Lee
47	County. These capacity payments also reflect a lower projected fuel cost.
48	
49	11. Energy cost of Economy purchases is now estimated to be higher than
50	originally estimated primarily due to the unexpected availability of low cost coal
51	power during off-peak periods and it's favorable comparison to the cost of
52	other FPL sources of energy.