

Writer's Direct Dial: (561) 691-7101 R. Wade Litchfield Senior Attorney Florida Authorized House Council Florida Power & Light Company 700 Universe Boulevard Juno Beach, FL 33408-0420 (561) 691-7103 (Facsimile) ORIGINAL

November 4, 1998

#### VIA HAND DELIVERY

Ms. Blanca S. Bayò
Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard, Room 110
Tallahassee, FL 32399-0850

Re: Florida Power & Light Company's Request for Confidential Classification of Certain Material Provided in Response to Interrogatories in Docket No. 980002-EG.

Dear Ms. Bayò:

I enclose and hand you herewith for filing in the above-referenced matter, the original and fifteen (15) copies of Florida Power & Light Company's ("FPL") Request for Confidential Classification with respect to interrogatories propounded by Staff for the Florida Power Service Commission. The original includes Exhibits A, C, D, and E. Exhibit B, incorporated by reference in this Request for Confidential Classification, was submitted under cover dated October 14, 1998 in connection with FPL's Notice of Intent to Request Confidential Classification. The fifteen copies include only Exhibits C and D.

Exhibit B contains the confidential information that is the subject of FPL's Request for Confidential Classification. Exhibit A is an edited version of Exhibit B, in which the information FPL asserts is confidential has been blocked out. Exhibit C contains FPL's justification for its request for confidential classification. Exhibit D contains an affidavit in support of FPL's Request for Confidential Classification. Exhibit E, a computer diskette, contains the electronic version of Exhibit C.

Pursuant to Rule 25-22.006(3)(d), FPL requests confidential treatment of the documents in Exhibit A pending disposition of FPL's Request for Confidential Classification.

DOCUMENT NUMBER - DATE

12378 HOV -4 S

FPSC-RECORDS/REPORTING

Ms. Blanca S. Bayò Director of Records and Reporting Florida Public Service Commission November 4, 1998 Page 2

Please do not hesitate to contact me should you or your Staff have any questions regarding this filing.

Thanking you for your attention to this matter, I remain,

Wase List
R. Wade Litchfield

RWL/bjw Enclosures

Service List (without Exhibits A, B, and E) cc:

#### BEFORE THE

#### FLORIDA PUBLIC SERVICE COMMISSION

In re: Energy Conservation Cost	)	DOCKET NO. 980002-EG
Recovery Clause	)	
	)	FILED: November 4, 1998

### OF CERTAIN MATERIAL PROVIDED IN RESPONSE TO STAFF INTERROGATORIES

NOW, BEFORE THIS COMMISSION, through undersigned counsel, comes Florida Power & Light Company ("FPL"), and, pursuant to section 25-22.006 of the Florida Administrative Code and section 366.093 of the Florida Statutes, hereby requests confidential classification of certain materials provided in response to interrogatories of the Florida Public Service Commission ("FPSC" or "Commission") staff ("Staff") in the above-entitled and numbered proceeding. In support of its Request, FPL states as follows:

Petitioner's name and address are:

Florida Power & Light Company P.O. Box 029100 Miami, Florida 33102-9100

Orders, notices, or other pleadings related to this request should be served on:

William G. Walker, III Vice President Florida Power & Light Company 215 South Monroe Street Suite 810 Tallahassee, FL 32301-1859 (850) 224-7595 R. Wade Litchfield Senior Attorney Florida Power & Light Company 700 Universe Boulevard Juno Beach, FL 33408-0420 (561) 691-7101

 On September 11, 1998, FPL received Staff's first set of interrogatories in the above-referenced matter. In the course of preparing its responses to such interrogatories, FPL determined that some of the information requested constitutes proprietary confidential business information within the meaning of section 366.093 of the Florida Statutes. Accordingly, on October 14, 1998, FPL filed a Notice of Intent to Request Confidential Classification of such information.

- 3. In connection with said Notice, FPL submitted copies of the responses in full to Staff's interrogatories as Exhibit B in an enveloped marked "CONFIDENTIAL." FPL incorporates herein by reference Exhibit B. Included herewith as Exhibit A are copies of the responses redacted to disclose only non-confidential information. The responses comprising Exhibit A were provided previously to Staff and to other parties to this proceeding.
- 4. Pursuant to section 25-27.006(3)(a)(1) of the Florida Administrative Code, the materials in Exhibit B are treated as temporarily exempt from section 119.07(1) of the Florida Statutes pending FPL filing a formal request for confidential classification with respect to such materials. FPL hereby makes such request.
- 5. In addition to Exhibit A referred to above, the following exhibits are included herewith and made a part hereof:
  - (a) Exhibit C is a table containing a line-by-line and page-by-page identification of the information for which confidential treatment is sought, and, with regard to each document or portions thereof, references to the specific statutory basis or bases for the claim of confidentiality and to the affidavits in support of the requested classification. Exhibit C is sometimes referred to hereinafter as the "Justification Table."
    - (b) Exhibit D is the affidavit of Dennis Brandt.
  - (c) Exhibit E is a computer diskette containing FPL's Justification Table (Exhibit C).
- 6. Pursuant to section 366.093, FPL seeks confidential protection for the information highlighted in Exhibit B. The statutory bases for FPL's assertion of confidentiality with regard to each document or portion thereof are set forth in the Justification Table under the column titled "FLORIDA STATUTE 366.093(3)." The letters (a) through (f) refer to subsections of section

366.093(3), as applicable. Support for FPL's Request for Confidential Classification of the referenced material is provided through the affidavit of Dennis Brandt, included herewith as Exhibit D. The Justification Table identifies the affiant attesting to the basis for FPL's assertion of confidentiality with regard to each document or portion thereof.

7. FPL submits that the information highlighted in Exhibit B is proprietary confidential business information within the meaning of section 366.093(3). As Mr. Brandt's affidavit indicates, the highlighted information consists of customer-specific information for non-governmental customers. In particular, FPL has withheld the names of customers on the lists of information provided in response to the Staff interrogatories in order to avoid disclosing specific rate and contract information associated with those customer accounts. FPL considers such information to be confidential proprietary business information of the customer and not disclose such information to third parties unless required by law or unless the customer consents to the disclosure. Pursuant to section 366.093, such materials are entitled to confidential treatment and are exempt from the disclosure provisions of the public records law. Thus, once the Commission determines that the information in question is proprietary confidential business information, the Commission is not required to engage in any further analysis or review such as weighing the harm of disclosure against the public interest in access to the information.

8. Upon a finding by the Commission that the material in Exhibit A for which FPL seeks confidential treatment is proprietary confidential business information within the meaning of section 366.093(3), pursuant to section 366.093(4) such materials should not be declassified for a period of at least eighteen (18) months and should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business.

. 3 -

WHEREFORE, for the above and foregoing reasons, as more fully set forth in the supporting materials and affidavits included herewith, Florida Power & Light Company respectfully requests that its Request for Confidential Classification be granted.

Respectfully submitted,

Charles A. Guyton Steel Hector & Davis 215 South Monroe Street Suite 601 Tallahassee, FL 32301 (850) 222-2300

and

R. Wade Litchfield Florida Authorized House Counsel Florida Power & Light Company 700 Universe Boulevard Juno Beach, FL 33408-0420 (561) 691-7101

Attorneys for

Florida Power & Light Company

#### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of "Florida Power & Light Company's Request for Confidential Classification," with the exception of Exhibits A, B and E, has been sent via United States Mail, postage prepaid, to the parties listed below this 4th day of November, 1998:

James Beasley, Esquire Austin & McMullen P.O. Box 391 Tallahassee, FL 32302

Mr. Thomas A. Geoffroy Florida Division of Chesapeake Utilities P.O. Box 960 Winter Haven, FL 33882

Mr. James McGee Flower Power Corporation P.O. Box 14042 St. Petersburg, FL 33733

Mr. Frank Cressman Florida Public Utilities Co. P.O. Box 3395 West Palm Beach, FL 33402

Ms. Susan D. Cranmer Gulf Power Company One Energy Place Pensacola, FL 32520

Mr. Ansley Watson MacFarlane Ausley P.O. Box 1531 Tampa, FL 33601 Mr. Michael Palecki City Gas Company of Florida 955 East 25th Street Hialeah, FL 33013

Wm. Cochran Keating, IV, Esquire Staff Counsel Florida Public Service Commission Gerald L. Gunter Building 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Mr. Kenneth Hoffman Rutledge Ecenia P.O. Box 551 Tallahassee, FL 32302

Mr. Wayne Schiefelbein Gatlin Woods 3301 Thomasville Road Suite 300 Tallahassee, FL 32312

Ms. Colette M. Powers Indiantown Gas Company P.O. Box 8 Indiantown, FL 23456

Mr. Norman Horton, Jr. Messer Vickers P.O. Box 1876 Tallahassee, FL 32302 Mr. Francis J. Sivard Peoples Gas System P.O. Box 2562 Tampa, FL 33601

Mr. John McLelland South Florida Natural Gas Company P.O. Box 248 New Smyrna Beach, FL 32170

Ms. Debra Swim LEAF 1115 N. Gadsden Street Tallahassee, FL 32303

John W. McWhirter, Esquire McWhirter Reeves McGlothlin P.O. Box 3350 Tampa, FL 33601 Sebring Gas System, Inc. 3515 Highway 27 South Sebring, FL 33870

Mr. Stuart Shoaf St. Joe Natural Gas Company P.O. Box 549 Port St. Joe, FL 32457

Vicki Gordon Kaufman, Esquire McWhirter Reeves McGlothlin 117 S. Gadsden Street Tallahassee, FL 32301

Ms. Angela Llewellyn Regulatory and Business Strategy Tampa Electric Company P.O. Box 11 Tampa, FL 33601

R. Wade Litchfield

## **EXHIBIT C**

## JUSTIFICATION TABLE

### LIST OF CONFIDENTIAL MATERIALS

**Energy Conservation Cost Recovery Clause** 

#### EXHIBIT C

COMPANY:

IN RE:

Florida Power & Light Company Energy Conservation Cost Recovery Clause

DOCKET NO.

980002-EG

DATE:

October 28, 1998

STAFF INTERROG'S.

Responses Submitted October 14, 1998

Attachment Number	Column/Line Number	Confidential Y/N	Florida Statute 366.093(3) Subsection	Affidavit	
1	Col. A, Lines	N	-	-	
I	Col. A, Line 9	Y	(e)	D. Brandt	
I	Col. A, Line 10	N	-	-	
I	Col. A., Lines 11-13	Y	(e)	D. Brandt	
I	Col. A., Lines 14-15	N	-	-	
I	Col. A, Lines 16-19	Y	(e)	D. Brandt	
I	Col. A, Line 20-21	N	-	-	
I	Col. A, Line 22	Y	(e)	D. Brandt	
I	Col. A, Line 23	N	-	-	
I	Col. A, Line 24	Y	(e)	D. Brandt	
I	Col. A, Lines 25-27	N	-	-	
I	Col. A, Line 28	Y	(e)	D. Brandt	

Attachment Number	Column/Line Number	Confidential Y/N	Florida Statute 366.093(3) Subsection	Affidavit	
I	Col. A, Lines 29-31	N	-	-	
I	Col. A, Lines 32-34	Y	(e)	D. Brandt	
I	Col. A, Lines N 35-37		= =	-	
I	Col. A, Line 38	Y	(e)	D. Brandt	
I	Col. A, Lines 39-40	N	-	-	
I	Col. A, Line 41	Y	(e)	D. Brandt	
I	Col. A, Line 42	N	-		
I	Col. A, Line 43	Y	(e)	D. Brandt	
I	Col. A, Line 44	N	-	-	
I	Col. A, Line 45	Y	(e)	D. Brandt	
I	Col. A, Lines 46-48	N	-	-	
I	Col. A, Line 49	Y	(e)	D. Brandt	
I	Col. A, Lines 50-52	N	-	-	
I	Col. A, Line 53-54	Y	(e)	D. Brandt	
I	Col. A, Line 55	N	-	_	

Attachment Number	Column/Line Number			Affidavit	
I	Col. A, Lines 56-60	Y	(e)	D. Brandt	
I	Col. A, Line 61	N	-	-	
I	Col. A, Lines 62-63	Y	(e)	D. Brandt	
I	Col. A, Line 64	N	-	-	
1	Col. A, Lines 65-66	Y	(e)	D. Brandt	
1	Col. A, Lines 67-68	N	-	-	
I	Col. A, Lines 69-71	Y	(e)	D. Brandt	
I	Col. A, Lines 72-103	N	-	5	
1	Col. A, Lines 104-106	Y	(e)	D. Brandt	
I	Col. A, Line 107	N	-	-	
I	Col. A, Lines 108-110	Y	(e)	D. Brandt	
I	Col. A, Line	N	-	-	
I	Col. A, Line 112	Y	(e)	D. Brandt	

Attachment Number	Column/Line Number	Confidential Y/N	Florida Statute 366.093(3) Subsection	Affidavit	
I	Col. A, Lines 113-114	N		-	
Col. A, Lines 115-116	Col. A, Lines 115-116	Y	(e)	D. Brandt	
I	Col. A, Lines 117-120	N	-	-	
I	Col. A, Lines 121-125	Y	(e)	D. Brandt	
1	Col. A, Lines 126-128	N	-	-	
I	Col. A, Lines 129-130	Y	(e)	D. Brandt	
I	Col. A, Line 131	N	-	-	
I	Col. A, Line 132	Y	(e)	D. Brandt	
I	Col. A, Lines 133-135	N	-	-	
I	Col. A, Lines 136-140	Y	(e)	D. Brandt	
I	Col. A, Lines 141-147	N	-	-	
ī	Col. A, Lines 148-156	Y	(e)	D. Brandt	

Attachment Number	Column/Line Number	Confidential Y/N	Florida Statute 366.093(3) Subsection	Affidavit	
I	Col. A, Line	N	-	-	
I	Col. A, Lines 158-161	Y	(e)	D. Brandt	
I	Col. A, Line 162	N	-	-	
I	Col. A, Line 163	Y	(e)	D. Brandt	
I	Col. A, Lines 164-169	N	-	-	
I	Col. A, Line 170-171	Y	(e)	D. Brandt	
I	Col. A, Line 172	N	-	-	
I	Col. A, Lines 173-179	Y	(e)	D. Brandt	
I	Col. A, Line 180	N	-	-	
I	Col. A, Lines 181-186	Y	(e)	D. Brandt	
II	Col. A, Lines	N	-	-	
II	Col. A, Lines 5-7	Y	(e)	D. Brandt	

Attachment Number	Column/Line Number	Confidential Y/N	Florida Statute 366.093(3) Subsection	Affidavit	
п	Col. A, Lines 8-11	N	-	-	
Col. A, Lines 12-13	Y	(e)	D. Brandt		
II	Col. A, Line 14	N	-	-	
II			(e)	D. Brandt	
П	Col. A, Lines 17-20	N	-	-	
II	Col. A, Lines 21-22	Y	(e)	D. Brandt	
П	Col. A, Lines 23-27	N	-	-	
II	Col. A, Line 28	Y	(e)	D. Brandt	
II	Col. A, Lines 29-30	N	-	-	
II	Col. A, Line 31	Y	(e)	D. Brandt	
II	Col. A, Lines 32-36	N	=	-	
И	Col. A, Line 37	Y	(e)	D. Brandt	
II	Col. A, Line 38	N	-	_	
II	Col. A, Line 39	Y	(e)	D. Brandt	
II	Col. A, Line 40	N	-	-	

Page 6 of 9

Attachment Number	Column/Line Number			Affidavit	
II	Col. A, Lines 41-43	Y	(c)	D. Brandt	
II	Col. A, Lines 44-45	N	-	-	
П	Col. A, Lines 46-49	Y	(e)	D. Brandt	
II	Col. A, Lines 50-51	N	-	-	
II	Col. A, Line 52	Y	(e)	D. Brandt	
11	Col. A, Line 53	N	-	-	
11	Col. A, Line 54	Y	(e)	D. Brandt	
II	Col. A, Lines 55-57	N	-	-	
П	Col. A, Line 58	Y	(e)	D. Brandt	
II	Col. A, Lines 59-61	N	•	-	
П	Col. A, Lines 62-64	Y	(e)	D. Brandt	
II	Col. A, Lines 65-67	N		-	
П	Col. A, Line 68	Y	(e)	D. Brandt	
II	Col. A, Lines 69-70	N	-	-	

Attachment Number	Column/Line Number	Confidential Y/N	Florida Statute 366.093(3) Subsection	Affidavit	
II	Col. A, Line 71	Y	(e)	D. Brandt	
П	Col. A, Line 72	N	-	-	
П	Col. A, Line 73	Y	(e)	D. Brandt	
II	Col. A, Line 74	N	-	-	
II	Col. A, Line 75	Y	(e)	D. Brandt	
П	Col. A, Lines 76-78	N	-	-	
II	Col. A, Line 79	Y	(e)	D. Brandt	
II	Col. A, Lines 80-82	N	-	_	
II	Col. A, Lines 83-84	Y	(e)	D. Brandt	
II	Col. A, Line 85	· N	-	-	
II	Col. A, Lines 86-90	Y	(e)	D. Brandt	
II	Col. A, Line 91	N	-	-	
П	Col. A, Lines 92-93	Y	(e)	D. Brandt	
II	Col. A, Line 94	N	-	-	
П	Col. A, Lines 95-96	Y	(e)	D. Brandt	

Attachment Number	Column/Line Number	Confidential Y/N	Florida Statute 366.093(3) Subsection	Affidavit
п	Col. A, Lines 97-98	N		-
П	Col. A, Lines 99-101	Y	(e)	D. Brandt
П	Col. A, Lines 102-133	N	-	-

# EXHIBIT D

# AFFIDAVIT OF DENNIS BRANDT

# BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Energy Conservation	)		DOCKET NO. 980002-EG
Cost Recovery Clause)	- 52		
STATE OF FLORIDA		)	
COUNTY OF DADE		)	AFFIDAVIT OF DENNIS BRANDT

BEFORE ME, the undersigned authority, personally appeared Dennis Brandt who, being first duly sworn, deposes and says:

- My name is Dennis Brandt. I am currently employed by Florida Power & Light Company ("FPL"). My title is Manager, Sales and Marketing Product Support. I have personal knowledge of the matters stated in this affidavit.
- 2. Regarding FPL's Exhibit C, I have reviewed the documents and information for which I am listed as Affiant and which are included in Exhibit B to FPL's Request for Confidential Classification. Such documents or materials that I have reviewed and which, in whole or in part, are asserted by FPL to be proprietary confidential business information, as noted on Exhibit C, contain or constitute customer-specific account information or information relating to same with respect to non-governmental customers. FPL has maintained the confidentiality of this information and does not disclose such information to third parties unless required by law or unless the customer consents to such disclosure.
- 3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of not less than eighteen months. In addition, these materials should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business so that FPL can continue to maintain the confidentiality of these documents.
  - Affiant says nothin further.

Dennis Brandt

SWORN TO AND SUBSCRI Dennis Brandt, who is personally know identification) as identification and who		1998, by (type of
	Notary Public, State of Flori	da J
My Commission Expires:	Magra Hernandsz  In Constituen & Constant Edit May 25, 1000  Rosero tvan titor yazi astuanci in	

# **EXHIBIT A**

# REDACTED MATERIALS

**Energy Conservation Cost Recovery Clause** 

Florida Power & Light Company
Docket No. 980002-EG
Staff's First Set of Interrogatories
Question No. 1
Page 1 of 1

- Q. 1 Please identify each customer who had entered into a Commercial and Industrial Load Control (CILC) Program Agreement but was not taking service under the CILC tariff, as of the date the CILC tariff was closed, March 19, 1996. Please provide the date that each of the identified customers the CILC rate.
- A. 1 See Attachment #1.

FPL has filed a petition for confidential classification of Attachment #1 and it is provided in its entirety as part of that petition.

Florida Power & Light Company Docket No. 980002-EG Staff's First Set of Interrogatories Question No. 2 Page 1 of 1

Q.72 Please provide the current status of each customer identified in response to Interrogatory No. 1, above. In your response, please indicate whether the customer is taking service under the CILC rate, is taking service under another FPL rate, or is not taking service from FPL.

#### A. 2 See Attachment #1

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FPL has filed a petition for confidential classification of Attachment #1 and it is provided in its entirety as part of that petition.

Florida Power & Light Company Docket No. 980002-EG Staff's First Set of Interrogatories Question No. 3 Page 1 of 1

- Q. 3 Please identify each customer who entered into a CILC Program Agreement but did not begin taking service under the rate within the two-year period specified in Section 7 of the CILC Program Agreement.
- A. 3 See Attachment #2

FPL has filed a petition for confidential classification of Attachment #2 and it is provided in its entirety as part of that petition.

Florida Power & Light Company
Docket No. 980002-EG
Staff's First Set of Interrogatories
Question No. 4
Page 1 of 2

Q. 4 Please identify each customer who entered into a CILC Program Agreement that did not become null and void following expiration of the two-year period for installing necessary equipment as specified in Section 7 of the CILC Program Agreement. For each customer identified, please explain why the CILC Program Agreement did not become null and void.

#### A. 4 See Attachment #2

FPL has filed a petition for confidential classification of Attachment #2 and it is provided in its entirety as part of that petition.

FPL does not track customer specified reasons as to why an individual customer took longer than two years to qualify for the CILC program. In general, from a customer's perspective there are many reasons why a customer might take longer than two years to be ready to join the CILC program such as:

- budgetary constraints
- construction schedules and delays
- expansion plans
- phased implementation of energy conservation initiatives

From FPL's perspective, these agreements did not become null and void because, consistent with the agreement, the Company "otherwise agreed" that they would not become null and void. FPL agreed not to let the agreements become null and void for several reasons.

In some cases FPL knew of customer commitments, such as the procurement of backup generation that the customer was in the process of completing in anticipation of taking service under the rate. To prevent such a customer from taking service under the rate would result in financial hardship to the customer. FPL has tried to avoid creating an unfair situation for customers who relied upon the prospect of taking service under the rate.

The primary reason FPL has "otherwise agreed" that the CILC agreements will not become null and void is to assist FPL in achieving its conservation goals. In the conservation goals hearing in Docket No. 941170-EG, the Commission set very aggressive DSM goals for FPL which far exceed FPL's forecast of reasonably achievable, cost-effective potential. The Commission also stated that failure to achieve DSM goals could result in a penalty. Thus, the Commission has provided FPL an incentive to achieve or exceed its DSM goals. When FPL requested approval from the Commission to close the CILC program to new customers, it did so in reliance upon the outstanding executed CILC agreements. FPL had outstanding agreements totaling approximately 150 MW. Achieving the maximum cost-effective level of CILC was important to FPL in achieving its overall DSM goals. FPL believed that those agreements, and modest attrition of some of those customers would allow FPL to achieve but not exceed its cost effective level of CILC, assisting FPL to achieve its conservation goals as well as keeping FPL in compliance with the Commission's non-firm service rule.

So, to retain its ability to achieve its DSM goals and avoid a potential penalty, and to avoid harming some customers who had relied upon their executed agreements and made investments that they would not recoup without being able to take CILC service, FPL exercised its option under the agreements to allow these agreements not to become null and void.

Florida Power & Light Company
Docket No. 980002-EG
Staff's First Set of Interrogatories
Question No. 4
Page 2 of 2

Based upon FPL's continuing review of its ability to meet its DSM goals, FPL has concluded that even with the extension of the CILC agreements there may be customers upon which FPL is relying to meet its DSM goals that may not ultimately take CILC service. Consequently, consistent with Section 13 of the CILC agreement, FPL intends to work with customers with executed CILC agreements and assist them in finding other FPL customers to which they might assign their CILC agreements. Such assignments would not cause FPL to exceed the previously identified maximum cost-effective level of CILC of 472 MW, but it should assist FPL in achieving its DSM goals.

Florida Power & Light Company Docket No. 980002-EG Staff's First Set of Interrogatories Question No. 5 Page 1 of 1

- Q.5\_ Please provide the megawatt savings attributable to those customers who began taking service under Rate Schedule CILC-1 after March 19, 1996. Please provide the current total megawatt savings attributable to the CILC program.
- A. 5 The megawatt savings attributable to customers who began taking service under Rate Schedule CILC-1 after March 19, 1996 is 31.9.
  - As of August 1998, the total megawatt savings attributable to the CILC program is 431.1.

Florida Power & Light Company Docket No. 980002-EG Staff's First Set of Interrogatories Attachment No. I Page 1 of 4

### ATTACHMENT I

	CONTRACT		
	EXEC	DATE ON	CURRENT
CUSTOMER NAME	DATE	CILC	RATE
Broward County	12/1/92	Oico	GSD-1
Broward County	10/28/92		GSD-1
Broward County	6/1/93		GSLDT-2
Charlotte Regional Med Center	3/3/95	_	GSLDT-1
Descto County Sheriff's Dept	2/9/95		QSD-1
	12/18/95		GSLDT-1
Serenota County	7/6/95		GRLD-1
Service Control of the Control of th	9/18/92		GSD-1
	8/17/92		GSLDT-1
	6/22/92		GSLDT-1
Hendry Co. School Board	1/11/94		GSD-1
Manatae Co Bd Comm	5995		GSLD-1
mar date of the Country	5/16/04		GSLDT-1
			GLSDT-1
	12/13/93		GSLD-1
	9/26/95		GSLDT-1
United Stated Post Office	3/18/96		GSLDT-1
County of Sarasota	8/14/95		
	8/7/92		GSLD-1
SS County Govt CEP	6/1/95		GSLD-1
	7/24/92	_	_
Apollo Elementary School	1/18/96		GSD-1
Breverd Community College	10/25/95		_
Brevard Community College	10/25/95		GSLD-1
	1/12/06		GSLDT-1
City of Titusville	6/10/95		QSD-1
City of Titusville	10/25/95		GSD-1
Ciserteius Middle School	1/15/96		GSD-1
	12/1/90		GSLDT-1
	12/1/00		GSLDT-1
	12/1/90		GSLDT-1
Indian River County Utilities	11/13/90		QSD-1
6 Indian River County Utilities	11/13/90		GSLD-1
7 Jackson Middle School	1/15/90		GSD-1
	6/15/90		GSLDT-1
Madison Middle School	1/15/90		GSD-1
NASA - C5 Substation	10/11/90		GSLDT-3
	7/30/9		GSLD-1
2 Palm Bay High School	1/15/9	64	GSLD-1
	7/30/9	2	GSLD-1
4 School Board of Brevard County	12/15/9		GSLD-1
	2/24/9		GSD-1
6 So. Florida Water Mgmt Distr	12/31/9		GSLD-1
7 VA Medical Center	6/16/9		GSLDT-2
So. Florida Water Mgmt Distr	12/31/9		GSLD-1
	5/31/9	6	QSLD-1
0 USAF	10/11/0		GSLDT-3
USAF	10/11/0		OSLDT-3
USAF	10/11/0		GSD-1
	6/15/9		GSLDT-2
4世高海上海里	5/26/0		GSLDT-1
55 City of Titusville	11/2/9		0SD-1
	9/11/9	6	GSLDT-1

Florida Power & Light Company Docket No. 980002-EG Staff's First Set of Interrogatories Attachment No. I Page 2 of 4

10 5 X 5 5 1 5 X 5 1 1 1 1 1 1 1 1 1 1 1 1	11/2/95	GSLD-1
	5/13/94	GSLD-1
CONTRACTOR OF THE PROPERTY OF THE PARTY OF T	2/5/96	GSD-1
	8/19/92	GSLD-2
City of Hialeah	2/14/95	GSD-1
	7/13/93	GSLD-1
ALCOHOLD STATE OF THE PARTY OF	8/2/93	QSLD-1
Federal Corrections Institution	3/18/93	GSLD-1
	2/14/94	GSLDT-1
Contractor of the Contractor o	12/12/95	GSLDT-1
Metropolitan Dade County	1/12/93	CST-1
Metropolitan Dade County	1/12/93	QSI.D-2
The state of the s	10/12/93	GSLDT-1
	6/12/96	GSD-1
	12/14/93	GSD-1
MAD Cone H	7/2492	GSLD-1
MAD N Term Ex2	7/24/92	GSLD-1
4 MAD NR20		GSLD-1
5 Metro Dade Aviation	7/24/92	
6 MAD 2130	7/24/92	GSLDT-1
MAD 2130	7/24/92	
MAD 2132	7/24/92	GSLD-1 GSLD-1
9 MAD 2200/2206	7/24/92	
MAD 2208	7/24/92	GSD-1
1 MAD 2222	7/24/92	GSLD-1
2 MAD 2224	7/24/92	GSLD-1
AND DESCRIPTION OF THE PARTY OF	7/24/92	GSLD-1
MAD 2226	7/24/92	GSLD-1
4 MIAD N829	7/24/92	GSLD-1
6 MIAD 2203/2207	7/24/92	GSLD-1
6 MAD 2205	7/24/92	QSLD-1
7 MAD 2212	7/24/92	GSLD-1
6 MAD 2214	7/24/92	GSLD-1
MAD 2216	7/24/92	GSLD-1
6 MAD 2218	7/24/92	GSLD-1
MAD 2220	7/24/92	GSLD-1
2 MIAD N808	7/24/02	GSLD-1
MIAD N811	7/24/92	GSLD-1
MIAD N817	7/24/92	GSLD-1
6 MIAD N823	7/24/92	GSLD-1
6 St Fla Reception Center - Annex	7/30/92	G\$D-1
7 Everglades Correctional Inst	8/19/92	GSD-1
6 Everglades Correctional Inst	8/19/92	GSD-1
Everglades Correctional Inst	8/19/92	GSD-1
Dade Correctional	5/23/04	GSD-1
11 Dade Correctional	5/23/94	GSD-1
2 Dade Correctional	5/23/94	GSD-1
Marni Dade Wasad - SW Well fields	12/12/95	GSD-1
A CONTRACTOR OF THE CONTRACTOR	05/24/95	3/28/96 CILC-1G
05 CT   CT   CT   CT   CT   CT   CT   CT	05/01/95	4/9/96 CILC-1D
OF THE PERSON OF	05/24/95	4/23/96 CILC-1G
77 BCMC - Main Court House	06/13/95	4/25/96 CILC-1D
		-
	10/06/95	4/30/96 CILC-1D
·	08/29/95	4/30/96 CILC1-D
10	07/22/94	6/11/96 CILC-1D
11 City of Sarasota	06/20/92	6/20/96 CILC-1D
12 (12)	05/24/95	6/28/98 CILC-1G
13 Collier County Utilities	12/20/94	7/1/96 CILC-1D

4 Charlotte Co Utilities	06/19/95	7/22/96 CILC-1D
	05/24/95	BYING CILC-1G
C. T. C.	07/27/95	9/13/96 CILC-1D
Lee Co Commission	07/25/95	9/19/96 CILC-1D
8 County of Sarasota Utilities	06/30/95	9/27/96 CILC-1G
City of Hallandale	04/18/95	5/28/97 CILC-1G
0 South Broward Hosp Dist	10/21/94	6/30/97 CILC-1D
		5/11/98 CILC-1D
	12/01/95	3/25/96 CILC-1G
	7/27/95	4/11/96 CILC-1G
	7/27/95	4/11/96 CILC-1G
	5/16/95	59/96 CILC-1G
S Acme Improvement District	11/29/94	5/17/96 CILC-1U
7 City of Titusville	9/1/93	5/29/96 CILC-1G
8 Acme Improvement District	11/29/94	64496 CILC-1G
	7/27/95	6/13/96 CILC-1D
	7/27/95	7/15/96 CILC-1G
1 Loxahatchee River	12/26/95	7/17/96 CILC-1D
	7/27/95	7/23/96 CILC-1G
3 Ckeechobee Correctional	7/27/95	8/28/96 CILC-1D
4 St Lucie County Board of County Comm	1/20/96	10/7/96 CILC-1G
State of Florida Military Dept	12/8/95	2/29/97 CILC-1D
	7/21/95	3/6/97 CILC-10
THE REAL PROPERTY OF THE PARTY	12/12/95	4/25/97 CILC-1G
	12/12/95	5/2/97 CILC-1G
	7/31/92	5/30/97 CILC-1T
0 校览是图像 经现代的	9/7/95	7/31/97 CILC-1D
I US Federal Aviation	6/25/95	10/7/97 CILC-10
2 US Federal Aviation	8/25/95	10/7/97 CILC-1D
City of Boca Raton	11/29/93	12/4/97 CILC-1G 3/10/98 CILC-1G
14 Indian River County Board of Commission	11/13/95	6/19/98 CILC-1G
66 Board of Palm Beach Co Commission	3/10/92	8/26/98 CILC-1D
17 City of Cape Caneveral	1/3096	10/8/98 CILC-1G
to the state of th	2/2/95	3/28/96 CILC-1D
		4/15/96 CILC-1G
10 10 10 10 10 10 10 10 10 10 10 10 10 1	5/26/95	
50 (1) (S (WA) )	5/26/95	4/26/96 CILC-1G
51	5/24/95	4/29/96 CILC-1G
52	5/24/95	5/14/96 CILC-1D
53	5/26/95	7/8/96 CILC-1G
M CONTROL OF THE PARTY OF THE P	1/1/95	7/9/96 CILC-1D
	7/31/95	9/3/96 CILC-1G
56	3/15/96	9/12/96 CILC-1G
57 Jackson Memorial Hosp	11/23/92	10/14/96 CILC-1D
	5/13/94	10/23/96 CILC-1D
	5/24/95	10/24/96 CILC-1G
THE RESERVE OF THE PARTY OF THE	5/13/94	1/25/97 CILC-1D
60		2/17/97 CILC-1G
61	3/15/96	THE RESERVE THE PERSON NAMED IN COLUMN TWO IS NOT THE OWNER.
62 Metro Dade County Aviation	7/24/92	2/27/97 CILC-1D
63	7/24/92	3/27/97 CILC-1D
64 Mami Dade Wasad	1/12/93	8/15/97 CILC-1D
65 US Dept of Commerce National	12/11/95	8/23/97 CILC-1G
66 Mami Dade Wasad	10/8/93	10/10/97 CILC-1D
167 Mami Dade Community College-Kendall	8/13/92	8/3/98 CILC-1G

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168 Mami Dade Wasad	10/8/93	8/19/98 CILC-1D

89 Final Billed Accts		
70	4/15/94	
71	12/11/95	
72 USN Naval Security	8/11/92	
73 Carlotte	9/26/94	
74	2/28/92	and the same
76 CELLECTED	3/14/94	
78 70 77	10/6/93	
77	10/8/93	
76/ N. O	9/25/96	
70	1/22/92	
80 Indian River Co	6/21/93	11.77
81 PLESTON STATE OF THE STATE O	64/92	
82 11 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	4/24/91	
20 20 20 20 20 20 20 20 20 20 20 20 20 2	2/5/96	
M THE STATE OF THE	7/23/93	
	6/1/93	
120	7/23/93	

#### ATTACHMENT II

Customer Name	Date Ligreement Was Signed	C Actual Date on Rate
FT DEPT OF CORR - COLUMBIA COR	05/31/91	11/17/9
	02/21/92	10/20/9
	06/29/92	08/09/9
	07/22/92	02/15/9
METRO DADE CO AVIATION DEPT	07/24/92	02/27/9
NORTH BREVARD HOSPITAL DISTRICT	08/01/92	12/30/9
CITY OF LAKE CITY	08/12/92	06/19/9
CITY OF PALM BAY	08/18/92	03/27/9
	01/01/93	07/09/9
	09/28/93	11/17/9
NBHD #5001 SYST DAYA	04/26/93	08/28/9
	08/18/93	12/18/9
	09/02/63	11/21/9
MAMI-DADE WASAD #WP3039 629510	09/12/93	08/15/9
MAMI-DADE WASAD	10/06/93	10/10/9
MAMI-DADE WASAD	10/08/93	08/19/9
CITY OF BOCA RATON	11/29/93	12/04/9
	05/13/94	10/23/9
	05/13/94	01/25/9
CITY OF HALLANDALE	04/18/95	06/28/9
MAMI-DADE COMM COLLEGE KENDALL BRA	00/23/95	08/03/9
U S FEDERAL AVIATION ADMIN	09/25/95	
U S FEDERAL AVIATION ADMIN	09/25/95	10/07/0
INDIAN RIVER COUNTY BOARD OF COUNTY	The state of the s	10/07/0
THE PROPERTY BOARD OF COUNTY	11/13/95	03/10/9
CITY OF CP CANAVRL	12/01/95	05/11/9
CITY OF SARASOTA	01/30/96	10/08/9
THE STATE OF THE S	08/20/92	06/20/9
US DEPT OF COMMERCE NATIONAL HURRE	07/24/92	03/27/0
SOUTH BROWARD HOSPITAL DISTRICT	12/11/95	08/23/9
	10/21/94	06/30/9
Broward County	12/1/92	
5 Broward County	10/28/92	
6 Broward County	6/1/03	
	3/3/95	
Desoto County Sheriff's Dept	2/9/95	
A STATE OF THE PARTY OF THE PAR		
Carrente County	12/18/95	
Sarasota County	7/6/95	
	9/18/92	
	8/17/92	
	5/22/92	
Handry Co. School Second	1/11/94	
Montes Co Rd Comm		
Manatee Co Bd Comm	5/9/95	
	5/16/94	
	12/13/93	
	2/5/96	
	9/26/95	
United Stated Post Office	3/18/96	
County of Saranota		
County or carried	8/14/95	
	8/7/92	
SS County Govt CEP	8/1/95	

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	7/24/92
Apollo Elementary School	1/18/96
Brevard Community College	10/25/95
Brevard Community College	16-25/95
	1/12/96
City of Titueville	5/10/95
City of Titusville	10/25/95
Cleariake Middle School	1/15/96
	12/1/95
	12/1/95
	12/1/95
Indian River County Utilities	11/13/95
Indian River County Utilities	11/13/95
Jackson Middle School	1/15/96
	6/15/95
Madison Middle School	1/15/96
NASA - C5 Substation	10/11/95
	7/90/92
Palm Bay High School	1/15/96
CAN THE PROPERTY OF THE PARTY O	7/30/92
School Board of Brevard County	12/15/92
	2/24/93
So. Florida Water Mgmt Distr	12/31/91
VA Medical Center	6/16/95
So. Florida Water Mgmt Distr	12/31/91
	5/31/95
USAF	10/11/05
USAF	10/11/95
USAF	10/11/95
	6/15/95
	5/26/93
City of Titusville	11/3/95
	9/11/95
E NO STATE OF SHIPM	11/2/95
· · · · · · · · · · · · · · · · · · ·	5/13/94
NAME OF THE PARTY	2/5/96
	8/19/92
City of Hislesh	2/14/95
	7/13/93
	6/2/93
Federal Corrections Institution	3/18/93
	2/14/94
Secretary Control of the Control of	12/12/95
Metropolitan Dade County	1/12/93
Metropolitan Dade County	1/12/93
	10/12/93
3	6/12/95
	12/14/93
MIAD Conc H	7/24/92
MIAD N Term Ex2	7/24/92
4 MIAD N820	7/24/92

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105 Metro Dade Aviation	7/24/92
106 MIAD 2130	7/24/92
107 MIAD 2132	7/24/92
198 MIAD 2134	
109 MIAD 2200/2206	7/24/92
110 MAD 2208	7/24/92
111 MIAD 2222	7/24/92
112 MAD 2224	7/24/92
113 MIAD 2226	7/24/92
14 MAD N829	7/24/92
15 MAD 2203/2207	7/24/92
16 MAD 2205	7/24/92
117 MAD 2212	7/24/92
18 MAD 2214	7/24/92
19 MAD 2216	7/24/92
20 MAD 2218	7/24/92
21 MAD 2220	7/24/92
	7/24/92
22 MIAD N808	7/24/92
23 MAD N811	7/24/92
24 MIAD N817	7/24/92
25 MIAD N823	7/24/92
26 St Fla Reception Center - Annex	7/30/92
27 Everglades Correctional Inst	8/19/92
28 Everglades Correctional Inst	8/19/92
Everglades Correctional Inst	8/19/92
Dade Correctional	5/23/94
31 Dade Correctional	5/23/94
22 Dade Correctional	5/23/94
13 Mami Dade Wasad - SW Well fields	12/12/95

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