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January 28, 2002

- VIA HAND DELIVERY -

Ms. Blanca S. Bayó Director of the Commission Clerk and Administrative Services Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

Re: Docket No. 001148-El

Dear Mr. Bayó:

I am enclosing for filing in the above docket the original and fifteen (15) copies of the prefiled testimony and exhibits for the following Florida Power & Light Company ("FPL") witnesses:

	Mark R. Bell 01061-02	K. Michael Davis 01067-07
01064	M. Dewhurst-01062-02	Paul J. Evanson OLO68-02.
	William W. Hamilton DID63	Steven P. Harris OLD69 - 02.
	Dr. J. Stuart McMenamin	Rosemary Morley 01070-02
	Armando J. Olivera 010-5	James K. Peterson DIDTLE 02
	John M. Shearman DIDIda	Samuel S. Waters
	01000	0010-02

FPL is filing these witnesses' testimonies today in accordance with Order No. PSC-02-0089-PCO-EI, dated January 15, 2002. FPL's witnesses sponsor and explain the MFRs FPL has previously filed in this docket. Together with the MFRs, their testimonies demonstrate that FPL's 2002 test year results do not support any reduction in FPL's base rates.

Sincerely,

/ John T. Butler, P. A.

Enclosures cc: Counsel of record (w/copy of enclosures)

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of the prefiled testimony and exhibits of Mark R. Bell, K. Michael Davis, M. Dewhurst, Paul J. Evanson, William W. Hamilton, Steven P. Harris, Dr. J. Stuart McMenamin, Rosemary Morley, Armando J. Olivera, James K. Peterson, John M. Shearman and Samuel S. Waters were served by hand delivery (*) or overnight delivery this 28th day of January, 2002 to the following:

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Butler.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 001148-EI FLORIDA POWER & LIGHT COMPANY

JANUARY 28, 2002

IN RE: REVIEW OF THE RETAIL RATES OF FLORIDA POWER & LIGHT COMPANY

TESTIMONY & EXHIBITS OF:

DR. J. STUART MCMENAMIN

DOCUMENT NUMBER DUTE 01064 JAN 288 FPSC-COMMISSION CLERK

1		BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
2		FLORIDA POWER & LIGHT COMPANY
3		TESTIMONY OF DR. J. STUART MCMENAMIN
4		DOCKET NO. 001148-EI
5		JANUARY 28, 2002
6		
7	Q.	Please state your name and address.
8	А.	My name is Stuart McMenamin. My business address is 11236 El Camino
9		Real, San Diego, CA 92130.
10	Q.	By whom are you employed and in what capacity?
11	А.	I am the Executive Vice President of Regional Economic Research, Inc.
12		("RER"), a consulting firm that specializes in the energy industry. I am in
13		charge of the Forecasting and Software Development divisions at RER.
14	Q.	Please state your academic background.
15	А.	My training is in the fields of mathematics, statistics, and economics. I have a
16		B.S. in mathematics and economics from Occidental College and a Ph.D. in
17		economics from the University of California, San Diego.
18	Q.	Please explain your work experience regarding energy forecasting.
19	A.	I have specialized in the area of energy forecasting for the last 25 years,
20		including the most recent 15 years with RER. Over this period, I have worked
21		for most of the major utilities in North America on topics related to regional
22		forecasting, long-term end-use forecasting, monthly sales forecasting, and
23		short-term operational forecasting. In the end-use modeling area, I directed

the development of the Electric Power Research Institute ("EPRI") end-use 1 2 models (REEPS, COMMEND, and INFORM), that are widely used for long-run 3 forecasting. This work, which was funded by EPRI, included the 4 development of the modeling framework, implementation of software 5 systems, and development of national and regional databases to support the 6 models. Related to these efforts, I was the director of the EPRI Forecast 7 Support Office, which provided support for these models throughout the 1990s. 8

9

10 More recently, my efforts have been focused on short-run forecasting using 11 statistical models based on the MetrixND forecasting package. I directed the 12 development of this package including the development of the specific 13 estimation algorithms for ARIMA modeling, exponential smoothing, 14 multivariate regression, and artificial neural networks. This package is used 15 to develop statistical forecasts of annual, monthly, weekly, daily, and hourly 16 loads. This package is used by many of the major utilities in the U.S. and 17 Canada, and it was used by Florida Power & Light Company ("FPL" or the 18 "Company") to develop the statistical models used to develop the sales and 19 peak load forecasts.

20

21 Over the last few years, I have developed statistical forecasting models for 22 numerous entities, including Southern Company Services, Portland General 23 Electric, Bonneyville Power Administration, Florida Power Corporation, the

California ISO, the New York ISO, the Electric Reliability Council of Texas,
 Pennsylvania Power and Light, Southern California Edison, Texas Utilities,
 Tennessee Valley Authority, San Diego Gas & Electric, Ontario Hydro, and
 Entergy, among others.

5 Q. What is the purpose of your testimony?

6 A. My testimony sets forth conclusions from a review of the forecasting models 7 and economic assumptions used by FPL in this proceeding to forecast 8 customers, net energy for load, and sales by revenue class. I have been asked 9 to review the models, inputs and forecasts developed by FPL and to provide 10 my opinion about the validity of the forecasting methods and results as well as 11 the changes that have been implemented between the initial forecast and the 12 updated forecast.

Q. Please provide an overview of the system FPL used to forecast customers, energy sales, and net energy for load for this proceeding.

A. The FPL forecasting system uses statistical models to forecast customers, total
monthly energy requirements, revenue class monthly sales, and system peak
loads. The models are straightforward and are described in detail in MFR F-9.
The models relate the forecast elements to key driving factors. The main
factors are:

- 20 Customer levels depend on
- 21 -- Florida population
- 22 -- Florida commercial sector employment

1	Net En	ergy per Customer in each month depends on
2		Weather (heating degree days and cooling degree days)
3		Heating and cooling equipment saturation levels
4		Real price of electricity
5		Real per capita income
6	Sector	level monthly sales (Residential, Commercial, Industrial, and other)
7	depend	lon
8		Weather (heating degree days and cooling degree days)
9		Heating and cooling equipment saturation levels
10		Real price of electricity
11		Real personal income
12		Commercial employment, and
13		Manufacturing employment
14		
15	In the	monthly energy forecasting system, the Net Energy equation is used to
16	forecas	st total volume at the system level. This volume is allocated to the
17	revenu	e class level in a way that maintains the net energy value. This is often
18	called	"top-down" forecasting. Forecasts from the monthly sales models for
19	each re	evenue class are used to allocate the Net Energy total into revenue class
20	compo	nents that are consistent with that total. These forecasts of sales by
21	revenu	e class are then used to develop forecasts of revenues, as addressed in
22	witness	s Morley's testimony.

Q. Please provide your assessment of the FPL statistical models used in this
 case for customers, energy sales, and net energy for load for this
 proceeding.

- A. The model configuration used by FPL is broadly used in the industry for
 medium-term monthly forecasting systems. The approach is sound and has a
 long history of producing accurate and sensible forecasts. I have examined
 the FPL data, model statistics, and model sensitivities and find them to be in
 line with expectations for this type of model. Specifically,
- 9 -- In the Residential Customer model, the Florida population variable has 10 a long-run elasticity close to 1. That is, a 10% increase in population 11 will eventually produce about a 10% increase in FPL residential 12 customers. An elasticity value close to 1 is expected in situations 13 where customer growth is roughly proportional to population growth.
- In the Commercial Customer model, the commercial employment
 variable has a long-run elasticity slightly below 1. In this model, a
 10% increase in employment will eventually produce about a 9.5%
 increase in FPL commercial customers. An elasticity value close to 1
 is expected in situations where customer growth is roughly
 proportional to employment growth.
- In the Net Energy model, the real price elasticity is about -.13. In this
 model, a 10% increase in electricity prices will cause a reduction in
 electricity use of about 1.3%. This is consistent with the majority of

1		utility results, which typically produce price elasticities between10
2		and25.
3		In the Net Energy Model, the elasticity on real per capita income is
4		about .45. This implies that a 10% increase in real per capita income
5		will cause a 4.5% increase in electricity use. This is consistent with
6		results for stable long-run models that do not control explicitly for
7		appliance and equipment stocks.
8		
9		In addition to looking at the model sensitivities, I looked at the fit of the
10		model to the data and conducted some tests of the stability of the model. The
11		fit for the Net Energy model is extremely strong (R square = .98, Mean
12		Absolute Percentage Error = 1.7%). To test model stability, I estimated the
13		model withholding a randomly selected subset of 1/4 of the data from
14		estimation. The out-of-sample fit was very strong (Mean Absolute Percentage
15		Error = 1.3%), and the elasticities were not impacted significantly, indicating
16		that the model is stable.
17	Q.	After filing its initial forecast using these models, FPL updated the
18		forecast to reflect the consequences of the tragedies of September 11. Did
19		FPL use these same models to develop its updated forecast?
20	А.	The same models were used, although some of the input assumptions were
21		changed.
22	Q.	Have you reviewed FPL's initial and updated sales forecast?
23	А.	Yes.

1	Q.	Please explain the changes that were made in the updated forecast.		
2	A.	Four changes were made that account for the differences in the FPL forecast.		
3		These are:		
4		Lower Customer Growth		
5		Lower Real Per Capita Income		
6		Removal of an Added Telecom Load		
7		Removal of an error adjustment term.		
8	Q.	In your opinion, should FPL have adjusted its sales forecast downward?		
9	А.	Yes. The economic forecast underlying the initial forecast was based on an		
10		economic slowdown rather than the recession we are now experiencing.		
11		FPL's decision to reassess the forecast after the events of September 11 and		
12		the economic responses to those events was appropriate.		
13	Q.	In your opinion, was FPL's downward adjustment in customer growth		
14		from 85,643 to 65,001 in 2002 and from 79,314 to 74,000 in 2003		
15		reasonable?		
16	А.	It is my opinion that a downward adjustment was appropriate. However, in		
17		light of events since the update, it appears that the revised forecast of		
18		customer growth may still be overstated. When the forecast update was made		
19		in late September, there were no official data indicating a recession. Further,		
20		the updated economic forecast that was available at that time still showed real		
21		per capita income growth. It appears that this economic forecast may have		
22		been optimistic as well. Since late September, government data have become		
23		available (on November 26) indicating that we are officially in a recession that		

began in March. Also, the economic impacts in Florida appear to be more
 severe, and this has been evidenced by significantly decreased customer gains
 in October and November.

5 To get some perspective on the issue of customer gains, I looked at the pattern 6 that has occurred with past recessions. I concluded that there is a clearly 7 established pattern of slower customer growth in years following recessions 8 relative to years preceding recessions.

9

4

10 In reaching this conclusion, I examined FPL data related to the four past 11 recessions. These recessions began in November of 1973, January of 1980, 12 July of 1981, and July of 1990. For these recessions, I looked at the annual 13 customer gains in the 12-month period beginning 9 months after the start of 14 the recession (comparable to 2002) and the customer gains in the 12-month 15 period beginning 21 months after the start of the recession (comparable to 16 2003). These gains were compared to the gains in the two-year period 15 17 months before the start of the recession and extending until nine months after 18 the start of the recession (comparable to 2000 and 2001).

19

In all cases, gains in the first year following the recession were significantly below the annual customer gains of the preceding two years. In three of the four cases, gains in the second year following the recession were significantly

1	below the annual customer gains of the preceding two years. Specific
2	conclusions are as follows:
3	Customer gains for the two years before recessions averaged about
4	99,000
5	Customer gains for the 1 st year after recessions averaged about 66,000,
6	which is 33,000 customers per year below the previous two-year
7	average
8	Customer gains for the 2 nd year after recessions averaged about
9	68,000, which is 31,000 customers per year below the previous two-
10	year average.
11	
12	As these results indicate, there is a clearly established pattern of slower
13	customer growth in years following recessions relative to years preceding
14	recessions. These changes reflect a variety of factors that accompany
15	recession periods and the impacts that economic factors have on migration
16	rates (movement into and out of the territory), household formation rates (the
17	age at which people form households as well as the number of people per
18	household), and business formation cycles (the continuation of existing
19	businesses and the formation of new businesses). As seen above for past
20	recessions, the average reduction in the annual customer gain is a little over
21	30,000 for both the first and second year following a recession.

1		These results can be applied to the March 2001 recession, which began 9
2		months before the start of 2002. If a comparable slowdown occurs in 2002
3		and 2003 with the same timing as the numbers computed above, the results
4		will be as follows:
5		Customer growth for the two preceding years averaged about 87,000
6		Applying the factor for one year after, growth for 2002 would be
7		54,000
8		Applying the factor for 2^{nd} year growth, the gain for 2003 would be
9		56,000.
10		
11		Based on the impact of past recessions on customer growth, it appears that
12		FPL's updated customer growth forecast of 65,000 for 2002 and 74,000 in
13		2003 may be somewhat on the high side.
14	Q.	FPL also adjusted its forecast downward because of a reduction in the
15		forecast of real per capita income. What is your assessment of this
16		adjustment?
17	A.	Again it is my opinion that this downward adjustment was warranted.
18		However, based on information now available, it seems likely that a stronger
19		adjustment is appropriate. The change between the adjusted forecast
20		submitted by FPL and the original forecast is modest.
21		Over the five-year forecast horizon to 2006, the compound growth rate
22		was reduced from 2.9% in the original forecast to 2.2% in the revised
23		forecast. Most of this change comes from the first two years.

1		For 2002, the growth rate was cut in half (from 2.6% to 1.3%). Real
2		per capita income growth in comparable periods following past
3		recessions has averaged .2%.
4		For 2003, the growth rate was reduced by one third (from 3.3% to
5		2.2%). Real per capita income growth in comparable periods
6		following past recessions has averaged 1.7%.
7		
8		Of course, no one can say for sure how long the current economic downturn
9		will last. It is also difficult to foretell whether the impact on domestic travel
10		and tourism and the disproportionate impact on international travel will be
11		short-lived or not. However, it is my feeling that the assumptions used in the
12		updated FPL forecast are relatively optimistic. They are in line with a
13		scenario in which the current recession is short lived and the dislocational
14		impacts of September 11 are minor.
15	Q.	Another factor FPL used to update its sales forecast was removal of an
16		adjustment for telecom load growth. What is your opinion of this
17		adjustment?
18	A.	In the initial filing, the forecast for Net Energy included an external
19		adjustment for Telecom load growth. This adjustment added .47% to the Net
20		Energy forecast in 2002. Issues related to telecom and computer loads have
21		been a hot issue in the electricity industry for the last several years, fueled by
22		the internet boom. This boom included aggressive expansion plans of
23		dot.com companies and internet server facilities and was fueled by significant

1 quantities of speculative investment money. Many utilities were concerned 2 about the load growth that would accompany this unprecedented expansion, 3 leading to inclusion of upward forecast adjustments. The practice of including 4 forecast adjustments was supported by some confusion about the current and 5 potential significance of computer loads in the U.S. economy. The popular 6 quote was that computer loads accounted for 13% of electricity use today and 7 was headed for 50% within our lifetime. I worked with scientists at Lawrence 8 Berkeley National Labs to analyze these claims. We have extensive data on 9 computer equipment inventories and energy usage based on our work in the 10 end-use area. We concluded that computer equipment accounts for 5% or less 11 of current electricity usage and that the claim that this will grow to 50% of 12 total use is not realistic.

13

14 Without a doubt, the rise in usage of computers and internet related equipment 15 has added to electricity usage in the U.S. over the last two decades. However, 16 there is no reason to believe that the loads added over the next two years will 17 be disproportionate relative to those added over the past decade. As a result, 18 there is no need to include an external adjustment, since a continuation of 19 existing trends and relationships is implicit in the econometric forecast. 20 (Specifically, this is one of the trends that is included in the relationship between Net Energy and Real Per Capita Income). On this basis, I believe 21 22 that it is advisable to remove this external adjustment from the forecast. If 23 anything, over the next few years, there may be a reduction of load growth

associated with these activities, reflecting the collapse of the internet bubble
 and a return to more reasonable levels of investment in the supporting telecom
 infrastructure.

- Q. FPL's other adjustment to its sales forecast involved elimination of an
 intercept adjustment. Please explain the purpose of an intercept
 adjustment and whether you believe FPL's removal of this adjustment
 was appropriate.
- A. Stated simply, a positive intercept adjustment increases the forecast and a
 negative intercept adjustment decreases the forecast. The intercept in an
 equation is the constant term (the "a" in the expression a + b*X). A positive
 intercept adjustment shifts an equation upward. A negative intercept
 adjustment shifts an equation downward. Neither of these changes alters the
 sensitivity of the equation to driving factors (the X's).
- 14

15 In the initial filing, the forecast for Net Energy included a positive intercept 16 adjustment to reflect an apparent tendency for the models to under forecast 17 energy toward the end of the sample period. This adjustment added .72% to 18 the Net Energy forecast in 2002. The practice of including an intercept 19 adjustment is common in forecasting. The relationships in the forecasting 20model are estimated over a period of time and are intended to reflect the 21average relationship over the estimation period. In some instances, however, 22 there are cycles or trends that are not captured, and these may lead to over or 23 under prediction toward the end of the historical period. By adding an

2

intercept adjustment, the forecast line is adjusted upward or downward to agree more closely with the end-of-period data.

3

4 Toward the end of the 1990s and into 2000, it was often the case that 5 statistical models slightly under predicted sales. Part of this tendency to under 6 predict was related to the economic exuberance associated with the 7 technology sector and the speculative stock market bubble. Those days are 8 past. Under current conditions, utilities are now finding that models fitted 9 through this period are tending to over forecast. This is the case with the FPL 10 model, which is tracking high through the middle of 2001, before September 11 11, and is expected to predict significantly above actual levels through the end 12 of 2001. This situation is common. Even in short-term (day ahead) 13 forecasting models, some utilities are finding that their existing equations are 14 forecasting 3% to 4% above observed levels after accounting for actual daily 15 weather. In light of these developments, it is certainly not advisable to 16 include a positive intercept adjustment, and, if anything, a negative adjustment 17 would appear to be appropriate at this time.

18 Q. Why do you believe a negative intercept adjustment is appropriate at this 19 time?

A. As a positive adjustment is appropriate when models are tracking low, a
negative adjustment is appropriate when models are tracking high. The
principle is the same in both cases. So, if we were to apply this principle
today, we would include a negative intercept adjustment.

1 **Q.** Please summarize your testimony.

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2 I have examined the data and forecasting models used by FPL. I have focused A. 3 on the customer forecast, which was adjusted downward, and the Net Energy 4 equation, which reflects weaker economic assumptions and removal of 5 adjustments that were included in the original forecast but which are no longer 6 appropriate. I believe that these changes are both reasonable and advisable. If anything, I believe that FPL has not gone far enough in adjusting the forecast 7 downward to reflect the current recession and the continued long- run impacts 8 9 associated with September 11.