



2. No one has had the opportunity to dispute the fuel costs, transmission costs, or capacity factors used to derive the cents-per-kWh for the UPS alternative (to choose one example), even though the record contains substantial disagreement on the manner in which FPL quantified those figures. No one has had the chance to argue whether the years 1990, 1991, 1992 and 1993 should be ignored for the purchase option (FPL provides cents-per-kWh figures beginning in 1994 even though costs were first incurred in 1990) or whether UPS should be delayed until 1996.

3. Most significantly, no one has had the opportunity to argue whether FPL's "simple arithmetic" is relevant. Are "costs" that ignore the effects of the various options on FPL's system dispatch and total system fuel cost indicative of the delivered costs the utility would incur or costs that would ultimately affect billings to FPL's customers? As stated by FPL's witness, Mr. Waters:

[T]he bottom line is [that] the ultimate comparison between any two options should reflect effects on system fuel cost and should reflect how we actually expect [each option] to run.

[Tr. 558]

WHEREFORE, the Citizens of the State of Florida, through the Office of Public Counsel, move the Florida Public Service Commission to strike the bottom half of page 27, pages 28 and 29, and Appendix II of the Brief and Post-Hearing Statement of Issues and Positions of Florida Power & Light Company.

Respectfully submitted,

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CERTIFICATE OF SERVICE  
DOCKET NO. 900796-EI

I HEREBY CERTIFY that a true and correct copy of the PUBLIC COUNSEL'S MOTION TO STRIKE, has been furnished by U.S. Mail or by \*hand-delivery to the following on this 16th day of January, 1991.

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