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**FPL Responses to
FLASEIA's First Set of Interrogatories
(Nos. 1-5)**

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Energy Conservation Cost Recovery
Clause

Docket No: 110002-EG

Date: October 24, 2011

**FLORIDA POWER & LIGHT COMPANY'S OBJECTIONS AND
RESPONSES TO THE FLORIDA SOLAR ENERGY INDUSTRIES
ASSOCIATION'S FIRST SET OF INTERROGATORIES (NOS. 1-5)**

Florida Power & Light Company ("FPL"), pursuant to Rule 1.340, Florida Rules of Civil Procedure, Rule 28-106.206, Florida Administrative Code, and Order No. PSC-11-0136-PCO-EG, submits the following Objections and Responses to the Florida Solar Energy Industries Association's ("FlaSEIA") First Set of Interrogatories (Nos. 1-5).

I. General Objections

FPL objects to each and every discovery request that calls for information protected by the attorney-client privilege, the work product doctrine, the accountant-client privilege, the trade secret privilege, or any other applicable privilege or protection afforded by law, whether such privilege or protection appears at the time response is first made or is later determined to be applicable for any reason. FPL in no way intends to waive any such privilege or protection. The nature of the document(s), if any, will be described in a privilege log prepared and provided by FPL.

FPL is a large corporation with employees located in many different locations. In the course of its business, FPL creates numerous documents that are not subject to Florida Public Service Commission or other governmental record retention requirements. These documents are kept in numerous locations and frequently are moved from site to site as employees change jobs or as business is reorganized. Therefore, it is possible that not every relevant document may have been consulted in developing FPL's responses to the discovery requests. Rather, these responses provide all the information that FPL obtained after a reasonable and diligent search

conducted in connection with these discovery requests. To the extent that the discovery requests propose to require more, FPL objects on the grounds that compliance would impose an undue burden or expense on FPL.

FPL objects to each discovery request to the extent that it seeks information that is not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

FPL objects to each and every discovery request to the extent it is vague, ambiguous, overly broad, imprecise, or utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of such discovery requests. Any responses provided by FPL will be provided subject to, and without waiver of, the foregoing objection.

FPL also objects to each and every discovery request to the extent it calls for FPL to prepare information in a particular format or perform calculations or analyses not previously prepared or performed as purporting to expand FPL's obligations under applicable law.

FPL objects to providing information to the extent that such information is already in the public record before the Florida Public Service Commission and available to the requesting Party through normal procedures.

FPL objects to each and every discovery request that calls for the production of documents and/or disclosure of information from NextEra Energy, Inc. and any subsidiaries and/or affiliates of NextEra Energy, Inc. that do not deal with transactions or cost allocations between FPL and either NextEra Energy, Inc. or any subsidiaries and/or affiliates. Such documents and/or information do not affect FPL's rates or cost of service to FPL's customers. Therefore, those documents and/or information are irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, FPL is the party appearing before the Florida Public Service Commission in this docket. To require any non-regulated entities to

participate in irrelevant discovery is by its very nature unduly burdensome and overbroad. Subject to, and without waiving, any other objections, FPL will respond to the extent the request pertains to FPL and FPL's rates or cost of service charged to FPL's customers. To the extent any responsive documents contain irrelevant affiliate information as well as information related to FPL and FPL's rates or cost of service charged to its customers, FPL may redact the irrelevant affiliate information from the responsive document(s).

Where any discovery request calls for production of documents, FPL objects to any production location other than the location established by FPL, at FPL's Tallahassee Office located at 215 South Monroe Street, Suite 810, Tallahassee, Florida.

FPL objects to each and every discovery request and any instructions that purport to expand FPL's obligations under applicable law.

In addition, FPL reserves its right to count discovery requests and their sub-parts, as permitted under the applicable rules of procedure, in determining whether it is obligated to respond to additional requests served by any party.

FPL expressly reserves and does not waive any and all objections it may have to the admissibility, authenticity or relevancy of the information provided in its responses.

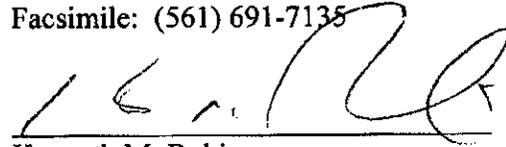
Notwithstanding any of the foregoing general objections and without waiving these objections, FPL hereby responds to FlaSEIA's discovery requests.

II. Responses

Attached hereto are FPL's answers to Interrogatory Nos. 1-5 of FlaSEIA's First Set of Interrogatories consistent with its objections, together with the affidavits of the persons providing the answers.

R. Wade Litchfield, Esq.
Vice President and General Counsel
Kenneth Rubin, Esq.
Senior Attorney
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408
Telephone: (561) 691-2512
Facsimile: (561) 691-7135

By:



Kenneth M. Rubin
Florida Bar No. 349038

CERTIFICATE OF SERVICE

DOCKET NO. 110002-EG

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by overnight mail (*), electronic mail, and regular U.S. Mail this 24th day of October, 2011 to the following:

Lee Eng Tan, Esq.
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Ltan@psc.state.fl.us

Office of Public Counsel
J. R. Kelly, Esq.
Patricia Ann Christensen, Esq.
c/o The Florida Legislature
111 West Madison St., Room 812
Tallahassee, FL 32399-1400
Kelly.jr@leg.state.fl.us
Christensen.patty@leg.state.fl.us

Beggs & Lane Law Firm
Jeffrey Stone, Esq./Russell Badders, Esq./
Steven Griffin, Esq.
Attorneys for Gulf Power Company
501 Commendancia Street
Pensacola, FL 32502-5953
jas@beggslane.com
rab@beggslane.com

Ausley Law Firm
James Beasley, Esq.
J. Jeffrey Wahlen, Esq.
Attorneys for Tampa Electric Company
(TECO)
P.O. Box 391
Tallahassee, FL 32302
jbeasley@ausley.com
jwahlen@ausley.com

Gulf Power Company
Ms. Susan D. Ritenour
One Energy Place
Pensacola, FL 32520-0780
sdriteno@southernco.com

Tampa Electric Company
Paula K. Brown
Regulatory Affairs
P. O. Box 111
Tampa, FL 33601-0111

Florida Industrial Power Users Group
John W. McWhirter, Jr., Esq.
c/o McWhirter Law Firm
P.O. Box 3350
Tampa, FL 33601-3350
jmcwhirter@mac-law.com

Keefe Law Firm
Vicki Gordon Kaufman, Esq.
Jon C. Moyle, Jr., Esq.
Attorneys for Florida Industrial Power
Users Groups (FIPUG)
118 North Gadsen Street
Tallahassee, FL 32301
vkaufman@kagmlaw.com
jmoyle@kagmlaw.com

Beth Keating, Esq.
Gunster Firm
Attorneys for FPUC
215 So. Monroe St., Suite 618
Tallahassee, Florida 32301-1804
bkeating@gunster.com

Florida Public Utilities Company
Joseph Eysie
P. O. Box 3395
West Palm Beach, FL 33402-3395

James W. Brew, Esq.
F. Alvin Taylor, Esq.
Attorneys for White Springs Agricultural
Chemicals, Inc.
Brickfield, Burchette, Ritts & Stone, P.C.
1025 Thomas Jefferson St., NW
Eighth Floor, West Tower
Washington, DC 20007
jbrew@bbrslaw.com
ataylor@bbrslaw.com

Randy Miller
White Springs Agricultural Chemicals, Inc.
P.O. Box 300
15843 Southeast 78th Street
White Springs, FL 32096
rmiller@pcsphosphate.com

Suzanne Brownless, Esq. (*)
Suzanne Brownless, P.A.
1301 Miccosukee Road
Tallahassee, FL 32308
suzannebrownless@comcast.net

Progress Energy Service Company, LLC
John T. Burnett, Esq.
P.O. Box 14042
St. Petersburg, FL 33733-4042
John.burnett@pgnmail.com

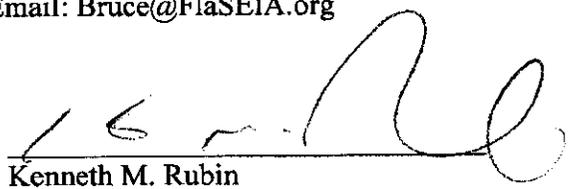
Progress Energy Florida, Inc.
Mr. Paul Lewis, Jr.
106 East College Avenue, Suite 800
Tallahassee, FL 32301-7740
Paul.lewisjr@pgnmail.com

Karen S. White, Esq.
Staff Attorney
AFLOA/JACL-ULT/FLOA/JACL-ULT
139 Barnes Drive, Suite 1
Tyndall AFB, FL 32403-5317
Attorney for the Federal Executive
Agencies
Karen.White@tyndall.af.mil

Southern Alliance for Clean Energy
c/o George Cavros, Esq.
120 East Oakland Park Blvd., Suite 105
Fort Lauderdale, FL 33334
Email: george@cavros-law.com

Florida Solar Energy Industries
Association
c/o R. Bruce Kershner
231 West Bay Avenue
Longwood, FL 32750-4125
Email: Bruce@FlaSEIA.org

By:


Kenneth M. Rubin
Florida Bar No. 349038

Q.

In Order PSC-11-0079-PAA-EG, issued in Docket No. 100155-EG, on January 31, 2011, and consummated by Order PSC-11-0128-CO-EG, issued on February 23, 2011, FPL was required to develop and implement 7 solar pilot programs: 1) residential solar water heating; 2) residential solar water heating (low income new construction); 3) business solar water heating; 4) residential photovoltaic; 5) business photovoltaic; 6) business photovoltaic for schools and 7) renewable research and demonstration project. The program standards for these pilot solar programs were administratively approved by the Commission Staff on May 13, 2011.

- a. Please provide the date that FPL initially made each solar pilot program listed above available to the public. If all solar pilot programs were released on the same date to the public, please so state.
- b. On the date that FPL initially made these programs available to FPL's ratepayers, please provide the amount of funds initially allocated to each solar pilot program identified above for the year ending December 31, 2011.
- c. For each solar pilot program identified above, please provide the program, date and time that the initially allocated funds were completely reserved for that specific program, i.e., all funds allocated to that particular solar pilot program were committed and customers could no longer sign up for that program with an assurance that they would be paid from 2011 allocated funds the approved incentive upon satisfaction of the program standards.
- d. Did FPL reallocate the remaining unreserved solar pilot program funds for 2011 based upon customer participation in the solar pilot programs? If the answer to this question is yes, please provide the following information:
 - (1) The amount of funds reallocated to each program and the total amount of funds available for each solar pilot program after the reallocation, e.g., residential photovoltaic received XXX amount for a total allocation of XXX for 2011; residential solar water heating was reduced by XXX amount for a total allocation of XXX for 2011.
 - (2) For each applicable program, the date that the program was reopened and reallocated funds were made available to FPL's ratepayers.
 - (3) For each applicable program, the date that the reallocated program funds were completely reserved the second time, i.e., all funds allocated were committed and customers could no longer sign up for that program with an assurance that they would be paid from 2011 funds upon compliance with program standards.

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Question No. 1
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A.

1.a. - All programs were initially made available on June 29, 2011.

1.b. - Please see Table 1.b. below. Note, amounts shown reflect pro-rata allocation of common costs.

Residential Solar Water Heating	\$4,626,847
Residential Solar Water Heating Low Income New Construction	\$1,245,634
Business Solar Water Heating	\$1,428,801
Residential Photovoltaic	\$4,166,323
Business Photovoltaic	\$2,960,241
Business Photovoltaic for Schools	\$632,952
Renewable Research and Demonstration	\$345,187

1.c. - Please see Table 1.c. below. "n/a" indicates that initially allocated funds were not completely reserved.

Residential Solar Water Heating	n/a	n/a
Residential Solar Water Heating Low Income New Construction	n/a	n/a
Business Solar Water Heating	n/a	n/a
Residential Photovoltaic	6/29/11	~8:45 a.m.
Business Photovoltaic	6/29/11	~8:40 a.m.
Business Photovoltaic for Schools	n/a	n/a
Renewable Research and Demonstration	n/a	n/a

1.d. - Yes, FPL reallocated funds on August 30, 2011.

1.d.(1), (2) & (3) - Please see Table 1.d.(1)-(3) below. Note, amounts shown reflect pro-rata allocation of common costs. "n/a" indicates that the allocated funds were not completely reserved. Any program whose funds were not completely reserved before the 8/30/11 reallocation were not closed during the 2011 operating period which ended September 30, 2011.

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Residential Solar Water Heating	\$4,626,847	(\$3,207,436)	\$1,419,411	n/a	9/14/11
Residential Solar Water Heating Low Income New Construction	\$1,245,634	(\$866,568)	\$379,066	n/a	n/a
Business Solar Water Heating	\$1,428,801	(\$132,845)	\$1,295,956	n/a	n/a
Residential Photovoltaic	\$4,166,323	\$2,400,693	\$6,567,016	8/30/11	8/30/11
Business Photovoltaic	\$2,960,241	\$2,400,692	\$5,360,933	8/30/11	8/30/11
Business Photovoltaic for Schools	\$632,952	(\$427,600)	\$205,352	n/a	n/a
Renewable Research and Demonstration	\$345,187	(\$166,936)	\$178,251	n/a	n/a

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Q. For each solar pilot program identified above please provide the amount of funds that remain available to FPL's ratepayers as of October 1, 2011.

A. Please see Table 2 below.

Residential Solar Water Heating	\$0
Residential Solar Water Heating Low Income New Construction	\$0
Business Solar Water Heating	\$0
Residential Photovoltaic	\$0
Business Photovoltaic	\$0
Business Photovoltaic for Schools	\$0
Renewable Research and Demonstration	\$0

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Q.
For the years ending December 31, 2012, December 31, 2013 and December 31, 2014 please provide the total amount of funds allocated to the solar pilot programs identified above and the amount of funds allocated to each solar pilot program individually.

A.
Please see Table 3 below for 2012 program allocations. 2013 and 2014 allocations have not yet been determined. Note, amounts shown reflect pro-rata allocation of common costs.

Residential Solar Water Heating	\$2,315,531
Residential Solar Water Heating Low Income New Construction	\$2,620,960
Business Solar Water Heating	\$1,037,184
Residential Photovoltaic	\$3,000,796
Business Photovoltaic	\$3,026,897
Business Photovoltaic for Schools	\$2,020,926
Renewable Research and Demonstration	\$1,514,577
Total	\$15,536,870

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Q.

For the years ending December 31, 2011 and December 31, 2012, please provide the estimated rate impact per month for an FPL residential customer using 1,000 kWh per month for each of FPL's seven solar pilot programs individually and the total estimated rate impact per month for an FPL residential customer using 1,000 kWh per month total for all solar pilot programs.

A.

Please see Table 4 below.

Residential Solar Water Heating	\$0.01	\$0.03
Residential Solar Water Heating Low Income New Construction	\$0.00	\$0.03
Business Solar Water Heating	\$0.01	\$0.01
Residential Photovoltaic	\$0.06	\$0.03
Business Photovoltaic	\$0.05	\$0.03
Business Photovoltaic for Schools	\$0.00	\$0.01
Renewable Research and Demonstration	\$0.00	\$0.02
Total	\$0.14	\$0.15

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Q.
For each solar pilot program listed above, please provide the following information:

- a. The number of participants in each program as of October 1, 2011;**
- b. The number of kW reserved in each program as of October 1, 2011;**
- c. The number of kW installed in each program as of October 1, 2011.**

A.
 Please see Table 5.a.-c. below. Amounts reflect completed jobs plus reservations that were still active as of October 1, 2011.

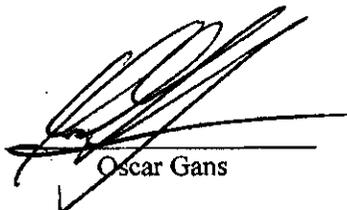
Residential Solar Water Heating	729	160.4	68.2
Residential Solar Water Heating Low Income New Construction	57	12.5	0.0
Business Solar Water Heating	36	408.6	0.6
Residential Photovoltaic	404	1,135.1	399.8
Business Photovoltaic	92	1,100.8	252.3
Business Photovoltaic for Schools	0	0.0	0.0
Renewable Research and Demonstration	0	0.0	0.0

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STATE OF FLORIDA)

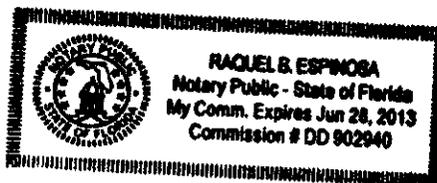
COUNTY OF MIAMI DADE)

I hereby certify that on this 20th day of October, 2011, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared Oscar Gans, who is personally known to me or who has produced Drivers License as identification and he acknowledged before me that he provided the answers to Interrogatory Nos. 1 through 3 and 5 from FLASEIA'S FIRST SET OF INTERROGATORIES NOS. 1-5 TO FLORIDA POWER & LIGHT COMPANY in Docket No. 110002-EG, and that the responses are true and correct based upon his personal knowledge.


Oscar Gans

In Witness Whereof, I have set my hand and seal in the State and County aforesaid on this 20 day of October, 2011.


Notary Public, State of Florida

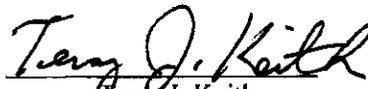


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STATE OF FLORIDA)

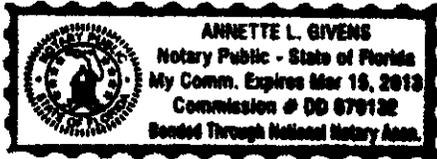
COUNTY OF MIAMI DADE)

I hereby certify that on this 21 day of October, 2011, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared Terry J Keith, who is personally known to me or who has produced personally known as identification and he acknowledged before me that he provided the answer to Interrogatory No. 4 from FLASEIA'S FIRST SET OF INTERROGATORIES NOS. 1-5 TO FLORIDA POWER & LIGHT COMPANY in Docket No. 110002-EG, and that the response is true and correct based upon his personal knowledge.


Terry J. Keith

In Witness Whereof, I have set my hand and seal in the State and County aforesaid on this

21 day of October, 2011.




Notary Public, State of Florida