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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION 11 MAR -1 PM 3:15

COMMISSION  
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DOCKET NO. 110009-EI  
FLORIDA POWER & LIGHT COMPANY

MARCH 1, 2011

TURKEY POINT 6&7 - 2009 & 2010  
EXTENDED POWER UPRATES - 2010

TESTIMONY & EXHIBITS OF:

WINNIE POWERS

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APA	<u>1</u>
ECR	<u>0</u>
GCL	<u>1</u>
RAD	<u>1</u>
SSC	<u>—</u>
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DOCUMENT NUMBER-DATE  
 01391 MAR-1 =  
 FPSC-COMMERCIAL-10-10

1                   **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

2                   **FLORIDA POWER & LIGHT COMPANY**

3                   **DIRECT TESTIMONY OF WINNIE POWERS**

4                   **DOCKET NO. 110009-EI**

5                   **MARCH 1, 2011**

6   **Q.     Please state your name and business address.**

7   A.     My name is Winnie Powers. My business address is 700 Universe Boulevard,  
8           Juno Beach, FL 33408.

9   **Q.     By whom are you employed and what is your position?**

10  A.     I am employed by Florida Power & Light Company (FPL or the Company) as  
11           the New Nuclear Accounting Project Manager.

12  **Q.     Please describe your duties and responsibilities in that position.**

13  A.     I am responsible for the accounting related to the new nuclear projects, which  
14           include Turkey Point 6 & 7 and the Extended Power Uprate (EPU or Uprate)  
15           Projects at Turkey Point and St. Lucie. I ensure that the costs expended and  
16           projected for these projects are accurately reflected in the Nuclear Cost  
17           Recovery filing requirements (NFR) schedules. In addition, I am responsible  
18           for ensuring that the Company's assets associated with these projects are  
19           appropriately recorded and reflected in FPL's financial statements.

20  **Q.     Please describe your educational background and professional**  
21           **experience.**

22  A.     I graduated from the University of Florida in 1976 with a Bachelor of Science  
23           Degree in Business Administration, majoring in Accounting. After college, I

1 was employed as an accountant by RCA Corporation in New York. In 1983, I  
2 was hired by Southeastern Public Service Company in Miami and attained the  
3 position of manager of corporate accounting. In 1985, I joined FPL and have  
4 held a variety of positions in the regulatory and accounting areas during my  
5 26 years with the Company. I obtained my Masters of Accounting from  
6 Florida International University in 1994. I am a Certified Public Accountant  
7 (CPA) licensed in the State of Florida, and I am a member of the American  
8 Institute of CPAs.

9 **Q. Are you sponsoring any Exhibits in this case?**

10 A. Yes, I am sponsoring or co-sponsoring the following Exhibits for the Turkey  
11 Point 6 & 7 and EPU Projects:

- 12 ● Exhibit WP-5, 2009 and 2010 Revenue Requirements, details the  
13 components of the 2009 and 2010 Turkey Point 6 & 7, and 2010 Uprate  
14 revenue requirements reflected in the True-Up (T schedules) by project,  
15 by year and by category of costs being recovered (e.g. Site Selection costs,  
16 Preconstruction costs, carrying costs on unrecovered balances and on the  
17 deferred tax asset/liability, and for Uprates, carrying costs on construction  
18 costs and on the deferred tax asset/liability, recoverable operation and  
19 maintenance (O&M) costs, and base rate revenue requirements for the  
20 year plant is placed into service).
- 21 ● Exhibit WP-6, 2010 Uprate Construction Costs and 2009 and 2010 Turkey  
22 Point 6 & 7 Preconstruction Costs, details the 2010 Uprate and the 2009  
23 and 2010 Turkey Point 6 & 7 total company costs and jurisdictional costs

1 by project, by year and by cost categories. These total company costs and  
2 prudence of them, variances from the actual/estimated costs and the  
3 explanation of the variances are further described in the testimonies of  
4 FPL Witness Jones and FPL Witness Scroggs.

- 5 • Exhibit WP-7, 2010 Base Rate Revenue Requirements, details the true-up  
6 of the revenue requirements for the Uprate plant modifications placed into  
7 service during 2010, specifically the true-up of the in-service date and  
8 true-up of the actual plant placed into service. FPL Witness Jones  
9 describes the plant being placed into service, as well as the necessity and  
10 timing of completing this plant.
- 11 • Exhibit WP-8, 2009 and 2010 Incremental Labor Guidelines, flowcharts  
12 the process used by the business unit accounting teams to determine  
13 incremental payroll costs chargeable to the projects for 2009 and 2010.
- 14 • Exhibit WP-9 is the 2010 incremental labor guidelines memo.
- 15 • Exhibit SDS-1, T Schedules, 2009 TP 6&7 Preconstruction Costs,  
16 sponsored by FPL Witness Scroggs, consists of the 2009 Turkey Point 6 &  
17 7 Preconstruction Schedules T-1 through T-7A. Page 2 of SDS-1 contains  
18 a table of contents which lists the T Schedules sponsored and co-  
19 sponsored by FPL Witness Scroggs and by me, respectively.
- 20 • Exhibit SDS-2, AE Schedules, 2010 TP 6&7 Preconstruction Costs,  
21 sponsored by FPL Witness Scroggs, consists of the 2010 Turkey Point 6 &  
22 7 Preconstruction Schedules AE-1 through AE-7B. Page 2 of SDS-2

1 contains a table of contents which lists the AE Schedules sponsored and  
2 co-sponsored by FPL Witness Scroggs and by me, respectively.

3 • Exhibit SDS-3, T Schedules, 2010 TP 6 & 7 Preconstruction Costs,  
4 sponsored by FPL Witness Scroggs, consists of the 2010 Turkey Point 6 &  
5 7 Preconstruction Schedules T-1 through T-7B. Page 2 of SDS-3 contains  
6 a table of contents which lists the T Schedules sponsored and co-  
7 sponsored by FPL Witness Scroggs and by me, respectively.

8 • Exhibit SDS-4, T Schedules, 2009 TP 6 & 7 Site Selection Costs,  
9 sponsored by FPL Witness Scroggs, consists of the 2009 Turkey Point 6 &  
10 7 Site Selection Schedules T-1 through T-6. Page 2 of SDS-4 contains a  
11 table of contents which lists the T Schedules sponsored and co-sponsored  
12 by FPL Witness Scroggs and by me, respectively.

13 • Exhibit SDS-5, AE Schedules, 2010 TP 6 & 7 Site Selection Costs,  
14 sponsored by FPL Witness Scroggs, consists of the 2010 Turkey Point 6 &  
15 7 Site Selection Schedules AE-1 through AE-6. Page 2 of SDS-5 contains  
16 a table of contents which lists the AE Schedules sponsored and co-  
17 sponsored by FPL Witness Scroggs and by me, respectively.

18 • Exhibit SDS-6, T Schedules, 2010 TP 6 & 7 Site Selection Costs,  
19 sponsored by FPL Witness Scroggs, consists of the 2010 Turkey Point 6 &  
20 7 Site Selection Schedules T-1 through T-6. Page 2 of SDS-6 contains a  
21 table of contents which lists the T Schedules sponsored and co-sponsored  
22 by FPL Witness Scroggs and by me, respectively.

- 1           ● Exhibit TOJ-12, Actual/Estimated (AE) Schedules, 2010 EPU  
2           Construction Costs, sponsored by FPL Witness Jones, consists of the 2010  
3           Uprate Schedules AE-1 through AE-7B. Page 2 of TOJ-12 contains a  
4           table of contents which lists the AE Schedules sponsored and co-  
5           sponsored by FPL Witness Jones and by me, respectively.
- 6           ● Exhibit TOJ-13, T Schedules, 2010 EPU Construction Costs, sponsored by  
7           FPL Witness Jones, consists of the 2010 Uprate Schedules T-1 through T-  
8           7B. Page 2 of TOJ-13 contains a table of contents which lists the T  
9           Schedules sponsored and co-sponsored by FPL Witness Jones and by me,  
10          respectively.

11   **Q.    What is the purpose of your testimony?**

12   A.    The purpose of my testimony is to present the calculation of the revenue  
13          requirements in the:

- 14          (1) NFR AE schedules for 2010 Turkey Point 6 & 7 Preconstruction and Site  
15          Selection costs and carrying costs for 2010;
- 16          (2) NFR T schedules for 2009 and 2010 Turkey Point 6 & 7 Preconstruction  
17          and Site Selection carrying costs;
- 18          (3) NFR AE schedules for 2010 Uprate costs and carrying costs;
- 19          (4) NFR T schedules for 2010 Uprate costs and carrying costs; and
- 20          (5) True-up of the 2010 base rate revenue requirements related to the Uprate  
21          modifications placed into plant in-service during 2010 as shown on Exhibit  
22          WP-7, page 1 of 11. FPL filed its annualized base rate increase for the Uprate  
23          modifications placed into service during 2010 and a true-up of the St. Lucie

1 Unit 2 Turbine Gantry Crane costs (originally included in a base rate filing on  
2 December 4, 2009) on October 7, 2010.

3

4 I also describe how these schedules comply with the Florida Public Service  
5 Commission's (FPSC or Commission) Rule No. 25-6.0423, Nuclear or  
6 Integrated Gasification Combined Cycle Power Plant Cost Recovery (Nuclear  
7 Cost Recovery Rule or NCRC). I explain how carrying costs are provided for  
8 under the Nuclear Cost Recovery Rule, describe the base rate revenue  
9 requirements included for recovery in the schedules, and discuss the  
10 Accounting controls FPL relies upon to ensure costs are appropriately charged  
11 to the projects.

12 **Q. Please summarize your testimony.**

13 **A.** My testimony refers to Exhibits and T schedules detailing revenue  
14 requirements for the Turkey Point 6 & 7 Project for 2009 and 2010 and the  
15 Uprate Project for 2010. Additionally my testimony and Exhibits include the  
16 2010 AE schedules for the Turkey Point 6 & 7 and Uprate Projects needed to  
17 true-up the 2010 costs FPL is requesting to recover through the NCRC. My  
18 testimony also describes the comprehensive corporate and overlapping  
19 business unit controls for incurring costs and recording transactions associated  
20 with FPL's capital projects, including the Turkey Point 6 & 7 and Uprate  
21 Projects. My testimony describes these controls and outlines the  
22 documentation, assessment, and auditing processes for these overlapping  
23 control activities.

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**NUCLEAR COST RECOVERY RULE**

**Q. Please describe the Commission’s Nuclear Cost Recovery Rule and the NFR schedules.**

A. On March 20, 2007, in Order No. PSC-07-0240-FOF-EI, the FPSC adopted the Nuclear Cost Recovery Rule to implement Section 366.93, Florida Statutes (the Statute), which was enacted by the Florida Legislature in 2006.

The Nuclear Cost Recovery Rule has been interpreted by this Commission to include FPL’s Turkey Point 6 & 7 and Uprate Projects. In compliance with the Nuclear Cost Recovery Rule, FPL is recovering the costs, carrying costs, recoverable O&M, and base rate revenue requirements (for the year plant is placed into service) for the Turkey Point 6 &7 and Uprate Projects at its St. Lucie and Turkey Point nuclear power plants through FPL’s Capacity Cost Recovery Clause (CCRC). Base rate recovery of the annualized revenue requirements subsequent to the year the plant is placed into service is to be requested in a separate petition outside of the Nuclear Cost Recovery Clause as contemplated by the Rule.

The Nuclear Cost Recovery Rule implements this mechanism for cost recovery and provides for the annual recovery of eligible costs through the CCRC. FPL continues to work with Commission Staff, the Office of Public



1 Counsel, Progress Energy Florida (PEF) and interested parties to refine a  
2 comprehensive set of NFR schedules, which set forth construction and cost  
3 information on nuclear power plant projects.  
4

5 The NFR schedules provide an overview of nuclear power plant projects and a  
6 roadmap to the detailed project costs. The NFR schedules consist of True-up  
7 (T), Actual/Estimated (AE), Projected (P) and True-up to Original (TOR)  
8 Schedules. The T Schedules filed each March provide the True-Up for the  
9 prior year.  
10

#### 11 **2009 True-up – Turkey Point 6 & 7**

12 **Q. What 2009 schedules are you filing in this testimony?**

13 A. I am filing the 2009 T Schedules for Turkey Point 6 & 7 Preconstruction and  
14 Site Selection in this testimony.

15 **Q. Please discuss the 2009 T Schedules.**

16 A. The Turkey Point 6 & 7 Preconstruction and Site Selection 2009 T schedules  
17 included as SDS-1 and SDS-4 present the final true-up of revenue  
18 requirements by comparing 2009 actual costs to 2009 actual/estimated costs  
19 approved by this Commission in Docket No. 090009-EI, Order No. 09-0783-  
20 FOF-EI. The result of this comparison is an overrecovery of \$10,648,277 for  
21 Turkey Point 6 & 7, which I describe in this testimony. I note for  
22 informational purposes that when combined with the 2009 Uprate T schedules  
23 overrecovery of \$3,971,698, described in separate testimony filed in this

1 Docket, the total 2009 total overrecovery is \$14,619,975 as shown on my  
2 Exhibit WP-1. The details of the 2009 Turkey Point 6 & 7 revenue  
3 requirements can also be found in my Exhibit WP-5, page 1 of 2. FPL  
4 requests the Commission approve the revenue requirements and resulting  
5 overrecovery of \$10,648,277 for Turkey Point 6 & 7 for 2009.

6  
7 **2010 True-up – Turkey Point 6 & 7 and Uprate**

8 **Q. What 2010 schedules are you filing in this testimony?**

9 A. I am filing 2010 AE Schedules and 2010 T Schedules for the Turkey Point 6  
10 & 7 and Uprate Projects in this testimony.

11 **Q. Please discuss the 2010 AE and T Schedules.**

12 A. The 2010 AE schedules filed in this docket as Exhibits SDS-2 and SDS-5 for  
13 Turkey Point 6 & 7 and Exhibit TOJ-12 for Uprates show the true-up of the  
14 2010 P schedules filed in 2009. The 2010 T schedules filed with this  
15 testimony present the final true-up of Turkey Point 6 & 7 (Exhibit SDS-3 for  
16 *Preconstruction and Exhibit SDS-6 for Site Selection*) and Uprate (Exhibit  
17 TOJ-13) Projects revenue requirements by comparing 2010 actual costs to  
18 2010 actual/estimated costs. These T schedules, when compared to the 2010  
19 AE schedules, result in our true-up amount of an overrecovery of  
20 \$16,418,342. This consists of an overrecovery of \$17,949,858 for Turkey  
21 Point 6 & 7 and an underrecovery of \$1,531,516 for Uprates for 2010. These  
22 amounts, which include related carrying charges, will be reflected in the  
23 beginning balance of FPL's 2011 AE Schedules to be filed on May 2, 2011,

1 and will be reflected in costs to be recovered in FPL's 2012 revenue  
2 requirements request. The details of these 2010 True-up of costs are included  
3 in my Exhibit WP-5, page 2 of 2. FPL requests the Commission approve the  
4 revenue requirements and resulting overrecovery of \$16,418,342 for 2010.

5  
6 **TURKEY POINT 6 & 7**

7 **2009 True-up**

8 **Preconstruction**

9 **Q. Please describe the NFR schedules for the recovery of 2009 Turkey Point**  
10 **6 & 7 Preconstruction costs included in Exhibit SDS-1.**

11 **A.** FPL has included the 2009 T Schedules in this testimony as Exhibit SDS-1 for  
12 Turkey Point 6 & 7 Preconstruction Costs.

13  
14 My Exhibit WP-5, page 1, shows that the actual 2009 revenue requirements  
15 are \$38,456,738, compared to the actual/estimated revenue requirements of  
16 \$49,005,239 filed on May 1, 2009 in Docket No. 090009-EI, approved in  
17 Order No. PSC-09-0783-FOF-EI. The difference resulting from the final true-  
18 up of 2009 actual costs compared to the 2009 actual/estimated costs including  
19 the resulting carrying charges is an overrecovery of \$10,548,501. The details  
20 of these revenue requirements and the resulting true-up can be seen in  
21 schedule T-1, T-2, and T-3A.

22  
23 As shown in schedule T-6 in Exhibit SDS-1 FPL's actual 2009 Turkey Point

1 6 & 7 Preconstruction expenditures on a total Company basis are \$37,731,525  
2 (\$37,599,045, jurisdictional). Comparing these costs to the actual/estimated  
3 amount of \$45,640,661 (\$45,444,468, jurisdictional) filed on May 1, 2009 in  
4 Docket No. 090009-EI results in the overrecovery of jurisdictional  
5 Preconstruction costs of \$7,845,423. As shown on Exhibit WP-5, page 1 of 2,  
6 the actual 2009 carrying charges of \$857,693 compared to the  
7 actual/estimated carrying charges of \$3,560,771 reflected in the 2009 AE-2  
8 and AE-3A schedules result in an overrecovery of \$2,703,078. The resulting  
9 total overrecovery of \$10,548,501 reduces the CCRC charge being paid by  
10 customers in 2011. These costs are summarized in my Exhibits WP-5 and  
11 WP-6.

12  
13 For the reasons stated in FPL Witness Scroggs's March 1, 2011 testimony,  
14 FPL respectfully requests the Commission review and approve these 2009  
15 Turkey Point 6 & 7 jurisdictional Preconstruction expenditures and carrying  
16 charges as prudent and recoverable consistent with the Nuclear Cost Recovery  
17 Rule.

#### 18 **Site Selection**

19 **Q. Please describe the NFR schedules for the recovery of 2009 Turkey Point**  
20 **6 & 7 Site Selection costs included in Exhibit SDS-4.**

21 A. FPL has included the 2009 T Schedules as Exhibit SDS-4 for Site Selection.  
22 FPL's Turkey Point 6 & 7 Site Selection expenditures ceased with the filing  
23 of our need petition on October 16, 2007. All recoveries of site selection costs

1 with resulting true-ups have been reflected in nuclear cost recovery filings.

2  
3 As shown on schedule T-1, T-2, and T-3A in this testimony, the actual 2009  
4 carrying charges are \$373,162, compared to the actual/estimated carrying  
5 charges of \$472,938 filed on May 1, 2009 in Docket No. 090009-EI and  
6 approved in Order No. PSC-09-0783-FOF-EI. The overrecovery of \$99,776  
7 reduces the CCRC charge paid by customers in 2011. The summary of these  
8 revenue requirements and the resulting true-up can also be seen in Exhibit  
9 WP-5, page 1 of 2. FPL respectfully requests the Commission review and  
10 approve these 2009 Turkey Point 6 & 7 Site Selection carrying costs as  
11 prudent and recoverable consistent with the NCRC.

12  
13 **2010 True-up**

14 **Preconstruction**

15 **Q. Please describe the NFR schedules for the recovery of 2010 Turkey Point**  
16 **6 & 7 Preconstruction costs included in Exhibit SDS-2.**

17 A. FPL has included the 2010 AE Schedules as Exhibit SDS-2 for Turkey Point 6  
18 & 7 Preconstruction Costs. As contemplated by the Nuclear Cost Recovery  
19 Rule, these AE schedules provide the basis for determining the reasonableness  
20 of FPL's 2010 actual/estimated costs.

21 **Q. Please describe the NFR schedules for the recovery of 2010 Turkey Point**  
22 **6 & 7 Preconstruction costs included in Exhibit SDS-3.**

23 A. FPL has included the 2010 T Schedules as Exhibit SDS-3 for Turkey Point 6

1           & 7 Preconstruction Costs.

2  
3           For Preconstruction, schedule T-1 shows that the actual 2010 revenue  
4           requirements are \$19,441,209, compared to the actual/estimated revenue  
5           requirements of \$37,391,067 included as Exhibit SDS-2. The difference  
6           resulting from the final true-up of 2010 actual costs compared to the 2010  
7           actual/estimated costs including the resulting carrying charges is an  
8           overrecovery of \$17,949,858.

9  
10          As shown in schedule T-6 in Exhibit SDS-3, FPL's actual 2010 Turkey Point  
11          6 & 7 Preconstruction expenditures on a total Company basis are \$25,593,577  
12          (\$25,291,109, jurisdictional). Comparing these costs to the actual/estimated  
13          amount of \$42,629,655 (\$42,125,853, jurisdictional) included as Exhibit SDS-  
14          2 results in the overrecovery of jurisdictional Preconstruction costs of  
15          \$16,834,744. As shown on schedules T-2 and T-3A (Exhibit SDS-3) the final  
16          true-up of actual 2010 carrying charges of (\$5,849,900) compared to the  
17          actual/estimated carrying charges of (\$4,734,785) on schedules AE-2 and AE-  
18          3A (Exhibit SDS-2) results in an overrecovery of \$1,115,115. The resulting  
19          2010 total Turkey Point 6 & 7 Preconstruction overrecovery of \$17,949,858  
20          will be reflected in the CCRC charge sought to be recovered in 2012.

21  
22          The 2010 total Company expenditures are discussed in FPL Witness  
23          Scroggs's March 1, 2011 testimony and are also summarized on Exhibits WP-

1 5 and WP-6. For the reasons stated in FPL Witness Scroggs's March 1, 2011  
2 testimony, FPL respectfully requests the Commission review and approve  
3 these 2010 Turkey Point 6 & 7 jurisdictional Pre-construction expenditures  
4 and carrying charges as prudent and recoverable consistent with the Nuclear  
5 Cost Recovery Rule.

6 **Site Selection**

7 **Q. Please describe the NFR schedules for the recovery of 2010 Turkey Point**  
8 **6 & 7 Site Selection costs included in Exhibit SDS-5.**

9 A. FPL has included the 2010 AE Schedules as Exhibit SDS-5 for Site Selection.  
10 As contemplated by the Nuclear Cost Recovery Rule, these AE schedules  
11 provide the basis for determining the reasonableness of FPL's 2010  
12 actual/estimated costs.

13 **Q. Please describe the NFR schedules for the recovery of 2010 Turkey Point**  
14 **6 & 7 Site Selection costs included in Exhibit SDS-6.**

15 A. FPL has included the 2010 T Schedules as Exhibit SDS-6 for Site Selection.

16  
17 As previously described in my testimony, FPL's Turkey Point 6 & 7 Site  
18 Selection expenditures ceased with the filing of our need petition on October  
19 16, 2007 and all recoveries of Site Selection costs with resulting true-ups have  
20 been reflected in nuclear cost recovery filings. There continues to be carrying  
21 charges as shown in T-2 and T-3A in Exhibit SDS-6 of \$145,965 for 2010,  
22 which, when compared to the actual/estimated carrying charges of \$145,965  
23 in Exhibit SDS-5 result in no true-up of costs. The details of these revenue

1 requirements and the resulting true-up can also be seen in Exhibit WP-5, page  
2 2 of 2. FPL respectfully requests the Commission review and approve these  
3 2010 Turkey Point 6 & 7 Site Selection carrying costs as prudent and  
4 recoverable consistent with the NCRC.

5  
6 **UPRATES**

7 **2010 True-up**

8 **Q. Please describe the NFR schedules for the recovery of 2010 Uprate costs**  
9 **and carrying costs included in Exhibit TOJ-12.**

10 A. FPL has included in Exhibit TOJ-12 the 2010 AE schedules for nuclear and  
11 transmission Uprate costs. As contemplated by the Nuclear Cost Recovery  
12 Rule, these AE schedules provide the basis for determining the reasonableness  
13 of FPL's 2010 actual/estimated costs.

14 **Q. Please describe the NFR schedules for the recovery of 2010 Uprate costs**  
15 **and carrying costs included in Exhibit TOJ-13.**

16 A. FPL has included in Exhibit TOJ-13 the 2010 T schedules for nuclear and  
17 transmission Uprate costs. As shown on schedule T-6, FPL's actual Uprate  
18 expenditures for the period January 2010 through December 2010 total  
19 \$309,982,999 (\$296,181,013 jurisdictional, net of participants). As shown on  
20 schedule T-3 and T-3A, FPL incurred related carrying charges of  
21 \$41,568,070. As shown on schedule T-4, FPL incurred \$7,170,412  
22 (\$7,061,419 jurisdictional, net of participants) of recoverable O&M expenses.  
23 FPL incurred related interest at the 30-day commercial paper rate on



1 recoverable O&M of \$5,983. Additionally, the 2010 base rate revenue  
2 requirements of \$414,079 and related carrying charges of (\$464,185) related  
3 to the Uprate modifications placed into plant in service in 2010 result in an  
4 overrecovery of \$50,106 as shown in Exhibit WP-5, page 2 of 2. The total  
5 actual 2010 revenue requirements of \$48,585,366 (carrying costs, recoverable  
6 O&M, and base rate revenue requirements), compared to the actual/estimated  
7 revenue requirements of \$47,053,850 included in the AE schedules in Exhibit  
8 TOJ-12 result in an underrecovery of \$1,531,516. This amount will be  
9 reflected in the CCRC charge sought to be recovered in 2012. The details of  
10 these revenue requirements and the resulting true-ups are shown in Exhibit  
11 WP-5, page 2 of 2. The prudence and necessity of the 2010 actual total  
12 Company costs are discussed in FPL Witness Jones's March 1, 2011  
13 testimony.

14 **Q. Were there any revisions to the recoverable O&M reporting process for**  
15 **2010?**

16 **A.** Yes, revisions to the process FPL uses for reporting recoverable O&M were  
17 made following Staff's July 1, 2010 meeting with the parties in Docket No.  
18 100001-EI and Docket No. 100009-EI.

19 **Q. Please explain FPL's process prior to the revision.**

20 **A.** Prior to the revision, beginning January 1, 2010, FPL expensed the deferred  
21 recoverable O&M representing 2008 and 2009 actual costs and began  
22 expensing the current month 2010 actual recoverable O&M incurred to FPL's  
23 CCRC recoverable accounts. Any resulting over/under recoveries were

1 included in those CCRC accounts and accrued interest at the 30-day  
2 commercial paper rate. While this process facilitated the calculation of  
3 over/under recoveries and the calculation of the interest, it separated the  
4 calculation from the underlying variances reported in the NFRs that created  
5 the over/under recoveries.

6 **Q. How has FPL revised its process?**

7 A. FPL revised its process in June 2010 and removed the NCRC recoverable  
8 O&M variances from the CCRC recoverable accounts and from its CCRC  
9 schedules. FPL recalculated interest in the CCRC excluding those variances.  
10 The result is that the 2010 CCRC estimated/actual True-up schedules that FPL  
11 filed on August 2, 2010 in Docket No. 100001-EI did not reflect NCRC  
12 recoverable O&M variances or the associated interest. Instead, those  
13 variances and interest have been reported on the NFRs and requested for  
14 recovery in the NCRC. The result of this change was reflected in the NFRs  
15 filed in this Docket.

16 **Q. Please explain the 2010 base rate revenue requirements.**

17 A. FPL included \$2,018,321 of base rate revenue requirements in its 2010 AE  
18 schedules in Exhibit TOJ-12 Appendix B for the Uprate modifications  
19 projected to be placed into service in 2010. This amount relates to the  
20 revenue requirements for the first year this plant is placed into service and is  
21 based on the estimated jurisdictional costs (net of participants) and the  
22 estimated in-service dates when the estimates were initially submitted to the  
23 Commission May 3, 2010.

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FPL included \$414,079 of base rate revenue requirements in the 2010 T schedules in TOJ-13 Appendix B.

The difference between the \$2,018,321 of base rate revenue requirements in the 2010 AE schedules and the \$414,079 of base rate revenue requirements in the 2010 T schedules in TOJ-13 Appendix B is an overrecovery of \$1,604,242 as shown in Exhibit WP-5 pg 2 of 2.

The actual amounts of plant, in-service dates, and related revenue requirements for the Uprate modifications placed into service in 2010 are reflected in Exhibit WP-7 in this testimony.

In accordance with Nuclear Cost Recovery Rule No. 25-6.0423 (7), on October 7, 2010, FPL filed a request to recover in base rates in 2011, the annualized base rate revenue requirements related to the Uprate modifications placed into service in 2010 separate from its cost recovery clause petition as approved in Order No. PSC-11-0078-PAA-EI, Docket No. 100419-EI.

**Q. What caused the difference between 2010's base rate revenue requirements in the AE schedules and the base rate revenue requirements in the T schedules for the Uprate modifications placed into service?**

A. The difference is due to: actual as opposed to projected in-service amounts, actual as opposed to projected in-service dates, actual as opposed to projected

1 jurisdictional separation factors, and the actual rate of return as filed in FPL's  
2 most recent surveillance report at the time the Uprate modifications were  
3 placed into service.

4 **Q. Please describe the reasons for the difference in revenue requirements.**

5 A. The 2010 AE Schedules filed in this Docket as Exhibit TOJ-12 reflect FPL's  
6 estimate that Uprate modifications of \$138,988,557 (\$137,126,585  
7 jurisdictional, net of participants) would be placed into service in 2010. The  
8 actual plant placed into service during 2010 was \$12,955,015 (\$12,422,640  
9 jurisdictional, net of participants), which is reflected in my Exhibit WP-7,  
10 page 1 of 11 in this testimony. The plant placed into service in 2010 and the  
11 revised in-service dates are also shown in Exhibit WP-7.

12

13 FPL used a projected jurisdictional separation factors from the rate case  
14 (Docket No. 080677-EI) for the 2010 AE schedules in Exhibit TOJ-12. For  
15 the T schedules in Exhibit TOJ-13, FPL adjusted the projected jurisdictional  
16 separation factors to the jurisdictional separation factors as reflected in FPL's  
17 2010 monthly Surveillance Reports to the FPSC.

18

19 Lastly, in the AE schedules, FPL used its then most current rate of return  
20 which was based on the December 2009 Surveillance Report. The rate of  
21 return in our T schedules is the rate of return based on the most current 2010  
22 monthly surveillance reports at the time the Uprate modifications are placed  
23 into service. This is in accordance with the requirements of the Nuclear Cost

1 Recovery Rule No. 25-6.0423 Section 7 (d). The reasons for the changes  
2 related to the plant placed into service are explained in greater detail in  
3 Witness Jones's testimony.

4 **Q. What accounting and regulatory treatment is provided for costs that**  
5 **would have been incurred regardless of the Uprate Project?**

6 A. Costs that would have been incurred regardless of the Uprate Project are not  
7 included in FPL's NCRC calculations. Such expenditures that are not  
8 "separate and apart" from the nuclear Uprate Project will be accounted for  
9 under the normal process for O&M and capital expenditures. Capital  
10 expenditures will accrue Allowance for Funds Used During Construction  
11 (AFUDC) while in Construction Work in Progress (CWIP) until the system or  
12 component is placed into service. Only costs incurred for activities necessary  
13 for the Uprate Project are charged to the Uprate work orders and included as  
14 recoverable O&M or as construction costs included in the calculation of  
15 carrying charges in the NFR schedules. This method ensures that FPL only  
16 receives recovery of the appropriate recoverable O&M or carrying charge  
17 return currently under the Nuclear Cost Recovery Rule and expenses or  
18 accrues the appropriate O&M or AFUDC return on costs that are not "separate  
19 and apart" that will be recovered through rate base when the project is placed  
20 into service. FPL employs a rigorous, engineering-based process to segregate  
21 costs that are "separate and apart" from those that would have normally been  
22 incurred, so that only the appropriate costs are reflected in the NCRC request.

1 This process is discussed in more detail in FPL Witness Jones's March 1,  
2 2011 testimonies.

3

4

## ACCOUNTING CONTROLS

5

6 **Q. Please describe the accounting controls FPL relies upon to ensure proper**  
7 **cost recording and reporting for these projects.**

8 A. FPL relies on its comprehensive corporate and overlapping business unit  
9 controls for recording and reporting transactions associated with any of its  
10 capital projects including the Uprate Project and Turkey Point 6 & 7. These  
11 comprehensive and overlapping controls include:

- 12 ● FPL's Accounting Policies and Procedures;
- 13 ● Financial systems and related controls including FPL's general ledger and  
14 construction asset tracking system (CATS);
- 15 ● FPL's annual budgeting and planning process;
- 16 ● Reporting and monitoring of plan costs to actual costs incurred; and
- 17 ● Business Unit specific controls and processes.

18 The project controls are further discussed in the March 1, 2011 testimony of  
19 FPL Witnesses Scroggs and Jones.

20 **Q. Are there any changes to existing accounting controls or additional**  
21 **accounting controls implemented and relied upon for these projects and**  
22 **the related reporting for 2010?**

1 A. Yes. As I describe later in my testimony, there were changes in 2010 to the  
2 Nuclear Business Unit accounting controls in the Uprate Project.

3 **Q. Are these controls documented, assessed and audited and/or tested on an**  
4 **ongoing basis?**

5 A. Yes. The FPL corporate accounting policies and procedures are documented  
6 and published on the Company's internal website, Employee Web. In  
7 addition, accounting management provides formal representation as to the  
8 continued compliance with those policies and procedures each year. The  
9 Company's external auditors, Deloitte & Touche, LLP, as a part of its annual  
10 audit, which includes assessing the Company's internal controls over financial  
11 reporting and testing of general computer controls, expresses an opinion as to  
12 the effectiveness of those controls. Sarbanes-Oxley processes are identified,  
13 documented, tested and maintained, including specific processes for planning  
14 and executing capital work orders, as well as acquiring and developing fixed  
15 assets. Certain key financial processes are tested during the Company's  
16 annual test cycle.

17 **Q. Describe the responsibilities and accounting controls of the New Nuclear**  
18 **Accounting Project Group.**

19 A. The primary responsibility of the New Nuclear Accounting Project Group is  
20 to provide financial accounting guidance for the recovery of costs under the  
21 Nuclear Cost Recovery Rule. Additional responsibilities include the  
22 preparation and maintenance of the NFR schedules, (e.g. T, AE, P, and TOR  
23 Schedules) and on a monthly basis, ensuring the costs included in the NFR

1 schedules are recorded to the financial records of the Company and reconciled  
2 to the NFRs. The Nuclear Cost Recovery projects utilize unique work orders  
3 to capture costs directly related to these projects. After ensuring accurate costs  
4 are recorded, adjustments are made to reflect participants' credits,  
5 jurisdictionalize the costs, and include other adjustments required in the NFR  
6 schedules. Monthly journal entries are prepared to reflect the effects of the  
7 recovery of these costs and monthly reconciliations of the NFR accounts are  
8 performed. The resulting schedules are included in our Nuclear Cost  
9 Recovery filings and described in testimony.

10

11 The New Nuclear Accounting Project Group works closely with the Nuclear  
12 Business Unit, Engineering, Construction & Corporate Services Division  
13 (ECCS), and the Transmission Business Unit to address issues surrounding  
14 the costs related to the projects. This involves researching, providing  
15 direction and resolving project accounting issues that arise as the new nuclear  
16 projects develop.

17

18

## **UPRATE SPECIFIC ACCOUNTING CONTROLS**

19

20

### ***Nuclear Business Unit Accounting Controls***

21

**Q. Describe the oversight role of the Nuclear Business Operations (NBO)**

22

**Group related to the Uprate Project.**



1 A. The NBO Group is independent of the EPU Project Team and provides  
2 oversight of the costs charged to the Uprate Project. The NBO Group is  
3 primarily responsible for the work order maintenance function, reviewing  
4 payroll to ensure only appropriate payroll is charged to the Uprates,  
5 determining appropriate accounting for costs, raising potential issues to the  
6 Property Accounting Group when necessary, providing accounting guidance  
7 and training to the Uprate team, assisting with internal and external audit-  
8 related matters, reviewing project projections and producing monthly variance  
9 reports.

10 **Q. Are there any changes to existing Nuclear controls or additional controls**  
11 **implemented and relied upon for the Uprate Project and the related**  
12 **reporting for 2010?**

13 A. Yes. There was a revision in January 2010 to Extended Power Uprate Project  
14 Instructions Number EPPI-230 *Project Invoice*, revising invoice approvers for  
15 certain dollar limits. Before payment can be made, any invoice greater than  
16 \$1 million requires approval of the Vice President, Nuclear Power Uprates,  
17 and any invoice greater than \$5 million requires the approval of the Executive  
18 Vice President & Chief Nuclear Officer. Secondly, a nuclear division process  
19 was implemented to provide guidance on the process to effectively identify,  
20 evaluate and dispose of obsolete equipment, parts, and material. Lastly, the  
21 Nuclear Asset Management System (NAMS) for the issuance of purchase  
22 orders (PO) and the payment of invoices was implemented in July 2010 to

1 replace the previous system, Procurement Control and Inventory Management  
2 System (PASSPORT).

3 **Q. Describe the NBO Group accounting controls which ensure costs are**  
4 **appropriately incurred and tracked for the Uprate Project.**

5 A. The NBO Group accounts for the activities necessary to perform the Uprates  
6 at the four nuclear units, Turkey Point Units 3 and 4 and St. Lucie Units 1 and  
7 2. Costs associated with the work performed on components defined as a  
8 property retirement unit will be transferred from CWIP to plant in service at  
9 the end of each outage or when they become used and useful (i.e. such as the  
10 modifications to the St. Lucie Unit 2 Turbine Gantry Crane). In order to  
11 facilitate this process, a separate budget activity was set up for each unit and  
12 capital work orders were set up within each budget activity to capture costs  
13 related to each Uprate outage. Additional work orders are set up, as  
14 necessary, to capture costs associated with plant placed into service at a  
15 different time than the outages (e.g. turbine gantry cranes, generator step-up  
16 transformers, etc). Transmission related work for the Uprate project is also  
17 being accounted for by work order based on the scope of work and will be  
18 placed into service when the respective work is used and useful.

19  
20 Through June 2010, purchase orders were issued and invoices paid in  
21 PASSPORT for work to be performed at each unit. Subsequent to this date  
22 the PO's are issued and invoices paid in NAMS. This transition to the NAMS  
23 system continues to facilitate cost analysis to track discrete projects and tasks.

1 **Q. Describe the NBO Group accounting controls which ensure costs are**  
2 **appropriately charged to the Uprate Project.**

3 A. Invoices are routed to the St. Lucie or Turkey Point site project controls  
4 analyst, as appropriate. The analyst checks the invoices for accuracy and for  
5 agreement to the PO terms and conditions. Once the invoice has been  
6 appropriately verified, the analyst records invoice information on an Invoice  
7 Tracking Log. The Invoice Approval/Route List is then routed for verification  
8 of receipt of goods/services and all required approvals. Before payment can  
9 be made on any invoice greater than \$1 million, the approval of the Vice  
10 President, Nuclear Power Uprates is required. Before payment can be made on  
11 any invoice greater than \$5 million, the approval of the Executive Vice  
12 President & Chief Nuclear Officer is required. Once all necessary approvals  
13 have been obtained, the project controls analyst processes the invoice for  
14 payment in NAMS against the respective purchase order. Extended Power  
15 Uprate Project Instruction Number EPPI-230, *Project Invoice*, details the flow  
16 of the invoice through the approval, receipt and payment process at the sites  
17 and establishes responsibilities at each stage of the process.

18 **Q. Describe the review performed by the EPU Project Controls Team and**  
19 **the NBO Group related to the Uprate Project.**

20 A. Throughout the month, general ledger detail transactions are monitored by the  
21 EPU Project Controls Team and NBO to ensure that costs charged to the  
22 Uprates are appropriate and are accurately classified as capital or O&M. Site  
23 cost engineers perform reviews to ensure invoices are accurately coded to the

1 appropriate activity/scope work order. NBO reviews internal labor costs to  
2 ensure that only appropriate payroll is charged to the Uprates. In addition, all  
3 steps in this process are subject to internal and external audits and reviews.

4

5 The Project engineers and NBO together work closely to make sure the costs  
6 are appropriate and are accurately classified as capital or O&M. Construction  
7 Leads perform reviews to ensure invoices are accurately coded to the  
8 appropriate activity/scope work order.

9 **Q. Describe the reporting performed by the EPU Project Controls Team and  
10 the NBO Group related to the Uprate Project.**

11 **A.** The Uprate Project Controls Director, along with the Controls group at each  
12 site, record schedule changes, project delays, and project costs. The Uprate  
13 Project Controls Director, along with the Controls group, support risk  
14 management and contract administration.

15

16 The NBO Group drafts monthly variance reports that compare actual  
17 expenditures incurred to the originally estimated budget and reports year end  
18 forecast estimates. The draft reports are sent to the St. Lucie and Turkey Point  
19 Uprate Project Controls Teams responsible for providing variance  
20 explanations and forecast updates to NBO. The reports are reviewed by the  
21 Uprate Project control supervisors and management prior to the submission to  
22 NBO. NBO reviews the variance explanations and forecast numbers for  
23 reasonableness and accuracy prior to compilation and inclusion in the Nuclear

1 Business Unit corporate variance report. NBO is also responsible for  
2 reviewing numbers reported to the FPL Executive Steering Committee to  
3 ensure consistency with corporate variance reports and for providing the  
4 Accounting Department with project numbers for inclusion in the NFR  
5 schedules.

### 7 **Transmission Business Unit Accounting Controls**

8 **Q. Describe the role of the Transmission Business Unit related to the Uprate**  
9 **Project.**

10 A. The Transmission Business Unit is incurring expenditures related to the  
11 Uprate Project in order to perform substation and transmission line  
12 engineering, procurement, and construction on specific work orders assigned  
13 to projects, which resulted from transmission interconnection and integration  
14 studies performed by FPL Transmission Planning. These studies were based  
15 on incorporating the additional amount of megawatts to be generated by the  
16 uprated nuclear units at St. Lucie 1 & 2 and Turkey Point 3 & 4 into the FPL  
17 transmission system. The Transmission Business Unit cost and performance  
18 team ensures costs are appropriately incurred and charged to the Uprate  
19 Projects. The Transmission Business Unit reviews payroll to ensure only  
20 appropriate payroll is charged to the Uprate Project, determining appropriate  
21 accounting for costs, raising potential issues to the Property Accounting  
22 Group when necessary, providing accounting guidance and training to the

1 Uprate Project team, assisting with internal and external audit-related matters,  
2 reviewing project projections, and producing monthly variance reports.

3 **Q. Describe the Transmission Business Unit accounting controls which**  
4 **ensure costs are appropriately incurred and tracked for the Uprate**  
5 **Project.**

6 A. The Transmission Business Unit identifies the transmission activities  
7 necessary to support the increased electrical output of the Uprates at the four  
8 nuclear units, St. Lucie Units 1 & 2 and Turkey Point Units 3 & 4. Costs  
9 associated with the work performed for each outage are transferred from  
10 CWIP to plant in service by Property Accounting as necessary. In order to  
11 facilitate this process and identify activities, two separate budget activities  
12 were set up with appropriate sub activities and multiple work orders.  
13 Purchase Orders are handled by Integrated Supply Chain (ISC) via the e-Pro  
14 Process (e-Pro). In e-Pro, a PO request is routed from the originator to all  
15 approvers required based on the dollar amount of the PO. The PO  
16 Requisitioning group determines the required approvals based on the business  
17 unit's PO approval limits, and routes the request as required. Once all  
18 required approvals are secured, the PO will be created based on the  
19 information in the e-Pro request.

20 **Q. Describe the Transmission Business Unit accounting controls which**  
21 **ensure costs are appropriately charged to the Uprate Project.**

22 A. Invoices are routed to the Transmission Project Control Administrator  
23 (Administrator). The Administrator checks the invoices for accuracy and for

1 agreement to the PO terms and conditions. Once the invoice has been  
2 appropriately verified, the Administrator records invoice information on the  
3 Cost Control Tracking sheet and routes the invoice for all required approvals.  
4 Invoices found to contain any inaccuracies are returned to the requestor for  
5 revisions. Any invoice greater than \$1 million requires the approval of the  
6 Business Unit Vice President. Any invoice greater than \$5 million requires  
7 the approval of FPL President & Chief Executive Officer before payment is  
8 made. Once all necessary approvals have been obtained, the Administrator  
9 processes the invoice for payment in SAP against the respective purchase  
10 order.

11 **Q. Describe the review performed by the Transmission Business Unit related**  
12 **to the Uprate Project.**

13 A. The Cost & Performance Analyst updates the Turkey Point and St Lucie  
14 Uprate Cost reports on a monthly basis for actual costs incurred. The Turkey  
15 Point and St Lucie Uprate Cost reports are then reviewed by the assigned  
16 Project Managers and Administrators who work closely together to ensure that  
17 all costs are appropriately charged to the Uprate Project and are accurately  
18 classified as either Capital or O&M. Construction Leaders also perform  
19 reviews to ensure all invoices are accurately assigned and coded to the  
20 appropriate Work Order for the Uprate Project as well. Any discrepancies  
21 identified as a result of these reviews are resolved at this time. The assigned  
22 Project Manager then updates the individual Work Order forecasts, if

1 warranted. In addition to the above review processes, all FPL contracts are  
2 also subject to both Internal and External audits.

3 **Q. Describe the reporting performed by the Transmission Business Unit**  
4 **related to the Uprate Project.**

5 A. The Transmission Cost & Performance group drafts monthly variance reports  
6 that compare actual expenditures incurred to the originally estimated budget  
7 and reports year end forecast estimates. These are reviewed by the assigned  
8 Project Manager for reasonableness and accuracy and the final is then  
9 submitted to the Corporate Budget Group.

10

11 **TURKEY POINT 6 & 7 SPECIFIC ACCOUNTING CONTROLS**

12

13 **Q. Describe the role of the Engineering, Construction & Corporate Services**  
14 **Division related to the Turkey Point 6 & 7 Project.**

15 A. The ECCS Division has a Project Controls Group that reports through the  
16 Vice President of ECCS and provides structural leadership, governance and  
17 oversight for the project. On a monthly basis, the group completes a thorough  
18 review of all costs ensuring accuracy of the charges posted to the project.  
19 Additionally, Project Controls prepares monthly variance reports, identifying  
20 variances against budgeted information. Team members and project  
21 management meet monthly to review and understand existing budget  
22 variances against the projected forecast. The Group consists of a Director of  
23 Construction with an economics degree and 29 years experience at FPL, 21



1 years in the ECCS and Nuclear Business Units and 8 years in the Auditing,  
2 Property and Financial Accounting Groups. He is supported by staff with  
3 business, finance and accounting degrees and nuclear and construction  
4 experience.

5 **Q. Describe the Engineering, Construction & Corporate Services Division**  
6 **accounting controls which ensure costs are appropriately incurred for the**  
7 **Turkey Point 6 & 7 Project.**

8 A. When FPL filed its Need Determination in October 2007, costs related to the  
9 project recorded in a deferred debit account were transferred to CWIP. A  
10 separate work order was set up for Site Selection costs and Preconstruction  
11 costs. As stated in the Rule, a site is deemed to be selected upon the filing of  
12 a petition for a determination of need; therefore, all costs expended prior to  
13 the Need Filing are categorized as Site Selection costs. All Site Selection  
14 expenditures have been determined prudent by this Commission in Order No.  
15 PSC-08-0749-FOF-EI and all recoveries with resulting true-ups have been  
16 reflected in previous filings. Preconstruction costs are costs expended after a  
17 site has been selected, captured in a unique work order, and are included in the  
18 Preconstruction T Schedules for actual costs incurred in each year.

19 **Q. Describe the Engineering, Construction & Corporate Services Division**  
20 **accounting controls which ensure costs are appropriately charged to the**  
21 **Turkey Point 6 & 7 Project.**

22 A. When a potential expenditure greater than \$5,000 is identified, project  
23 personnel input the expenditure request detailing the need, justification,

1 estimated cost and documentation in the ECCS Electronic Approval Database  
2 (EAD). The request is routed to the Project Controls Group, which inputs all  
3 pertinent budget information, verifies appropriate accounts are charged, and  
4 verifies the budgeted resources for the proposed transaction are available.  
5 This information is sent through the EAD to the Project Manager of the  
6 functional area who verifies the expense is applicable to the project. The  
7 Project Manager then routes the information in the EAD to the appropriate  
8 approvers based on authorization levels, to the *Integrated Supply Chain (ISC)*  
9 department and to the Project Controls Group. Once the expenditure is  
10 approved, ISC issues a Purchase Order in compliance with procurement  
11 policies and procedures. After the goods have been received or services  
12 rendered and an invoice is received by the functional area, it is reviewed,  
13 determined appropriate, approved if appropriate, and input into the SAP  
14 payment processing system. In SAP, online approvals based on authorization  
15 levels are required for any expenditure greater than \$250 prior to the invoice  
16 being paid. *For items less than \$250, the monthly SAP transaction register*  
17 *detailing the document number, work order, account, amount, description,*  
18 *purchase order and the total dollar amount of the transaction must be reviewed*  
19 *and approved by the functional area designated SAP approver.*

20

21 Currently, the majority of expenditures are for one vendor: *Bechtel*, which is  
22 handling the *Combined Operating License Application (COLA)*, and  
23 supporting the site certification application. The invoices from this and other

1 vendors which can be quite voluminous are received electronically by the  
2 Project Controls Group. They are loaded into a SharePoint database and routed  
3 to the appropriate business unit contacts to access, review and approve. The  
4 Contract Administrator ensures all parties have signed off on their appropriate  
5 section of the invoice prior to payment. The invoices are also reviewed for  
6 compliance with the purchase order and/or contract and differences with  
7 vendors are resolved. The remaining invoices relate to charges incurred by  
8 groups such as Legal, Marketing and Communications, Transmission,  
9 Environmental Services and long lead procurement items.

10 **Q. Describe the review and reporting performed by the ECCS Project**  
11 **Controls organization related to the Turkey Point 6 & 7 Project.**

12 **A.** The Project Controls organization is responsible for preparing, analyzing and  
13 clearly and concisely explaining variances against planned budgets for current  
14 month, year-to-date and year end. Project Controls holds monthly meetings  
15 with team members and project management to review and understand  
16 existing budget variances and any projected variances. Project Controls  
17 provides the resulting expenditures to Accounting for inclusion in the NFR  
18 schedules.

19  
20 **ADDITIONAL NEW NUCLEAR AND UPRATE**

21 **ACCOUNTING OVERSIGHT**

22  
23 **Q. Are there any additional controls implemented and relied upon for these**

1           **Projects and the related reporting?**

2    A.    Yes. The Company has issued specific guidelines for charging costs to the  
3           project work orders. These guidelines emphasize the need for particular care  
4           in charging only incremental labor to the project work orders included for  
5           nuclear cost recovery and ensure consistent application of the Company's  
6           capitalization policy. These guidelines describe the process for the exclusion  
7           of non-incremental labor from current NCRC recovery while providing full  
8           capitalization of all appropriate labor costs through the implementation of  
9           separate project capital work orders that will be included in future non-NCRC  
10          base rate recoveries. Exhibit WP-8 provides a flowchart depicting this  
11          process for 2009 and 2010.

12   **Q.    Did the guidelines for charging costs to the project work orders change**  
13          **from 2009 to 2010?**

14    A.    Yes. As a result of FPL's rate case (Docket No. 080677-EI), the Company  
15          reset the basis upon which incremental employee labor is established in  
16          determining which employees are clause recoverable. Starting in 2010,  
17          personnel previously determined non-incremental became incremental and  
18          eligible to record labor to NCRC work orders. Any employee dedicated to the  
19          Project and charging 100% of his time to the NCRC during 2010 is considered  
20          incremental for the entire year 2010. Any employee that charged a percentage  
21          of his time to capital in the NCRC in 2010 will be designated incremental for  
22          that percentage of his costs.

23   **Q.    What is the purpose of the continuous internal audits conducted by FPL**

1           **on the Turkey Point 6 & 7 and Uprate Projects?**

2    A.    The Company continues to undergo specific project related internal audits.  
3           The objective of these audits is to test the propriety of expenses charged to the  
4           NCRC and to test the process of recording and capturing costs related to the  
5           Turkey Point 6 & 7 and Uprate Projects in the pre-established work orders to  
6           ensure compliance with the Commission's Rule. FPL will continue to ensure  
7           these projects are audited on an ongoing basis. The 2009 and 2010 costs and  
8           controls related to the Turkey Point 6 & 7 and the Uprate Projects will have  
9           been audited prior to the start of the hearing in this docket. These audits will  
10          continue to provide assurance that the internal controls surrounding  
11          transactions and processes are well established, maintained and communicated  
12          to employees, and provide additional assurance that the financial and  
13          operating information generated within the Company is accurate and reliable.

14   **Q.    Please comment on the overall level of control and oversight of the NCRC**  
15   **process.**

16    A.    The ongoing cycles of cost collection, aggregation, analysis and review which  
17          lead to the NFR filings provide for a level of detailed review that is  
18          unprecedented. For example, in the preparation of the NFR schedules,  
19          transactional expenditures are projected by activity and an immediate review  
20          of projection to actual, in many cases at the transactional level, is conducted.  
21          The manual nature of the data collection and aggregation process, along with  
22          the manual calculation of carrying charges and construction period interest,  
23          provides an increased level of detailed review. The requirements of the Rule

1 have, by design, significantly increased the review and transparency of the  
2 costs themselves.

3 **Q. How are carrying charges provided for under the Nuclear Cost Recovery**  
4 **Rule?**

5 A. Carrying charges are established by Statute based on the pre-tax AFUDC rate  
6 at the time the utility files its Need Determination. For FPL this rate is  
7 11.04% (based on an AFUDC rate of 7.42%) annually.

8 **Q. How has FPL incorporated the Commission-ordered treatment in Docket**  
9 **No. 090009-EI, Order No. PSC-09-0783-FOF-EI that AFUDC charged to**  
10 **these Projects should be based on the pre-tax AFUDC rate at the time the**  
11 **Utility filed its Need Determination?**

12 A. In Order No. PSC-09-0783-FOF-EI, the Commission determined that “utilities  
13 shall not be permitted to record in rate base the incremental difference  
14 between carrying costs established in Section 366.93, F.S., and their  
15 respective most currently approved AFUDC rate.” Therefore, FPL has  
16 adjusted the AFUDC recorded on its projects under the NCRC on a retroactive  
17 basis effective November 2009 to reflect the AFUDC rate of 7.42%. Since  
18 December 2009, FPL has applied this 7.42% statutory rate going forward to  
19 all eligible CWIP charges for the Uprate and Turkey Point 6 & 7 Projects.  
20 *FPL records and recovers a carrying charge through the CCRC at the fixed*  
21 *rate specified in the NCRC, and no longer calculates or tracks any resulting*  
22 *incremental/decremental AFUDC for amounts recovered through the NCRC.*

1 **Q. Should any FPL regulatory commission expenses (rate case type expense)**  
2 **associated with the 2010 Nuclear Cost Recovery Clause hearing be**  
3 **removed?**

4 A. No. FPL provides the NCRC team with a separate non-NCRC work order to  
5 capture in FERC Account 928, Regulatory Commission Expenses (“rate case  
6 type expenses”), for hearing related expenses related to its 2010 Nuclear Cost  
7 Recovery Clause hearing and therefore no adjustment is needed.

8 **Q. Does this conclude your direct testimony?**

9 A. Yes.

WP-5



**Florida Power & Light Company**  
**2009 Revenue Requirements**  
(In Jurisdictional \$'s net of participants)

(c)

Line No.	(a) March 1, 2010 True-up filing (Docket No. 110009-EI)			(b) May 1, 2009 Actual/Estimated Filing (Docket No. 090009-EI)			March 1, 2010 True-up filing (Docket No. 110009-EI)		March 1, 2011 True-up filing (Docket No. 110009-EI)	
	(A) 2009 P's	(B) 2009 T's	(C) (Over)/ Under Recovery	(D) 2009 P's	(E) 2009 AE's	(F) (Over)/ Under Recovery	(G) 2009 AE's	(H) 2009 T's	(I) (Over)/ Under Recovery	
	2009 Projections Collected in 2009 Docket No. 080009-EI	2009 Actual Costs Dkt 100009-EI		2009 Projections Collected in 2009 Docket No. 080009-EI	2009 Actual/Estimated Costs Collected in 2010 Docket No. 090009-EI		2009 Actual/Estimated Costs Collected in 2010 Docket No. 090009-EI	2009 Actual Costs Dkt 100009-EI		
1										
2	<b>Turkey Point 6 &amp; 7</b>									
3	Site Selection Costs	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
4	Carrying Costs	\$381,938	\$343,600	(\$38,338)	\$381,938	\$346,025	(\$35,913)	\$346,025	\$343,600	(\$2,425)
5 (d)	2008 Carrying Costs on DTA/(DTL)	\$0	(\$19,559)	(\$19,559)	\$0	\$0	\$0	(\$19,559)	(\$19,559)	(\$19,559)
6	Carrying Costs on DTA/(DTL)	\$127,112	\$49,121	(\$77,991)	\$127,112	\$126,913	(\$199)	\$126,913	\$49,121	(\$77,792)
7	Total Carrying Costs	\$509,050	\$373,162	(\$135,888)	\$509,050	\$472,938	(\$36,112)	\$472,938	\$373,162	(\$99,776)
8	Total Site Selection	\$509,050	\$373,162	(\$135,888)	\$509,050	\$472,938	(\$36,112)	\$472,938	\$373,162	(\$99,776)
9										
10	Preconstruction Costs	\$109,540,915	\$37,599,045	(\$71,941,870)	\$109,540,915	\$45,444,468	(\$64,096,447)	\$45,444,468	\$37,599,045	(\$7,845,423)
11	Carrying Costs	\$3,975,003	(\$691,521)	(\$4,666,524)	\$3,975,003	\$1,524,630	(\$2,450,373)	\$1,524,630	(\$691,521)	(\$2,216,151)
12 (d)	2008 Carrying Costs on DTA/(DTL)	\$0	(\$42,148)	(\$42,148)	\$0	\$0	\$0	(\$42,148)	(\$42,148)	(\$42,148)
13	Carrying Costs on DTA/(DTL)	\$3,369,810	\$1,591,363	(\$1,778,447)	\$3,369,810	\$2,036,141	(\$1,333,669)	\$2,036,141	\$1,591,363	(\$444,778)
14	Total Carrying Costs	\$7,344,813	\$857,693	(\$6,487,120)	\$7,344,813	\$3,560,771	(\$3,784,042)	\$3,560,771	\$857,693	(\$2,703,078)
15	Total Preconstruction	\$116,885,728	\$38,456,738	(\$78,428,990)	\$116,885,728	\$49,005,239	(\$67,880,489)	\$49,005,239	\$38,456,738	(\$10,548,501)
16	Total TP6&7	\$117,394,778	\$38,829,900	(\$78,564,878)	\$117,394,778	\$49,478,177	(\$67,916,601)	\$49,478,177	\$38,829,900	(\$10,648,277)
17										
18	<b>Uprates</b>									
19	Total Uprates Revenue Requirements	\$16,553,019	\$16,953,619	\$400,600	\$16,553,019	\$20,925,317	\$4,372,298	\$20,925,317	\$16,953,619	(\$3,971,698)
20										
21	Total TP6&7 and Uprates	\$133,947,797	\$55,783,519	(\$78,164,278)	\$133,947,797	\$70,403,494	(\$63,544,303)	\$70,403,494	\$55,783,519	(\$14,619,975)
22	Totals may not add due to rounding									
23										
24	<b>Notes:</b>									
25										
26	(a) The March 1, 2010 True-up filing compares 2009 Actual costs to the 2009 Projections (Order No. PSC-08-0749-FOF-EI) in order to calculate carrying charges.									
27	(b) The May 1, 2009 Actual/Estimated Filing (Order No. PSC-09-0783-FOF-EI) compares the 2009 Actual/Estimated Costs to the 2009 Projections.									
28	(c) The March 1, 2010 and March 1, 2011 True-up filing ultimately compares the 2009 Actual Costs to the 2009 Actual/Estimated Costs resulting in a final true-up amount of									
29	(\$14,619,975) which will reduce the CCRC charge paid by customers when the CCRC is re-set in 2011.									
30										
31	(d) The deferred income tax liability created by income tax deductions relate to expenditures incurred in 2006 - 2009. These income tax deductions relate to qualifying Research									
32	and Development expenditures (Internal Revenue Code 174), Nuclear Licensing Internal Payroll costs (Internal Revenue Services Code Regulations Section 1.263(a)(4)), and									
33	Investigatory costs (Internal Revenue Code 162). Refer to TOJ-1 and SDS-1 for further details.									

**Florida Power & Light Company**  
**2010 Revenue Requirements**  
 (in Jurisdictional \$'s net of participants)

(c)

(a)  
**March 1, 2011**  
**True-up filing**  
**(Docket No. 110009-EI)**

(b)  
**May 3, 2010**  
**Actual/Estimated Filing**  
**(Docket No. 110009-EI)**

**March 1, 2011**  
**True-up filing**  
**(Docket No. 110009-EI)**

Line No.	(a)			(b)			(c)		
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)
	2010 P's	2010 T's	(Over)/ Under Recovery	2010 P's	2010 AE's	(Over)/ Under Recovery	2010 AE's	2010 T's	(Over)/ Under Recovery
	2010 Projections Collected in 2010 Docket No. 090009-EI	2010 Actual Costs Dkt 110009-EI		2010 Projections Collected in 2010 Docket No. 090009-EI	2010 Actual/Estimated Costs Collected in 2011 Docket No. 100009-EI		2010 Actual/Estimated Costs Collected in 2011 Docket No. 100009-EI	2010 Actual Costs Dkt 110009-EI	
1									
2	<b>Turkey Point 6 &amp; 7</b>								
3	\$0	\$0	\$0	\$0		\$0	\$0	\$0	\$0
4	Site Selection Costs								
5	Carrying Costs	(\$20,238)	(\$31,207)	(\$10,969)	(\$20,238)	(\$31,207)	(\$10,969)	(\$31,207)	(\$0)
6	Carrying Costs on DTA/(DTL)	\$253,374	\$177,172	(\$76,202)	\$253,374	\$177,172	(\$76,202)	\$177,172	\$0
7	Total Carrying Costs	\$233,136	\$145,965	(\$87,171)	\$233,136	\$145,965	(\$87,171)	\$145,965	\$0
8	Total Site Selection	\$233,136	\$145,965	(\$87,171)	\$233,136	\$145,965	(\$87,171)	\$145,965	\$0
9	Preconstruction Costs	\$90,654,124	\$25,291,109	(\$65,363,015)	\$90,654,124	\$42,125,853	(\$48,528,272)	\$25,291,109	(\$16,834,744)
10	Carrying Costs	(\$4,821,040)	(\$9,331,388)	(\$4,510,348)	(\$4,821,040)	(\$8,627,017)	(\$3,805,977)	(\$9,331,388)	(\$704,371)
11	Carrying Costs on DTA/(DTL)	\$5,794,775	\$3,481,488	(\$2,313,287)	\$5,794,775	\$3,892,232	(\$1,902,544)	\$3,481,488	(\$410,744)
12	Total Carrying Costs	\$973,735	(\$5,849,900)	(\$6,823,635)	\$973,735	(\$4,734,785)	(\$5,708,520)	(\$5,849,900)	(\$1,115,115)
13	Total Preconstruction	\$91,627,859	\$19,441,209	(\$72,186,650)	\$91,627,859	\$37,391,067	(\$54,236,792)	\$19,441,209	(\$17,949,858)
14	Total TP6&7	\$91,860,995	\$19,587,174	(\$72,273,821)	\$91,860,995	\$37,537,032	(\$54,323,963)	\$19,587,174	(\$17,949,858)
15	<b>Uprates</b>								
16	(a) Carrying Costs	\$41,594,586	\$44,111,293	\$2,516,706	\$41,594,586	\$44,348,843	\$2,754,257	\$44,348,843	\$44,111,293
17	Carrying Costs on DTA/(DTL)	\$0	(\$2,543,223)	(\$2,543,223)	\$0	(\$1,996,520)	(\$1,996,520)	(\$1,996,520)	(\$2,543,223)
18	Total Carrying Costs	\$41,594,586	\$41,568,070	(\$26,516)	\$41,594,586	\$42,352,323	\$757,736	\$42,352,323	\$41,568,070
19	Recoverable O&M	\$2,147,983	\$7,061,419	\$4,913,436	\$2,147,983	\$3,139,397	\$991,413	\$3,139,397	\$7,061,419
20	Interest on Recoverable O&M	\$0	\$5,983	\$5,983	\$0	\$1,572	\$1,572	\$5,983	\$4,411
21	Total Recoverable O&M and Interest	\$2,147,983	\$7,067,402	\$4,919,419	\$2,147,983	\$3,140,969	\$992,986	\$3,140,969	\$7,067,402
22	Base Rate Revenue Requirements	\$15,877,877	\$414,079	(\$15,463,598)	\$15,877,877	\$2,018,321	(\$13,859,356)	\$2,018,321	\$414,079
23	Carrying Costs (Over)/Under Recovery (d)	\$0	(\$464,185)	(\$464,185)	\$0	(\$457,762)	(\$457,762)	(\$464,185)	(\$6,423)
24	Total Base Rate Revenue Requirements and Carrying Costs	\$15,877,877	(\$50,106)	(\$15,927,783)	\$15,877,877	\$1,560,559	(\$14,317,118)	\$1,560,559	(\$50,106)
25	Total Uprates	\$59,620,247	\$48,585,366	(\$11,034,881)	\$59,620,247	\$47,053,883	(\$12,566,367)	\$48,585,366	\$1,531,516
26									
27	Total TP6&7 and Uprates	\$151,481,242	\$68,172,540	(\$83,308,702)	\$151,481,242	\$84,590,883	(\$66,890,360)	\$68,172,540	(\$16,418,342)
28	Totals may not add due to rounding								
29									
30	<b>Notes:</b>								
31									
32	(a) The March 1, 2011 True-up filing compares 2010 Actual costs to the 2010 Projections (Order NCPSC-09-0783-FOF-EI) in order to calculate carrying charges.								
33	(b) The May 3, 2010 Actual/Estimated Filing submitted in 2010 and currently filed in this Docket compares the 2010 Actual/Estimated Costs to the 2010 Projections.								
34	(c) The March 1, 2011 True-up filing ultimately compares the 2010 Actual Costs to the 2010 Actual/Estimated Costs resulting in a final true-up amount of (\$16,418,342) which will reduce the CCRC								
35	charge paid by customers when the CCRC is re-set in 2012.								
36	(d) Carrying Costs reflect the return on any over/under base rate revenue requirements recovered through the Nuclear Cost Recovery Clause.								

WP-6

Docket No. 110009-EI  
 Preconstruction and Construction Costs  
 Exhibit WP-6, Page 1 of 2

Florida Power & Light Company  
 Turkey Point 6 & 7  
 2009 & 2010 Preconstruction Costs

Line No.		(A)	(B)	(C)
		2009	2010	Total
1	<b>Turkey Point 6 &amp; 7</b>			
2	<b>Site Selection:</b>			
3	Project Staffing	\$0	\$0	\$0
4	Engineering	\$0	\$0	\$0
5	Environmental Services	\$0	\$0	\$0
6	Legal Services	\$0	\$0	\$0
7	Total Site Selection Costs (a)	\$0	\$0	\$0
8	Jurisdictional Factor (b)	0.99648888	0.98818187	0.98818187
9	Total Jurisdictional Site Selection Costs	\$0	\$0	\$0
10				
11	<b>Pre-Construction:</b>			
12	<b>Generation:</b>			
13	Licensing	\$30,271,612	\$23,184,978	\$53,456,590
14	Permitting	\$991,090	\$1,223,203	\$2,214,293
15	Engineering and Design	\$6,445,161	\$1,185,396	\$7,630,557
16	Long lead procurement advance payments	\$0	\$0	\$0
17	Power Block Engineering and Procurement	\$23,662	\$0	\$23,662
18	Total Generation Costs	\$37,731,525	\$25,593,577	\$63,325,102
19	Jurisdictional Factor (b)	0.99648888	0.98818187	0.98818187
20	Total Jurisdictional Generation Costs	\$37,599,045	\$25,291,109	\$62,890,154
21	<b>Transmission</b>			
22	Line Engineering	\$0	\$0	\$0
23	Substation Engineering	\$0	\$0	\$0
24	Clearing	\$0	\$0	\$0
25	Other	\$0	\$0	\$0
26	Total Transmission Costs	\$0	\$0	\$0
27	Jurisdictional Factor (b)	0.99412116	0.88696801	0.88696801
28	Total Jurisdictional Transmission Costs	\$0	\$0	\$0
29				
30	<b>Total Company Turkey Point 6 &amp; 7 Costs (Line 7 + Line 18 + Line 26)</b>	\$37,731,525	\$25,593,577	\$63,325,102
31				
32	<b>Total Jurisdictional Turkey Point 6 &amp; 7 Costs (Line 9 + Line 20 + Line 28)</b>	\$37,599,045	\$25,291,109	\$62,890,154
33	Totals may not add due to rounding			
34				
35				
36	<b>Notes:</b>			
37	(a) Site Selection construction costs have been fully recovered.			
38	(b) Jurisdictional separation factor as reflected in the 2009 & 2010 FPSC Earnings Surveillance Report.			

Florida Power & Light Company  
 Uprate  
 2010 Construction Costs

Line No.		2010
1	<b>Uprates</b>	
2	<b>Generation:</b>	
3	License Application	\$26,332,425
4	Engineering & Design	\$19,832,530
5	Permitting	\$274,880
6	Project Management	\$22,574,151
7	Clearing, Grading and Excavation	\$0
8	On-Site Construction Facilities	\$0
9	Power Block Engineering, Procurement, etc.	\$220,984,301
10	Non-Power Block Engineering, Procurement, etc.	\$5,413,644
11	<u>Total Generation costs</u>	<u>\$295,411,930</u>
12	Participants Credits Port St. Lucie (PSL) Unit 2	
13	OUC (b)	(\$3,584,240)
14	FMPA (b)	(\$5,183,146)
15	<u>Total Participants Credits PSL Unit 2</u>	<u>(\$8,767,386)</u>
16	<u>Total FPL Generation Costs</u>	<u>\$286,644,544</u>
17	<u>Jurisdictional Factor (a)</u>	<u>0.98818187</u>
18	<u>Total FPL Jurisdictional Generation Costs</u>	<u>\$283,256,941</u>
19		
20	<b>Transmission:</b>	
21	Plant Engineering	\$9,081,833
22	Line Engineering	\$34,613
23	Substation Engineering	\$1,280,243
24	Line Construction	\$1,362,950
25	Substation Construction	\$2,811,431
26	<u>Total Transmission Costs</u>	<u>\$14,571,069</u>
27	<u>Jurisdictional Factor (a)</u>	<u>0.88696801</u>
28	<u>Total Jurisdictional Transmission Costs</u>	<u>\$12,924,072</u>
29		
30	<b><u>Total Company Uprate Generation and Transmission Costs (Line 11 + Line 26)</u></b>	<b><u>\$309,982,999</u></b>
31		
32	<b><u>Total FPL Jurisdictional Generation &amp; Transmission Costs (Net of Participants)</u></b>	<b><u>\$296,181,013</u></b>
33	Totals may not add due to rounding	
34		
35	<b>Notes:</b>	
36	(a) Jurisdictional separation factor as reflected in the 2010 FPSC Earnings Surveillance Report.	
37	(b) Participant ownership rates of 6.08951% for Orlando Utilities Commission (OUC) & 8.806% for Florida	
38	Municipal Power Agency (FMPA).	
39	(c) See Exhibit WP-2.	

WP-7

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Florida Power & Light Company  
 2010 Base Rate Revenue Requirement  
 To be recovered through the NGRC  
 St. Lucie & Turkey Point Upgrade Project  
 Exhibit WP-7

2010 as filed in T-Schedules

2010							2010	2010	2010	2010	2010	2010	2010	2010	2010	2010	2010	2010	2010
Detail	In-Service Date	Total Company Incremental Plant In-Service (Reference Exhibit TOJ-13)	Incremental Plant In-Service (Jurisdictional, Net of Participants)	Total Company Incremental & Non-Incremental Plant In-Service	Plant In-Service - Includes Non-Incremental Costs (Jurisdictional, Net of Participants)	January	February	March	April	May	June	July	August	September	October	November	December	Total	
May 2010 - Transmission - St. Lucie	May-10	\$1,501,571	\$1,331,845	\$1,501,571	\$1,331,845					\$7,031	\$14,048	\$14,019	\$13,990	\$13,961	\$13,932	\$13,903	\$13,874	\$104,758	
June 2010 - Warehouse - Turkey Point	Jun-10	\$1,611,912	\$1,592,862	\$1,611,912	\$1,592,862						\$7,357	\$14,705	\$14,887	\$14,668	\$14,650	\$14,631	\$14,613	\$95,311	
June 2010 - FWH Nozzle Encapsulation - St. Lucie Unit 1	Jun-10	\$204,753	\$202,333	\$204,753	\$202,333						\$951	\$1,901	\$1,896	\$1,896	\$1,894	\$1,891	\$1,888	\$12,321	
August 2010 - Simulator - St. Lucie Common	Aug-10	\$346,613	\$313,075	\$346,613	\$313,075								\$1,442	\$2,882	\$2,878	\$2,875	\$2,871	\$12,947	
September 2010 - Tooling - Turkey Point Common	Sep-10	\$24,377	\$24,088	\$24,377	\$24,088									\$111	\$221	\$221	\$221	\$774	
October 2010 - St. Lucie Unit 1 - Turbine Gentry Crane	Oct-10	\$5,734,539	\$5,686,787	\$5,734,539	\$5,686,787										\$27,388	\$54,733	\$54,646	\$138,768	
October 2010 - Transmission - Turkey Point	Oct-10	\$358,054	\$317,583	\$358,054	\$317,583										\$1,581	\$3,120	\$3,115	\$7,796	
November 2010 - GSU Upgrade - Turkey Point Unit 3	Nov-10	\$1,586,713	\$1,416,233	\$1,586,713	\$1,416,233											\$7,172	\$14,331	\$21,504	
November 2010 - Valves - Turkey Point Unit 3	Nov-10	\$1,521,833	\$1,503,847	\$1,521,833	\$1,503,847											\$7,054	\$14,099	\$21,153	
November 2010 - Fabric Building Roof - St. Lucie Common	Nov-10	\$54,652	\$54,006	\$54,652	\$54,006												\$248	\$487	\$746
<b>Total</b>		<b>\$12,955,015</b>	<b>\$12,422,840</b>	<b>\$12,955,015</b>	<b>\$12,422,840</b>					\$7,031	\$22,356	\$30,626	\$32,017	\$33,518	\$62,525	\$105,850	\$120,158	\$414,079	
Base Rate Revenue Requirement 2010							\$0	\$0	\$0	\$0	\$7,031	\$22,356	\$30,626	\$32,017	\$33,518	\$62,525	\$105,850	\$120,158	\$414,079
Totals may not add due to rounding																			

Notes:  
 (a) Base rate revenue requirements to be recovered through the NGRC are those related to plant going into commercial service during 2010.

Florida Power & Light Company  
St. Lucie & Turkey Point Upgrade Project  
Base Rate Revenue Requirement  
For the year plant is placed into service

May 2010 - Transmission - St. Lucie

Line No.	Work Order #	Plant Account	Detail	Incremental Plant	Depreciation Rate (Annual)	Pre-Tax Rate of Return (Annual) March 2010 Surveillance Report	In-Service Amount Reconciliation to T-3	
							Total Co. In-Service Jurisdictional Factor	T-3 Transfer to Plant
1	00715-009-0485-000	356	OH Conductors & Devices	1,467,737	3.20%	9.33%	\$1,501,571	\$1,501,571
2	00717-009-0485-000	397.9	Comm Equip - Fiber Optics	33,834	10.00%		0.88696801	0.88696801
3	00718-009-0485-000						\$1,331,845	\$1,331,845
4							Adjustments	\$90,453
5							Jurisdictional Factor	0.88696801
6								\$80,229
7							T-3 Transfer to Plant	\$1,251,617
8								
9								
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(a) Rate of return on capital investments is from FPL March 2010 Surveillance Report per Rule 25-6.0423 Section 7(d).  
 (b) Participants share is Orlando Utilities Commission of 8.0895% and Florida Municipal Power Agency of 8.806% on St. Lucie Unit No. 2. If plant placed into service is related to common St. Lucie Plant, the participants share is calculated on half of the plant placed into service.  
 (c) Jurisdictional Separation Factor is FPL's nuclear capital separation factor for 2010 reflected in the 2010 FPSC Earnings Surveillance Report.  
 (d) Depreciation and Amortization rates are from Order No. PSC-10-0153-FOF-EI in Dkt. 080677-EI, Pgs 47,48,77, & 79.

Total \$104,758



Florida Power & Light Company  
St. Lucie & Turkey Point Uprate Project  
Base Rate Revenue Requirement  
For the year plant is placed into service

June 2010 - Warehouse - Turkey Point

Line No.	Work Order #	Plant Account	Detail	Incremental Plant	Depreciation Rate (Annual)	Pre-Tax Rate of Return (Annual) April 2010 Surveillance Report	In-Service Amount Reconciliation to T-3							
1	01152-070-0914-008	321	Structures & Improvements	1,611,912	1.80%	9.29%	Total Co. In-Service Jurisdictional Factor \$1,611,912 0.98818187 \$1,592,862							
2							Adjustments							
3							Jurisdictional Factor 0.98818187							
4							\$0							
5	In-Service Date						T-3 Transfer to Plant \$1,592,862							
6	Jun-10													
7			Total Company In-Service	\$1,611,912										
8			Jurisdictional Factor	0.98818187										
9			Jurisdictional Plant In-Service	\$1,592,862										
10														
11														
12	Account	Detail	2010 June	2010 July	2010 August	2010 September	2010 October	2010 November	2010 December	2010 January	2011 February	2011 March	2011 April	2011 May
13		321 Total Plant in Service	1,611,912	1,611,912	1,611,912	1,611,912	1,611,912	1,611,912	1,611,912	1,611,912	1,611,912	1,611,912	1,611,912	1,611,912
14		Jurisdictional Factor	0.98818187	0.98818187	0.98818187	0.98818187	0.98818187	0.98818187	0.98818187	0.98818187	0.98818187	0.98818187	0.98818187	0.98818187
15		Jurisdictional Plant	\$1,592,862	\$1,592,862	\$1,592,862	\$1,592,862	\$1,592,862	\$1,592,862	\$1,592,862	\$1,592,862	\$1,592,862	\$1,592,862	\$1,592,862	\$1,592,862
16	1.80%	Depr Rate (monthly)	0.0015	0.0015	0.0015	0.0015	0.0015	0.0015	0.0015	0.0015	0.0015	0.0015	0.0015	0.0015
17		Depreciation	\$1,195	\$2,389	\$2,389	\$2,389	\$2,389	\$2,389	\$2,389	\$2,389	\$2,389	\$2,389	\$2,389	\$2,389
18		Accumulated Depreciation	\$1,195	\$3,584	\$5,973	\$8,363	\$10,752	\$13,141	\$15,530	\$17,920	\$20,309	\$22,698	\$25,088	\$27,477
19		Net Plant in Service	\$1,591,668	\$1,589,278	\$1,586,889	\$1,584,500	\$1,582,111	\$1,579,721	\$1,577,332	\$1,574,943	\$1,572,553	\$1,570,164	\$1,567,775	\$1,565,386
20		Average Plant	\$795,834	\$1,590,473	\$1,588,084	\$1,585,695	\$1,583,305	\$1,580,916	\$1,578,527	\$1,576,137	\$1,573,748	\$1,571,359	\$1,568,969	\$1,566,580
21	9.29%	Return	\$6,163	\$12,316	\$12,297	\$12,279	\$12,260	\$12,242	\$12,223	\$12,205	\$12,186	\$12,168	\$12,149	\$12,131
22														
23														
24														
25		Total Jurisdictional Revenue Requirement	\$7,357	\$14,705	\$14,687	\$14,668	\$14,650	\$14,631	\$14,613	\$14,594	\$14,576	\$14,557	\$14,539	\$14,520
26		Totals may not add due to rounding												
27														
28														
29														
30														
31														
32														
33														
34														

(a) Rate of return on capital investments is from FPL April 2010 Surveillance Report per Rule 25-6.0423 Section 7(d).  
 (b) Participants share is Orlando Utilities Commission of 6.0895% and Florida Municipal Power Agency of 8.806% on St. Lucie Unit No. 2. If plant placed into service is related to common St. Lucie Plant, the participants share is calculated on half of the plant placed into service.  
 (c) Jurisdictional Separation Factor is FPL's nuclear capital separation factor for 2010 reflected in the 2010 FPSC Earnings Surveillance Report.  
 (d) Depreciation and Amortization rates are from Order No. PSC-10-0153-FOF-EI in Dkt. 080677-EI, Pgs 47,48,77, & 79.

Total \$95,311

Florida Power & Light Company  
 St. Lucie & Turkey Point Upgrade Project  
 Base Rate Revenue Requirement  
 For the year plant is placed into service

June 2010 - Feedwater Heater Nozzle Encapsulation - St. Lucie Unit 1

Line No.	Work Order #	Plant Account	Detail	Incremental Plant	Depreciation Rate (Annual)	Pre-Tax Rate of Return (Annual) April Surveillance Report	In-Service Amount Reconciliation to T-3	
							Total Co. In-Service	
1	01890-070-0915-006	322	Reactor Plant Equipment	\$204,753	2.00%	9.29%	\$204,753	\$204,753
2							0.98818187	0.98818187
3							\$202,333	\$202,333
4							Adjustments	
5								0.98818187
6								\$0
7								\$202,333
8								T-3 Transfer to Plant
9								
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Account	Detail	2010 June	2010 July	2010 August	2010 September	2010 October	2010 November	2010 December	2010 January	2011 February	2011 March	2011 April	2011 May
322	Total Plant in Service	\$204,753	\$204,753	\$204,753	\$204,753	\$204,753	\$204,753	\$204,753	\$204,753	\$204,753	\$204,753	\$204,753	\$204,753
	Jurisdictional Factor	0.98818187	0.98818187	0.98818187	0.98818187	0.98818187	0.98818187	0.98818187	0.98818187	0.98818187	0.98818187	0.98818187	0.98818187
	Jurisdictional Plant	\$202,333	\$202,333	\$202,333	\$202,333	\$202,333	\$202,333	\$202,333	\$202,333	\$202,333	\$202,333	\$202,333	\$202,333
	2.00% Depn Rate (monthly)	0.0017	0.0017	0.0017	0.0017	0.0017	0.0017	0.0017	0.0017	0.0017	0.0017	0.0017	0.0017
	Depreciation	\$169	\$337	\$337	\$337	\$337	\$337	\$337	\$337	\$337	\$337	\$337	\$337
	Accumulated Depreciation	\$169	\$506	\$843	\$1,180	\$1,517	\$1,855	\$2,192	\$2,529	\$2,866	\$3,204	\$3,541	\$3,878
	Net Plant in Service	\$202,184	\$201,827	\$201,490	\$201,153	\$200,816	\$200,478	\$200,141	\$199,804	\$199,467	\$199,129	\$198,792	\$198,455
	Average Plant	\$101,082	\$201,896	\$201,859	\$201,321	\$200,984	\$200,647	\$200,310	\$199,973	\$199,635	\$199,298	\$198,961	\$198,624
	9.29% Return	\$783	\$1,584	\$1,582	\$1,559	\$1,536	\$1,514	\$1,491	\$1,469	\$1,448	\$1,427	\$1,406	\$1,385
	Total Jurisdictional Revenue Requirement	\$951	\$1,901	\$1,599	\$1,896	\$1,894	\$1,891	\$1,888	\$1,886	\$1,883	\$1,881	\$1,878	\$1,875
	Totals may not add due to rounding												
								\$12,321					

(a) Rate of return on capital investments is from FPL April 2010 Surveillance Report per Rule 25-6.0423 Section 7(d).  
 (b) Participants share is Orlando Utilities Commission of 6.0895% and Florida Municipal Power Agency of 8.806% on St. Lucie Unit No. 2. If plant placed into service is related to common St. Lucie Plant, the participants share  
 (c) Jurisdictional Separation Factor is FPL's nuclear capital separation factor for 2010 reflected in the 2010 FPSC Earnings Surveillance Report.  
 (d) Depreciation and Amortization rates are from Order No. PSC-10-0153-FOF-EI in Dkt. 080677-EI, Pgs 47, 48, 77, & 78.

Florida Power & Light Company  
St. Lucie & Turkey Point Upgrade Project  
Base Rate Revenue Requirement  
For the year plant is placed into service

August 2010 - Simulator Modifications - St. Lucie

Line No.	Work Order #	Plant Account	Detail	Incremental Plant	Depreciation Rate (Annual)	Pre-Tax Rate of Return (Annual) May 2010 Surveillance Report	In-Service Amount Reconciliation to T-3							
							Total Co. In-Service Participants	\$346,613 (\$29,794)						
1	01317-070-0929-008	325	Misc Power Plant Equipment	346,613	1.80%	9.26%	Total Co. In-Service Participants	\$346,613						
2	01375-070-0010 (Participant)						Total Co. Net of Part	\$316,819						
3							Jurisdictional Factor	0.98818187						
4							Juris Net of Part	\$313,074.50						
5							Adjustments	\$0						
6							Jurisdictional Factor	0.98818187						
7	In-Service Date						T-3 Transfer to Plant	\$313,075						
8	Aug-10													
9			Total Company In-Service	\$346,613										
10			Participants	(\$29,794)										
11			Total Company Net of Participants	\$316,819										
12			Jurisdictional Factor	0.98818187										
13			Jurisdictional Plant In-Service	\$313,075										
14														
15	Account	Detail	2010 August	2010 September	2010 October	2010 November	2010 December	2011 January	2011 February	2011 March	2011 April	2011 May	2011 June	2011 July
17		325 Total Plant in Service Net of Part	316,819	316,819	316,819	316,819	316,819	316,819	316,819	316,819	316,819	316,819	316,819	316,819
18		Jurisdictional Factor	0.98818187	0.98818187	0.98818187	0.98818187	0.98818187	0.98818187	0.98818187	0.98818187	0.98818187	0.98818187	0.98818187	0.98818187
19		Jurisdictional Plant	\$313,075	\$313,075	\$313,075	\$313,075	\$313,075	\$313,075	\$313,075	\$313,075	\$313,075	\$313,075	\$313,075	\$313,075
20		1.80% Depr Rate (monthly)	0.0015	0.0015	0.0015	0.0015	0.0015	0.0015	0.0015	0.0015	0.0015	0.0015	0.0015	0.0015
21		Depreciation	\$235	\$470	\$470	\$470	\$470	\$470	\$470	\$470	\$470	\$470	\$470	\$470
22		Accumulated Depreciation	\$235	\$704	\$1,174	\$1,644	\$2,113	\$2,583	\$3,052	\$3,522	\$3,992	\$4,461	\$4,931	\$5,401
23		Net Plant in Service	\$312,840	\$312,370	\$311,900	\$311,431	\$310,961	\$310,492	\$310,022	\$309,552	\$309,083	\$308,613	\$308,144	\$307,674
24		Average Plant	\$156,420	\$312,805	\$312,135	\$311,666	\$311,196	\$310,726	\$310,257	\$309,787	\$309,318	\$308,848	\$308,378	\$307,909
25		9.26% Return	\$1,297	\$2,412	\$2,409	\$2,405	\$2,401	\$2,398	\$2,394	\$2,390	\$2,387	\$2,383	\$2,380	\$2,376
26														
27														
28		Total Jurisdictional Revenue Requirement	\$1,442	\$2,882	\$2,878	\$2,875	\$2,871	\$2,867	\$2,864	\$2,860	\$2,856	\$2,853	\$2,849	\$2,846
29		Totals may not add due to rounding												
30														
31														
32														
33														
34														
35														
36														
37														
38														

(a) Rate of return on capital investments is from FPL May 2010 Surveillance Report per Rule 25-6.0423 Section 7(d).  
 (b) Participants share is Orlando Utilities Commission of 6.0895% and Florida Municipal Power Agency of 8.806% on St. Lucie Unit No. 2. If plant placed into service is related to common St. Lucie Plant, the participants share is calculated on half of the plant placed into service.  
 (c) Jurisdictional Separation Factor is FPL's nuclear capital separation factor for 2010 reflected in the 2010 FPSC Earnings Surveillance Report.  
 (d) Depreciation and Amortization rates are from Order No. PSC-10-0153-FOF-EI in Dkt. 080677-EI, Pgs 47,48,77, & 79.

Florida Power & Light Company  
St. Lucie & Turkey Point Uprate Project  
Base Rate Revenue Requirement  
For the year plant is placed into service

September 2010 - Turkey Point Sheet Metal Fab Equipment - Turkey Point

Line No.	Work Order #	Plant Account	Detail	Incremental Plant	Depreciation Rate (Annual)	Pre-Tax Rate of Return (Annual) June 2010 Surveillance Report	In-Service Amount Reconciliation to T-3							
1	01343-070-0914-008	325	Miscellaneous Power Plant Equipment	24,377	1.80%	9.25%	Total Co. In-Service \$24,377 Jurisdictional Factor 0.98818187 \$24,089							
2														
3														
4							Adjustments Jurisdictional Factor 0.98818187							
5	In-Service Date						\$0							
6	Sep-10						T-3 Transfer to Plant \$24,089							
7			Total Company In-Service	\$24,377										
8			Jurisdictional Factor	0.98818187										
9			Jurisdictional Plant In-Service	\$24,089										
10														
11	Account	Detail	2010 September	2010 October	2010 November	2010 December	2011 January	2011 February	2011 March	2011 April	2011 May	2011 June	2011 July	2011 August
14	325	Total Plant in Service	24,377	24,377	24,377	24,377	24,377	24,377	24,377	24,377	24,377	24,377	24,377	24,377
15		Jurisdictional Factor	0.98818187	0.98818187	0.98818187	0.98818187	0.98818187	0.98818187	0.98818187	0.98818187	0.98818187	0.98818187	0.98818187	0.98818187
16		Jurisdictional Plant	\$24,089	\$24,089	\$24,089	\$24,089	\$24,089	\$24,089	\$24,089	\$24,089	\$24,089	\$24,089	\$24,089	\$24,089
17	1.80%	Depr Rate (monthly)	0.0015	0.0015	0.0015	0.0015	0.0015	0.0015	0.0015	0.0015	0.0015	0.0015	0.0015	0.0015
18		Depreciation	\$18	\$36	\$36	\$36	\$36	\$36	\$36	\$36	\$36	\$36	\$36	\$36
19		Accumulated Depreciation	\$18	\$54	\$90	\$126	\$163	\$199	\$235	\$271	\$307	\$343	\$379	\$416
20		Net Plant in Service	\$24,071	\$24,035	\$23,999	\$23,962	\$23,926	\$23,890	\$23,854	\$23,818	\$23,782	\$23,746	\$23,710	\$23,673
21		Average Plant	\$12,035	\$24,053	\$24,017	\$23,981	\$23,944	\$23,908	\$23,872	\$23,836	\$23,800	\$23,764	\$23,728	\$23,691
22	9.25%	Return	\$93	\$185	\$185	\$185	\$184	\$184	\$184	\$184	\$183	\$183	\$183	\$183
23														
24														
25		Total Jurisdictional Revenue Requirement	\$111	\$221	\$221	\$221	\$221	\$220	\$220	\$220	\$220	\$219	\$219	\$219
26		Totals may not add due to rounding												
27														
28														
29														
30														
31														
32														
33														
34														
							Total							\$774

(a) Rate of return on capital investments is from FPL June 2010 Surveillance Report per Rule 25-8.0423 Section 7(d).  
(b) Participants share is Orlando Utilities Commission of 8.0895% and Florida Municipal Power Agency of 8.806% on St. Lucie Unit No. 2. If plant placed into service is related to common St. Lucie Plant, the participants share is calculated on half of the plant placed into service.  
(c) Jurisdictional Separation Factor is FPL's nuclear capital separation factor for 2010 reflected in the 2010 FPSC Earnings Surveillance Report.  
(d) Depreciation and Amortization rates are from Order No. PSC-10-0153-FOF-EI in Dkt. 080677-EI, Pgs 47,48,77, & 79.



Florida Power & Light Company  
 St. Lucie & Turkey Point Uprate Project  
 Base Rate Revenue Requirement  
 For the year plant is placed into service

October 2010 - Transmission - Turkey Point

Line No.	Work Order #	Plant Account	Detail	Incremental Plant	Depreciation Rate (Annual)	Pre-Tax Rate of Return (Annual) July 2010 Surveillance Report	In-Service Amount Reconciliation to T-3							
							Total Co. In-Service Jurisdictional Factor	Adjustments Jurisdictional Factor	T-3 Transfer to Plant					
1	00380-009-0379-000	353	Station Equipment	358,054	2.60%	9.21%								
2														
3														
4														
5														
6	In-Service Date													
7	Oct-10													
8														
9														
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(a) Rate of return on capital investments is from FPL July 2010 Surveillance Report per Rule 25-6.0423 Section 7(d).  
 (b) Participants share is Orlando Utilities Commission of 6.0895% and Florida Municipal Power Agency of 8.806% on St. Lucie Unit No. 2. If plant placed into service is related to common St. Lucie Plant, the participants share is calculated on half of the plant placed into service.  
 (c) Jurisdictional Separation Factor is FPL's nuclear capital separation factor for 2010 reflected in the 2010 FPSC Earnings Surveillance Report.  
 (d) Depreciation and Amortization rates are from Order No. PSC-10-0153-FCF-EI in Dkt. 080677-EI, Pgs 47,48,77 & 79.

Florida Power & Light Company  
 St. Lucie & Turkey Point Upgrade Project  
 Base Rate Revenue Requirement  
 For the year plant is placed into service

November 2010 - Upgrade the Generator Step Up Transformer (GSU) - Turkey Point Unit 3

Line No.	Work Order #	Plant Account	Detail	Incremental Plant	Depreciation Rate (Annual)	Pre-Tax Rate of Return (Annual) September 2010 Surveillance Report	In-Service Amount Reconciliation to T-3	
							Total Co. In-Service Jurisdictional Factor	T-3 Transfer to Plant
1	06103-070-0914-007	353.1	Station Equipment - Step Up	1,596,713	2.90%	9.27%	\$1,596,713	\$143,725
2							0.88696801	
3							\$1,416,233	
4							Adjustments	
5							Jurisdictional Factor	
6	In-Service Date						0.88696801	
7	Nov-10						\$1,272,508	
8							T-3 Transfer to Plant	
9							\$143,725	
10								
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Account	Detail	2010 November	2010 December	2011 January	2011 February	2011 March	2011 April	2011 May	2011 June	2011 July	2011 August	2011 September	2011 October
353.1	Total Plant In-Service	1,596,713	1,596,713	1,596,713	1,596,713	1,596,713	1,596,713	1,596,713	1,596,713	1,596,713	1,596,713	1,596,713	1,596,713
	Jurisdictional Factor	0.88696801	0.88696801	0.88696801	0.88696801	0.88696801	0.88696801	0.88696801	0.88696801	0.88696801	0.88696801	0.88696801	0.88696801
	Jurisdictional Plant In-Service	\$1,416,233	\$1,416,233	\$1,416,233	\$1,416,233	\$1,416,233	\$1,416,233	\$1,416,233	\$1,416,233	\$1,416,233	\$1,416,233	\$1,416,233	\$1,416,233
	2.90% Depr Rate (monthly)	0.0024	0.0024	0.0024	0.0024	0.0024	0.0024	0.0024	0.0024	0.0024	0.0024	0.0024	0.0024
	Depreciation	\$1,711	\$3,423	\$3,423	\$3,423	\$3,423	\$3,423	\$3,423	\$3,423	\$3,423	\$3,423	\$3,423	\$3,423
	Accumulated Depreciation	\$1,711	\$5,134	\$8,556	\$11,979	\$15,402	\$18,824	\$22,247	\$25,669	\$29,092	\$32,514	\$35,937	\$39,359
	Net Plant in Service	\$1,414,522	\$1,411,068	\$1,407,677	\$1,404,254	\$1,400,831	\$1,397,409	\$1,393,986	\$1,390,564	\$1,387,141	\$1,383,718	\$1,380,296	\$1,376,873
	Average Plant	\$707,261	\$1,412,610	\$1,406,366	\$1,400,965	\$1,402,543	\$1,399,120	\$1,395,699	\$1,392,275	\$1,388,852	\$1,385,430	\$1,382,007	\$1,378,585
	9.27% Return	\$6,461	\$10,909	\$10,882	\$10,856	\$10,830	\$10,803	\$10,777	\$10,750	\$10,724	\$10,697	\$10,671	\$10,645
	Total Jurisdictional Revenue Requirement	\$7,172	\$14,331	\$14,306	\$14,279	\$14,252	\$14,226	\$14,199	\$14,173	\$14,146	\$14,120	\$14,094	\$14,067
	Totals may not add due to rounding												
	Total		\$21,504										

(a) Rate of return on capital investments is from FPL September 2010 Surveillance Report per Rule 25-6.0423 Section 7(d).  
 (b) Participants share is Orlando Utilities Commission of 5.0895% and Florida Municipal Power Agency of 8.806% on St. Lucie Unit No. 2. If plant placed into service is related to common St. Lucie Plant, the participants share is calculated on half of the plant placed into service.  
 (c) Jurisdictional Separation Factor is FPL's nuclear capital separation factor for 2010 reflected in the 2010 FPSC Earnings Surveillance Report.  
 (d) Depreciation and Amortization rates are from Order No. PSC-10-0153-FOF-EI in Dkt. 080677-EI, Pgs 47,48,77, & 79.

Florida Power & Light Company  
 St. Lucie & Turkey Point Upgrade Project  
 Base Rate Revenue Requirement  
 For the year plant is placed into service

November 2010 - Heater Drain Valves - Turkey Point Unit 3

Line No.	Work Order #	Plant Account	Detail	Incremental Plant	Depreciation Rate (Annual)	Pre-Tax Rate of Return (Annual) September, 2010 Surveillance Report	In-Service Amount Reconciliation to T-3							
1	06414-070-0914-007	322	Reactor Plant Equipment	1,521,833	2.00%	9.27%	Total Co. In-Service \$1,521,833							
2							Jurisdictional Factor 0.98818187							
3							\$1,503,847							
4							Adjustments (\$27,444)							
5							Jurisdictional Factor 0.98818187							
6	In-Service Date						(\$27,120)							
7	Nov-10						T-3 Transfer to Plant \$1,530,887							
8				Total Company In-Service	\$1,521,833									
9				Jurisdictional Factor	0.98818187									
10				Jurisdictional Plant In-Service	\$1,503,847									
11														
12	Account	Detail	2010 November	2010 December	2011 January	2011 February	2011 March	2011 April	2011 May	2011 June	2011 July	2011 August	2011 September	2011 October
13														
14	322	Total Plant in Service	1,521,833	1,521,833	1,521,833	1,521,833	1,521,833	1,521,833	1,521,833	1,521,833	1,521,833	1,521,833	1,521,833	1,521,833
15		Jurisdictional Factor	0.98818187	0.98818187	0.98818187	0.98818187	0.98818187	0.98818187	0.98818187	0.98818187	0.98818187	0.98818187	0.98818187	0.98818187
16		Jurisdictional Plant	\$1,503,847	\$1,503,847	\$1,503,847	\$1,503,847	\$1,503,847	\$1,503,847	\$1,503,847	\$1,503,847	\$1,503,847	\$1,503,847	\$1,503,847	\$1,503,847
17	2.00%	Depr Rate (monthly)	0.0017	0.0017	0.0017	0.0017	0.0017	0.0017	0.0017	0.0017	0.0017	0.0017	0.0017	0.0017
18		Depreciation	\$1,253	\$2,506	\$2,506	\$2,506	\$2,506	\$2,506	\$2,506	\$2,506	\$2,506	\$2,506	\$2,506	\$2,506
19		Accumulated Depreciation	\$1,253	\$3,760	\$6,266	\$8,772	\$11,279	\$13,785	\$16,292	\$18,798	\$21,305	\$23,811	\$26,317	\$28,824
20		Net Plant in Service	\$1,502,584	\$1,500,088	\$1,497,581	\$1,495,075	\$1,492,568	\$1,490,062	\$1,487,556	\$1,485,049	\$1,482,543	\$1,480,036	\$1,477,530	\$1,475,024
21		Average Plant	\$751,297	\$1,501,341	\$1,498,834	\$1,496,328	\$1,493,822	\$1,491,315	\$1,488,806	\$1,486,302	\$1,483,796	\$1,481,290	\$1,478,783	\$1,476,277
22	9.27%	Return	\$5,801	\$11,592	\$11,573	\$11,554	\$11,534	\$11,515	\$11,496	\$11,476	\$11,457	\$11,438	\$11,418	\$11,399
23														
24														
25		Total Jurisdictional Revenue Requirement	\$7,054	\$14,099	\$14,080	\$14,060	\$14,041	\$14,021	\$14,002	\$13,983	\$13,963	\$13,944	\$13,925	\$13,905
26		Totals may not add due to rounding												
27														
28														
29														
30														
31														
32														
33														
34														

(a) Rate of return on capital investments is from FPL September 2010 Surveillance Report per Rule 25-6.0423 Section 7(d).  
 (b) Participants share is Orlando Utilities Commission of 6.0895% and Florida Municipal Power Agency of 8.608% on St. Lucie Unit No. 2. If plant placed into service is related to common St. Lucie Plant, the participants share is calculated on half of the plant placed into service.  
 (c) Jurisdictional Separation Factor is FPL's nuclear capital separation factor for 2010 reflected in the 2010 FPSC Earnings Surveillance Report.  
 (d) Depreciation and Amortization rates are from Order No. PSC-10-0153-FOF-EI in Dkt. 080677-EI, Pgs 47, 48, 77, & 79.



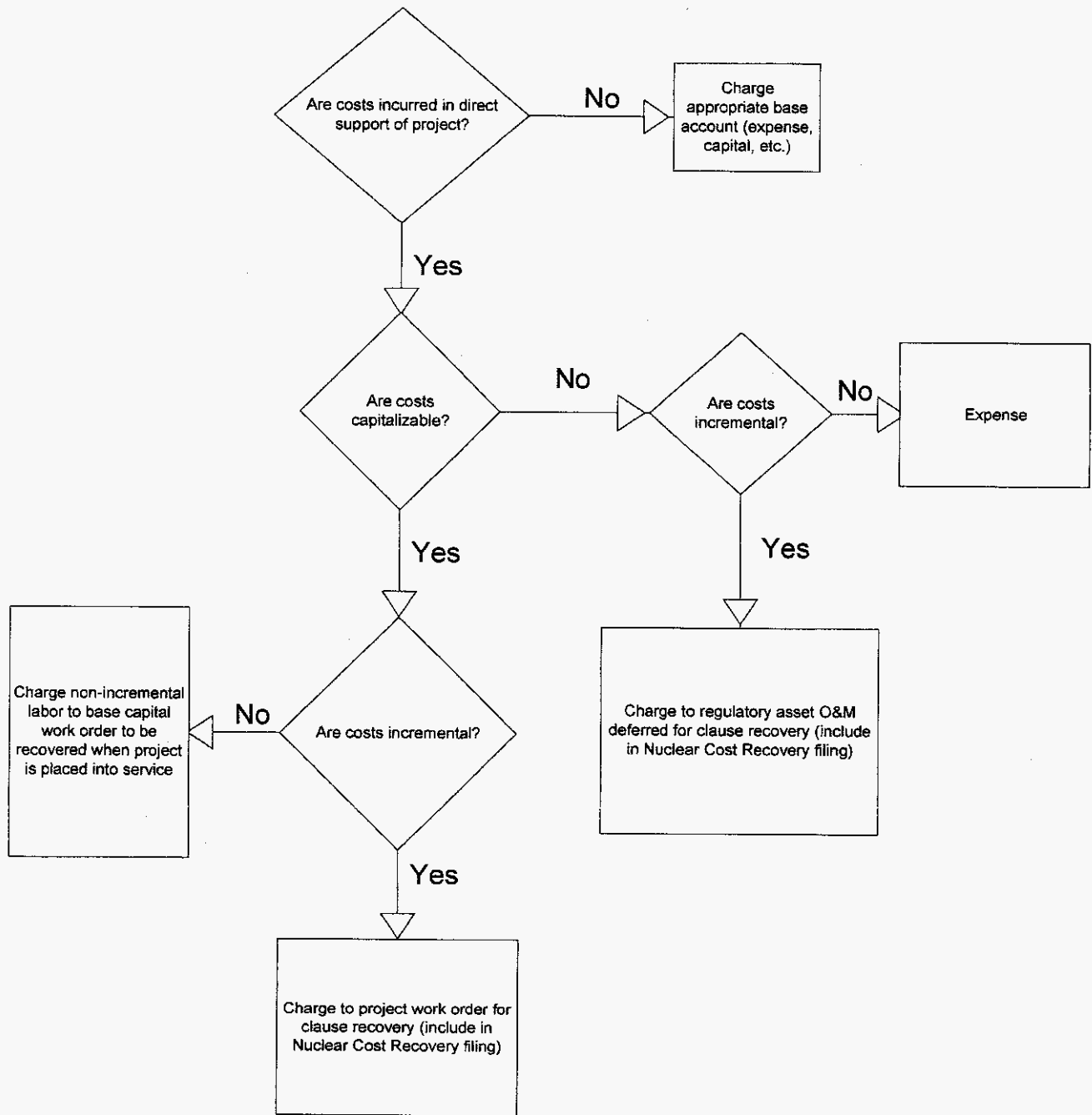
Florida Power & Light Company  
St. Lucie & Turkey Point Upgrade Project  
Base Rate Revenue Requirement  
For the year plant is placed into service

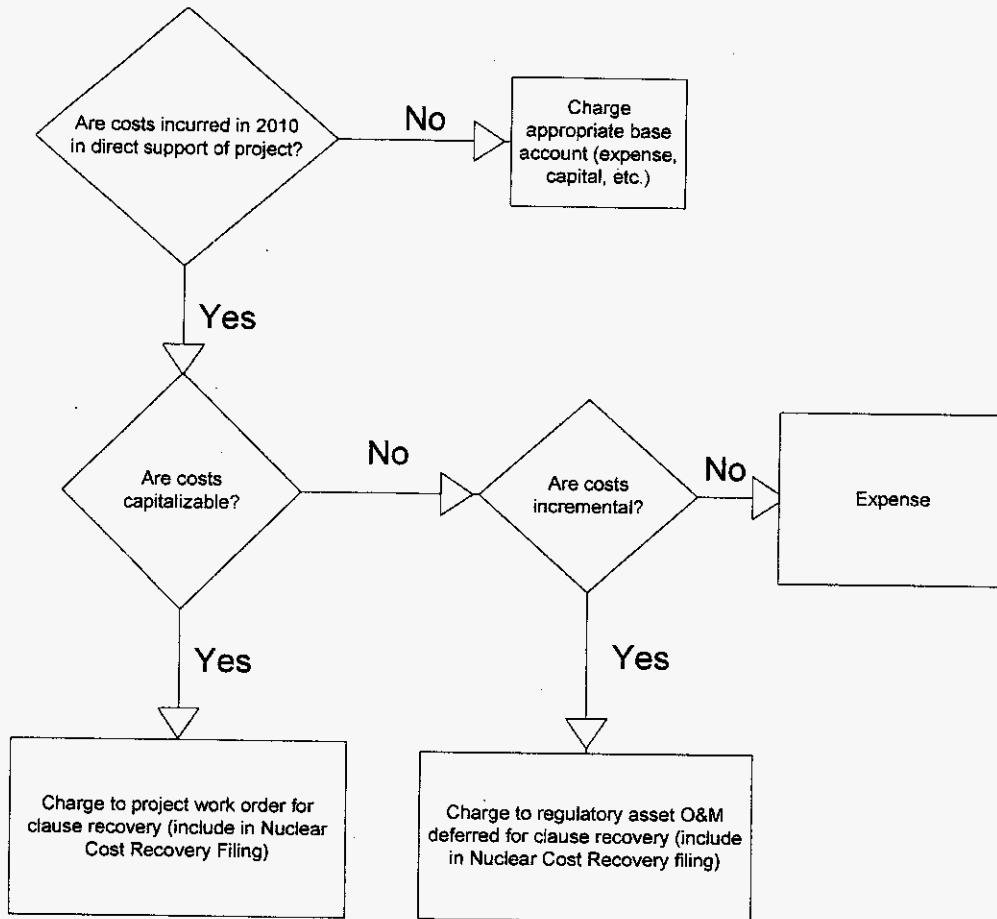
November 2010 - Fabric Building Roof - St Lucie

Line No.	Work Order #	Plant Account	Detail	Incremental Plant	Depreciation Rate (Annual)	Pre-Tax Rate of Return (Annual) September 2010 Surveillance Report	In-Service Amount Reconciliation to T-3							
							Total Co. In-Service	Jurisdictional Factor						
1	01864-070-0929-008	321	Structures and Improvements	54,652	1.80%	9.27%	\$54,652	0.98818187						
2							\$54,006							
3							\$0							
4							0.98818187							
5	In-Service Date						\$0							
6	Nov-10						T-3 Transfer to Plant	\$54,006						
7			Total Company In-Service	\$54,652										
8			Jurisdictional Factor	0.98818187										
9			Jurisdictional Plant In-Service	\$54,006										
10														
11														
12	Account	Detail	2010 November	2010 December	2011 January	2011 February	2011 March	2011 April	2011 May	2011 June	2011 July	2011 August	2011 September	2011 October
13														
14	321	Total Plant in Service	54,652	54,652	54,652	54,652	54,652	54,652	54,652	54,652	54,652	54,652	54,652	54,652
15		Jurisdictional Factor	0.98818187	0.98818187	0.98818187	0.98818187	0.98818187	0.98818187	0.98818187	0.98818187	0.98818187	0.98818187	0.98818187	0.98818187
16		Jurisdictional Plant	\$54,006	\$54,006	\$54,006	\$54,006	\$54,006	\$54,006	\$54,006	\$54,006	\$54,006	\$54,006	\$54,006	\$54,006
17	1.80%	Depr Rate (monthly)	0.0015	0.0015	0.0015	0.0015	0.0015	0.0015	0.0015	0.0015	0.0015	0.0015	0.0015	0.0015
18		Depreciation	\$41	\$81	\$81	\$81	\$81	\$81	\$81	\$81	\$81	\$81	\$81	\$81
19		Accumulated Depreciation	\$41	\$122	\$203	\$284	\$365	\$446	\$527	\$608	\$689	\$770	\$851	\$932
20		Net Plant in Service	\$53,965	\$53,884	\$53,803	\$53,722	\$53,641	\$53,560	\$53,479	\$53,398	\$53,317	\$53,236	\$53,155	\$53,074
21		Average Plant	\$26,983	\$53,925	\$53,844	\$53,763	\$53,682	\$53,601	\$53,520	\$53,439	\$53,358	\$53,277	\$53,196	\$53,115
22	9.27%	Return	\$208	\$416	\$416	\$415	\$414	\$414	\$413	\$413	\$412	\$411	\$411	\$410
23														
24														
25		Total Jurisdictional Revenue Requirement	\$249	\$497	\$497	\$496	\$496	\$495	\$494	\$494	\$493	\$492	\$492	\$491
26		Totals may not add due to rounding												
27														
28														
29														
30														
31														
32														
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(a) Rate of return on capital investments is from FPL September 2010 Surveillance Report per Rule 25-6.0423 Section 7(d).  
 (b) Participants share is Orlando Utilities Commission of 6.0895% and Florida Municipal Power Agency of 6.806% on St. Lucie Unit No. 2. If plant placed into service is related to common St. Lucie Plant, the participants share is calculated on half of the plant placed into service.  
 (c) Jurisdictional Separation Factor is FPL's nuclear capital separation factor for 2010 reflected in the 2010 FPSC Earnings Surveillance Report.  
 (d) Depreciation and Amortization rates are from Order No. PSC-10-0153-FOF-EI in Dkt. 080677-EI, Pgs 47, 48, 77, & 79.

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Note: In 2010 new base rates were set for FPL and 2010 actual costs charged to Nuclear Cost Recovery Projects will become the baseline for recoverable costs in future periods.

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entire year 2010. Any employee charging a percentage of his time to NCRC or ECRC in 2010 will be designated incremental for that percentage of his costs going forward.

If employee labor costs are incurred in direct support of the project, they shall be charged to one of the project work orders set up to capture costs for the New Nuclear Projects (Turkey Point 6&7 and St. Lucie 1&2 and Turkey Point 3&4 Uprates) and the Environmental Cost Recovery Clause.

For purposes of determining whether labor is incremental, beginning January 1, 2011, using the actual payroll charges in 2010 as a baseline, the following guidelines shall be used.

- Employees charging the NCRC or the ECRC in 2010 will continue to charge the NCRC or ECRC at the same percentages charged in 2010 (refer below for further detail on capital, clause, and O&M splits).
- Employees who did not charge the NCRC or ECRC in 2010 and whose labor was included in O&M in 2010 will be evaluated as clause recoverable based on one of the following: 1) employee is dedicated to the project and his position prior to service on the project has been filled by another employee; or 2) he is a new employee hired specifically for the project. Unless one of these two guidelines are met, labor costs should be charged to either a designated non-incremental project work order which will be capitalized, accrue AFUDC and be transferred to plant in service for base rate recovery when the related NCRC plant is placed into service or for the ECRC to the appropriate non-clause recoverable O&M account to be recovered through base rates. This will ensure consistency with the Company's policy regarding the proper categorization of costs as O&M or Capital to be recovered.
- If an individual was charged to O & M, capital, and clause recoverable in 2010 and the department can substantiate this, then the percentage charged to capital and clause recoverable in 2010 can be charged to the clause recoverable work orders. As an example, if an employee previously included in the test year was split 50 percent capital, 40 percent O & M, and 10 percent clause recoverable, then no more than 60 percent of that employee's time could be charged to the clause recoverable work orders. If the employee is now 100% dedicated to a recoverable project, the remaining 40% of his labor should be charged to either a designated non-incremental project work order which will be capitalized, accrue AFUDC and be transferred to plant in service for base rate recovery when the related NCRC plant is placed into service or for ECRC to the appropriate O&M account to be recovered in base rates. This will ensure consistency with the Company's capitalization policy, or charging to O&M as appropriate and capture all project costs. It will be the responsibility of the business unit to maintain adequate documentation to support this type of an allocation.

It is the responsibility of the business units to prepare their budgets and track actual payroll in a manner consistent with those guidelines and allow the FPSC Staff to confirm that the policy is followed.

Please also note that it is important to review all other charges to the project work orders to ensure that only those appropriate are included. Pay close attention to employee related expenses charged to ensure they are legitimate, necessary charges in support of these projects.

If you have any questions regarding what costs should or should not be recorded to the Nuclear Project work orders, please contact Winnie Powers, New Nuclear Accounting Project Manager at 305-552-2318. For questions regarding what costs should or should not be recorded to the Solar project work orders, please contact Skip Gwinn, Manager of Construction Business Services at 561-304-5485.

Please share this memo with any other personnel who might require this information.