## **REVISED EXHIBIT B**

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## CONFIDENTIAL

#### AUDIT FINDING NO. 1

- 2 SUMMARY: The script given to FPLES representatives who offer products and services
- 3 to FPL customers does not require the representative to say that they work for FPLES.
- When calls were observed by Public Service Commission staff the representative did
- say that she worked for FPLES. Although the script does not require the representative
- 6 to state what company he or she works for, the Key Elements section of the training
- > manual says "Always advise customers and partners your name and company" as a
- & critical element.
- 9 The way the question is phrased when providing the confirmation number and offering
- m services insures that the customer has to answer yes to the question if they want their
- a confirmation number. The confirmation number should be provided before they ask the
- customer if it is alright for them to offer other services.
- 3 STATEMENT OF FACT: Part of the FPLES representative training is related to
- My handling the connect service business calls which are the transfer of certain customers
- needing new service from FPL to FPLES. After the collection of information by the FPL
- 76 representative for the new service connection, the FPL representative then puts the
- 77 customer on hold to wait for the confirmation number and transfers the call to FPLES.
- 78 The manual calls for the FPLES representative to greet the customer as follows: "Good
- morning/afternoon Mr./Mrs. \_\_\_\_\_, my name is \_\_\_\_\_ and I will be providing you with
- your confirmation number, as well as offering some services to help you with your
- 21 move. Is that ok? Thank you. Let me know when you are ready to write down your
- 22 new number. Your confirmation number is \_\_\_\_\_ which is also your bill account
- 23 number. Using this number for future inquiries and requests will ensure a quick
- 24 response." The FPLES representative then proceeds to ask the customer if they are
- ar interested in the next service that appears on the screen such as telephone service,
- 21 cable service, newspaper deliver, or other FPLES services such as Utility Guard. Some
- 27 calls are never transferred to FPLES because when obtaining the new service
- 28 connection information, it is determined that the caller does not meet the screening
- 29 criteria. The screening criteria is whether the caller is the actual customer, whether they
- speak English or Spanish, if they have questions that require referral to another
- 3/ department, or when the caller does not have time when the FPL representative tells
- 32. them when that they will be transferred.
- 33 EFFECT ON GENERAL LEDGER IF FINDING IS ACCEPTED: This finding does not
- 3y impact the general ledger.
- FFECT ON FILING IF FINDING IS ACCEPTED: This audit does not have a filing.

CONFIDENTIAL

- 2 SUMMARY: FPLES offers several programs to FPL customers such as Utility Guard,
- Power Surge and Surge Shield Protection. A customer may believe FPLES is the
- regulated electric company.
- STATEMENT OF FACT: FPLES offers several programs either through the transfer of 5
- Service Connect business or through billing inserts. These programs are for Utility 6
- Guard Insurance, Power Surge insurance and Surge Shield Protection. Utility Guard is 7
- insurance for protection of water lines and electric lines and it's offered to the customers
- when the call is transferred to the FPLES representative. Also, FPLES includes billing
- 10 inserts for Power Surge and Surge Shield Protection in FPL's utility bills. Power Surge
- is an insurance to provide protection for the customer's electronics and appliances. It 11
- reimburses the customer for repair or replacement for covered losses, up to the 12
- maximum of their policy. Surge Shield Protection protects the appliances before surges 13
- enter through the customer's home's electric lines or other vulnerable points of entry.
- Surge protectors are installed on the meter and are monitored by FPLES. 15
- 16 When offering the Utility Guard Plan the representative says that the services are
- offered by FPLES. The billing inserts included in the electric bills shows that the Power 17
- Surge insurance and the Surge Shield Protection plan are being offered by FPLES, an 18
- affiliate of FPL. 17
- Customers may not be aware that IFFLES is a non-regulated company. Having FPL in the name may imply to the customer that FPLES is the regulated utility. A rule 20
- 21
- proposed by staff on March 24, 2000 related to Chapter 25-6 for a Code of Conduct for 22
- electric companies. This rule was never approved by the Commission. However, it 23
- stated that "A utility shall not give the appearance that the utility speaks on behalf of its 24
- affiliates or visa versa or that the customer will receive preferential treatment as a 25
- consequence of conducting business with the affillates. A utility many not promote or 26
- advertise its affiliate's relationship with the utility nor allow the utility's logo or name to 27
- be used by the affiliate in all forms of media unless it is accompanied by a clear written 28
- or audio disclaimer that states that the affiliate is not the same company as the utility 29
- and is not regulated by the Commission." 30
- 31 EFFECT ON GENERAL LEDGER IF FINDING IS ACCEPTED: This finding does not
- 32 impact the general ledger.
- EFFECT ON FILING IF FINDING IS ACCEPTED: This audit does not have a filing.

# CONFIDENTIAL

#### AUDIT FINDING NO. 3

- 3 SUMMARY: The customer's confidential information is transferred from FPL to FPLES
- 3 In order for the FPLES representative to confirm the customer's electric service order
- 9 and to provide their confirmation number. FPL has a confidentiality policy for information
- s entered on its website that says that FPL does not reveal the customers confidential
- 6 information to third parties, including other subsidiaries of the FPL Group. The
- 7 Commission has a rule establishing a Code of Conduct for gas companies that
- disallows the transfer of confidential information between affiliates. A rule written in
- 9 March 2000 was proposed to provide standards for the electric companies on handling
- to the confidential information between regulated electric companies and affiliates. The
- // proposed rule for electric companies was never approved.
- /Z STATEMENT OF FACT: According to the company "when new service calls are
- 13 transferred to an FPLES representative, only the information needed to confirm the
- ry electric service order, such as the customer's name, address, the connect order date
- and the confirmation number is provided. The customer is then asked for their
- permission prior to offering FPLES Connect Services. (See finding 1) If the customer
- gives their permission, then only the confirmation number and any other FPLES
- 'y customer information needed to fulfill the services agreed to by the customer is retained
- in the FPLES database system. If the customer does not give their permission, then
- 20 none of the customer information used by FPLES to confirm electric service is retained
- 2) in the FPLES database system."
- 22 FPL has consistently throughout the years applied for confidentiality of customer's
- 23 information such as customer's account number, name and address.
- 27 Even though once the call is ended the screen is erased the FPLES representative still
- 25 receives the customer's information at the start of the call. If the customer verbally
- agrees that FPLES can provide further information, this information is also retained in
- the database system.
- 2Y FPL's Privacy Policy on related to its website says "FPL does not reveal any personal
- 27 information that is provided by our customers through our Web site to any third parties.
- 30 including other subsidiaries of the FPL Group, except when requested to do so by a
- 3/ governmental agency having jurisdiction, or by a court of competent jurisdiction or other
- 32 operation of law."
- 53 Commission Rule 25-7.072, 2 (b1) which is the Code of Conduct for gas service, states
- 34 that the company "will not disclose, or cause to be disclosed, to any marketer, broker or
- 35 agent, previously non-public information about a customer without that customer's prior
- 2/2 authorization."
- 37 This is a rule for gas service, but it appears reasonable that FPL should not disclose
- 38' any customer information to any affiliate.

A Commission Rule was proposed by staff on March 24, 2000 related to Chapter 25-6 of the Florida Administrative Code for a Code of Conduct for electric companies. This rule was never approved by the Commission. Although this rule was never approved, the concept may be relevant to this issue. Item 9(C) (1) states: "Utilities may not release any proprietary customer information to any affiliate without the prior written consent of the customer."

EFFECT ON GENERAL LEDGER IF SIGNIFICANT FINDING IS ACCEPTED: This finding does not impact the general ledger.

EFFECT ON FILING IS ACCEPTED: This audit does not have a filing.

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- 2 SUMMARY: The FPL call care representative obtains personal information needed to
- 3 establish electric service from the customer before the call is transferred to FPLES.
- Y Some of this information such as: name, address and phone number is used by
- 5 FPLES. In addition, certain information obtained by FPL qualifies the customer for the
- La transfer to FPLES. No time is allocated to FPLES for obtaining this information, FPLES
- 7 Is charged for 10 seconds per call which is the estimate of the time from when the FPL
- representative transfers the call to FPLES and waits for a response from the FPLES
- 9 representative. The FPL representative then tells the FPLES representative the
- /D customer's name.
- If From the observation of new service calls it was determined that to gather customer's
- 12 information takes from 3 minutes and 18 seconds to 7 minutes and 44 seconds
- 73 depending on the type of call. Only 10 seconds of this time was charged to FPLES.
- 74 Some of the information obtained by FPL is a benefit to FPLES.
- /S STATEMENT OF FACT: FPL's representative obtains customer information such as:
- 1/4 name, social security number, telephone contact, whether the person calling is the
- owner or the renter, current power status, closing date, billing address, email address, deposit information and verification of information. The computer does a credit check
- /9 based on this information. The time it takes to process each call is ranges from 3
- 20 minutes and 18 seconds to 7 minutes and 44 seconds. (See attached summary of calls
- 21 observed). The cost for the time it takes to gather this information is not charged to
- 22 FPLES. FPLES is not only benefiting from the transfer call but also from obtaining this
- 23 information without having to spend additional time to obtain it on their own. Based on
- 21 FPL's analysis of cost for call center representatives and managers every 10 seconds.
- 25 costs FPL \$1.46. See detail attached. Based on three month's data from 2004 there
- are an average of call transferred to FPLES each month.
- 27 EFFECT ON THE GENERAL LEDGER: This finding does not affect the general 21 ledger.
- 29 EFFECT ON THE FILING: There is no filling related to this audit.

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#### SUMMARY OF CALLS AND TIMES

1) NEW SERVICE CALL

This call lasted 4 minutes and 20 seconds from the time the customer called up to the time the FPL representative transferred the call and spoke to the FPLES representative.

During the request for new service the customer requested the billing statement be sent to a different address. This added time on to the call.

2) NEW SERVICE CALL

This call lasted 3 minutes and 18 seconds. The customer's billing statement was sent to the customer's address.

3) NEW SERVICE CALL

This call lasted 5 minutes and 16 seconds. The call was made by a friend of the FPL customer. The FPL representative gave the confirmation number and the call was not transferred to an FPLES representative because the caller was not the customer.

4) NEW SERVICE CALL

This call lasted 4 minutes and 18 seconds. During the request for new service the customer requested his billing statement be sent to another address and this added time on to the call.

5) NEW SERVICE CALL

This call lasted 5 minutes and 21 seconds. During the request for new service the customer asked for the billing statement to be sent to another address. She also asked if the name on the bill should be under the person renting for the landlord which increased the length of the call. The customer seemed confused as to why the FPL representative was transferring her to get her confirmation number.

6) NEW SERVICE CALL:

This call lasted 4 minutes and 51 seconds. The customer seemed confused between the confirmation number and the account number.

7) NEW SERVICE CALL

This call lasted 7 minutes and 44 seconds. The person calling was not the customer. The FPL representative gave her the confirmation number instead of transferring her to FPLES, because she was not the customer.

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### / CALCULATION OF THE COST PER 10 SECONDS

3	10 seconds 3600	# If seconds charged to FPLES per call 60 seconds times 60 minutes (3600) total seconds	in one hour
•	= .002777	Percent of time per call in one hour	
6	<u>.002777</u> 173	Percent of time per hour per call Total hours in a month	- TIM
4	= .0000160565	Percent of time per month per call CONF	DENTIAL
10	.0000160565	•	_
11 12 13	x 1.15 =	Queuing factor for time lost for calls going through	queue
14	.00001846496	Percent of time with queuing factor per call	
15	.00001846496 .7125	Percent of time with queuing factor per call Adjustment for agent's productive time	
17 18 19	.00002591576	Non-exempt full time equivalent (Percent of time p for queuing factor and productive time)	er call adjusted
20 21	\$50,736 ×	Representative's salary and overhead	
22 23	.00002591576 = \$1.31486000	Full time equivalent time Cost per 10 seconds for the representative	
24	.00002591576	Full time equivalent	•
25 2L	16 = .00000161972	Span of Control (Supervisor handles 16 represent Full time equivalent for Supervisor per representation	
27 28	.0000161972 ·	Full time equivalent for Supervisor	-
29	\$91,163	Supervisor's salary and overhead	
30 31	14765853436	Cost per Supervisor	•
<b>32</b> .	The total cost per	10 seconds is \$1.31 representative + .15 supervisor	<b>= \$1.46</b> .

- 2 SUMMARY: FPLES revenues for 2004 related to the connect service business are 3 manufactured and the related expenses are 3
- Y EFFECT ON THE GENERAL LEDGER: This finding does not affect the general
- 5 ledger.

6 EFFECT ON THE FILING: There is no filing related to this audit.

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SUMMARY: The script given to FPLES representatives who offer products and services to FPL customers does not require the representative to say that they work for FPLES. When calls were observed by Public Service Commission staff the representative did say that she worked for FPLES. Although the script does not require the representative to state what company he or she works for, the Key Elements section of the training manual says "Always advise customers and partners your name and company" as a critical element.

The way the question is phrased when providing the confirmation number and offering services insures that the customer has to answer yes to the question if they want their confirmation number. The confirmation number should be provided before they ask the customer if it is alright for them to offer other services.

STATEMENT OF FACT: Part of the FPLES representative training is related to handling the connect service business calls which are the transfer of certain customers needing new service from FPL to FPLES. After the collection of information by the FPL representative for the new service connection, the FPL representative then puts the customer on hold to wait for the confirmation number and transfers the call to FPLES. The manual calls for the FPLES representative to greet the customer as follows: "Good · morning/afternoon Mr./Mrs. \_\_\_\_\_, my name is \_\_\_\_\_ and I will be providing you with 20 your confirmation number, as well as offering some services to help you with your move. Is that ok? Thank you. Let me know when you are ready to write down your which is also your bill account new number. Your confirmation number is \_ number. Using this number for future inquiries and requests will ensure a quick response." The FPLES representative then proceeds to ask the customer if they are interested in the next service that appears on the screen such as telephone service, 25 cable service, newspaper deliver, or other FPLES services such as Utility Guard. Some calls are never transferred to FPLES because when obtaining the new service connection information, it is determined that the caller does not meet the screening criteria. The screening criteria is whether the caller is the actual customer, whether they speak English or Spanish, if they have questions that require referral to another department, or when the caller does not have time when the FPL representative tells 32. them when that they will be transferred.

FFECT ON GENERAL LEDGER IF FINDING IS ACCEPTED: This finding does not impact the general ledger.

75 EFFECT ON FILING IF FINDING IS ACCEPTED: This audit does not have a filing.

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SUMMARY: FPLES offers several programs to FPL customers such as Utility Guard, Power Surge and Surge Shield Protection. A customer may believe FPLES is the regulated electric company.

STATEMENT OF FACT: FPLES offers several programs either through the transfer of Service Connect business or through billing Inserts. These programs are for Utility Guard insurance, Power Surge insurance and Surge Shield Protection. Utility Guard is insurance for protection of water lines and electric lines and it's offered to the customers when the call is transferred to the FPLES representative. Also, FPLES includes billing inserts for Power Surge and Surge Shield Protection in FPL's utility bills. Power Surge is an Insurance to provide protection for the customer's electronics and appliances. It relmburses the customer for repair or replacement for covered losses, up to the maximum of their policy. Surge Shield Protection protects the appliances before surges enter through the customer's home's electric lines or other vulnerable points of entry. Surge protectors are installed on the meter and are monitored by FPLES.

When offering the Utility Guard Plan the representative says that the services are offered by FPLES. The billing inserts included in the electric bills shows that the Power Surge insurance and the Surge Shield Protection plan are being offered by FPLES, an affiliate of FPL.

Customers may not be aware that FPLES is a non-regulated company. Having FPL in the name may imply to the customer that FPLES is the regulated utility. A rule proposed by staff on March 24, 2000 related to Chapter 25-6 for a Code of Conduct for electric companies. This rule was never approved by the Commission. However, it stated that "A utility shall not give the appearance that the utility speaks on behalf of its affiliates or visa versa or that the customer will receive preferential treatment as a consequence of conducting business with the affiliates. A utility many not promote or advertise its affiliate's relationship with the utility nor allow the utility's logo or name to be used by the affillate in all forms of media unless it is accompanied by a clear written or audio disclaimer that states that the affillate is not the same company as the utility and is not regulated by the Commission."

BY EFFECT ON GENERAL LEDGER IF FINDING IS ACCEPTED: This finding does not impact the general ledger.

B EFFECT ON FILING IF FINDING IS ACCEPTED: This audit does not have a filing.

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- SUMMARY: The customer's confidential information is transferred from FPL to FPLES
- 3 in order for the FPLES representative to confirm the customer's electric service order
- 4 and to provide their confirmation number. FPL has a confidentiality policy for information
- 5 entered on its website that says that FPL does not reveal the customers confidential
- 6 Information to third parties, including other subsidiaries of the FPL Group. The
- 7 Commission has a rule establishing a Code of Conduct for gas companies that
- & disallows the transfer of confidential information between affiliates. A rule written in
- 9 March 2000 was proposed to provide standards for the electric companies on handling
- the confidential information between regulated electric companies and affiliates. The
- proposed rule for electric companies was never approved.
- /2 STATEMENT OF FACT: According to the company "when new service calls are
- 13 transferred to an FPLES representative, only the information needed to confirm the
- /y electric service order, such as the customer's name, address, the connect order date
- 15 and the confirmation number is provided. The customer is then asked for their
- 1/2 permission prior to offering FPLES Connect Services. (See finding 1) If the customer
- 17 gives their permission, then only the confirmation number and any other FPLES
- /y customer information needed to fulfill the services agreed to by the customer is retained
- 19 in the FPLES database system. If the customer does not give their permission, then
- to none of the customer information used by FPLES to confirm electric service is retained
- 2/ in the FPLES database system."
- 22 FPL has consistently throughout the years applied for confidentiality of customer's
- 23 Information such as customer's account number, name and address.
- 24 Even though once the call is ended the screen is erased the FPLES representative still
- 25 receives the customer's information at the start of the call. If the customer verbally
- 26 agrees that FPLES can provide further information, this information is also retained in
- 27 the database system.
- 28' FPL's Privacy Policy on related to its website says "FPL does not reveal any personal
- 29 Information that is provided by our customers through our Web site to any third parties,
- including other subsidiaries of the FPL Group, except when requested to do so by a
- governmental agency having jurisdiction, or by a court of competent jurisdiction or other
- operation of law."
- Commission Rule 25-7,072, 2 (b1) which is the Code of Conduct for gas service, states
- that the company "will not disclose, or cause to be disclosed, to any marketer, broker or
- agent, previously non-public information about a customer without that customer's prior authorization."
- This is a rule for gas service, but it appears reasonable that FPL should not disclose any customer information to any affiliate.

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A Commission Rule was proposed by staff on March 24, 2000 related to Chapter 25-8 of the Florida Administrative Code for a Code of Conduct for electric companies. This rule was never approved by the Commission. Although this rule was never approved, the concept may be relevant to this issue. Item 9(C) (1) states: "Utilities may not release any proprietary customer information to any affiliate without the prior written consent of the customer."

EFFECT ON GENERAL LEDGER IF SIGNIFICANT FINDING IS ACCEPTED: This finding does not impact the general ledger.

ENFECT ON FILING IS ACCEPTED: This audit does not have a filing.

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(U) A W AUDIT FINDING NO. 4

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SUMMARY: The FPL call care representative obtains personal information needed to establish electric service from the customer before the call is transferred to FPLES. Some of this information such as: name, address and phone number is used by FPLES. In addition, certain information obtained by FPL qualifies the customer for the transfer to FPLES. No time is allocated to FPLES for obtaining this information. FPLES is charged for 10 seconds per call which is the estimate of the time from when the FPL representative transfers the call to FPLES and waits for a response from the FPLES representative. The FPL representative then tells the FPLES representative the customer's name.

From the observation of new service calls it was determined that to gather customer's information takes from 3 minutes and 18 seconds to 7 minutes and 44 seconds depending on the type of call. Only 10 seconds of this time was charged to FPLES. Some of the information obtained by FPL is a benefit to FPLES.

STATEMENT OF FACT: FPL's representative obtains customer information such as: name, social security number, telephone contact, whether the person calling is the owner or the renter, current power status, closing date, billing address, email address, deposit information and verification of information. The computer does a credit check based on this information. The time it takes to process each call is ranges from 3 minutes and 18 seconds to 7 minutes and 44 seconds: (See attached summary of calls observed). The cost for the time it takes to gather this information is not charged to FPLES. FPLES is not only benefiting from the transfer call but also from obtaining this information without having to spend additional time to obtain it on their own. Based on FPL's analysis of cost for call center representatives and managers every 10 seconds costs FPL \$1.46. See detail attached. Based on three month's data from 2004 there are an average of

EFFECT ON THE GENERAL LEDGER: This finding does not affect the general ledger.

EFFECT ON THE FILING: There is no filing related to this audit.

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1) NEW SERVICE CALL

This call lasted 4 minutes and 20 seconds from the time the customer called up to the time the FPL representative transferred the call and spoke to the FPLES representative.

During the request for new service the customer requested the billing statement be sent to a different address. This added time on to the call.

2) NEW SERVICE CALL

This call lasted 3 minutes and 18 seconds. The customer's billing statement was sent to the customer's address.

3) NEW SERVICE CALL

This call lasted 5 minutes and 16 seconds. The call was made by a friend of the FPL customer. The FPL representative gave the confirmation number and the call was not transferred to an FPLES representative because the caller was not the customer.

4) NEW SERVICE CALL

This call lasted 4 minutes and 18 seconds. During the request for new service the customer requested his billing statement be sent to another address and this added time on to the call.

5) NEW SERVICE CALL

This call lasted 5 minutes and 21 seconds. During the request for new service the customer asked for the billing statement to be sent to another address. She also asked if the name on the bill should be under the person renting for the landlord which increased the length of the call. The customer seemed confused as to why the FPL representative was transferring her to get her confirmation number.

6) NEW SERVICE CALL

This call lasted 4 minutes and 51 seconds. The customer seemed confused between the confirmation number and the account number.

7) NEW SERVICE CALL

This call lasted 7 minutes and 44 seconds. The person calling was not the customer. The FPL representative gave her the confirmation number instead of transferring her to FPLES, because she was not the customer.

## / / CALCULATION OF THE COST PER 10 SECONDS

•			
23 4 5	10 seconds 3600	# if seconds charged to FPLES per 60 seconds times 60 minutes (3600)	
5.	.002777	Percent of time per call in one hour	
6 7 8	.002777 173	Percent of time per hour per call Total hours in a month	CONFIDENTIAL
ğ	.0000160565	Percent of time per month per call	90.
: 10 : 11	.0000160565 x		
· 12 13	1.15 Queuing factor for time lost for calls going through queue		
14	.00001846496	Percent of time with queuing factor	per call
15 16 17	.00001846496 .7125	Percent of time with queuing factor Adjustment for agent's productive ti	
18	.00002591576	Non-exempt full time equivalent (Pe for queuing factor and productive times)	
20	\$50,736	Representative's salary and overhe	ad
22 · 23	.00002591576 = \$1.31486000	Full time equivalent time Cost per 10 seconds for the represe	entative
24 25 26	.00002591576 16 = .00000161972	Full time equivalent Span of Control (Supervisor handle Full time equivalent for Supervisor p	s 16 representatives) per representative
27	.0000161972	Full time equivalent for Supervisor	
28 29:	x <u>\$91,163</u> =	Supervisor's salary and overhead	·
31	.14765853438	Cost per Supervisor	
32	✓ The total cost per	10 seconds is \$1.31 representative +	.15.supervisor= \$1.46.

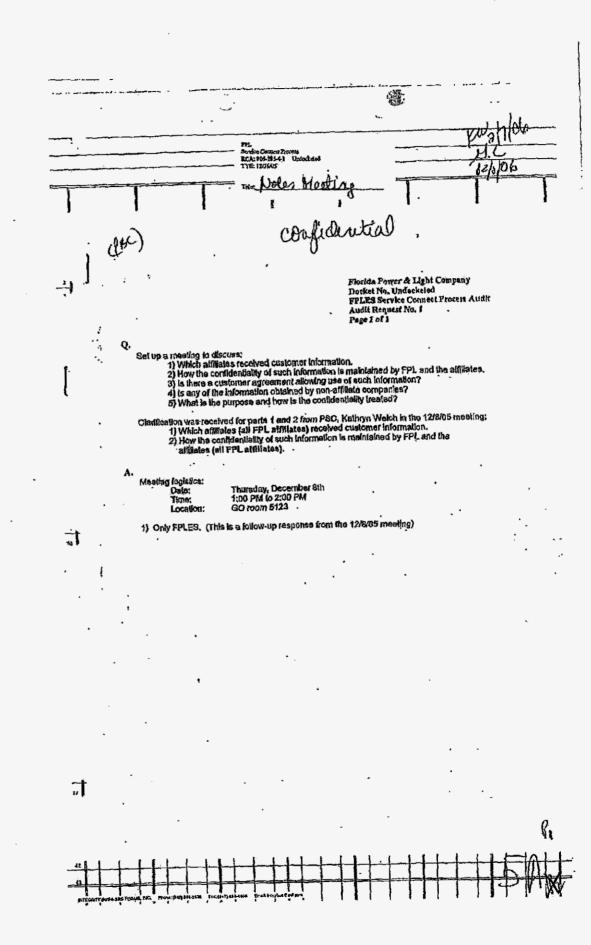
SUMMARY: FPLES revenues for 2004 related to the connect service business are

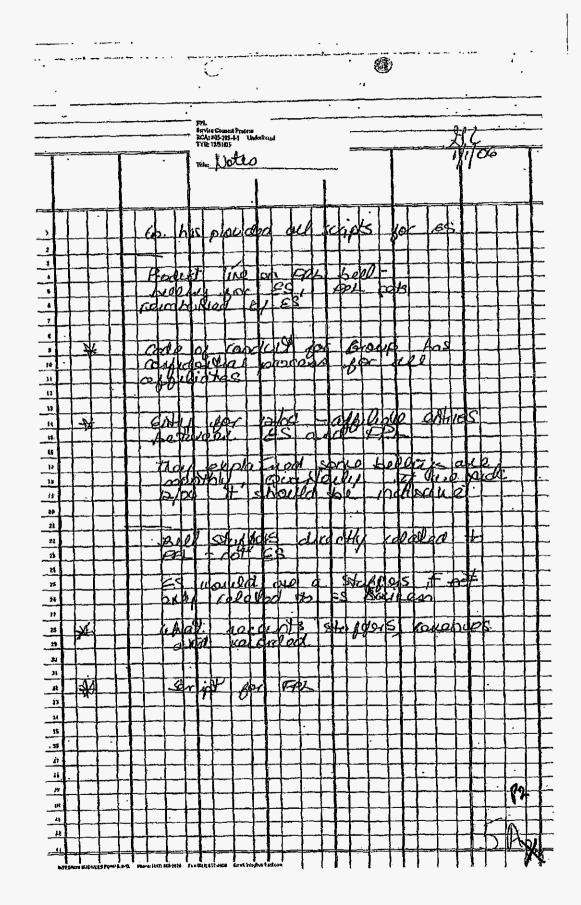
EFFECT ON THE GENERAL LEDGER: This finding does not affect the general ledger.

EFFECT ON THE FILING: There is no filing related to this audit.

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AUDITOR:

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PERIOD:

FPL MEETING RELATED TO THE FPL SERVICE CONNECT PROCESS CLARIFICATION OF COST ALLCCATION RATE 2004 AND 2006

GABRIELA LEON

Confideration

- FPLES has its own 1-800 Calls that come to FPL related to FPLES can be tracked.
- cells fimes the seconds = FTE (MANPOWER=FULLY LOADED RATE)
- The rates provided in DRR#5 are applied to FTE.
- 5 second time of weiling for the FPLES rep. After a  $\delta$  second weil, if the call is not picked up by FPLES then the call is routed back to FPL.
- Ю
- " \$91,163 = AVERAGE SALARY OF A MANAGER
- 12 \$50,738= AVERAGE SALARY OF REPRESENTATIVE
- 13 total seconds for the group times the FTE (full time equivalent)

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Florida Power & Light Company Docket No. Undocketed FPLES Service Connect Process Audit Audit Request No. 9 Page 1 of 1

Please arrange for me to observe one of the FPLES representatives that answer the transfer calls at their workstellon. E C ტ

Date: Tine Location: Security Access: Cell Phone Contact: December 28, 2005 2:00 to 3:00 PM LFO Building

4200 West Flagler

Will be arranged for Gabby Leon and Illana Piedra Maria Besada 305-776-8886 Maria Besada will meet you in the LFO lobby and direct you to the call center location

LFO Address: LFO Map:

Meeting Location:

EXHIBIT #19

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91011213195671

Please note that all auditor's notes will be designated as confidential.

Conclusion: after making the down vation of one of the FPLES representatives the cuatomer; confidential in another information so transferred to TPLES in order information so transferred to TPLES in order to FPLES to offer wire FPL's customers their account member and to our somices. Please per audit finding #3 on up 25-1, p. p. 25 p. 21 22 23 74 25 26 27

m. Observation of FPLES Rep "Notes" Observation of FPLES Representative The FPL coise representative announces this call. The name of the customer is given, also it distinguishes the call when it's prom a Sparish speaking customer. The customer's confirmation murrher in always its FPL account rumber. The colls that are transferred are for their Sehmon only and and pregualified at the For case center). 10 For example: If the landlord calls in for rew columnia toth und considered instruction is to window. call in not transferred to FPLES. An puch as care the FPL care representative gives the customer) the account rumber. For a list of the prequalified call we wo. \_ 15 also if the customers derive to be transpersed throw 16 the FPL care suprementatives given the unstance its 17 Confirmation rumber. Own the coal is transferred in the FRES replacedation 19 introduced levely and that she was from 20 FPL Every wines. She said that she was would 21 give the customen their conformation number and 22 sile as prividing them products or penner offers. 23 the Order of products and survices provided were as 24 Jullow: , Horri Herald 25 ) hundproses < Sur Sentinel. with and 1 (s ie prachitych Bellswith . 3) Local Hom Distance Place FRU Telecom 28 AL OLLOWER W 4) Cable Solvellite white waster Incatton. 30

De observed that if a customer is transfer.

To applie department on another business the call is excled and the representatives Comment of the the posterior of portice of portice of portice of portice of portice of the confirmation of was given and the was the customer of the following pommen were of the state of the following pommen were of the state o

12 There is a contractived represent between FRES
13 and its postressor with a they wont to include
14 the example. The Heari Honold very and are of to
15 Deliver to contain among therefore, and in property
16 are eliminated from this inclusion.

Open the Foles representation index the cost, the satisficon interest information is drawed. Wanted 19 if the could go book and have access to this 20 information again and she said to that went 21 its mount she could retain.

12/28 objectation -O offered offer and & sure paper - offer made by newspaper and & sure for Sure 13 nich 23 for price of a nuss. 5 declined, garked upplied package. declined call pasced over to BS. it rall igoog to BS nothing also is appeared. 10 the snear shows customer #, connect dule @ Keps name of EPA ELOIRY SUS effores, actorior said no 12 gues # add 13 14 to offenigo. 1 rops name at 4FPL Example SUS. 15 afford utility ward resplaned destrict 16 protection, declined 17 offened Direct TV, ES + Direct TV offer it together, declered 19 offered photo + for fittle if demond 20 is made to inquire about offer 1 877-968-21 ZZ New Services call transported only based on progralification criterias transfer only the progralified call Didney available of 23 transfer only the 25 only qualify for Didny cuplained 26 (2) what Oarea cortain products 27 28 are other qualifications? 3 usas are 29 all the offerings

seconds is some confunation of ,d name, multioned APL Exorgup SUB. some #3, Helily quant 4 declined, offened 1-977 # 5 the had a question about FPL service, 6 so coel was transformed back to FPL no other opports made. name, moustoxed APT Exercy SVS offerred BS - customer hing up. 10 confunción, connect 1/6/05, per name/ ES Palm Beack Sin Seiting. at 50% 12 13 declined, offered weelend pts, declined transferred to Adelphia , renstioned it 14 16 a countery of Everyly Sis to get into on services for your area. 17 represent w/ PPL Every Services, Letter # \_\_\_ , help you with some in your 18 19 new address, PT It here nous paper office on behalf of FILESur 3 with for piece of and. 20 accopiled , transferred to Adalphia 2/ 22 ti declened. terles (Business call). cong it, rep, with drang Cio. offered PPN - phone, internet Maples 25 dedired 26 represent we evoy evo, coup #. affered Bravard Akraed declined 28 question about deposit , transported back to deliter. 2505

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AUDIT FINDING NO. 3

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SUMMARY: The customer's confidential information is transferred from FPL to FPL Energy Services (FPLES) in order for the FPLES representative to give the customer their account number. Florida Power and Light has a confidentiality policy on their website that says that FPL does not reveal the customers confidential information to initid parties, including other subsidiaries of the FPL Group. The Commission has a rule establishing a Code of Conduct for gas companies that disallows the transfer of confidential information between affiliates. A rule written in March 2000 was proposed to provide standards for the electric companies on handling the confidential information between regulated electric companies and affiliates. The proposed rule for electric companies was never approved.

STATEMENT OF FACT: According to the company "when new service calls are transferred to an FPLES representative, only the information needed to confirm the electric service order, such as the customer's name, address, the connect order date and the confirmation number is provided. The customer is then asked for their permission prior to offering FPLES Connect Services. (See finding 1) if the customer gives their permission, then only the confirmation number and any other FPLES customer information needed to fulfill the services agreed to by the customer is retained in the FPLES database system. If the customer does not give their permission, then none of the customer information used by FPLES to confirm electric service is retained in the FPLES database system."

FPL has consistently throughout the years applied for confidentiality of customer's information such as customer's account number, name and address.

Even though once the call is ended the screen is erased the FPLES representative still receives the customer's information at the start of the call. If the customer verbally agrees that FPLES can provide further information, this information is also retained in the database system.

Florida Power and Light's Privacy Policy on their website says "FPL does not reveal any personal information that is provided by our customers through our Web site to any third parties, including other subsidiaries of the FPL Group, except when requested to do so by a governmental agency having jurisdiction, or by a court of competent jurisdiction or other operation of law."

Commission Rule 25-7.072, 2 (b1) which is the Code of Conduct for gas service, states that the company "will not disclose, or cause to be disclosed, to any marketer, broker or agent, previously non-public information about a customer without that customer's prior authorization."

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This is a rule for gas service, but it appears reasonable that FPL should not disclose any customer information to any affiliate or any other vendor for which they sell services.

A Commission Rule was proposed by staff on March 24, 2000 related to Chapter 25-6 of the Florida Administrative Code for a Code of Conduct for electric companies. This rule was never approved by the Commission. Although this rule was never approved, the concept may be relevant to this issue. Item 9(C) (1) states: "Utilities may not release any proprietary customer information to any affiliate without the prior written consent of the customer."

EFFECT ON GENERAL LEDGER IF SIGNIFICANT FINDING IS ACCEPTED: This finding does not impact the general ledger.

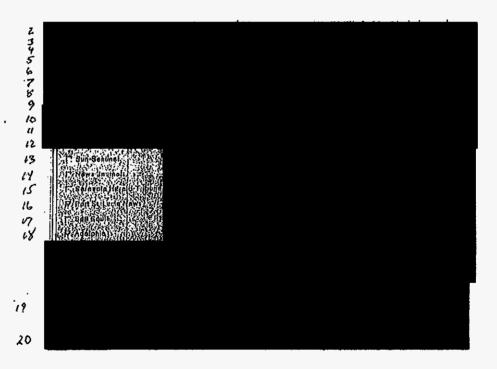
EFFECT ON FILING IS ACCEPTED: This audit does not have a filing.

FPL States Connect Present RCA: 105:385-41 Un TYE: 12/31/05

Print Screen 90

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CONFIDENTIAL



Call John and ask dim ig he considers this cust ungo as confidential

Created on 03/15/04

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FPL regressestative training

Company: FPL Summary of FPL care representative training on finalizing New Service Orders 3-Jan-08 Dale: Gabriela Leon Auditor: A customer makes a call to FPL to establish new service. Once all the necessary steps are performed and the call is ready to be finalized the FPL care representative goes through the following steps: 3 if customer has additional questions/inquiries or requests 4 related to FPL business 11 Examples: Connect Outdoor Lighting 12 13 On call Transfer to Premise Risk 15 Then select: Transfer to other department and the representative provides the confirmation number which is the same as the bill account number 16171819 clicks ok and stop. 20 24 If same as previous customer Example: Re-open same customer 22 23 Same oustomer and gives the confirmation number CONFIDENTIAL clicks ok and stop 25 26 27 29 te not customer of record or family member Examples: Leadlord Resilor Secretary 30 31 32 Not Decision Maker and the FPI care representative gives the customer its confirmation number is not transferred for any other reason 33 Examples: Oces not speak English or Spanish 弘弘彩 (French/Creole only)
Does not have time or does not want to be transferred 孙的竹花野 Then select Other Type reason for not kanademing and the FPL care representative gives the customer its confirmation number clicks als and step 44 If none of the above 45 Then select: Transferred to Sales Center Specialist and clicks ok, and transfers to Sales Center Specialist The VAPORS (Value Added Programs Opportunities for Relat Sales) Introduction window is the pridge between the connect service order and the Sales 48 ११ ११ ११ Center product offer, and For tracking purposes, slows you to select the resson you may not he transferring a qualified outlomer to a Sales Center Specialist 53 VAPORS transfer script 2335 Mr. Mars. \_\_\_\_\_\_your order to connect is now complete. Please remember to check your circuit breakers upon arrival. Now allow me to lansier you for your order confirmation number, and thank you for calling FPL. It has been my pleasure in assist you. 57 Conclusion: See Audit finding #3 m wp 25-1.
If the customer dentes & involvement in
Affined Services then FPL gives them 58 59

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their account runber

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Company: Fiorida Power and Light Notes from the FPLES training manual 2004 Period: 5-Jan-08 Data: Auditor. Gabriela Leon The FPLES Sales Center provides customers with products and services of the time of connection. & Call Process Flows Customer calls FPL to connect or transfer service.

Call is routed to a Service Orders Representative.

Service Order entered in FPL's system.

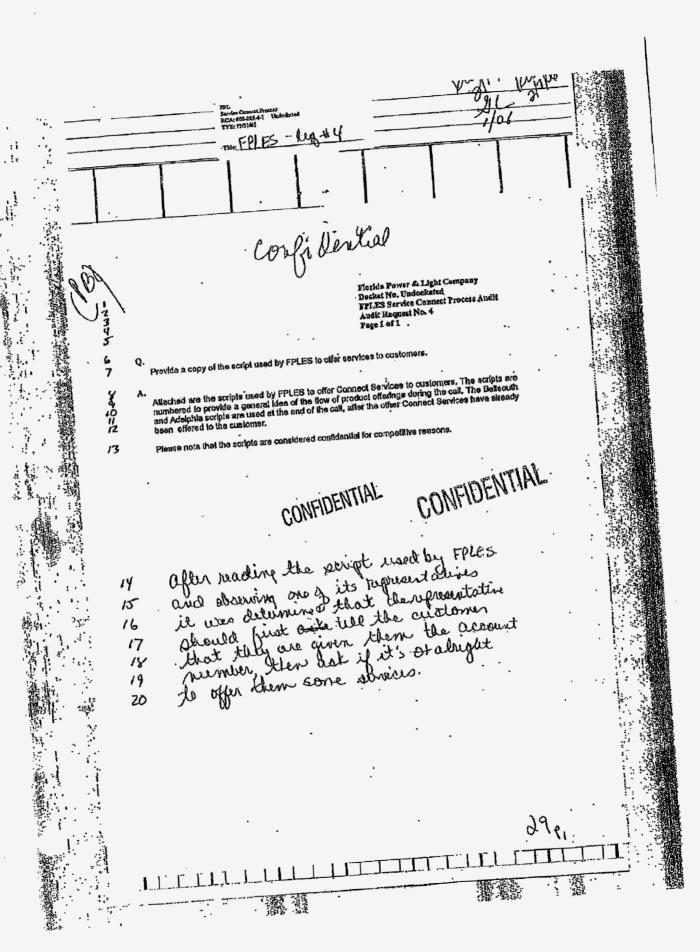
VAPORS (Value Added Product Opportunities for Retail Sales) system pre-qualifies customers for Products and Services.

Qualified customers are transferred to Sales Specialist.

Sales Specialist provides confirmation number and offers Products and Services.

Process order and/or transfer customer to partner. りんけれらればしけ VAPS (VALUE ADDED PRODUCTS AND SERVICES)-ORDER OF OFFERS 18 CONFIDENTIAL 19 Newspapera Warrantias ZÞ Local/Long Distance Phone 71 77 Cable/Satellite On the Key Elements Summary under Critical Etaments it says " always actrise customer and partners your name and company" nowever, the script does not mention that the employee has to include who he/she works for. Ask what does it mean "NEVER CLEAR THE SCREEN IF YOU SPOKE TO THE CUSTOMER"
 1 did see in the observation that the screen was erased, but don't remember if she erased herself
 or if after the call the screen is erased automatically.

28 pz



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i	, <u>Greeting Script</u>		•	
2 345678	"Good morningiationnon Mr. Mrs my name is with your confirmation number as well as offering some move, is that OK?" "Thank you. Let me know when you are ready to write do confirmation number is which is also your bill are number for future inquiries and requests will ensure a question."	and I will be preservices to help you own your new numb scount number. Ush uloker response	oviding you with your er, Your ng this	و د ستاسته موسول و د د د د د د د د د د د د د د د د د د
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	Mlami/Broward Herald Script	- " :	
2 .	"Mr. / Mrs. () are you currently subscribed/receiving Miami/Broward Hera	ld	
3	your local newspaper?"		. ] .
450	"Great to welcome you to the area, FPL Energy Services and the Mismi/Broward "Great to welcome you a 3 month subscription at nearly 50% off which is only  Herald are offering you a 3 month subscription at nearly 50% off which is only  week.		- d' : : :
? 8	"I can schedule your delivery to begin on () (start date). Will you be in the residence to receive the paper?	one	
9 40	"Also, during that time the Miami/Broward Heraid may contact journment of verify your delivery and satisfaction with the paper."		
H	"Is this the telephone number where you can be reached at your new home?"		*/>- 2
12	"Great, we can also include the previous Sunday's paper so you can immediately take advantage of the TV Book and coupons; Is that ok?		**************************************
14	Confirmation Statement:		
15	"Mr. / Mrs to confirm/ recap/ summarize your newspaper order;	-	•
16 17	<ul> <li>A 3 mouth subscription for the Miami/Broward Herald will begin on</li> <li>() (start date).</li> </ul>	•	_
18	<ul> <li>You have agreed to have the Herald subscription charge appear on t FPL bill correct?</li> </ul>		
20 21 22 23	<ul> <li>The introductory rate for the first 3 months will be at nearly 50% of (S per month) including tax and delivery. After the first 3 months yo qualify for a special 33% discount for the following 3 months which be (\$ per month) before it converts to the regular rate. OK?</li> </ul>		***************************************
24 25	<ul> <li>If you do not wish to renew your subscription, you must call the Her customer service center at 305-350-2000 (Dade) 954-462-3000 (Brown</li> </ul>	ald's ard).	
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2 3	"Mr. / Mrs. () are you currently subscribed/receiving t local newspaper?"	the Sun Sentine	l your	
·	Great to welcome you to the area, FPL Energy Services and you a 26 week subscription at 50% off which is only \$1.68 a	Sun Sentinel ar week.	e offering	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
	"I can schedule your delivery to begin on () (start date).	Will you be in	the	
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	"Is this the telephone number where you can be reached at	your new house	, jan	
	"Great, we can also include the previous Sunday's paper so take advantage of the TV Book and coupone; Is that ok?  (If no type NSVA: If yes, type YSVA in the remarks)	o you can imme	diately .	
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	A 26 week subscription for the Sun Sentinel will  (Start date).  You will receive a bill in the mail from the ( total amount of ).		For the	
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	<u>Herald Tribune Script</u>		•	
1 2	(Charlotte/Manates/Sarasota/Venice/North Port)		• .	
1 2 34 567 89 1011	"Mr. / Mrs. () are you currently subscribed/receiving the () H Tribune your local newspaper?"			
5 6 7	"Great to welcome you to the area, FPL Energy Services and the () H Tribune are offering you an 8 week subscription at 50% off which is only week.			
8	"I can schedule your delivery to begin on () (start date). Will you be i residence to receive the paper?	n the	•	•
10 	"Also, during that time the () Herald Tribune may contact you at (number) to verify your delivery and satisfaction with the paper."	) (Phone		
	"Is this the telephone number where you can be reached at your new hor	ne3 p	-	
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	local newspaper?"  "Great to welcome you to the area, HPL Energy Services and the News Journal is  "Great to welcome you to the area, HPL Energy Services and the News Journal is	iş.
! #4 \$5	"Great to welcome you to the area, FPL sheigh both sending you a 4 week complimentary subscription.  Sending you a 4 week complimentary subscription.	: • • •
A	sending you a 4 week complimentary sanstrage.  (Start date). Will you be in the care for receive the paper?	: :
1 4	"I can schedule you tear to residence to receive the paper?	
8	"Also, during that time the News Journal may contact you would like to continue after the 4 to verify your delivery, satisfaction, and to see if you would like to continue after the 4	
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45	"Great to welcome you to the area, FPL Energy Services and the News-Fra		
46	"I can schedule your delivery to begin on () (start date). Will you be	. IT the	
7	"Also, during that time the News-Press may contact you at () (Priore		
10	Is this the telephone number where you can be reached at your new no	mer"	
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345678	"Great to welcome you to the area, FPL Energy Services and the sonly () a week.	
· 量 7	the data wour delivery to begin on ( ) (Start Galley	
\$ 8	residence to receive and residence to reside	*
4 10	"Also, during that time the (Newspaper Name) may contact."  number) to verify your delivery and satisfaction with the paper."	
3 11	"to this the telephone number where you can be reached at 3	
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/3 /Y	"Mr. / Mrs to confirm/ recap/ summarize your development on () (start  A 3 month subscription for the price of 2 will hegin on () (start	. y a
15	date).  Von will receive a bill in the mail from the (Newspaper Name) for the section of the sec	
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	COLMINA	
	<u> Florida Today Script</u>	
3	"Mr. / Mrs. () are you currently subscribed/receiving the Florida Today your local newspaper?"	
4	"Control of the cree FPI. Energy Services and Florida Today is offering	
5 th	you an 11 week subscription at 40% oir which is only 4200 it with	
6 7	"I can schedule your delivery to begin on () (start data). Will you be in the residence to receive the paper?	
*	"Also, during that time the () Florida Today may contact you at () (Phone number) to verify your delivery and satisfaction with the paper."	
2 10	"Is this the telephone number where you can be reached at your new home?"	
1/2	We can also include the previous Sunday's paper so you can immediately take advantage of the TV Book and coupons; is that old?	
B	(If no, type INS in the remarks)	من المناسب
. 14	Coussimation Statement:	
12	to confirm/ recap/ summarize your newspaper order,	
16	An 11 week subscription for the Florida Today will begin on () (start date).	
18	You will receive a bill in the mail from the () Florida Today for the total amount of \$31.80.	
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·	Verify: *Own			
1 3	*Single family home / Town home / Trailer home / Duplex			
# 4 5 16 7	Mr. /Ms, FPI. Energy Services is offering SurgeShield, which is a prevents surges from entering your home and damaging your major applian and your family with the peace of mind that the things you depend on every officen costly surge-related damage.	ices, providing you		
84-1011 1011-1011	We can install a heavy duty device at your meter which will prevent surger your major appliances such as your air conditioner, water heater, refrigerator, washer/dryer and so on. This does not cover electronic devices. This prevent only \$8.95 (30/day) plus tax per month which can be conveniently added.	stove, and etative service is	· •	
12 /3	Florida is the lightning capital of the US, and we know it causes millions of devery year. For example, lighting causes over 40% of the damage to air cond	lotters in losses litioners.	•	
4	I can have a contractor install this device within the next 15-20 days, are you signing up for this service?  CONFIDENTIAL	interested in	,	
16	Confirmation Statement;	)	•	
18	<ul> <li>Thank you for choosing FPL Energy Services SurgeShield Protect For quality control purposes, the remainder of the call will be record</li> </ul>	lon for your home. ed.		
A . C & 19	Mention customer name and address			
20	<ul> <li>You are purchasing SurgeShield Protection for \$8.95 plus tex per be included in your FPL bill is that correct?</li> </ul>	r month which will		
27 23 24	<ul> <li>Please note that the first bill amount will be provided for actual d who do not make the billing cycle for the first month will see a gr the following month.</li> </ul>	lays of use. Those eater billed amount	٠.	
25 26 27 28	<ul> <li>This meter unit alone cannot fully protect the entire home as sur through the phone, cable and data lines. If you are interested in protection for your electronics, you can visit FPL. COM/SurgeS 288-8843 for assistance.</li> </ul>	polut-of-use		
29 36 37 37	system Voltavill not beye to be home for the installation and	ys to install your we will leave you a		
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	BITTCHAPPY BUSINESS ANNOTAL SMC. IBAN SESSAGES PAX (BOT) 428-7484			$\Gamma$
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Estables Comment Process
Estables Street Undownloads
TYPE: 12021/05

Title FPLES - RUG-H-Y

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- O If No: A contractor will contact you to schedule a time to install the system within 10 to 15 days. You will not have to be home for the installation and we will leave you a notice that we were there and the installation is complete.
- Please be aware that there will be a 10-15 minute loss of power while the meter unit is being installed.
- After installation, there will be two red lights on the side of the meter device, ensuring the unit is working properly. Our meter readers will be monitoring the lights on a monthly basis. Should you notice either of the lights out during the month, please call 1-888-NO SURGE to report the problem.

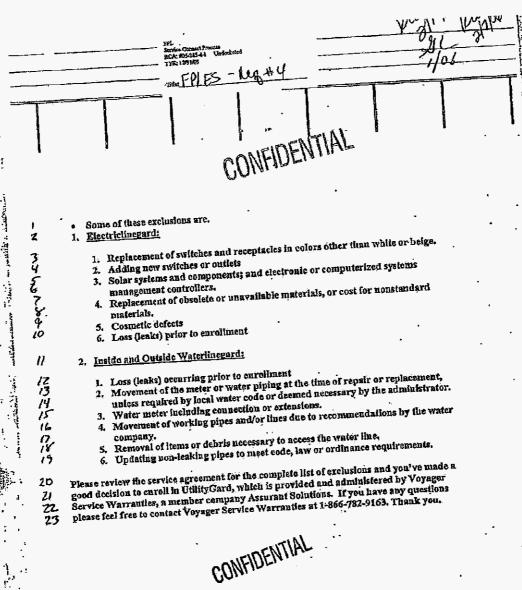
We appreciate the opportunity to serve you. For any further questions, just visit us on-line at <a href="https://www.fpl.com/surgeshield">www.fpl.com/surgeshield</a> or feel free to call us at 1-888-NO SURGE.

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§ · · · ——	Berlie Corposal Process Rock 585-285-43 Underdested	3,
· · · · · · · · · · · · · · · · · · ·	TYELINIAS	
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and the second s	CONFIDENTIAL	
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A L	verette Pirati Statis	
	<u>Unilty Gard Script</u> Verify: Own	1
23	** Single family home / Town home / Trailer home / Duplex	
事的是 4	** Are the electric, lines and water lines in currently good working order?	1
7	** Are the electric times and assect times in contenut Front	
567898	Mr. /Ms. FPL Energy Services is offering a Service Plan for home owners called Utiliky Gard which repairs or replaces your inside electric lines, as well as your inside and outside water lines in the event they become damaged due to normal wear and tear. This plan is only \$8.99 a month, which is conveniently included in your FPL bill. And best of all, there is no deductible, and you will have 24-hour assistance, 365 days a year. All I need to process your caroliment today is to verify some information, okay?	
- 1 4 4 W	Confirmation Statement:	
A R	<ul> <li>Mr. / Mrs. () today's date () and with your permission the next few moments will be tage recorded to confirm your enrollment and ensure the correct information. Okay?</li> </ul>	-
13	<ul> <li>Now that I have your permission to record I'd like to confirm your curoliment in Utility Gard. This program provides services that will help pay the cost to repair or replace your inside electric lines and your inside and outside water lines in the even</li> </ul>	
1 2 Z	monthly fee will be included in your next FPL bill and every 30 days there after unless you cancel. You may cancel by calling 1-866-782-9163. Is that OKAY?	٠. ٠
	Today's date is	
	ElectricLineGuard pays up to \$500 per calendar year for the repair or replacement of the inside electric lines. OutsideWaterLineGard pays up to \$3000 per occurrence and insideWaterLineGard pays up to \$1000 per occurrence for repair or replacement of these water lines.	
	<ul> <li>Your coverage begins in 30 days and you will receive your service agreement in about two weeks. It will explain all of the benefits of the program in detail. As with all services there are some exclusions and limitations.</li> </ul>	÷
	· •	9 812
	Brisday Cy Submics Folyula, Dut: "(July 18) 3855 FAX (SCT) 665-1906	

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		CONFIDENTIAL	
Constant I	1 2 3 4	Adelphia Script  "Mr. / Mrs. () to save you an additional phone call allow me one moment while I transfer you directly to Adelphia, this way they may assist you setting up your cable	•
もなった。	4	services, OK?	• •

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CONFIDENTIAL 4h BeliSouth Script "Mr. / Mrs. (\_\_\_\_) to save you an additional phone call allow me one moment while I transfer you and your information directly to BellSouth, this way they may assist you setting up your local and long distance services, QK? 234 CONFIDENTIAL

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AUDIT FINDING NO. 1

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SUMMARY: The script given to FPL Energy Services (FPLES) representatives who offer products and services to FPL customers does not require the representative to say that they work for FPLES. When calls were observed by PSC staff the representative did say that she worked for Florida Power and Light Energy Services (FPLES). Although the script does not require the representative to state what company he or she works for, the Key Etements section of the training manual says "Always advise customers and partners your name and company" as a critical element.

The way the question is phrased when providing the confirmation number and offering services insures that the customer has to answer yes to the question if they want their confirmation number, which they need. The confirmation number should be provided before they ask the customer if it is alright for them to offer other services.

STATEMENT OF FACT: Part of the Florida Power and Light Energy Services (FPLES) representative training is related to handling the Value Added Programs Opportunities for Retail Sales (VAPORS) calls which are the transfer call for certain customers needing new service from FPL to FPLES. If the customer is pre-qualified for other services based on their answers to other questions, the FPL representative takes the information needed to connect the new service. The FPL representative their puts the customer on hold to wait for the confirmation number and then transfers the call to FPLES. The manual calls for the FPLES representative to greet the customer as follows: "Good morning/atternoon Mr./Mrs.\_\_\_\_\_, my name is \_\_\_\_\_ and I will be providing you with your confirmation number, as well as offering some services to help you with your move. Is that ok? Thank you. Let me know when you are ready to write down your new number. Your confirmation number is \_\_\_\_\_\_ which is also your bill account number. Using this number for future inquiries and requests will ensure a quick response." The FPLES representative then proceeds to ask the customer if they are interested in the next service that appears on the screen such as telephone service, cable service, newspaper deliver, or other FPLES services such as Utility Guard.

EFFECT ON GENERAL LEDGER IF FINDING IS ACCEPTED: This finding does not impact the general ledger.

EFFECT ON FILING IF FINDING IS ACCEPTED: This audit does not have a filing.

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Blorida Power & Light Company Decket No. Undocketed PPLES Service Connect Process Audit Audit Request No. 3 Page 1 of 1

Provide a list and a description of all the services provided by FPL to FPLES

 Explain how it is determined that FPI, is fully reimbursed for all expenses incurred on behalf of FPLES. Provide any related company procedures.

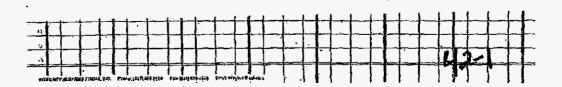
1) General services that FPL provides FPLES include a occurring, financial, consuling, human resources, systems and programs, education and training; land management, legal, payroli, management and administrative, computer services, printing and duplicating, physical facilities, softwars maintenance, license less, and aviation services. These services are primarily balled to FPLES through the Affiliated Management Fee (AMF).

in addition, FPL provides specific services to FPLES as listed in the table below.

Sne	oific Services FPL provides FPLES	Basis for charge
1	Bill mailing and payment processing	Actual use - direct charge: fully loaded rate
2.	Product line item billing	Actual use - direct charge: fully loaded rate
1	Call handing	Actual use - direct charge; fully loaded rate
4	Credit checks	Actual use - direct charge: fully loaded rate
5.	Field Operations management	Actual use - direct charge: fully loaded rate .
8	information management	Actual use - direct charge; fully loaded rate
<u> </u>	Legal	Actual use - direct charge: fully loaded rate
18.	Marketing	Actual use - direct charge; fully loaded rate
9.	Product development	Actual use - direct charge: fully loaded rate
10.	Office space; furniture and equipment	Actual use - direct charge; fully loaded rafe
11.	Long distance telephone	Actual use - direct charge; actual cost
12.	Malarials and supplies	Actual use – direct charge: cost plus FPL Stores loading

2) FPL directly charges FPLES for specific services end any related expenses incurred. FPL psyroll charges, for both direct charges and those billed through the AMF, are fully loaded to capture indirect costs. See attached excerpts from the Cost Accounting Manual provided by FPL.

Please note that the excerpts from the Cost Allocation Manual is considered confidential.



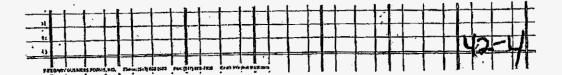
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Box	Confident	tial	
1 2 3 4 5	CONFIDEN	TIAL	Ftorida Rower & Light Company Docket No. Undocketed FPLES Service Connect Process Audit Audit Request No. 6 Page 1 of 1
· 3.	Provide training materials for trapesentatives. Highlight the training re-	he customer stated to confid	care representatives and the FPLES antial procedures.
. <b>4</b>	2) Which companies does FPLES offer	le connect to b	y eres?
. 10	3) What commission does FPLES get to	i the connecti	oh?
·- #	4) Does FPLES offer its own gas service	eż .	
12	5) Does FPLES offer other gas compan	y services?	
18 18		rook submitted rkelive, Custon e in attachmen	
119	FPLES Connect Services Providers		Area
2D	Bejişouth .	Common s	arvice territories between BellSouth and
22	Adelphia	Dede, Bro	verd, Palm Beach Countles
23	Directly	All FPL se	vice lenitory
. 24	The Miami Heraki Newspaper	Dada and	Broward Counties
25	Daylona News Journal Newspaper		nd Flaglar Countles
. 26	Sun Sentinel Newspaper		nd Palm Beach Counties
. 27	Saresola Herald Tribune Newspaper	Englowee	County, Manates County, Charlotte, d, North Port, Venice
30	Scripps Newspaper		Coast, North Palm Beach County, Martin Idian River County
31	The Florida Today Newspaper		nd Indien River Counties
32. . 1\ 33	The FL Myers News Press Newspaper	Ft. Myers Alva, Lab	Napes, Punta Gorda, Bentia Springs, elle
. 4	FDN Communications	All FPL se	ervice lerritory
. 35	FPLES Surgestileld		erytoe territory
1 76	FPLES UtillyGard	All FPL s	stwice ferritory

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יאדרט.		Fiorids Power & Light Company Docket No. Undocketed FPLES Service Connect Process Audit Audit Request No. 8 Page 1 of 1
- Å ·	Describe how FPLES Connect Services signs up cable	customers for other services as felaphone or
4	2) Provida procedures.	· •
O	3) List all companies that FPLES attempts to offer se	rvices to new customers.
H.	4) When FPLES addresses the customer, what comp	ranies do they offer connection to.
12	<ul> <li>5) Also, determine how FPLES is reimbursed ( companies.</li> </ul>	or offening services of other non-attitlated
14	6) Provide procedures.	
印记	A.	
17	1) See the FPLES Representative training materials	•
- 18	2) See the FPLES Representative training material s	•
- 19	<ol> <li>See response to question #6 for a first of all the Ff</li> <li>Bee response to question #6 for a first of all the FP</li> </ol>	<u>-</u>
20	At one seek of the case of the	the Counters Services Service broatests.
21 22	specific sess and whether the compensation is based	See response to question #6 for the
23		
	6) See response to question #8 icialed to the fees re	
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46.	┸╌╂╌╂╌╂╌╂╌╂╌╂╌┼╌┼╌┼╌┼╌┼╌┼	<del>┈┧┈╉═╃┈┦┈╶┠┈╣┈╎┈╎┈╏┈╏┈╏┈╏</del> ┈┼
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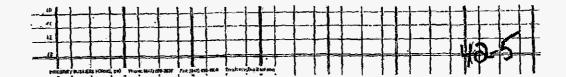
Florida Payter & Light Company Docket No. Undocketed PFI\_RS Service Connect Process Audit Audit Request No. 12 Page I of I

- Q. 1) The answer provided in Document Record Request #5 was based on a study/studies, if so, please provide a copy.
  - 2) Has the company updated this study?
- A.
   1) The document provided in response to request #5 contains any studies conducted.
  - 2) The document provided in response to request #5 in the most updated enalysis at this time.



PPL does not receive a commission for the connection to FPLES. Rather, FPL is reinforsed to the costs and overheads, plus paid certain adders, as addressed in question its.

If should be noted that FPLES provides customers their olacific service connect confirmation number at the ones for FPL. This confirmation number is to castomer osterior be customers with FPLE statements.



	FPL Service County Process RCA: 500-343-41 Understand TYPE: 120-1005  Tels: DAR 14.
- marks	Florida Power & Light Company Deckel No. Undockeled BPLES Service Connect Process Audit Andit Request No. 14 Page 1 of 1
.5 4	Q.
7	1) Are the only calls transferred to FPLEB for new service?
8	2) How many calls are transferred in a year?
9	3) Provide the number of calls for the years 2003 and 2004.
10 11 12 13	A.  1) No. The calls that are transferred from FPL to FPLES are related to customers that are either a) transferring their existing electric service or b) are establishing a new electric service account.  2) The number of calls transferred from FPL to FPLES was provided as a constant of 2004.
14.	3) See response to $\#2$ for the specific amounts for the years requested.

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	FPL Service Connect Process RCA: 865-255-4: Undockete 1 TYS: 1931/85		ML.
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÷,	oes the customer information get entere	-	iem?
4 A. WI	hen the customer is connected to FPLE PLES. Only the information needed to co me, the address, the connect order date	infirm the electric service order	', such as the customer's
17 64 64 64 64 64 64 64 64 64 64 64 64 64	e customer is then asked for their perm stomer gives their permission, then only stomer information needed to fulfill the s LES delebese system. If the customer stomer information used by FPLES to co LES delabese system.	the confirmation number and services agreed to by the custo does not give their permission,	any other FPLES mer is retained in the then none of the
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00	Service Comment Process  ROA 305-333-4-1 Undocksted  TYPE 12/2 UNS	15 Popular
12345678	CONFIDENTIAL	Florida Power & Light Company Docket No. Undocketed FPLES Service Connect Process Audit Andit Request No. 19 Page 1 of 1
3678 9 1011 12 13/15/60 18/90 22 22	the screen it you spoke to the customer.  1) What is the representative supposed to do?  2) My understanding from the observation at the server of the call has end as exact from the screen once the call has end as it is exact from the database at FPLES?  A.  1) The FPLES Representative is instructed to "customer" to ensure that the Representative secret onto the next call. Once the outcome code is secustomer's information from the screen.  2) The customer information that is displayed on the screen of	never clear the screen if you spoke to the lects an outcome code for the call before moving elected, the system automatically clears the national confirm the connect order. Since the customer information is protected and this information. Consequently, the information
	CONFIDENTIAL	CONFIDENTIAL
<u></u>		

COMPANY: TYPLES COST ALLOCATION PERIOD: TYE 12/31/04 DATE: FEBRUARY 16, 2008 AUDITOR: GABRIELA LEON Per Marie Besada's explanation of the Bellsouth FTEs NON-EXEMPT 9 10 11 12 el Number of Cells related to Bellsouth (113-1 R) es 80 minules(lotal seconds per hour) D BY THE ADJUSTMENT FOR THE AGENT'S PRODUCTIVE TIME NON EXEMPT FIRE 23 FOR EXEMPT FIE OMDED BY OR THE SPAN OF CONTROL
WHICH MEANS FOR EVERY REPRESENTATIVES THERE IS ONE SUPERVISOR. 27 28 for exemple TE Conclusion: the cost for the time it to. Fto gather the customer's information is not charged to FPLES. See audit Findings #4 on 43 P2-4. On audit tinding 5 we show the amount to the VAPOLS calos. (see up 43ps). audit Finding + 2 (48 43 p.6) mentions that a customer may believe FPLES in the regulative congany and this benefits FPLES.

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AUDIT FINDING NO. 4

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SUMMARY: The Florida Power and Light call care representative obtains personal Information from the customer before the call is transferred to FPLES. Some of this information such as: name, address and phone number is used by EPLES. In addition, certain information obtained by FPL qualifies the customer for the transfer to FPLES.

No time is allocated to FPLES for obtaining this information. FPLES is charged for 10 seconds per ball which is the estimate of the time from when the FPL representative transfers the call to FPLES and walts for a response from the FPLES representative. The FPL representative then tells the FPLES representative the customer's name.

10 From the observation of new service calls it was determined that to gather customer's information takes from 3 minutes and 18 seconds to 7 minutes and 44 seconds depending on the type of call. Only 10 seconds of this time was charged to FPLES. Some of the information obtained by FPL is a benefit to FPLES. 12

STATEMENT OF FACT: FPL's representative obtains customer information such as: name, social security number, telephone contact, whether the person calling is the owner or the renter, current power status, closing date, billing address, email address, 167181921 deposit information and verification of information. The computer does a credit check based on this information. The time it takes to process each call is ranges from 3 minutes and 18 seconds to 7 minutes and 44 seconds. (See attached summary of calls observed). The cost for the time it takes to gether this information is not charged to FPLES. FPLES is not only benefiting from the transfer call but also from obtaining this 22 23 information without having to spend additional time to obtain it on their own. Based on FPL's analysis of cost for call center representatives and managers every 10 seconds costs FPL \$1,46. See detail attached. Based on three month's data from 2004 there call transferred to FPLES each month. 25 ate an average o

24 EFFECT ON THE GENERAL LEDGER: This finding does not affect the general 27 ledger.

EFFECT ON THE FILING: There is no fling related to this audit.

SUMMARY OF CALLS AND TIMES

1) NEW SERVICE CALL
This call lasted 4 minutes and 20 seconds from the time the customer called up
This call lasted 4 minutes and 20 seconds from the time the customer called up to the time the FPL representative transferred the call and spoke to the FPLES

During the request for new service the customer requested the billing statement be sent to a different address. This added time on to the call.

 NEW SERVICE CALL
 This call lasted 3 minutes and 18 seconds. The customer's billing statement was sent to the customer's address.

This call lasted 5 minutes and 16 seconds. The call was made by a friend of the FPI customer. The FPI representative gave the confirmation number and the call was not transferred to an FPLES representative because the caller was not the customer. 3) NEW SERVICE CALL the customer.

NEW SERVICE CALL.

This call lasted 4 minutes and 18 seconds. During the request for new service the customer requested his billing statement be sent to another address and this 4) NEW SERVICE CALL added time on to the call.

5) NEW SERVICE CALL.

This call lasted 5 minutes and 21 seconds. During the request for new service this call lasted 5 minutes and 21 seconds. During the request for new service the customer asked for the billing statement to be sent to another address. She also asked if the name on the bill should be under the person renting for the landlord which increased the length of the call. The customer seemed confused and only the FPL representative was transferring her to get her confirmation mimber.

6) NEW SERVICE CALL This call lested 4 minutes and 51 seconds. The customer seemed confused between the confirmation number and the account number.

This call leated 7 minutes and 44 seconds. The person calling was not the 7) NEW SERVICE CALL trus can resident immutes and 44 seconds. The person caning was not the customer. The FPL representative gave her the confirmation number instead of transferring her to FPLES, because she was not the customer.



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SIGNE Connect Process

SCA: \$05-215-41 Underlying

TYP: \$2/51/05

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2 3 4 5	10 seconds 3600	# if seconds charged to FPLES per call 60 seconds times 60 minutes (3600) total seconds in one hour
5-	.002777	Percent of time per call in one hour
6. 7	.002777 173	Percent of time per hour per call Total hours in a month
. 4	.0000160565	Percent of time per month per call
10 U	.0000160565 1.15	Queuing factor for time tost for calls going through queue
13	.00001846498	Percent of time with queuing factor per call
14.20 St. 18.	.00001846496 .7125	Percent of time with queuing factor per call Adjustment for egent's productive time
18	.00002591576	Non-exempt full time equivalent (Percent of time per call adjusted for queuing factor and productive time)
(7 20	\$50,736 x	Representative's salary and overhead
11 12	00002591576 \$1,31486000	Full time equivalent time Cost per 10 seconds for the representative
23 24 25	.00002591576 18 = .00000161972	Full time equivalent Span of Control (Supervisor handles 16 representatives) Full time equivalent for Supervisor per representative
26	.0000161972	Full time equivalent for Supervisor
27 28 24	X \$91,163	Supervisor's salaty and overhead
30	<u>.14765853436</u>	Cost per Supervisor
31	The total cost per	10 seconds is \$1,31 representative + .15 supervisor= \$1.46.

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AUDIT FINDING NO. 5

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SUMMARY: FPLES revenues for 2004 related to the VAPORS program are and the related expenses are

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EFFECT ON THE GENERAL LEDGER: This finding does not affect the general ledger.

EFFECT ON THE FILING: There is no filing related to this audit.

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## AUDIT FINDING NO. 2

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SUMMARY: FPL Energy Services offers several programs to FPL customers such as Utility Guard, Power Surge and Shiald Protection. A customer may believe FPL Energy Services is the regulated electric company.

STATEMENT OF FACT: Florida Power and Light Energy Services offers several programs either through the transfer of VAPORS calls or through billing inserts. These programs are for Utility Guard insurance. Power Surge insurance and Shield Protection. Utility Guard is insurance for protection of water lines and electric lines and it's offered to the customers when the call is transferred to the FPLES representative. Also, FPLES includes billing inserts for Power Surge and Shield Protection in FPL's utility bills.

Power Surge is an Insurance to provide protection for the customer's electronics and appliances. It reimburses the customer for repair or replacement for covered losses, up to the maximum of their policy. Shield Protection protects the appliances before surges enter through the customer's home's electric lines or other vulnerable points of entry.

Surge protectors are installed on the meter and are monitored by FPL.

When offering the Utility Guard Plan the representative says that the services are offered by FPL Energy Services. The billing inserts included in the electric bills shows that the Power Surge insurance and the Shield Protection plan are being offered by FPL Energy Services, and office the FPL Energy Services, and office the FPL Energy Services, and office the services are

Customers may not be aware that FPL Energy Services is a non-regulated company. Having FPL in the name may imply to the customer that Energy Services is the regulated utility. A rule proposed by staff on March 24, 2000 related to Chapter 25-6 for a Code of Conduct for electric companies. This rule was never approved by the Commission. However, it stated that "A utility shall not give the appearance that the utility speaks on behalf of its affiliates or visa versa or that the customer will receive preferential treatment as a consequence of conducting business with the affiliates. A utility many not promote or edvertise its affiliate's relationship with the utility nor allow the utility's logo or name to be used by the affiliate in all forms of media unless it is accompanied by a clear written or audio disclaimer that states that the affiliate is not the same company as the utility and is not regulated by the Commission."

31 EFFECT ON GENERAL LEDGER IF FINDING IS ACCEPTED: This finding does not impact the general ledger.

33 EFFECT ON FILING IF FINDING IS ACCEPTED: This audit does not have a filing.

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Fiorida Power & Light Company Docket No. Undocketed PPLES Service Connect Process Audit Audit Itequest No. 15 Page 1 of 1

Please set up a meeting with the person responsible for answering Document Record Request #5, for next Tuesday if possible.

A meeting was conducted on January 13, 2006 to discuss the response to question #5. At the meeting, the Auditors requested the amounts FPL biffed FPLES for 2004 related to the calls transferred to FPLES Connect Services. They also requested the April 2004 entry related to this expense.

Allached is the entry for April 2004 that was billed by FPL to FPLES for the calls transferred to FPLES Connect Services. The April entry is for the billing related to March's call activity.

As noted in the discussion on Jan. 13th, the billing is based on the number of cells transferred from FPL to FPLE8 multiplied by the transfer time associated with these calls. We discussed that FPLE9 uses as the transfer time. If during the transfer process the FPLE9 Representative does not pick up the call within the call is routed back to the FPL. Representative who provides the service connect configuration number and completes the call. The billing is based on a more conservative o ensure that all time and costs incurred by FPL are accounted for in the billing.

Schedule B is an excerpt of the support document that is the basis of the entry. It shows that the number of calls transferred from FPL to FPLES for March 2004 was the The total monthly calls are then distributed across the FPLES products. Schedule B shows the broakdown of the total March call volume across the various FPLES products.

The product specific cell count is multiplied by 10 seconds to determine the workload associated with hendling these calls. This workload amount is converted to non-exempt full time equivalents (FTE) using a formula provided by the FPL Care Center. This formula accounts for the workload associated with hendling these cells over a one month period taking into account a queuing factor (system delay time) and a call handling factor of 29% that applies to all call types.

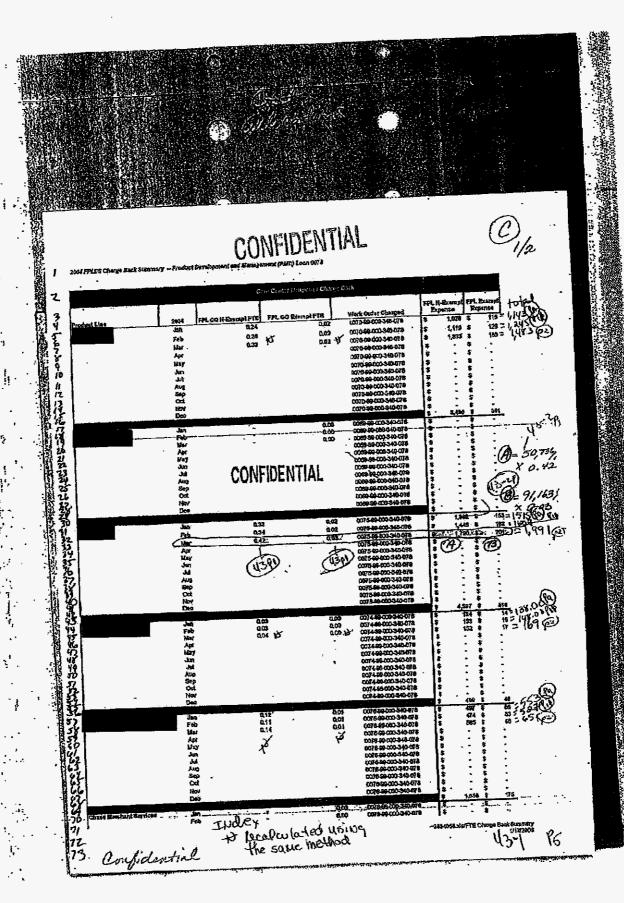
Using the provided in a non-exempt FTE of 0.42. The 0.42 non-exempt FTE is used to determine the Exempt FTE supervision based on a 1 to 16 span of control. The resulting Exempt FTE is 0.03. The FTE amounts are then multiplied by one twelfth of the corresponding fully loaded rates provided in the analysis submitted in response to question #5.

3 200 002 PLORIDA PONDA É LICHT DOMENIE REPORT: 0X43-002-040424 名 SINES DATE STOR DATE, TRECHERCY COMPANY = RI DATE DVI PAGE SEC SEARUE 200404 31 0005 65800 COMPLETED CONFIDENTIAL EXCEPTION APPROVAL INFOR THE PERSON LOC SECT DATE PORTE THE PERSON 12094-04-28 15.52 MERCEPES LEGIC 10 TIME ITERADE 20.72 OPQR THIS IS A PSEUDO TRANSLAPION 1, 100 179 4, 00 179 4, 00 179 5, 00 170 7, 00 170 12, 00 170 12, 00 170 122, 00 170 122, 00 170 122, 00 170 122, 00 170 122, 00 170 123, 00 170 123, 00 171 124, 00 171 125 100 100 ### DEATH OF THE PROPERTY OF T 0042 0013 0042 0044 0595 0042 0044 0078 0078 acts Roc FPIES Volustidates 0078 0076 0326 0326 0010 0010 0078 0078 0078 0078 STATES CORRES 2,155.65- 630 84476 983 900 9000 81055 835 800 3400 CONFIDENTIAL 5 50 BOLLESS TO THE REAL PROPERTY OF THE PARTY OF

TLORIDA TONCA & LICKY CONTANY ON-DEMAND QUEST AFFORE TAGE 003 PAY AMOUNT EAC LOC DESCRIPTION SEL D/C NO 11,486.10 TOPAL DOTRIES. DATCH TOTAL:

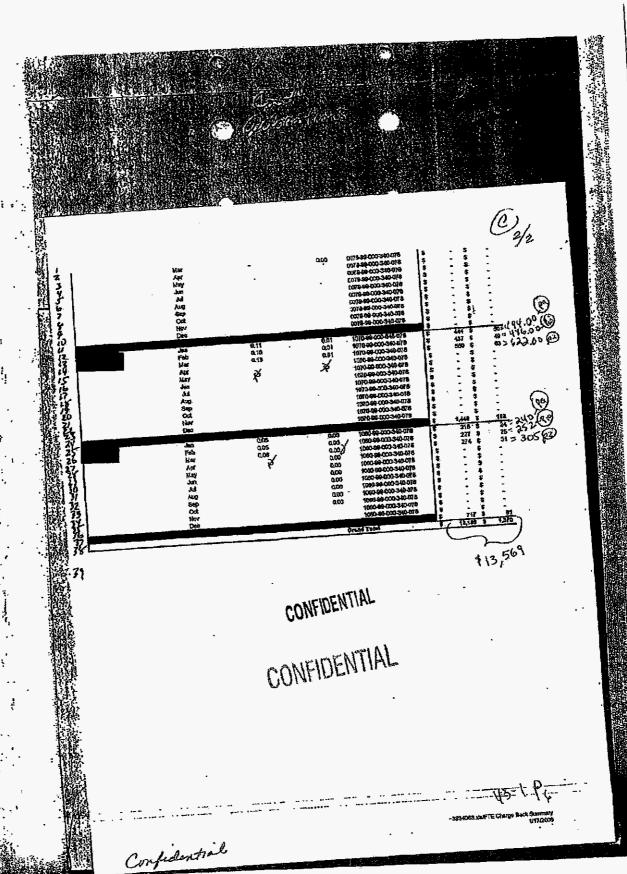
B CONFIDENTIAL 12,168/42,830=28.41%. from FPL to FPLES for Work.

2004. The total calls are distributed across the spies. products. wegge 犯3333 (1) CONFIDENTIAL Confidential U3-14



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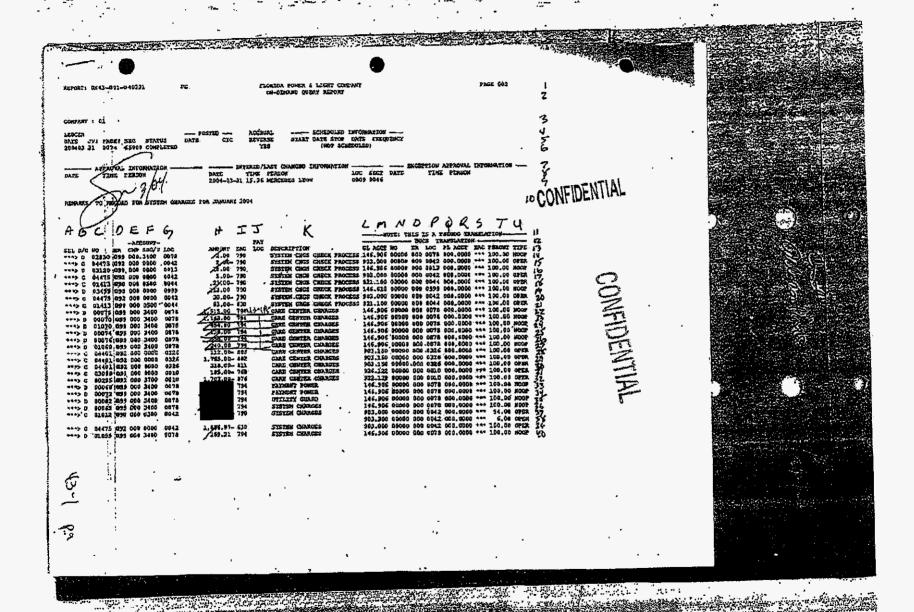


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			SERVICE DRIDERS - 2000		,	•
	w abbent		PERCHPLOYEE		•	
SOUTHERN SERVA			CUST SVCS		4	
DIRECT CO SERVICE ORDER PAYROLL	5 1,428,36 <b>6</b>	EAC 802	BUDGET 15.1 ARG 5 21,935	<u>TOTAL</u> 3 21,925	9 . 5	•
TAXES & INSURANCE	8,64% <u>9 123,198</u>		ş- 1,005	\$ 1,595	6	
PAYROLL & FREIGE BENEFITS	\$ 1,549,582				7	
CONTRACTOR PAYMENTS					¥	_
HON-PAYROLL	5 10,910	790	4 168	\$ 150	9	•
	\$ 7,580,491	•	s 22,103 \$ 1,815 \$ -	5 23,990	ID.	
TOTAL DIRECT COSTS					1)	
Undirect Co			4 497 5 41 5 179	n ș 049	12	
*MANAGER	2.06% \$ 42,170	803		5 \$ 1,453.	13.	
OPERATIONS SUPERVISOR	0;62% \$ 04,485	202	\$ 945 \$ 93 \$ 41	• • .,,,,	14	
""ACHINISTRATIVE & GENERAL PAYROLL	14,06% \$ 200,837		ş 3,08	8 5 3,088	15	
MAXES & INSURANCE	B.64% \$ 17,348		s <sup>r</sup> 287	\$ 26T	lbr	
""AOMINISTRATIVE & GENERAL EXPENSES	25,65% \$ 250,286		3 5,84	8 3 5,648	18	
TOTAL HUREOT COSTS	a 735,119		\$ 1,382 \$ 401 \$ 9,52	2 \$ 11,005	19	
	<del></del>		\$ 23,480 \$ 2,205 \$ <u>1,52</u>		20	
TOTAL COSTS	<u> </u>		<u> </u>		••	
* OŁCYTO	1,082,203			a 3	<u> </u>	•
COST PER CALL-DIRECT COST PER CALL-SIDIRECT	\$ 6.5111 # 0.7118		MINERON.	14	27 23	
TOTAL COST PER CALL	\$ 2,2218		<b>CUMPINEIAI</b>	i im		
AVERAGE LENGTH OF CALL	290 SECONDS		CONFIDENTI	MENTIL	11 25	
COST PER SECOND-SERVICE OR	PERS \$ 0.0037		COM	IDENTI	76 27	
COST PER SECOND INFRASTRUC TOTAL COST PER SECOND	1 00035 1 00035		•		28	
TOTAL COST PER INNUTE	3 0.6529				29	•
# OF FTES - SOUTHERN SERVICE	ORDERS 65				3D `	
FTE COST - DIRECT	\$ 23,992	•	•		31	
FTE COST - INDIRECT	3 11,305	•			72	
FTE COST - SERVICE ORDERS FTE - TELECONSHINCATIONS EX FTE COST - BIFRASTRUCTURE	9 25,303 9 2,958 5 11,477	<b>B</b> 11	\$ 3,958 \$ 11,47	\$ 3,258 7 8 15,477	野	•
TOTAL FTE COST	\$ 50,736	ı	z 3,956 \$ - \$ 11,47	7 \$ 16.458	36	
APPLIED TO PAYROLL	•	RECA	•		22	
"APPLIED TO A 3 3 PAYROLL "APPLIED TO PAYROLL & CONTI	RACIOR 43%	J02	\$ 21,935 \$ \$ -	\$ 21,035	18 19 10	
	. 9%	103 709	\$ 1,592 \$ - \$ - \$ 168 5 - \$ -	4 1,382 5 188	<i>9</i> 0	)
	114	851	\$ 2,950 \$ - \$ -	<u> 5 3,958</u>	AN OR OF ST	184
ş.'	54%	SUBTO	AL \$ 27,442 \$ \$ -	\$ 27,442	13 (18 (13)) 13 (18)	7
	5% 41%		\$ - \$ 2,295 \$ - \$ - \$ - \$ 20,05	\$ 2,795 °	W (0K)	,
	100%			· · · · · · · · · · · · · · · · · · ·	20 T.	
*	193%	-	\$ 27,442 \$ 2,895 \$ 20,81	- 3	אַרּעַנ	
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<b>15</b> 2					1(3)	187.
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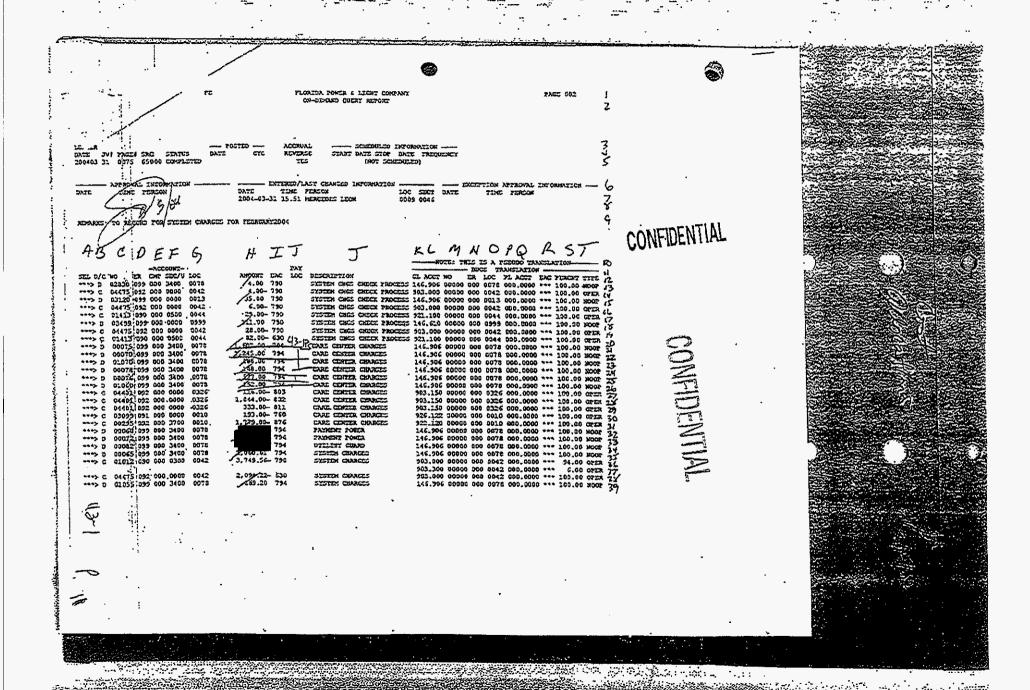
		5-11-	, (15 15										
				Prod	SELVENDA E	53.35		1			Magarita.	en e las tépas	- 17.71
				SERVI	CE ORDER:								
表 Z 3	FULLY LOADED SUPERVISOR (LEVEL 3) FOR SOUTHERN			í	nnNi	FIL	)EN		AL		~		
35	CARE CENTER SERVICE ORDERS.				-	ÇUS	T SVCS					******	
1 7 10 Y	DIRECT COSTS	3			EAC	<u> 171</u>	AXGET		īši	'	<u> </u>	<u>TOTAL</u>	
119	LEVEL 3 MID RANGE		ş	59 <b>,969</b> .	803	\$	50,950				•	\$ 50,960	
Si LO	TAXES & INSURANCE	8.84%	\$	4,401				ş	4,401			\$ 4,401	
差11	NONPAYROLL		\$	\$,000	790	\$	3,000					\$ 3,000	
<u> </u>	TOTAL DIRECT COSTS		5	53,361		s	53,960	\$	4,401	\$		\$ 58,361	
3	INDIRECT COST	E						•			•		
3.74	'MANAGER	2,96%	\$	1,507	803	\$	1,016	5	95	\$	395	\$ 1,507	
原工	*OPERATION SUPERVISOR	0.52%	\$	3,378	803	ş	2,196	ş	216	\$	963	\$ 3,376	
31L 1317	*ADMINISTRATIVE & GENERAL PAYROLL	14.08%	\$	7,176						\$	7,176	\$ 7,175	
19 18	'ADMINISTRATIVE & GENERAL EXPENSES	26.66%	\$	13,697						\$	13,587	\$ 13,587	
(A)	"TAXES & INSURANCE	3.64%	\$	620			euri	ďί	620		,	\$ 620	
21	CALL CENTER RE-ENGINEERING		\$	2,165	CO	WFI	ENTI	11	• .	\$	2,165	\$ 2,165	
\$22 \$23	BUILDING COSTS 140 SQ FT@	\$ 18,68	<b>\$</b> .	2,\$35						\$	2,335	\$ 2,335	
21	OFFICE & WORK STATION	-	s	2,033						\$	2,038	\$_2,038	
125	TOTAL INDIRECT COSTS		ş	32,802		\$	3,211	\$_	931	\$	26,659	\$ 32,802	
126	TOTAL COSTS		\$	91,163		\$	57,171	\$	5,333	\$	28,859	\$ 91,163	
國犯	"APPLIED TO LEVEL 3 MIDRANGE "APPLIED TO A & G PAYROLL				RECAP								
遊技		_		59% 3%	803 780	\$ \$	54,171 3,000	\$ \$	• •	\$ \$		\$ 54,171 \$ 3,000	
第37				63%	SUBTOTAL	\$	57,171	\$		ş	-	\$ 57,171	
33	3	_		6% 31%	T&I A E G	\$	:	\$	5,333	`\$ \$	28,659	\$ 5,333 \$ 28,659	
3	1	=	_	100%	TOTAL	\$	67,171	\$	5,333	\$	28,659	\$ 01:163°	<sup>43</sup> ادن
												<b>B</b> low	4

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ON-SERVED CALLE, EXISTS, CONSESS. 21 SATCH TOTAL:



MINORT: 0X45-051-640331 TOTAL ENTRES: 24, 257.78

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	1 66N	-	CE ORDERS-2	southern 5/1
	2 FULLY LOADED SUPERVISOR 3 (LEVEL 3) FOR SOUTHERN 4 CARE CENTER SERVICE 5 ORDERS.	L	c	COLC (61746) 211
	7 DIRECT	COSTB	EAC	BRUSEL TO
	4 LEVELS MID RANGE I'		. 50-	\$ 50,960 \$ 4,401 \$ 4,401
を変し	NON PAYROLL  TOTAL DIRECT (	\$ 3,00 costs \$ 58,36		\$ 3,000 \$ 3,000 \$ 153,960 \$ 4,401 \$ 3.58,381
	<u>-(1</u>	COSTS	07 803	\$ 1,016 \$ 95 \$ 396 \$ 1,507
	OPERATION SUPERVISOR	1. 6.62% \$ 3,3 (1)		\$ 2,195 \$ 216 \$ 963 \$ 3,376 \$ 7,175 \$ 7,175
が	GENERAL PAYROLL  A ADMINISTRATIVE &  GENERAL EXPENSES	14.08% \$ 7.1 (h) 26,56% \$ 13.6		5 13,587 \$ 13,587 5 620
15.00	TAXES & INSURANCE	FRING S 2	165 CO	S 2,165 \$ 2,185
4	BUILDING COSTS	5QFT@ \$ 18,88 \$ 2.	"/ ,335	\$ 2,335 \$ 2,335 \$ 2,038 \$ 2,038
	2/ OFFICE & WORK STATIO  TOTAL WIDIREC	T COSTS \$ 32	.038 .802	\$ 3,211 \$ 931 \$ 28,659 \$ 32,802 \$ 57,171 \$ 5,333 \$ 28,659 \$ B1,163
	TOTA  APPLIED TO LEVEL 3 N  APPLIED TO A & G PAY	DRANGE	.163 RECAP	c 54.171 \$ \$ \$ \$ \$4,171
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	33 33 33	ENTIAL _	5% T&I 31% A&G 100% TOTAL	3 57,171 \$ 5,333 \$ 28,859 \$ 31,163
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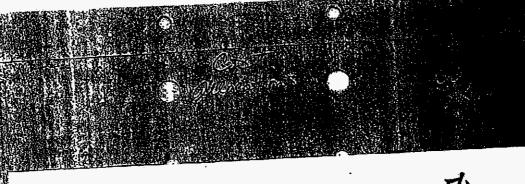
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RECAP SUPV - 99

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COMPOSITE PAYROLL OVERHEAD RATE FOR OPERATIONS SUPERVISOR

COST PER EMPLOYEE

COMPONIC					ÇO	gire	W Can en		
				THUOMA	TOALL	OCAT (9446)	E 13/65)	\$1,453.04	
LEVELS MID RANGE	ş	89,000		%OF TOTAL	EAC	CUS BL	T SVCS IDGET	<u>[2}</u>	ASG
WIO 8127 PAYROLL TEAM SUPERVISOR PAYROLL	\$ 1,429,368 \$ 175,000 \$1	601,366 =	D 4.31%	65.05%	803	\$	945.18		
*ADJAINISTRATIVE & GENERAL PAYROLL		14.00%	0.51%	9,16%			•		\$ 133.08
	TOTAL PAYROLL	8.64%	4.92% 0.42%	6.41%				s 93.13	
*TAXES & INSURANCE *ADJUNISTRATIVE &		28 <u>.55</u> %	1.15%	17.34%					\$ 251,99
GENERAL EXPENSES CALL CENTER RE-ENGINEERIN	13 s 2,185 S 1,601,366	(h)	(B) 0.14%	2.04%					\$ 29,65
TOTAL PAYROLL	•	•		100.00%		.\$	945.1		\$ 414.73
TOTAL OPERATION SUPERVIS	ior							\$1,453.0	1
APPLIED TO 4.92%				Mr.	<b>\</b>				

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- (B) 69,000: 4.31% [evel 5/10101914].
- 1,601,366 = . 14% null center erg.

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		Southærn service orders		86	PER EMPLOYEE CUST SVCS		5/1
		Direct Costs  Fernice Order Payroll  Jes a nisurance  Payroll a frince beriefits	5 1,426,356 5 123,198 \$ 1,649,882	5AC 802	#UNGET T&1 \$ 21,935 \$ 1,883	<u>ABG JOTAL</u> \$ 21,935 \$ 1,865	ľ
		CONTRACTOR PAYMENTS  NON-PAYROLL  TOTAL DIRECT COSTS  RIGHECT COSTS	\$ 10,918 \$ 1,680,441	7\$0	\$ 168 \$ 27,103 \$ 1,896	\$ 168 \$ - \$ 23,998	
233		**************************************	6 \$ \$4,483 6 \$ 200,831	863 863	\$ 427 \$ 46 8 945 \$ 93	\$ 170 \$ 54b \$ 415 \$ 1,463 \$ 3,088 \$ 3,086 \$ 267	
19 19 19 19 19 19 19 19 19 19 19 19 19 1		"TAXES & INSURANCE (Pg) 8.64" "AQMUNISTRATALE & GENERAL EXPENSES 26.65" TOTAL INDURECT COSTS			\$ 1,382 \$ {B1	\$ 5,848 \$ 5,842 \$ 9,522 8 11,305 \$ 9,522 8 23,305	
10 11 22 21	が対象	TOTAL COSTS  # OP CALLS  COST PER CALL DIRECT  COST PER CALL MOREUT  TAL COST PER CALL	1,032,703 5 1,5111 5 0,7118 4 2,2228		CONFIDEN	CONFIDE	- 1971 A <b>l</b>
127		COST PER SECOND SERVICE DRIDERS COST PER SECOND NERVOE DRIDERS TOTAL COST PER SECOND	3 0.9189	ra I	000	CONFIDE	MIAL
1972 334 17	はいな	TOYAL COST PER LINUTE 604 .0 107 = .654 4 672 80 FTES SOUTHERN SERMICE ORDERS FTE COST - DIRECT FTE COST - SERVICE GROERS	\$ 23,838 \$ 11,385 \$ 25,263	• •		\$ 3,088	•
36 37 38		FTE - TELECORMUNICATIONS EXPENSE FTE COST - INFRASTRUCTURE TOTAL FTE COST "APPLIED TO PAYROLL "APPLIED TO PAYROLL "APPLIED TO PAYROLL & CONTRACTOR "APPLIED TO PAYROLL & CONTRACTOR	\$ 2,665 \$ 25,677 \$ 50,735	RECAI 602	\$ 21 995 \$	\$ 15,477 \$ 14,477 \$ 12,477 \$ 15,435	
5. 4. 25.55 A	が記れ	3.3.03 - 00 jg	63	790 6 811 6 SUSTOT	\$ 2.26	\$ 1,382 \$ 168 \$ 5 2,990 \$ 27,442 \$ 3 2085 \$ 70,092 \$ 20,990	•
42 48			1003	_		3 20,999 5 80,730	13-72 N3-2
49.		RECAP - SERVICE OROSES	ad Come a self that feet, a self d	proprior by sales		mpiripasy requirements produce for	JDM1214720081258 PM

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1893 Actuals Service Connect Related: ER 90 \\C 6127 REPARED BY KEN GETCHELL

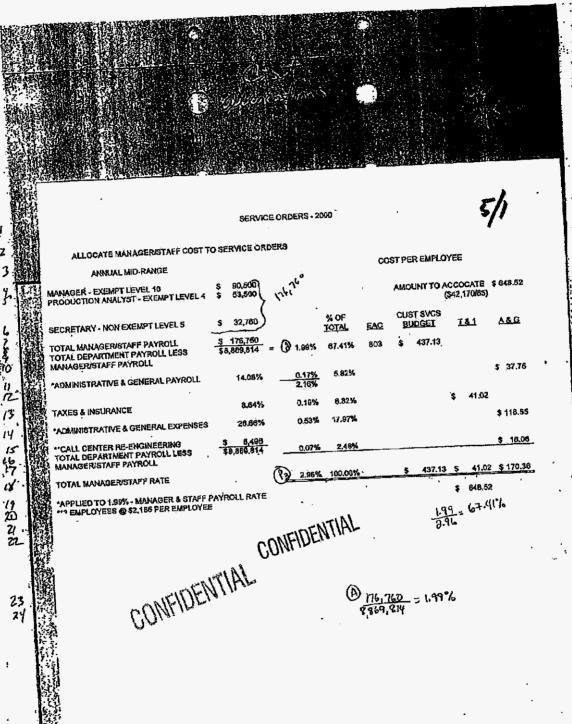
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626 - OFFICE EQUIP-NAINT
529 - OFFICE SUPPLIES
846 - VEHICLE-OCCASNAL USE
ALB - VEHICLE - CONTINUE
562 - CONTRACTOR
668 - EDUCATION AND TRABING
EBY - PROFESSIONAL SERVICES
750 - INSURANCE-LIABILITY
BOZ - RIS PAY NON BARG FIXD
803 - REG PAY-EXELPY FIXED
805 - OT PAY-NON BARG FIX
108 OT PAY EXEMPT FIXED
BID - LONG DIST. TELSERY.
811 - LOCAL TEL SERVICE
813 - TELECOM EQUIPMAINT
814 - GELLULAR MONTEL EXP
820 - NICENTINE PAYMENTS
921 - PAYROLL-OTHER EARNOS
822 - PAYROLL - LULAP SURA ENG
901 - BLISINESS MEALS 902 - HOTEL/LODGING
003 - HC) (FF) (FO)

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****	\$50.00 15,820.74 5,044.00 1,969.58 237.80 1,932,473.71	\$   	500.00 6,724.9 Total Hours FIE's		9	80,458.80 29	-	

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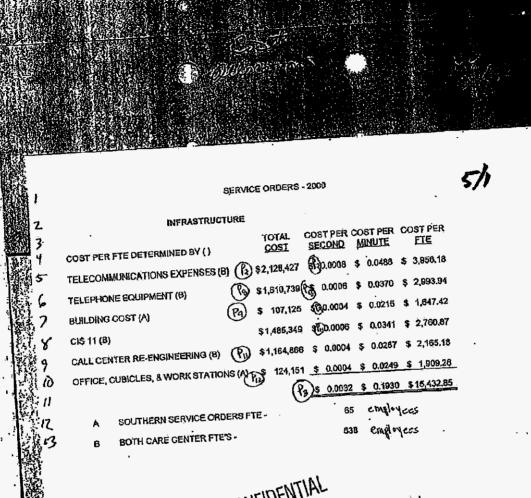


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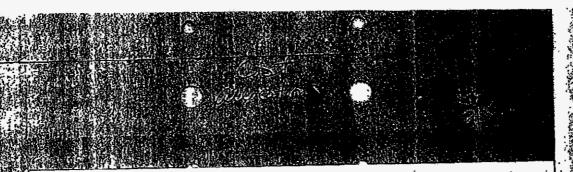
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PER CARE CENTER PERFORMANCE - YEAR END 1999 PREPARED BY KEN GETCHELL

EAC	DESCRIPTION	AMOUNT
720	COMMUNICATIONS - PRINT	<b>\\ ^\</b> \$ 94,171
721	Comm - Print Media (Deleted)	\$ 464
810	LONG DISTANCE TEL SERV (*) \\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	\$1,093,982
811	LOCAL TELEPHONE SERVICE	<b>\$</b> 766,455
812	LEASED PHONE LINES	\$ -
813	TELECOM EQUIP/MAINT	\$ 158,657
814	CELLULAR MON TEL EXP	\$ 14,698

Included ECCR Telecom charges CONFIDENTIAL

® \$2,128,427

TAL CALLS HANDLED - SOUTHERN & CENTRAL - 1999 @ 10,804,026

COST PER CALL

0.1970(A)

AVERAGE LENGTH OF CALL

242 SECONDS \$

0.009

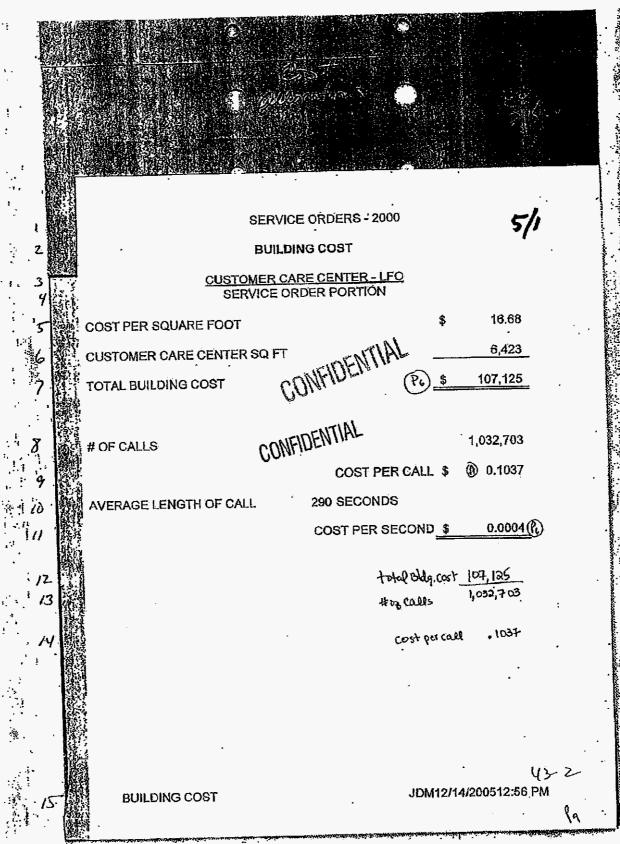
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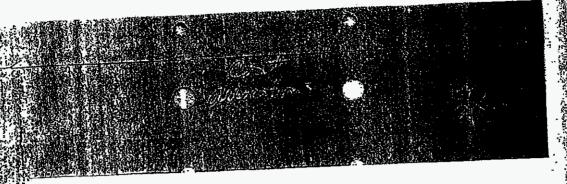
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SERVICE OFFICIAL SAME SECONDS 1					,
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THE EPHONE ECANPAIRTY  AS OF 1299 - CPRIOCATION 8081000201 MT 397.3  ACCOUNTY					
THE EPHONS ECONPAIRN  AS OF 1299 - CPR LOCATION BOSTOGOGOUNT 1967.3  ACCOUNTY SETS PLAST  PLAST  PLAST  BERSENY PLAST  10 BERSENY PLAST  11 JOSE PER \$1000 X \$ 6,422,95 \$ 1,455  REAL PROPERTY TAXES  12 M X \$ 6,492,861 \$ 79,121  12 BERLUNNON INVESTMENT  12 JOHN X \$ 5,793,742 \$ 834,799  ANDRIAN COST-LEO \$ 1,322,893  18 AS OF 1299 - CPR LOCATION 8042204350  19 GROSS  10 BERSENYS PLAST  10 BERSENYS PLAST  11 SAME PER \$ 12,327,849 \$ 818,149  20 DEPRECIATION \$ 1,49,472  PROPERTY HISURANCE  21 JOSE PER \$ 1000 X \$ 1,44,790 \$ 963  22 ASSESS  12 JOSE PER \$ 1000 X \$ 1,44,790 \$ 963  23 ANDRIAN COST-CSE \$ 283,776  34 TOTAL TELEPHONE EQUIPMENT COST \$ 1,600,705  37 TOTAL TELEPHONE EQUIPMENT COST \$ 1,600,705  37 TOTAL TELEPHONE EQUIPMENT COST \$ 1,600,705  37 AVGRADE LENGTH OF CALL 702 SECONDS  OGST PER CALL  A 1,999  AVGRADE LENGTH OF CALL 702 SECONDS  OGST PER SECOND \$ 0,0000 (b)				es e est mass que acres	:
THE REPHOND EQUIPMENT  150  AS OF 1299-CPR LOCATION BOSTOGOGIANT 1957-3  CONTINUES OF 1299-CPR LOCATION BOSTOGOGIANT 1957-3  PERPECUATION  BESSENY PLANT  10 BESSENY PLANT  10 BESSENY PLANT  10 BESSENY PLANT  10 BESSENY PLANT  11 JOSE PER \$1000 X \$ 9,422,95 \$ 1,495  12 REAL PROPERTY HASURANCE  12 REAL PROPERTY MANUAL COST - LFO 3 1,322,895  13 AS OF 1299-CPR LOCATION 804226450  14 SESSENY PLANT  12 OHY X \$ 5,783,742 \$ 932,799  ANNUAL COST - LFO 3 1,322,895  15 AS OF 1299-CPR LOCATION 804226450  16 AS OF 1299-CPR LOCATION 804226450  17 SESSENY PLANT  18 AS OF 1299-CPR LOCATION 804226450  18 AS OF 1299-CPR LOCATION 804226450  PROPERTY INSURANCE  19 GROSS  18 LESS:  PLANT  12 AS OF 1299-CPR LOCATION 804226450  ANNUAL COST - LFO 3 1,322,895  20 GROSS  18 LESS:  PARTIE STRONG X \$ 2,644,765 \$ 963  AS OF 1299-CPR STRONG X \$ 2,644,765 \$ 963  ANNUAL COST - CSE 5 283,778  21 AS X \$ 2,846,779 \$ 35,016  RETURN ON PROPERTY TAXES  12 AS X \$ 2,846,779 \$ 35,016  RETURN ON PROPERTY TAXES  12 ANNUAL COST - CSE 5 283,778  TOTAL CALLS PURHOLED - SOUTHERN & CENTRAL - L509  17 TOTAL CALLS PURHOLED - SOUTHERN & CENTRAL - L509  18 AUSBAGE LENGTH OF CALL 202 SECOND \$ 0,0008 (b)			SCOWLE ORDERS - 2000		
S OF 1299 - CPR LOCATION SOSTORED ACCOUNT 1973  S OF 1299 - CPR LOCATION SOSTORED PLANT SOSTORED		1 2	TELEPHONE EQUIPMENT	5/1	•
1					
DEPRECIATION    10   DEPRECIATION   S   012,049		4	AS OF 12/99 - CPR LOCATION 6081080221 ACCOUNT 397.3		
DEPRECIATION    10   DEPRECIATION   S   012,049		. 6	Less: Net Bross Deserve Plant		إفلاقاها
14 12-04% X \$ 5,798,242 \$ 634,298.  ANNUAL COST - LFO \$ 1,326,989.  AVERAGE LENGTH OF CALL 242 SECONDS COST PER SECOND \$ 0,0006 (Fe)	養養				. 3
14 12-04% X \$ 5,798,242 \$ 634,298.  ANNUAL COST - LFO \$ 1,326,989.  AVERAGE LENGTH OF CALL 242 SECONDS COST PER SECOND \$ 0,0006 (Fe)	整件		DEPRECIATION \$ 612,049	LAIDE	
14 RETURN ON INVESTMENT  12.04% X \$ 5,295,242 \$ 034,298.  ANNUAL COST - LFO \$ 1,326,983  77 CSE  18. AS OF 1289 - CPR LOCATION 6042804380  19. GROSS PLANT PROPERTY RESERVE PLANT  20. LESS. MET PLANT  21. \$ 248,798 \$ 12,027,8489 \$ 818,148  22. DEPRECIATION \$ 149,472  23. PROPERTY INSURANCE  24. 2236 PER \$1000 X \$ 2,64,798 \$ 663  25. REAL PROPERTY TAXES  26. RETURN ON INVESTMENT  27. RETURN ON INVESTMENT  28. ANNUAL COST - CSE \$ 223,778  30. TOTAL TELEPHONE EQUIPMENT COST \$ 1,610,793  31. TOTAL CALLS HANDLED - SOUTHERN & CENTRAL - 1999  33. AVERAGE LENGTH OF CALL 242 SECONDS  COST PER CALL  9,14999  AVERAGE LENGTH OF CALL 242 SECONDS  COST PER SECOND \$ 0,0006 (%)			PROPERTY INSURANCE	Million	nes.
14 RETURN ON INVESTMENT  12.04% X \$ 5,295,242 \$ 034,298.  ANNUAL COST - LFO \$ 1,326,983  77 CSE  18. AS OF 1289 - CPR LOCATION 6042804380  19. GROSS PLANT PROPERTY RESERVE PLANT  20. LESS. MET PLANT  21. \$ 248,798 \$ 12,027,8489 \$ 818,148  22. DEPRECIATION \$ 149,472  23. PROPERTY INSURANCE  24. 2236 PER \$1000 X \$ 2,64,798 \$ 663  25. REAL PROPERTY TAXES  26. RETURN ON INVESTMENT  27. RETURN ON INVESTMENT  28. ANNUAL COST - CSE \$ 223,778  30. TOTAL TELEPHONE EQUIPMENT COST \$ 1,610,793  31. TOTAL CALLS HANDLED - SOUTHERN & CENTRAL - 1999  33. AVERAGE LENGTH OF CALL 242 SECONDS  COST PER CALL  9,14999  AVERAGE LENGTH OF CALL 242 SECONDS  COST PER SECOND \$ 0,0006 (%)			2328 PER \$1000 X \$ 6,432,581 3	100	A Plane
14 RETURN ON INVESTMENT  12.04% X \$ 5,295,242 \$ 034,298.  ANNUAL COST - LFO \$ 1,326,983  77 CSE  18. AS OF 1289 - CPR LOCATION 6042804380  19. GROSS PLANT PROPERTY RESERVE PLANT  20. LESS. MET PLANT  21. \$ 248,798 \$ 12,027,8489 \$ 818,148  22. DEPRECIATION \$ 149,472  23. PROPERTY INSURANCE  24. 2236 PER \$1000 X \$ 2,64,798 \$ 663  25. REAL PROPERTY TAXES  26. RETURN ON INVESTMENT  27. RETURN ON INVESTMENT  28. ANNUAL COST - CSE \$ 223,778  30. TOTAL TELEPHONE EQUIPMENT COST \$ 1,610,793  31. TOTAL CALLS HANDLED - SOUTHERN & CENTRAL - 1999  33. AVERAGE LENGTH OF CALL 242 SECONDS  COST PER CALL  9,14999  AVERAGE LENGTH OF CALL 242 SECONDS  COST PER SECOND \$ 0,0006 (%)		•	REAL PROPERTY TAXES		j.
15. AB OF 12/89 - CPR LOCATION 6012904180  ANNUAL COST - LFO 3 13/26/85  16. AB OF 12/89 - CPR LOCATION 6012904180  CONVENIENT ALL  17. GROSS RESERVE PLANT  20. LESS MET PLANT  21. S 246/78 \$ 12/27/869 \$ 819/149  22. DEPRECIATION \$ 149/472  23. PROPERTY INSURANCE  24. 23/8 PER \$1900 X \$ 2.646/78 \$ 663  25. REAL PROPERTY TAXES  26. RETURN ON PROPERTY TAXES  27. RETURN ON PROPERTY TAXES  28. S 113/149 \$ 98/528  ANNUAL COST - CSE 3 22/37/78  30. TOTAL TELEPHONE EQUIPMENT COST 5 16/10/38  31. TOTAL CALLS HANDLED - SOUTHERN & CENTRAL - 19/99  33. AVERAGE LENGTH OF CALL 242 SECONDS  COST PER CALL  8,14999  AVERAGE LENGTH OF CALL 242 SECONDS  COST PER SECOND \$ 0.0006 (Fb.)			•		!
ANNUAL COST-LEO 3 1,328,883  AS OF 1289 - CPR LOCATION 5042804380  CONFIDENTIAL  18. AS OF 1289 - CPR LOCATION 5042804380  P. AS OF 1289 - CPR LOCATION 6042804380  LESS: MET PLANT  24 \$ 2,446,788 \$ 12,427,849 \$ 419,412  25 DEPRECIATION \$ 1,49,472  PROPERTY INSURANCE  27 REAL PROPERTY TAXES  1,23 % X \$ 2,846,788 \$ 35,015  RETURN ON INVESTMENT  28 ANNUAL COST - CSE \$ 283,776  ANNUAL COST - CSE \$ 233,776  TOTAL TELEPHONE EQUIPMENT COST \$ 1,610,749  71 TOTAL CALLS HANDLED - SOUTHERN & CENTRAL - 1990  37 AVERAGE LENGTH OF CALL 242 SECONDS  29 COST PER CALL 0,14999  AVERAGE LENGTH OF CALL 242 SECONDS  COST PER SECOND \$ 0,0008 }		t	45.4.700	·	
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P   GROSS   PLANT   PLANT		l D	SSE CANCINENTIAL		
19   GROSS   PLANT   PLANT			- AS OF 1289 - CPR LOCATION 6042804380		
24 \$ 2846,768 \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$		19	GROSS RESERVE PLANT	·	
22 DEPRECIATION \$ 149,472  PROPERTY INSURANCE  23 PROPERTY INSURANCE  24 2528 PER \$1800 X \$ 2,846,798 \$ 963  25 REAL PROPERTY TAXES  1,23 W X \$ 2,846,798 \$ 35,015  RETURN ON INVESTMENT  26 RETURN ON INVESTMENT  27 12,04% X \$ 819,149 \$ 98,526  ANNUAL COST - CSE \$ 283,778  29 TOTAL TELEPHONE EQUIPMENT COST \$ 1,610,793  30 TOTAL CALLS HANDLED - SOUTHERN & CENTRAL - 1999 10,804,028  31 TOTAL CALLS HANDLED - SOUTHERN & COST PER CALL 0,14999  33 AVERAGE LENSTH OF CALL 212 SECONDS  COST PER SECOND \$ 0,0006 (b)		49	22 (527 649) \$ \$19,149	•	
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2 2328 PER \$1600 X \$ 2,846,798 \$  REAL PROPERTY TAXES  123 1/4 X \$ 2,845,798 \$ 35,015  RETURN ON INVESTMENT  27 RETURN ON INVESTMENT  12.04% X \$ 819,149 \$ 98,528  ANNUAL COST - CSE \$ 223,775  TOTAL TELEPHONE EQUIPMENT COST \$ 1,610,733  TOTAL CALLS HAMDLED - SOUTHERN & GENTRAL - 1999 10,804,028  COST PER CALL 0,14999  AVERAGE LENGTH OF CALL 242 SECONDS  COST PER SECOND \$ 0,0006 (%)	9 3	. 3			
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TOTAL TELEPHONE EQUIPMENT COST \$ 1610,785  TOTAL CALLS HANDLED - SOUTHERN & GENTRAL - 1990 10,804,026  COST PER CALL 0,14909  AVERAGE LENGTH OF CALL 242 SECONDS  COST PER SECOND \$ 0,0008 (b)		95,9 <del>2</del>	005 € 283 775	•	
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32 COST PER CALL WESSES  33 AVERAGE LENGTH OF CALL 242 SECONDS  COST PER SECOND \$ 0.0006 (b)		25.4X	TOTAL CALLS HANDLED - SOUTHERN & CENTRAL - 1999 10,804,026		
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COST PER SECOND \$ 0.000 (16)		4.7	AVERAGE LENGTH OF CALL 242 SECONDS		
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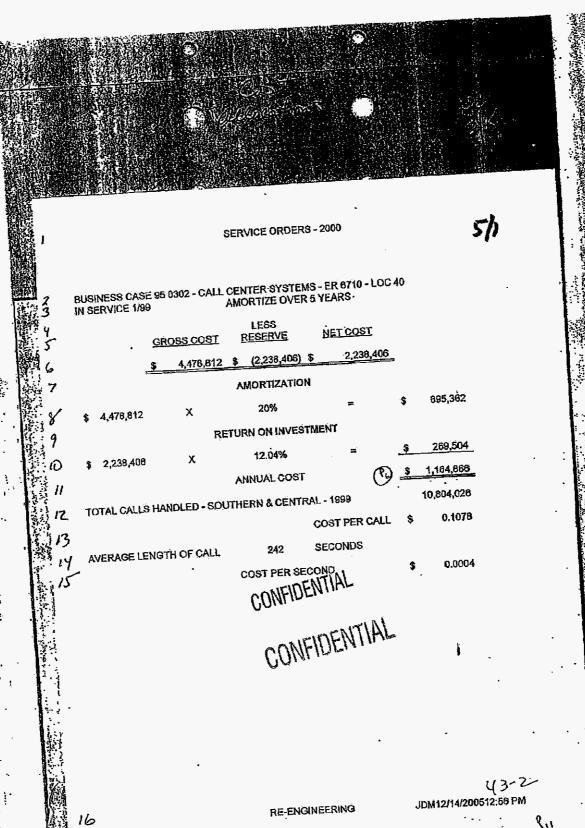
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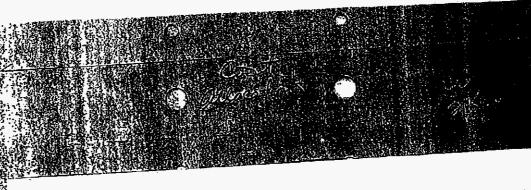




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Ì	<b>E</b>	21	CIS 11 - E	R 4839 40 (8 PART 4	OF CP	R 708100022	20. THIS EI	R W	ENT IN SERVICE		,
	ğ.	22	ON 4/94.	CALCULATION		HAS A LIFE	OF 120 M	ON	THS (10 YEARS)		
ķ.,	Ź	13 ***	•	57,798,138	,		120		481,651		
	*	24 -	Ş	1994		снтком		\$	4,334,880		
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Ş.,		24		1899		MONTHS		3	5,779,814	•	
۸۱2 ت		30				TOTAL RE	SERVE	\$	33,233,928		
18		32	GROSS F	PLANT TAKEN FROM	A ÇAPI	TALIZED SO	FTWARE	REF	ORT PREPARED	•	
		13	BY CARL	MEN VERDOOREN							
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GEORGE REYES SHOWED KEN AND MYSELF
THE SERVICE ORDER AREA ON THE 3RD FLOOR
OF THE LFO. KEN AND I COUNTED THE OFFICES
AND CUBICLES. THERE WERE 6 OFFICES AND
78 CUBICLES. 5 OF THE OFFICES HAD A WORK
STATION (THE OTHER OFFICE WAS A SUPPLY
ROOM) AND ALL CUBICLES HAD A WORK STATION.
AS THE CUBICLES ARE COMPACT, WE WILL
USE 1/2 THE NORMAL RATE.

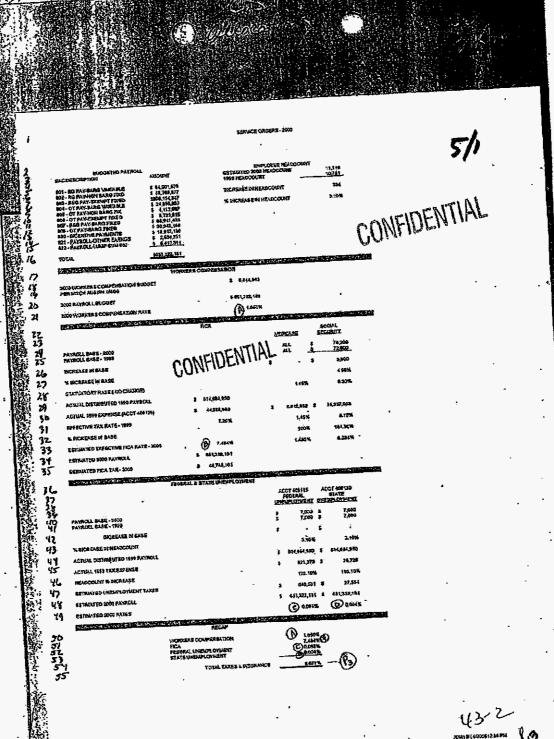
CONFIDENTIAL

## CONFIDENTIAL

## SOUTHERN CARE CENTER

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12		<u>UNITS</u>	UNIT PRICE	70 <u>AM</u>	OTAL OUNT	
1 64	OFFICES	8	\$1,184.16	<b>.</b> \$	7,105	
5	CUBICLES	78	\$ 692.08	\$	48,182	
16	WORKSTATIONS	83	\$ 853,79	<u>\$</u>	70,864	
17		TOTAL.		\$	124,151 (Pc)	
<b>登水</b>	# OF CALLS			1	1,032,703	
· /4		COST PE	R CALL	\$	0.1202	
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はいた	9	GROSS PLANT		RE	LESS SERVE	NO.	FIDE	VT\	NET PLANT	COM Inc.
	//	\$ 5,500		\$	2;750			\$	2,750	•
Ŋ	12			DEP	RECIATI	ЮИ				-
	13	14.29%	OF	\$	5,500		=	\$	785,71	
	14		PERS	ONA	L PROPE	ERTY	TAX			•
	15	1.2%	OF	\$	5,500		=	\$	66,00	
HE WAS	16		PRO	OPER	TY INSU	RAN	ICE			
1	7	0.0245%	OF	\$	5,500		≍	\$	1.35	· · .
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7	( CANADA MANAGEMENT)		The state of the s	*****	**************************************	******	Charles Market	enda Me	AND THE PROPERTY OF	AND ASSESSMENT OF THE PROPERTY OF THE PARTY

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i i	21			RVICE ORDERS - 2009			5/1	•
· ·	Z)	THE FOLLOWING COSTS FOR A SERV MAS PROVIDED BY C A GARAVAGLIA PRICES QUOTED ON 7/30/92	er, workstation, of IMO and is base	and printer ed on	UNIT PRICE		Cartina — integral	
ļ.	25 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	SERVER: HP NETSERVER LC3 PENTIUM 500 MHZ, 300 MB RAM, NIC 9 168 7200 RPM DRIVE (X3) RAPID CONTROLLER HP 15' MONITOR	\$ 3,298 \$ 1,665 \$ 1,665 \$ 645 \$ 183 AL \$ 7,466	70 СОМНЕСТІОМЯ	5 <b>\$</b> 107		State Company of the state of	
1	12 1 16 16 16 16 16 16 16 16 16 16 16 16 1	WORKSTATION: HP YECTRA VIBIB, 10/100NIC, 32X C WITH SOUND AND AUDIO HP "17" MONITOR	\$ 270	•	\$ 1,634			
	37 38 39 10 11	PRINTER: HP LASERJET 4050N	\$ 1,353 -	10 USERS SUBTOTAL SHIPPINGHANDUN 6.5% SALES TAX	\$ 135 \$ 1,876 \$\$ 100 \$ 1,975 \$ 128		أد مال عادلان ، رايالان كالماكسية كيادة	
	47 47 47 47 47 47 47 47	TOTAL COST \$ 2,104 3 YEAR LIFE GROSS LESS	NET PLANT	TOTAL PRICE			· · · · · · · · · · · · · · · · · · ·	
, ,	47 47 47 50	PLANT RESERVE \$ 2,104 \$ 1,052 DEPRECIATIO 33,33% OF \$ 2,104	\$ 1,052 \$ \$ 701.34	COM	CONLIDE; Junt	WIAL	in the second se	
	57 52 , :53	REAL PROPERTY  1.2% OF \$ 2,104  PROPERTY INSUE  0.0245% OF \$ 2,104	e \$ 25.25		-			
	57 54 54	RETURN ON INVES	TNENT					
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	58	IWS	ggyar feli dan dajima sama sama sama sama sa	rationary and a first of the state of the st	<b>医感觉经验检验检验</b> (1988) 2013年 1013年(1984-1984)		200512:50 PM	Alto Contraction

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					A & G RECAP								Z	<b>1</b>			
NUMBECT EXPENSES		JOIN	AAG	CUSTOMER SERVICE	DISTRIBUTION	EVT	NUCLEAR	DELIVE		EGEN	SALES & MARKETING	SAM	3			É	
DEPREGIATION	s	28,817,402 \$	20,228,110	1,948,991	\$ 2,205.251	\$ 31,549	\$ 1,113,001	\$ 1,135	018 \$	1,125,159	\$ 1,032,323	\$ 2,919,314	5				
ELECTRICITY		2,859,763 \$	1,928,132	141,936	\$ 184,223	\$ 2,360	\$ 146,955	\$ 172	,051 \$	164,217	\$ \$3,949	\$ 241,845	6	5			
INTANGIBLE PLANT AMORTIZATION	\$	28,059,724 \$	13,106,002	:	\$ 5,388,034	<b>\$</b> •	\$ 1,338,042	\$ 160	,715 \$	1.112,843	\$ 341,298	\$ 311,296	7				
PROPERTY INSURANCE	\$	52,118 S	35,350	2,749	\$ 3,467	\$ 45	\$ 2,682	\$ 4	,947 3	3,127	\$ 1,629	5 4,579	४			artir ye. Ayr	200
PROPERTY TAXES	5	3,078,958 \$	2,062,142	143,900	\$ 162,325	\$ 2,332	\$ 164,664	5 12	,5G8 \$	210,951	\$ 107,176	5 231,078	9	Ŭ			
ROL-FACILITIES	5	16,894,619 \$	11,229,511	734,187	\$ 1,017,098	\$ 11,897	\$ \$42,432	\$ 1,13)	,313 S	1,235,923	3 \$85,369	\$ 1,318,570	10		- 10 m		1
ROF-INTANGIBLES	<u>.</u>	9,944,055 \$	6.013,531	<u> </u>	5 1,700,535	3 -	<b>5 296,8</b> 08	5 94	,23 <u>6:</u> \$	110,852	5 114,529	3 114,579	t1			10	
TOTAL - INDIRECT EXPENSES		89,716,639 \$	53,602,568	2,959,764	s 10,757,723	\$ 48,122	\$ 4,004,164	\$ 2,639	,847 \$	3,983,112	S 2.252,494	\$ 5,722,258	12	, , , , , , , , , , , , , , , , , , ,			
PRECT EXPENSES	\$	160,038,834 5	130,072,955	1,392,102	\$ 10,691,757	\$ 2,051,800	\$ 6,848,457	5 3,455	879 \$	5,249,289	\$ 336,785	\$ 1,728,897	13				
TOTAL EXPENSES	-5	249,755,473 \$									\$ 2,580,289	\$ 6,951,165	14			- 3	
PAYROLL	5	126,995,115 \$	77.752. <b>523</b> 8	1.00.00A	5 12,288,306	3 2,883,400	\$ 10,024,254	\$ 9,686	,837 \$	10,850,785	\$ 252,728	\$ 3,742,611	15			20.00	EN 55
A & G EXPENSE PATE (A)		196.68%	z36.23%	124,93%	174,02%	78,84%	108.86%		.81%	85.01%	1024,54%	18573%	16				
A & G PAYROLL RATE (B)		14.03%	8.15%	5.939	4.76%	72.05%	6,06%	i 12	L68%.	4,73%	1.46%	4.92%	ı'n				V. P.
ALTERNATE A & G EXPENSE		1,	,										18				
RATE (C) A B		27.59%	19.25%	7.419	8.29%	\$6.60%	6.50%		1.32%	4.02%	14.02%	8,13%	19				
TOTAL		41.63% Leading 1988	27.39%	13.35%	13.06%				1.39% 199%	8.76%		14.05%	20			العرب . درون	
LINE BUSINESS UNIT PAYROLL RATE CALL CENTER RE-ENGINEERING		(7)	The state of the s	5,939					.68%	4.71%		4.92%	21	7		₹.	
A & G PAYROLL RATE		9	8.15%	8.15%	8,12%	8.15%	8,159	6	3.15%	8.15%	B.15%	8.15%	强		i C		
TOTAL PAYROLL RATE		_=_	8,15%	14.089	12,91%			. 2	1.82%	12.80%	9,81%		21	Ţ			
LINE BUSINESS UNIT EXPENSE RATE	C		र्वे अञ्चलका स्थाने के को है। इ.स.च्या के स्थान	7,419	5,29%	56,00%			,32%	4.02%			25				
A A.G EXPENSE RATE			19,21%	19.257	19.25%	19,25%	19.259	1	9.25%	19.25%	19,25%	19,25%	26		<u>.</u>		
TOTAL EXPENSE RATE			10,25%	26.885					7,58%	23.274	34.21%	28.38%	27				de la politica
District Comments of the Comme	رد بلود س	- CO						الماليان والمالي				41.44%	28				
COMPOSITE RATE	•	•	27.39%	40.749	40.45%	155,25%	40,087	• •	2.35%	36.159	43,81%	41.4476	20	ĺ			
<u></u>		•									•		CH	1		A. 1860	
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7																	
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					AGC	OSTS					JDM12	2/14/200512:56 P	M	29			
											•						

CODE CODE LOCATION DESCRIPTION LEAJENE PLAGLER OFFICE ORIGINAL BULDING AND EXCLUDES SYSTEMOSPATCH

PROPERTY MGT WO 1408-91-018

MATERA SVEMB22H SVB34A35

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COST PER RENTABLE COURTE FOOT 16.66

128,000 16,53 11,321,800 0,065

735,904 ELECTRICAL COSTS

DEPRECIATION **ACCT#** DESORIPTION 167,009 3,523,671 \$ 5,633,510 \$ 3,019,539 \$ 12.57% 5,733,003 ROI RATE

PERTY INSURANCE BASE 457,020 PROPERTY INSURANCE RATE

PROPERTY INSURANCE ANOUNT TOTAL FACILITY IS 170,000 NET USABLE SQUARE FEET, THE BUILDING CURRENTLY IN USE OCCUPIED 130,000 SCULRER FEET, (TM,000H70,000 = 82M), APPLED 82M TO PROPERTY TAXES AND PROPERTY MAHAGEMENT, OTHER COST CATEGORIES ARE BASED ON THE OCCUPIED BUILDING.

CONFIDENTIAL.

CONFIDENTIAL

SUMBCERIVE

Page 17

5/1

199912

CPR Location

PL/ Description AC T GROS

RESERVE

NET

6031000221 CUSTOMER SERVICES DEPARTMENT - LFO

COMMUNICATION EQUIPMENT

397 \$6,432,581.32 \$(1,164,339.19) \$ 5,268,242.13

NEW SWITCHGEAR

DEPRECIATION

1/1/99 TO 12/31/99

COMMUNICATION EQUIPMENT

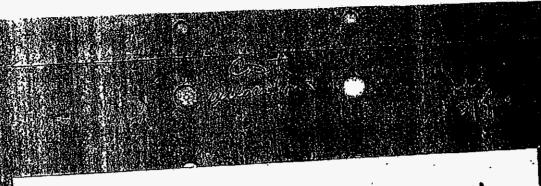
397 \$ . 612,049

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LFO SWITCHGEAR

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43:2 \$



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199912

CPR Location

Description

PLANT ACCT GROSS PLANT

RESERVE

NET

6049204380 EASTERN DIV REGIONAL TELEPHONE CENTER

COMMUNICATION EQUIPMENT

DEPRECIATION

397 .5 2,846,798 \$(2,027,649) \$ 819,149

1/1/99 TO 12/31/99

COMMUNICATION EQUIPMENT

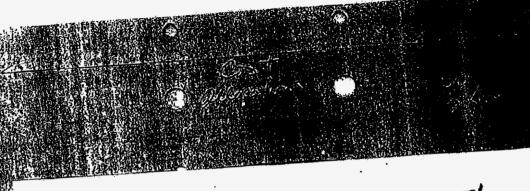
397 \$ 149,472

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LFO TELE EQUIP

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43299



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1989 Service Connect Gails Miami WPB Combined	Number 1,032,703 463,309 1,516,012	344
Contract	10 804 026	242

Total Calls Handled - Combined 10,804,026 242

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Additional Actuals based on 1999 bi-weekly salary
Miami Manager - Exempt 10
Production Analyst - Exempt 4
Secretary - Non exempt 5
32,760

Operations Supervisor Team Supervisor Payroli 69,000
175,000 This is for the 4 team supervisors that report to the Operations Supervisor (George Reyes)

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43-2 Pr

- (	1999 Mismi (Southern) Actuals	•	
3	• • • • • • • • • • • • • • • • • • • •	1999	
2	302 - Charge in NON BARG/REG PAY	147,527.	Total Payroll 9,046,574
			femilit miren
4	303 - Charge in EXEMPT/REB PAY	າຄ <b>√: 176,5</b> 90	•
5	305 - Charge in NON BARG/OT PAY	58.07.1	•
Š	306 - Charge in EXEMPT/OT PAY	8.706	
2	and by the bound of the state o	23.20	
<i>.</i>	321 - Charge in - OTHER EARNINGS		•
Y	402 - Charge Out NON BARG FIXD/REG PA	Y (624;118)	
9	403 - Charge Qut EXEMPTIRES PAY	1141.225)	
ib			
	405 Charge Out NON BARG/OT PAY	(209,455)	CONFIDENTIAL
11	408 - Charge Out EXEMPT/OT PAY	** (36,798)	
12	421 - Charge Out , OTHER EARNINGS.	(33,408)	6 ( ) (
	B15 - PAYROLL REGULAR ADJ	(38)	
	" Adely Medical Selection of the Column of t		Dichtar
14	617 - PAYROLL ADJINONEXEMP	(1,644)	
15	618 - PAYROLL - TEMPORARY	(2,743)	
	820 - MEALS - OVERTIME	16,027	
16			
17	821-BOOK PER., SUBSCRIP.	384	
14	624 - EMPLOYEE RELATIONS	34,629	
19	625 - EXP. ACCTS. & TRAVEL	11,876	
20	628 - JANTORIAL SERVISUPL	1,784	•
ZI.	828 - OFFICE EQUIP-MAINT.	2,293	
22	829 - OFFICE SUPPLIES	31,647	CONFIDENTIAL
23	630 - POSTAGE	145	M
24	631 - DATA PROC EQUIP-MAIN	329	
25	634 - FORMS & DUPLICATING	1,565	~ ~ 1
	636 - OFFICE EQUIPMENT - RENT	23,326	Ullillin
25 27	648 - VEHICLE-OCCASNAL USE	4,16D	(101)
2/4			•
	647 - VEHICLE - RENTAL	78	•
30	646 - VEHICLE - CONTRACT	5,075	
30	662 - CONTRACTOR	10,967	•
χ.	688 - EDUCATION AND TRAINING	4,470	
32			
	875 - FREIGHT & TRANSFER	478	
3.3	676 - MATERIAL & SUPPLIGEN	79	•
31	092 - PROFESSIONAL SERVICES	590,692	
	593 - OUTSIDE SERVICES	1,430	
7.			
71.	894 - Security	480	
37	708 - LAB.RADIO&COMM.EQUIP	461	
25	728 - Print Dupi - Outside (Deleted)	1	
3.	735 - OFFICE FURN, & FDCT.	158	
27			
80	741 - MICRO COMPUTER SFTWR	407	
40	750 - INSURANCE-LIABILITY	386	
わないのかかりかりない	784 - MCR COMPS/PERP MAINT	1,981	
	772 - VEHICLE - CAR RENTAL	79	
, ] ,	790 - MISCELLANEOUS		
44		12,538	
.7	802 - RG PAY-NON BARG FIXD	7,334,891	
YC	803 - REG PAY-EXEMPT FIXED	1,323,498	
47	805 - OT PAY NON BARG FIX		
		665,867	
44	806 - OT PAY-EXEMPT PIXED	71,124	
ŸŸ	810 - LONG DIST. TELSERY,	2,470	nctuded in overall telecore budget
50	811 - LOCAL TEL, SERVICE		induded in overall telecom budget
	813 - TELECOM EQUIPANAINT		
50 51 52		10,108	included in overall telecom budget
5 Z	814 -CELLULAR MONTEL EXP	2,713. 1	included in overall telecom budget
53	820 - INCENTIVE PAYMENTS	46,001	
ĴΫ	821 - PAYROLL-OTHER EARNGS	105,200	·
33	822 - PAYROLL-LUMP SUM INC		
3.4		118,297	
<b>)</b>	841 - MCRO CMP HRDW PURCH	. 171	•
Childr	901 - BUSINESS MEALS	74,350	
w	902 - HOTEL/LODGING		
η		3,534	
77	903 - AIRLINE TRAVEL	296	
60	EAC Total	9,873,275	
		, l	

U3-2- PM

Biorida Power & Light Company Docket No. Undocketed FPLES Service Connect Process Audit Audit Request No. 21 Page 1 of 1 Please arrange for us to observe an FPL representative. We would like to be able to observe when new customers call to initiate service or to transfer service to another residence. Wednesday, January 25th 12:00 PM to 1:00 PM M.Besada and W. Goldscheck will meet you in the LFO lobby @ 11:50 AM Meeting logistics: Date: Time! Location:

MAR 1/06 10 13 15 16.17 19. Does the aptea check ender n n 23 Doesn't transfer callo that had to make a deposition after right away traction owns.
May have been because it busintaction owns. 2Q. 24 25 26

WHOLL YOU. THE MODERNATION of The presentative

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		Fig. 1 Standar Connect Process Real-ton-2574-1 Underhied 7 Vir. 1974/05	
		THE Cost Offication Hannel 4.106	
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<b>第</b> 1. 美		DER#3	Ì
	1 2	Cost Measurement & Allocation Department Cost Accounting Manual	
	2-		٠
		CONFIDENTIAL	;
1	, !	CONFIDENTIAL	
	3	BACKGROUND	
	4	Market Rate Disclosure	
	567	Florida Fower & Light Company (FPL) supports affiliate operations through direct project activities and shared administrative functions. Direct activities are charged to affiliates through specific work orders. Shared	1
	8	administrative functions are attocated imposed and management were	
		transferred by using the employee too constitution impound in the mortest place in order to secure too	
444	: 12 : 13	administrative adders, PPL payroll is structured to be competitive in the bulleves that the services it provides to its employees; thus fully loaded rates reflect market rates. Therefore, FPL believes that the services it provides to its affiliates is in compliance with its policy to charge at the higher of cost or market.	
	14	Description of the six management fees:	
	. 15 16	<ol> <li>Affiliate Management Fee-FPL corporate staff infrastructure that benefits affiliates are transferred at fully loaded rates. This management fee is based on a cost pool of shared services, which is allocated based on</li> </ol>	٠.
	17	the Massachusetta formula. Services examples incince:	
	118	Payrell Freessing     Tax	-
	10 2	Accounting     Environmental	•
	23	Information Management     Comprete Communications     Finance/Treasury	:
	24	General Counsel	•
4.4	26 27 28	<ol> <li>Power Generation Division Management Fac. FPL's Power Generation Division provides support to FPL Energy Inc. (FPLE), Fully leaded costs are charged to the affiliate based on budgeted dollars with a year end true up based on semal accumulated dollars via specific workerders.</li> </ol>	ĺ
	11 Z)	2 France Marketing & Trading - FPL's Energy Trading provides support to FPLE. Fully loaded costs are	
	70	allocated based on installed megawatts.	1
	31	<ol> <li>Integrated Supply Chain -FPL provides procurement and materials management support to FPLB at fully loaded costs allocated based on installed megawatts.</li> </ol>	٤
	32		
		FPLE Seabrook at fully loaded costs allocated based on installed megawatts.  6. ISC Seabrook - FPL provides procurement and materials management support to FPLE Seabrook at fully	i
	35	6. ISC Scabrook - FPL provides procurement and materials management support to be loaded custs allocated based on installed megawaits	-
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	37	CAM Measure Excerpts for #3 Page 1 of S CONFIDENTIAL	
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	FFL Service Couses Process RCL BUCKS 42 Underlitted	A H C	
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	TION: USDI (US A MATO)		T
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	Cost Measurement & Allocation Department Cost Accounting Manual		:
2	- Coal veconsime -	-	*!
	CONFIDENTIAL CONFIDENTIAL	FIDENTIAL	
	COM INCHAING COM	LIDEMIN	
3	An Introduction	Florida Power &	
5	An Introduction  This Cost Allocation Manual was prepared for the use of FPL Group's regulated utility subsidiary. This Cost Allocation Manual was prepared for the use of FPL Group's regulated utility subsidiary. It is to be sufficient to the providing the use of those policies for both Inter-Company and Intra-Utility transaction.	e guidelines to us.	
6	THE PARTICULAR TO A THE TAX TO	S Correct and STOD	
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ģ. <b>∮</b> r. uk	Clear a policidati or more but an existing	and Participants HITTE	
1 (0)		,	
13	charging is not brown and		
1. "" 14	the second perventioned between terms.	na-regulated on-regulated	
15	activities. Apportunities comercia center conte remaining in the negative during, mais Consist	ent with the	
17	operating premise and definition, costs are apportioned based on mass tone	r dentificials to AR	
3 17	Direct - Costs of resources used exclusively for the provision of services that are mighted would be the salary of an engineer wo	ricing on a non-	•
20 21 22	repelated attitible a poster personal of initial little direct costs in the	uman Resources	
23	charging the operants only	I addriller that	
27 25 21	are apportioned water the property of ageinment costs.		
SEL STAN	regulated activities wasted to	nt-regulated activities	
2773	for which no cause to the same of the Management Pool and the party of	and welve the	÷
为	accorded with FFE deep (See Affiliate Management Fee section for more deather	mattributable charges.)	
12	Peopleted and Non-Regulated Entities		
3 23	the designed to document the processes used to apparation costs set were asset the	tod setivities should not to ano money consisted and	
44.478	This manual is designed to document the process shared between regulated and non-regulated activities. The prevailing premise is that resources shared between regulated and covices provided result in subsidization by either entity. This manual describes the standard strokes provided result in subsidization by either entity. This manual describes the standard strokes provided to mon-regulated entities, the utility is inter-company process for charging direct and indirect or non-regulated entities, the utility is inter-company process for charging direct and principles de-	and addition of	٠ .
34	result in subsidization by either entry. In the company process for charging direct and indirect or non-regulated entitles, the utility's inter-company process for charging direct and other apportionment methods. The costing concepts and psinoiples de management fee, and other apportionment methods. The costing concepts and psinoiples de applied consistently to all subsidiaries.		
4. 18	CONFIDENTIAL	•.	
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\$ .5 £ . <sup>57</sup>		COMPIDENTIAL .	
39	CAM Matural Excerpts for #3 Page 7 of S	CALIFORNIA (Man.	
10 4		THI	1014
			19 4
*	2019 GROTY RUSTICES (COMES, 1300). (947) 553-16336. FMS (8-13) 579 +466		1 1
			1. 11.

Cost allocation Cost Measurement & Allocation Department Cost Accounting Manual CONFIDENTIAL Purchase Orders When affiliates procure goods from common vendors of the Utility, they should do so directly under separate affiliate purchase orders. This emerce involving and product delivery will be processed directly to the affiliate, and the affiliate will not be billed for Utility loading costs. It also ensures that the contract terms (warranties and liabilities) of the purchase order(s) are placed with the affiliate, not with the Utility. When an asset used in FPL's regulated operations is transferred to a non-regulated affiliate, FPL will charge the affiliate the greater of market price or net book value. Broupt, FPL may charge the affiliate either the market price or net book value if documentation is maintained to support and justify that such a transaction benefits regulated operations. When an asset that is to be used in FPL's regulated operations is transferred from a non-regulated operations. When an asset that is to be used in FPL's regulated operations is transferred from a non-regulated operations, the asset must be recorded at the lower of market price or net book value. On certain occasions, FPL may record the asset at either market price or net book value if it maintains documentation to support and justify that such a transaction benefits regulated operations. An independent appraiser must verify the market value of a transferred asset with a net book value greater than S 1,000,000. Transfer of Assets CONFIDENTIAL CONFIDENTIAL Page 3 of 5 CAM Manual Excerpts for #3

Cost Measurement & Allocation Department Cost Accounting Manual CONFIDENTIAL CONFIDENTIAL FACILITY AND EQUIPMENT CHARGES Cost Measurement & Allocation is responsible for monthly entries through BR 99 work orders to bill the following activities: Accounting Systems

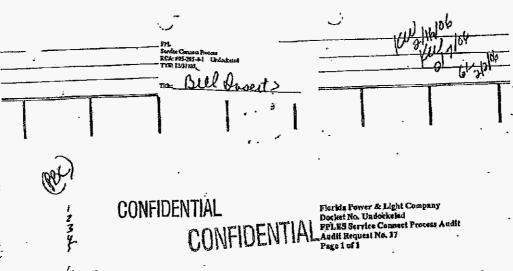
The Affiliates use the Utility's accounting systems on a limited basis for paying end issuing miscellaneous invoices. These systems are the Cash and Accounts Receivable Management (CARMS) and Customer Information System Plus (CIS Plus). The use of these systems is billed on a transactional basis. A cost study is performed by the Cost Measurement and Allocation department of Accounting to determine the cost to the Utility per transaction for these systems. The number of transactions are collected monthly and bitted to the Affiliates at those rates. Furniture and Computers

The Affiliates are billed for office furniture and personal computers on a cost basis period. The charges are based on the number of FPL owned equipment utilized by the Affiliates. Long Distance Telephone Charges
The Affiliates are billed monthly for their long distance service. This is tracked by telecommunications based on employee long distance IDs. Rates are based on somal contracted rates with the phone companies. Office Space is available to the Affiliates in Utility buildings only when vacancles exist. The Affiliates are charged for the square feet they occupy based on a market rate. Currently, FFI. Bacogy, FFI. Energy Services and Fibernet occupy space in utility buildings, primarily the General Office and the June Beach Office. CONFIDENTIAL CONFIDENTIAL CAM Manual Excepts for #1 Page 4 of 5

		Ant 8 .	
		Martob	
<del></del> ;	FPL Service Connect Process	<u> </u>	
<del></del>	RCA: FRE-18141 Vederal	1-101	
	The Bill Shouts	2/2/00	
(PIC).			
ilangh	Do RP	rida Power & Light Company cket No. Undocketed LES Service Connect Process Audit dit Request No. 7 ge 1 of 1	
6 7	Q. 1) Provide all bill inserts by month for 2005.		
4	<ol><li>How does FPL get paid for including these inserts (Individual advertisers).</li></ol>	e, Ones FPLES pay FPL or do the	
10	2) If FFLES does, provide revenues earned.	•	
11.	4) How does FFL determine how much is a reasonable adve	edsing fee?	
<i>I</i> z	<ul> <li>5) Provide the analysis that shows how much it costs to sen</li> </ul>	d a bill.	
13	6) Provide the account you record revenues for these adds	in.	
14	7) Print out the account for the most recent 12 month data a	nd highlight these revenues.	
15	A, 1) See alloched files displaying the FPL bill inserts for 2005	as requested, (44-14)	
17	<ol> <li>FPL signs agreements for the bill insert advertising service directly with potential advertisers, in which case the advertise a third party advertising broker, in which case the advertising</li> </ol>	er pays FPL directly and 2) by utilizing	
20 21	3) in 2005, FPL received revenues from FPLES in the amount of the products are related to advertising for FPLES products.		
72 23 24			
25	5) Allached is the analysis requested that shows how much it costs for FPL to send a bill.		
26	account 458.022.		
2y 21	7) See attached file for the print out of FPL account 456.022 for Jenuary through December 2005 (4418) revenues specific to the FPL Bit Statement Advertising program.		



نزز one page bill cost avalysis 2005 Confidential CONFIDENTIAL 2/4/00 - ちゃんちゃんるこ ちゃけ からい なるおはい ひかれかぶち E4 8 R plus Printing (No SPECIAL HANDLING COST)
Monthly , Annually



- 1) IS FPLES paying FPL for their billing inserts?
- 2) if so, please provide documentation for this and
- 3) Also, show the if this rate is comparable to what other companies are paying FPL for their own billing inserts
- A: 1) Yes.

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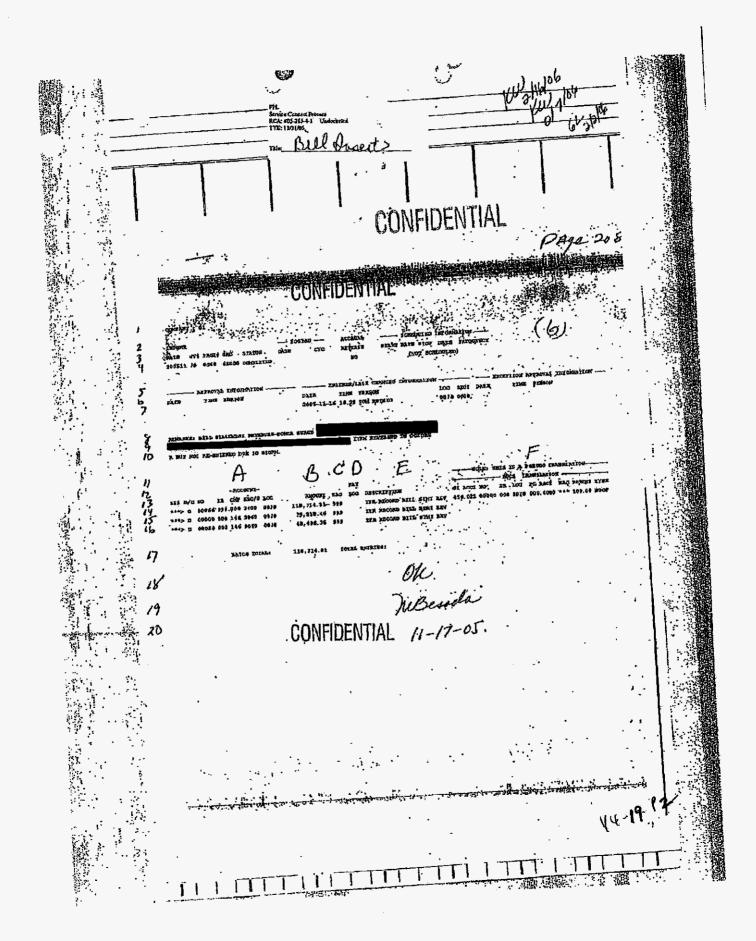
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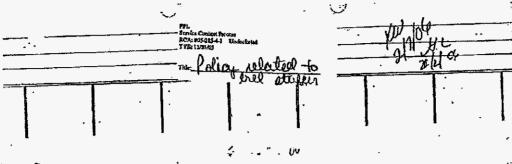
٤.

- 2) See allached journal entry that documents the transaction between FPLES and FPL. Note that the revenue to FPL is recorded in FPL's account 456,022, while the debit is recorded on the books of FPL to the inter-company account 146,905 "FPL Receivable from FPLES-VAPS".
- 3) FPL receives revenue related to "bill inserts" by two mechanisms: 1) directly from the advertiser such as FPLES or, 2) from its third party advertising broker. Repartiless of the arrangement, the rates are comparable. For example, FPL receives a fee of the per thousand inserts from the third party advertising broker. This broker typically bills its client (the third-party advertiser) a total fee of the per thousand inserts. If FPLES is the advertiser, FPL receives the total fee of the per thousand inserts. No broker is involved when FPLES is the advertiser.

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Florida Power & Light Company Docket No. Undocketed FPLES Service Connect Process Audit Audit Request No. 22 Page 1 of 1

- Please provide your policy that shows what you require of compenies that advertise through
  your bill stuffer.
  - 2) is there any FPL review of the companies? (i.e. financial integrity, reputation, alc.)
  - 3) Provide the criteria of the review.
  - 4) Does FPL review the bill stuffers to determine if the advertisement appears to indicate that FPL is endorsing the company, its products or services?
  - 5) Provide criteria used,
- 1) See attached screening criteria worksheat used in the bill insert management review process.

  - See altached screening criteria worksheet.
  - 4) Yes.
  - 5) As part of the management review process, FPL reviews the content of the bill insert. If the bill insert content appears to indicate that FPL endorses the company, its products or services, then the bill insert is not approved.

Service Convert Pressur

REAR (03-28-4-1) Understood

Title Palian Whetherd

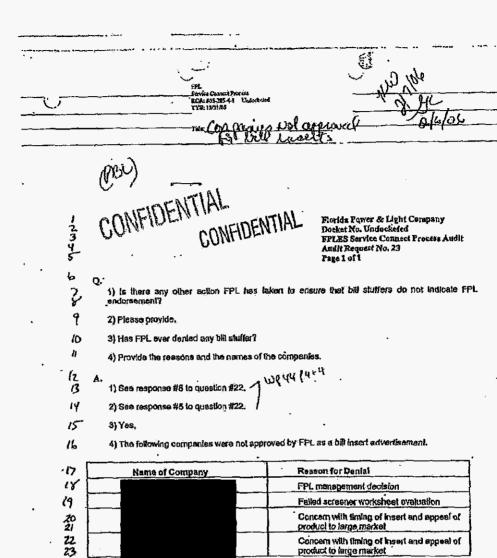
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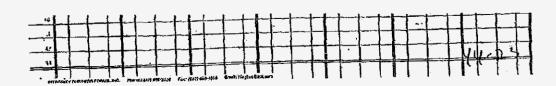
1	ns dissipations of the same same and sa	
~ W.		
- lo	1. Does this product compare with FPL branded products or services?	If Yes Reject
<b>.</b> . e		If Yes Reject
~	3. Is this fulfilled using ONLY direct marketing vehicles?	If Yes Rosest
*	4, is the quality of the creative or value of the offer in question?	l Yes Roject
4	5. Is this product compatible with FPL's care competencies and initiatives?	DaNo, Saves
હ	8. Does this company support a Florida lifestyle?	০=১৭৯, 3=7,৪৪
=₽	7, What is the ranking by Consumer's Reports?	0⊐ko listng, Poor ≈ -2, Fair ≈ -1, 3≈5,ood, 4≈/ey Good, 5≃Ettellent
CON.	*8. is there negative press regarding this product duting the past 5 years? Rank by seventy. List sources and explain on Background sheet.	Enter 0-5, Sertuns, 0=rndst savere. 3=rnodstats
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	1, is this company listed as one of Top Corporate Criminals?	#Yes, Reject
i c NT	2. Is the company activally supporting controversial/political issues?	if Yes, Rajoca
IAL	"3. is there a consumer suit pending? Rank by seventy. List sources and excluding on Baciground alreet.	Enter D.S., Sentone, Gentoost settere, Semoderate
2	4. Does this concomy listed in the CoreBrand Report?	Oatlo, 3=Yes
<b>∤</b> ⊼	5. Is this a Harris Interactive Top Consumer Brand?	C=NQ, S=Yes
4	8. Is this a Business Ethics Bast Corporate Chizen?	Conto, 34785
ផ្គ	'Y, is there negative press regarding this company during the past 6 years? Rank by sevenit. Explain on Background sheet.	Enter 0.5, 5-mont, 0-most severa, 3-moderate
73	Total Score Status	
a'a	Scoring Kay <10 = reject, > 10 accept. If there is nothing to score the company on, then determine:	
2.C	is there any risk of this company delivering on its promise? Will any Stakehiolders, small businesses, or environmental concerns be impacted by this decision?	If Yes then Reject.
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- steer	Worlda Power & Light Company Docket No. Undocketed FPLRS Service Connect Process Andit Andit Request No. 24 Page 1 of 1	
8 9 6	In the answer to document record request 7 item 5.1 received "One Page Bill Cost Analysis for 2006" which says the post per one page Insert is 3.0 cents. The answer to document record request 17, item 3 you say that FPL receives revenues of \$15 per 1000 inserts.	
10	1) Why is the charge of the insert lower than FPL's cost?	
4	2) is FPLES considered a third party advertising broker as well as an adventiser?	
18 18 18 18 18	1) The \$0.3054 cost provided in the "One Page Bill Cost Analysis 2005" document (item 5 of question 7) is the 2005 estimated cost for FPL to generate a one page printed bill weighing one ottoge or less. The fee that FPL receives of \$15 per 1,000 inserts (referenced in question 17, item 3) is a marketing rate for bill insert advertising. Thus, a comparison of the \$0.30 one page bill cost vs the \$15 per 1,000 insert fee is not appropriate.  2) No.	

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CONFIDENTIAL Confidential. Riorida Power & Light Company Docket No. Undocketed EPLES Service Councet Process Audit Audit Request No. 27 Page 1 of 1 67504 The 2005 revenues of the Detail Transaction Report provided to as the answer to Document Report Request #7, item 7. Reconcile. 01173 Number on Detail Transaction -A Month/Year 14 Amount 15 16 Dag. 2004 17 May 2005 3. 18 Juna 2005 August 2005 17 2D Nov. 2005 21 Revenue amounts #2 through #6 from this table above are identified on the attached Datall Transaction Report. (This is the same report provided in response to item #7 of question 7.) in addition, the Datall Transaction Report for December 2004 is provided, indicating amount #1 from 22 CONFIDENTIAL bound 7, item 7 requestics
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FPL GROUP, INC.

CODE OF BUSINESS CONDUCT & ETHICS

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## INTRODUCTION.

FPL Group, Inc. expects all representatives of the Company and its subsidiaries (collectively, the "Company") to act in accordance with the highest standards of personal and professional integrity in all aspects of their activities and to comply with all applicable laws, regulations, and Company policies. This Code of Business Conduct & Ethics (the "Code") applies to all representatives of the Company, including directors, officers and employees, temporary employees and all others who work with or represent us, directly or indirectly.

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#### LEGAL & ETHICAL RESPONSIBILITIES TO THE COMPANY

#### Responsibilities for Compliance

It is your responsibility to read and understand this Code and to comply with it in both letter and spirit. Although this Code addresses a wide range of business, legal, and ethical matters, it cannot anticipate every issue that may arise. In many situations, your judgment and common sense will provide sufficient guidance; if something seems unethical or improper, it probably is. But, if you are unsure of what to do in any situation, you should seek additional guidance and information before you act by contacting your supervisor, the head of your Business Unit or a Compliance Officer (who are listed under "Compliance Assistance" at the end of this Code).

It is also your responsibility to report any actual or suspected violation of a law or regulation, fraud, and any other violation or suspected violation of this Code. You may do so by contacting a Compliance Officer. You may also call our 24-hour "Hotline" at 888.694.6444 or contact any member of the Audit Committee of the Board of Directors of FPL Group (see "Compliance Assistance"). You may choose to remain anonymous.

The Company prohibite any retallatory action against any individual for raising legitimate concerns or questions regarding compliance with this Code or other ethics matters.

#### Records and Reporting

All records, date, and information owned, maintained and used by the Company must be accurate and complete. You are personally responsible for the integrity of the information, records and reports under your control. Records must be maintained in sufficient detail as to reflect accurately the Company's transactions. All financial statements must be prepared in accordance with generally accepted accounting principles and fairly present in all material respects the financial condition and results of the Company. All reports filed with the Securities and Exchange Commission must not contain any missistement of a material fact or omit to state a material fact necessary to

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make the statements made, in light of the circumstances under which such statements were made, not misleading.

If you have any concerns or complaints regarding questionable accounting, internal accounting controls or auditing matters, you are encouraged to submit those concerns or complaints (anonymously, confidentially, or otherwise) to the Audit Committee of the Board of Directors which will, subject to its duties arising under applicable law, regulation and legal proceedings, treat such submissions confidentially. Such submissions may be directed to the attention of Audit Committee or any director who is a member of the Audit Committee. A separate Whistiablower Policy has been adopted by the Company specifying additional procedures and protections for these types of concerns or complaints, copies of which may be obtained from a Compilance Officer.

Business records and other documents may become public through litigation, government investigations and the media. In this context, the Company or a third party may be in a position to refy on or interpret the document with the benefit of hindsight and the disadvantage of imperfect recollection. Accordingly, it is important that you avoid exaggleration, colorful language, guesswork, legal conclusions, and derogatory remarks or characterizations of people and companies. This rule applies to documents and communications of all kinds, including e-mail and informal notes and memoranda.

Records must always be retained and destroyed according to the Company's record retention policies. The Company's retention policies are based on specific statutory and regulatory requirements, some of which are specific to a particular business operation. These retention regularements apply to all Company documents, including e-mail and other electronic records. You are prohibited from destroying any records that are potentially relevant to a violation of law, any current pending or threatened litigation or any pending, threatened or foreseeable government investigation or proceeding.

#### Proper Use of Company Assets

Protecting the Company's assets, both tangible and intangible, against loss, thaft, and misuse is your responsibility. These assets were acquired solely for the purpose of conducting the Company's business. They may not be used for personal benefit, sold, loaned, given away, or disposed of except with proper authorization. Assets include cash, securities, business plans, customer information, supplier information, intellectual property (including computer programs, models and similar items), physical property (including equipment, vehicle, tools and supplies) and services.

Misappropriation of Company assets is theft and a breach of your duty to the Company.

An employee engaging in such action is subject to immediate dismissal and prosecution, if applicable.

Computer software and information provided by the Company and loaded on your computer is Company properly. Licensed software or documentation must be used strictly in accordance with licensing agreements and must not be duplicated without permission. You are responsible for safeguarding logins and passwords which provide access to Company networks.

Internet access and all Company electronic communications systems, such as e-mail and voice mail, are made available to you only to conduct the Company's business and incidental non-solicitational use. Company systems are the property of the Company and all communications are subject to review by appropriate, authorized Company personnel at any time. Users have no expectation of personal privacy in their use of Company communications systems or information sent to or from or stored in Company communications systems.

Use of Company computer resources or communications systems for the following is prohibited: abusive or otherwise objectionable language; information which is tilegal or obscene; messages which are likely to result in the loss of the recipients' work or systems; messages which defame or libel others; use which interferes with the work of

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employees or others, including sexual or other hardsement violative of applicable laws and Company policies; and solicitation of employees for any unauthorized purposes.

If you become aware of the theft or misuse of Company assets, immediately report the matter to your supervisor, your Business Unit Head, Corporate Security, or a Compliance Officer.

#### Proprietary and Confidential Information

You must retain in strictest confidence, and use solely for the benefit of the Company, all proprietary and confidential information relating to the Company which you acquire, directly or indirectly, in connection with your employment or association with the Company. Proprietary or confidential information about the Company may not be disclosed to envone outside the Company without specific authorization by the Company or to other Company personnal unless they have a need to know the information.

Examples of proprietary and confidential information include, but are not limited to, any system, information or process that gives the Company an opportunity to gain an advantage over its competitors; nonpublic information about the Company's strategies, business plans, forecasts, operations, and results; nonpublic information about customers and vendors; nonpublic information about the Company's systems, technology, products and services; and employee medical and other records.

You are responsible for safeguarding all proprietary and confidential information under your control. This includes taking steps to ensure documents are produced, handled and discarded in a manner that minimizes the risk that unauthorized persons might obtain access to them. You should also ensure that access to work areas and computers is properly controlled. Also you should not discuss proprietary or confidential information in public places, such as restaurants or airplanes, or on cellular phones.

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#### **ADDITIONAL LEGAL & ETHICAL RESPONSIBILITIES**

#### Conflicts of Interest

You must be sensitive to any activities, interests or relationships that might conflict, or even appear to conflict, with your ability to act in the best interests of the Company. Since it is impossible to describe every potential conflict of interest, the Company necessarily relies on you to exercise sound judgment and to adhere to the highest ethical standards. To assist you in this regard, a few of the more common situations in which a conflict of interest arises are described below.

Any activity, Interest or relationship of yours that might constitute a conflict of interest must be disclosed in writing to and approved by the Company prior to the time the situation arises whenever possible and, in any event, no later than when you first become aware of it. Conflict of interest situations involving members of the Board of Directors of FPL Group should be disclosed to the Board of Directors and the General Counsel; all other such situations should be disclosed to the person's supervisor and a Compliance Officer. If you are in doubt about a situation, ask a Compliance Officer.

A potential conflict of interest arises if you or any person having a close personal relationship with you (a "related person") has a direct or indirect interest in, or may derive a benefit from, or is employed by a business enterprise which does or seeks to do business with the Company. However, a situation in which a related person is employed by a business enterprise that furnishes products or services to the Company and the general public at prices and terms generally applicable to all its customers, and whose compensation is not determined in whole or in part by reference to the amount of business done with the Company, would not be considered to give rise to a conflict of interest.

Also, ownership of less than 1% of the outstanding publicly-traded securities of a business enterprise doing, or seeking to do, business with the Company is not considered to be a conflict of interest.

A person with whom you have a close personal relationship means your spouse, parents, children, siblings, mothers and fathers-in-law, sons and daughters-in-law, any person living in the same house with you or any business associate of yours.

You owe a duty to the Company to promote its business interests at every opportunity. Accordingly, you may not take for yourself a corporate opportunity that is discovered in the course of your employment or other association with the Company, nor may you compete with the Company. Among other things, you may not take for yourself apportunities that are discovered through the use of corporate property or information or your position, and you may not use corporate property or information for personal gain. Similarly, all copyrights; patents, trade secrets or other intellectual property associated with every idea, concept, technique, invention, process and work of authoriship developed or created by you in the course of performing work for the Company belongs to the Company, and, if requested, shall be specifically assigned by you to the Company.

#### Gifts and Entertainment

Neither you nor any person with whom you have a close personal relationship may accept gifts or anything of value (including entertainment) from a vendor (existing or potential) or customer if that gift or other thing of value is, or could reasonably be considered to be, intended to influence your behavior toward that vendor or customer. Absent such circumstances, gifts may be accepted when permitted by applicable law if they are non-cash gifts of nominal value (\$250 or less, individually or in the aggregate) or customary and reasonable meals and entertainment at which the giver is present, such as an occasional business meal or sporting event. Travel or todging may not be accepted unless previously approved by your Business Unit Head.

If you are offered money or a gift not in conformity with the exceptions noted above, or if either arrives at your office or home, you must report it to your supervisor in writing with a copy to a Compliance Officer.

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#### Insider Trading

Federal securities laws and Company policy prohibit a director, officer or other employee of the Company who is in possession of material, nonpublic information relating to the Company from directly or through family members or other persons or entities: (a) buying or selling securities of the Company or engaging in any other action to take personal advantage of that information or (b) passing that information on ("tipping") to others outside the Company, including family and friends.

In addition, it is the policy of the Company that no director, officer or other employee of the Company who, in the course of working for the Company, learns of material, nonpublic information about a company with which the Company does business, including a customer or vendor of the Company, may trade in that company's securities until the information becomes public or is no longer meterial.

It is not possible to define all categories of material information. However, information should be regarded as material if there is a reasonable likelihood that it would be considered significant by an investor in making a decision to buy, hold or sell securities. Similarly, any information that could be expected to affect the Company's (or another company's) stock price, whether it is positive or negative, should be considered material.

Nonpublic information is information that has not been previously disclosed to the general public and is not otherwise available to the general public. Even after disclosure, information is still considered nonpublic until an adequate time has passed for the securities markets to absorb the information. As a general rule, information should not be considered absorbed until after the close of business on the first "trading day" following the date of public disclosure of the information. A trading day is a day the New York Stock Exchange is open for trading.

This insider trading policy also applies to your family members who reside with you, anyone else who lives in your household, and any family members who do not live in

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your household but whose transactions in Company securities are subject to your control or influence.

it is also illegal to "tip" or pass on inside information to any other person if you know or reasonably expect that the person receiving such information from you will misuse such information by trading in securities or passing such information on further, even if you do not receive any monetary benefit from the tippes.

The foregoing is a summary of certain portions of the Company's Policy on Securities Trading by Company Personnel which is available on the Company's website at <a href="http://www.fplgnoup.com/governance/contenta/securities\_trading.shiml.">http://www.fplgnoup.com/governance/contenta/securities\_trading.shiml.</a> You are expected to be familiar with, and to abide by, the complete policy.

#### Antitrust Laws

The Company is subject to complex laws designed to preserve competition among enterprises and to protect consumers from unfair business arrangements and practices (generally known as "antitust laws"). You are required to comply with these laws at all times.

The potential for anti-competitive conduct can arise in various situations. These include proposals from competitors to share price or other competitive marketing information or to allocate markets or customers and discussions at industry trade association meetings of competitively sensitive topics, such as prices, pricing policies, costs and marketing strategies. All such situations should be avoided.

if a competitor, customer or a supplier tries to discuss subjects with you that raise concerns about enticompetitive conduct, you should refuse to do so and ask the person to stop immediately. If necessary, you should leave or otherwise terminate the conversation and report the matter to the Company's General Counsel or another member of the Law Department.



#### Commitment to the Environment

It has been, and will continue to be, the intent of the Company to conduct its business in an environmentally responsible manner. Accordingly, the Company undertakes to:

- Comply with the spirit and intent, as well as the letter, of environmental laws, regulations and standards.
- Incorporate environmental protection and stewardship as an integral part of the design, construction, operation and maintenance of its facilities.
- Encourage the wise use of energy to minimize the impact on the environment.
- Communicate effectively on environmental issues.
- Conduct periodic self-evaluations and report performance.

The Company has implemented an Environmental Assurance Program to assure compliance with all environmental laws and regulations and the fulfillment of its environmental commitment.

#### Privacy of Employee Information

The Company recognizes and protects the privacy and confidentiality of employee medical and personnel records. Such records must not be shared or discussed outside the Company, except as authorized by the affected employee or as required by taw, rule, regulation or a subpoena or order issued by a court or requested by a judicial, administrative or legislative body. Requests for such records from anyone outside the Company must be approved by internal Company legal counsel.

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#### **WORKPLACE RESPONSIBILITIES**

#### Fair Employment and Diversity

The Company considers diversity in our people critical to our success, and we seek to recruit, develop and retain the most talented people from a diverse candidate pool. Advancement at our Company is based on talent and performance. We are fully committed to equal employment opportunity and compilance with the letter and spirit of the full range of fair employment practices and nondiscrimination laws.

#### Harassment and Intimidation

The Company prohibits sexual or any other kind of harassment or intimidation, whether committed by or against a supervisor, co-worker, customer, vendor or visitor. Harassment, whether based on a person's race, gender, color, creed, religion, national origin, citizenship, age, disability, marital status, sexual orientation, ancestry, veteran status or socioeconomic status, is repugnant and inconsistent with our commitment to providing a respectful, professional and dignified workplace.

if you believe that you are being subjected to herassing behavior, or if you observe or receive a complaint regarding such behavior, you should report it to your supervisor, or to your Business Unit's Human Resource Relationship Manager, or to the EEO Coordinator, or to the Employee Relations Hotiline at 888.652,1055. Also, please consult the Employee Practices section of your FPL Policy Handbook. The Company will promptly investigate all allegations of herassment or discrimination and will take appropriate corrective action. Retaliation against individuals for raising claims of herassment or discrimination is prohibited.

#### Safety

The Company assigns the highest priority to the safety of its people. No job is so important that it has to be worked in an unsafe manner.

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The Company maintains a comprehensive employee safety program for the prevention of accidents. Supervisors and management are responsible for monitoring the use of all reasonable safeguards in the workplace including Company procedures, safe work practices, and personal protective equipment.

Ultimately, however, all employees are responsible for their own safety. Every employee must, for his or her own and fellow workers' health and welfare, abide by the Company procedures and safe work practices, and use all appropriate personal protective equipment. In particular, the Company is committed to maintaining the highest standards of nuclear safety in the design, operation and maintenance of our nuclear power plants. It is each employee's responsibility to bring to the attention of management any concerns relating to the safety of design, operation and maintenance of our nuclear plants.

Alternatively, employees can voice any concerns through the Nuclear Safety SPEAKOUT Program. In addition, anyone is free to bring such matters, at any time, to the attention of the Nuclear Regulatory Commission.

No employee will be discriminated against, in any way, for having brought his or her concerns to the attention of management, Nuclear Safety SPEAKOUT, or the Nuclear Regulatory Commission.

#### Drugs and Alcohol

The Company is firmly committed to providing its employees with a safe workplace to the extent reasonably possible and to promoting high standards of employee health.

The Company expects all employees and contractors to report to work able to perform their duties safely. Substance and alcohol abuse by employees or contractors is regarded as an unsafe work practice by creating an increased risk to their safety and the safety of their fellow workers and the public.

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The Company has explicit policies in this regard, which you are required to know. Employees in certain specific safety-sensitive work situations may be subject to more stringent requirements such as, but not limited to, those associated with the Nuclear Fitness for Duty Program, Commercial Driver's License requirements, or the Omnibus Transportation Employee Testing Act of 1991 and applicable federal regulations.

All such policies will be strictly enforced. You may obtain copies of them from a Compliance Officer.

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#### REPRESENTING THE COMPANY TO CUSTOMERS & OTHERS

#### Treatment of Customers

Our customers are extremely important to us. They are the reason the Company exists and our success depends upon their satisfaction. Customers are always to be treated with the utmost respect and courtesy. They are also to be treated fairly. No customer should be given preferential treatment.

Information that we have regarding our customers is to be kept confidential and used only for Company purposes. Customer satisfaction is the job of every employee.

Those of us who work on or around our customers' property have a special obligation. We should avoid unnecessary demage to a customer's property. If some damage is necessary in order to provide our services, it should be kept to a minimum and the property restored when the work is finished.

#### Honesty with Regulators

In our businesses, we are extensively regulated by a number of commissions, agencies, and other governmental entities. While we may not always agree with these regulators, it is essential that the information that we supply to them be accurate and not misleading. We must cooperate with all our employees and representatives who interface with our regulators and supply them in a timely manner with accurate and complete information which they require to fulfill their responsibilities.

#### Communications with the Public

Before publishing, making speeches, giving interviews or making public appearances that are connected to the Company's business interests, you must get approval from your supervisor.

In addition, in order to ensure the Company's communications with the public are accurate, complete, consistent and in compliance with applicable law, while still



protecting the Company's confidentiality and interests, you should always refer all news media, securities analyst and investor inquiries to Corporate Communications or investor Relations. You should not provide responses unless specifically requested to do so by an appropriate Company representative.

You have the right to participate voluntarily in the political process. No one in the Company may require you to contribute to, support or oppose any political candidate or group. If you choose to participate in the political process, you must do so as an individual, not as a representative of the Company. You may not work on a political fundraiser or other campaign activity while at work or use Company property for these activities. Any overt, visible and partisan political activity that could cause someone to believe that your actions reflect the views or position of the Company requires the prior approval of the General Counsel. Any questions regarding the Company's policies on political activities should be directed to the Vice President, Government Affairs or the Vice President, State Legislative Affaire, of Florida Power & Light Company.

U.S. federal law and the laws of certain states (not including Florida) generally prohibit a corporation from making political contributions. This prohibition includes monetary contributions, "in-kind" contributions (e.g., the use of facilities for a fundraiser, purchase of tickets for receptions or dinners, advertisements in journals or payments for services) and gifts to officials. Generally, our Political Action Committee (FPL PAC), which is funded by personal contributions made by Company employees, is the only permissible source for funding U.S. political contributions on matters important to the Company.

The Company encourages every employee to take an active interest in government processes. 'Any such participation, however, is to be undertaken as an individual - not as a representative of the Company.

10/1

As a general matter, you should not engage in lobbying activity on behalf of the Company. Any lobbying activity that is undertaken on behalf of the Company requires the prior approval of the Vice President, Government Affairs or Vice President, State Legislative Affairs of Florida Power & Light Company or, in the case of local governments, the Vice President, Corporate Communications.

Lobbying activity generally includes attempts to influence the passage or defeat of legislation, and it may trigger registration and reporting requirements. The U.S. government and many states (including Florida) extend the definition of lobbying activity to cover efforts to influence formal rulemaking by executive branch agencies or other official actions of agencies.

10/1

### WAIVERS

### Walvers of this Code

Any welver of any provision of this Code for executive officers (as "officer" is defined in Rule 16(a)-1(f) under the Securities Exchange Act of 1934, as amended) or directors must be approved by the Board of Directors, or a designated committee of the Board. Any such waiver must be promptly disclosed to shareholders in accordance with applicable New York Stock Exchange rules. The Company generally will not grant such walvers and will make exceptions only for good cause.

## COMPLIANCE ASSISTANCE

The following officers of the Company have been designated as "Comptiance Officers" to oversee the implementation and enforcement of this Code and other legal comptiance programs of the Company and to assist you in complying with them. You may contact them by sending an e-mail to Compliance Assistance@FPL.com

Namo

Title

Edward F. Tancer

Vice President & General Counsel

Alissa E. Ballot

Vice President & Corporate Secretary

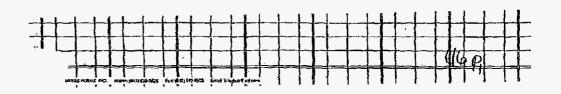
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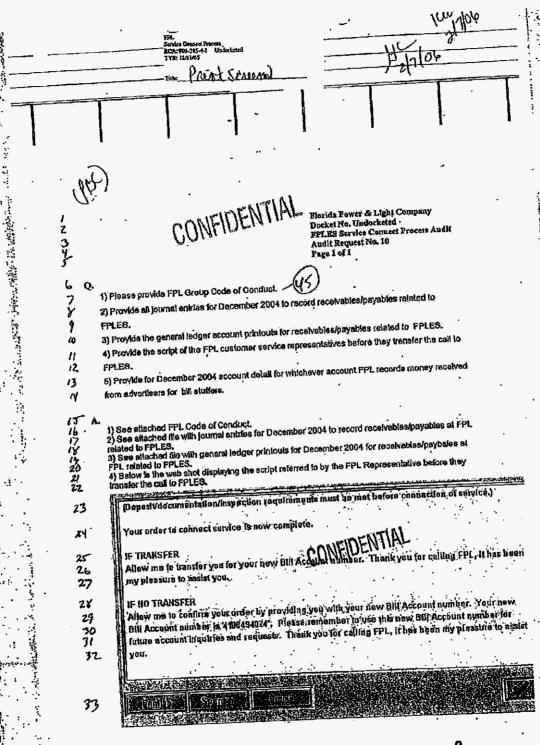
Vice President, Internal Audit

In addition, you may contact any member of the Audit Committee of the FPL Group Board of Directors by calling 561.694.4644 or writing to: Chairman of the Audit Committee, FPL Group, Inc., PO Box 14000, 700 Universe Boulevard, Juno Beach, Florida 33408.

Adopted March 31, 2004; revised July 29, 2005

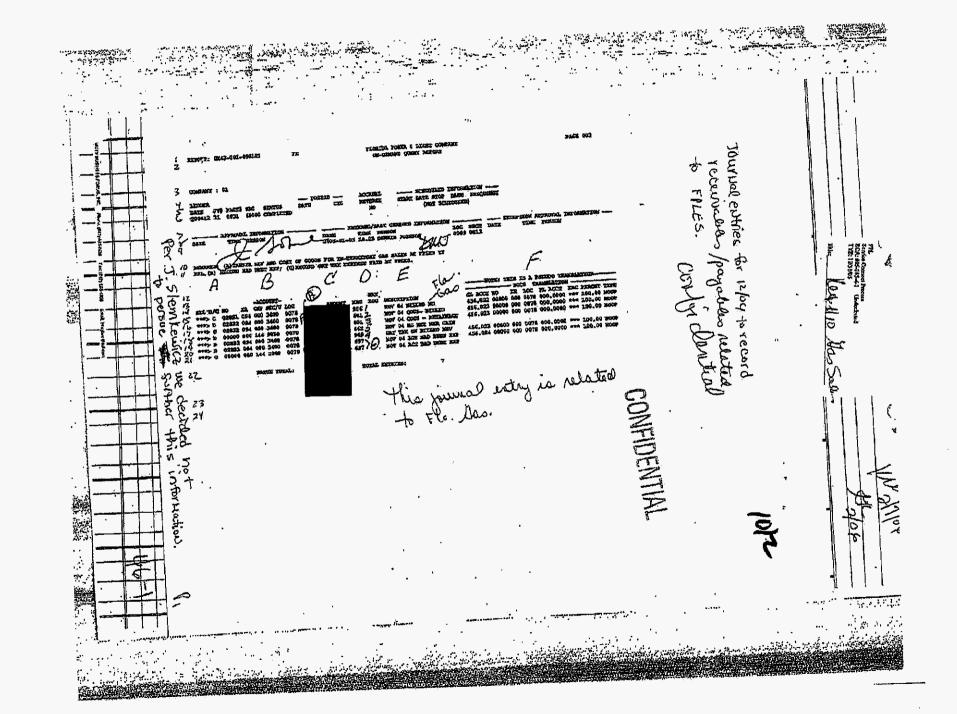
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(PBC)	Coff destroil	<i>.</i>
- Mary	CONFIDENTIAL	Florida Power & Light Company Docket No. Undockeled FPLES Service Connect Process Andil Audit Request No. 2 Page 1 of 1
, 5 e	1) Provide a list and a description of all the services provi	ded by FPLES to FPL.
· Š	2) Provide the total revenue received by FPLES. ("Most received from Gabriella Leon, PSC Auditor.)	receni 12 months ended = 2004"
(b ()	3) Provide the related expenses incurred by FPLES. ("N Cladification received from Gabriella Leon, PSC Auditor)	lost recent 12 months ended = 2004"
12 A. 13 15 16 17	<ol> <li>As part of the FPLES Connect Services process, the confirms the customer's electric service order information confirmation number. This confirmation number is also it number, which the customer can use to transact future to FPL for this service.</li> </ol>	he customer's FPL billing account with FPL. There is no cost to
13 19	2) The total revenue for 2004 realized by FPL Energy Se business was	
26 11	The total excenses for 2004 incurred by FPL Energy business was	Services related to the Connect Services
22_	Note that the revenues and expenses are considered or	onfidential for competitive reasons.
13 21 28	Dr. Oper se's 12/04 Afri APA A general ledger p	elated to FPLES. Next out 5 fev AR+AP.





46-18 /1

 See attached file for December 2004 FPL account detail, where revenues are recorded related FPL's Bill Statement Advertising program. 12.11



FLORIDA GAS ACTUAL GROSS MARGIN & BAD DEBT November Actual Flow Out-of-Yerritory (30): to-Torniony (3-9: 78.53% 100.00% REVIEWS
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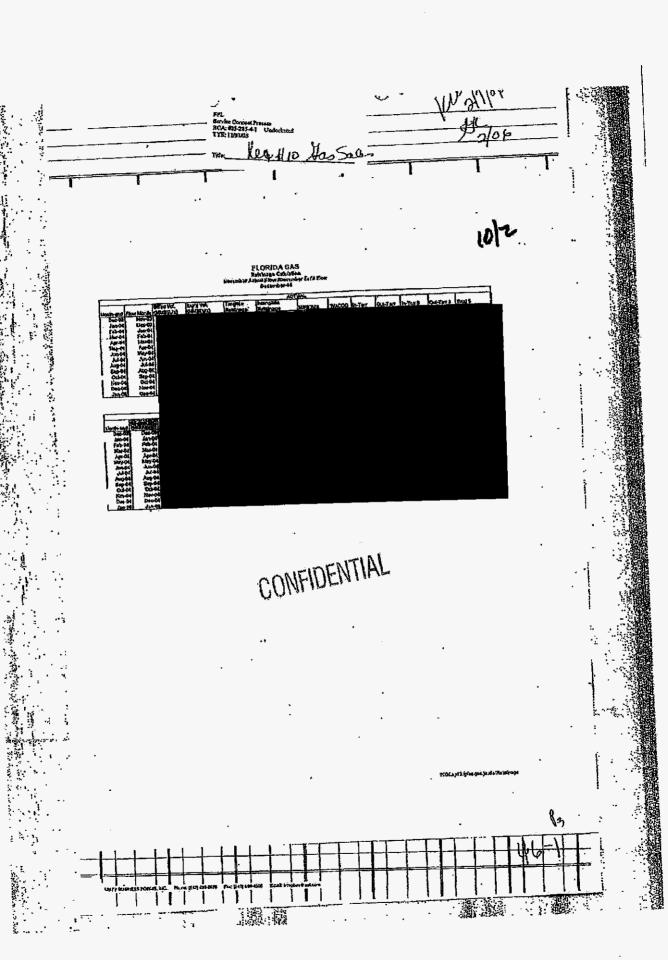
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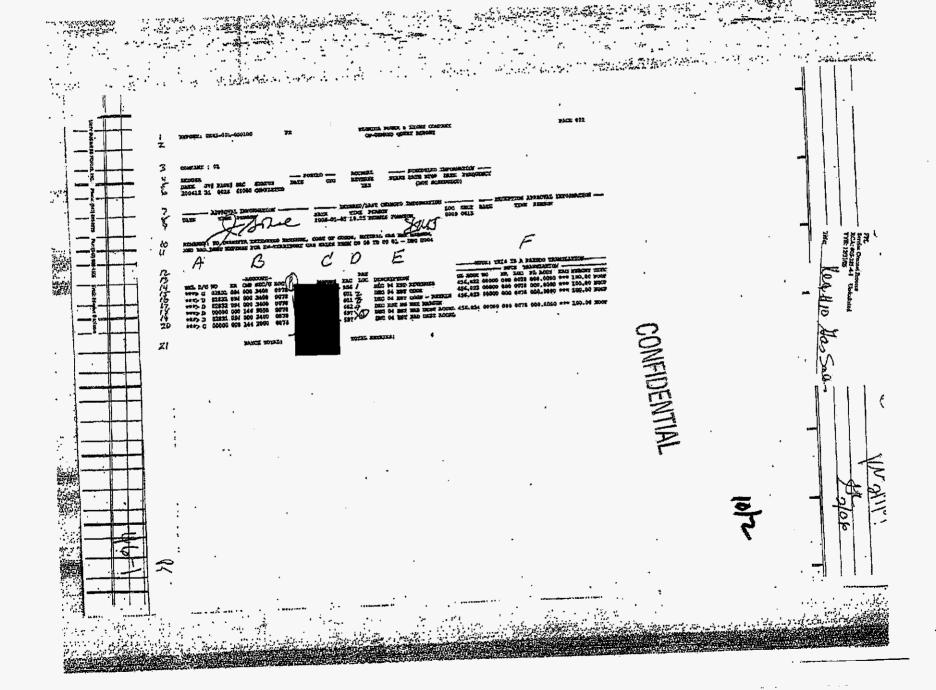
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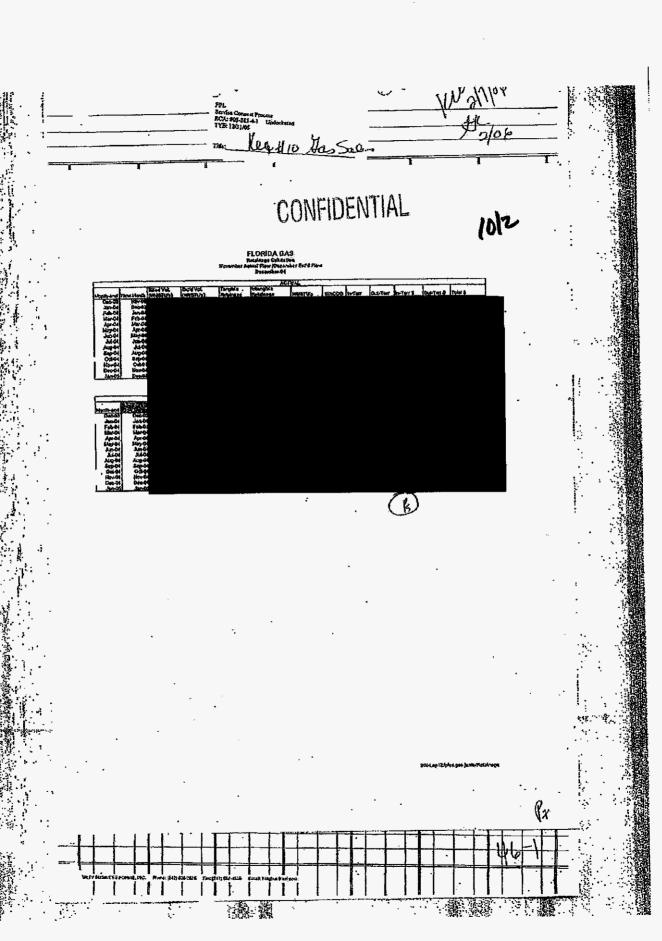
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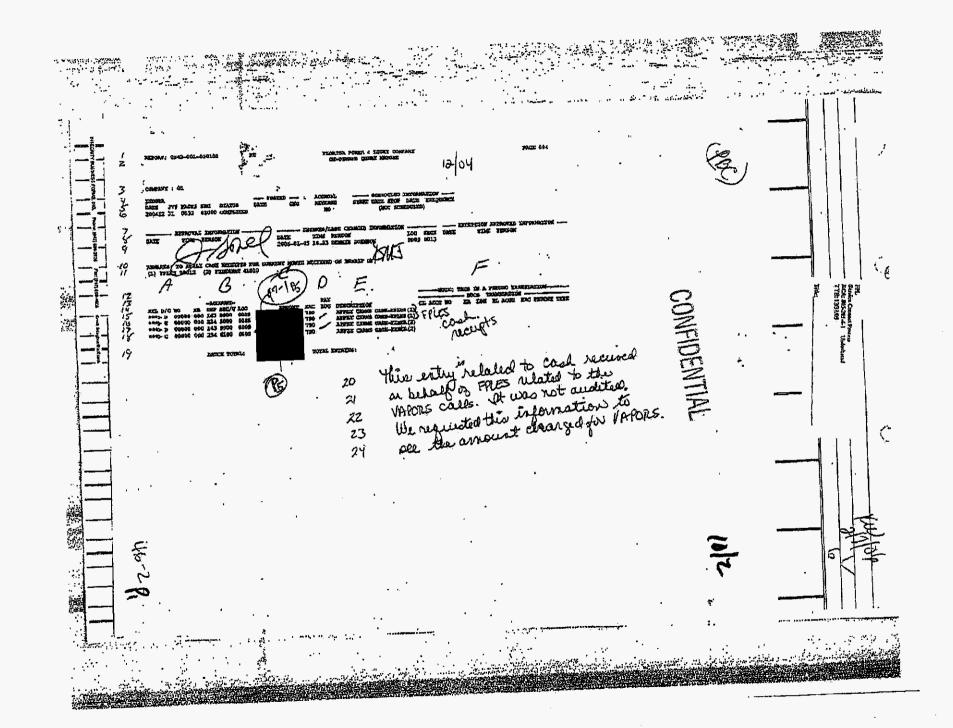
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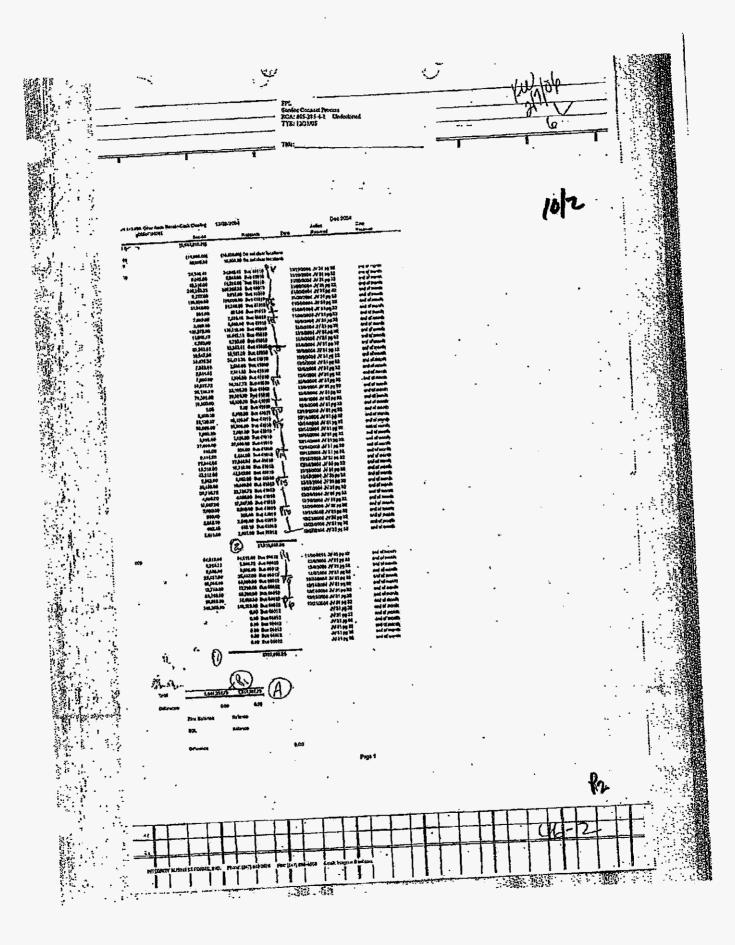


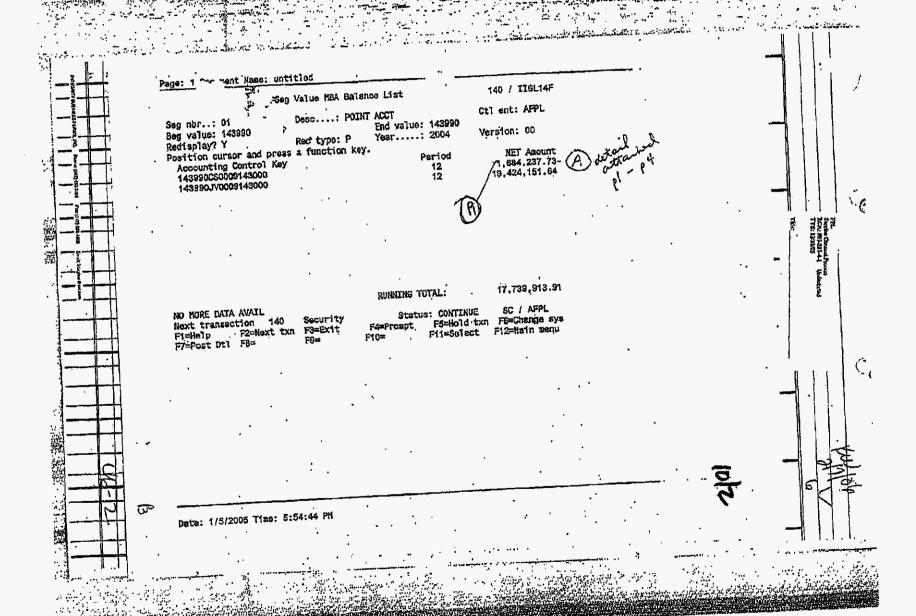
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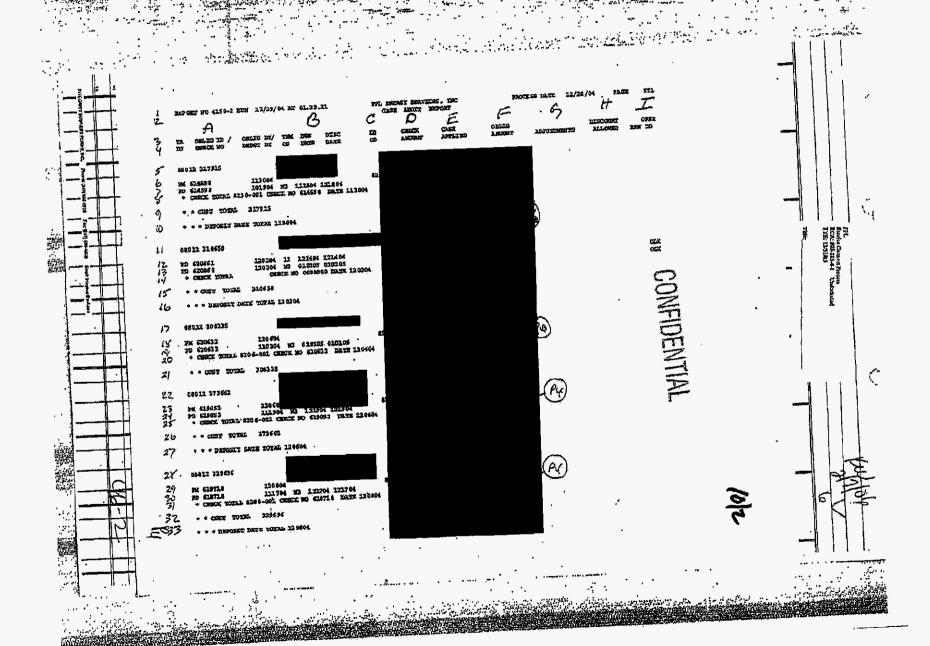


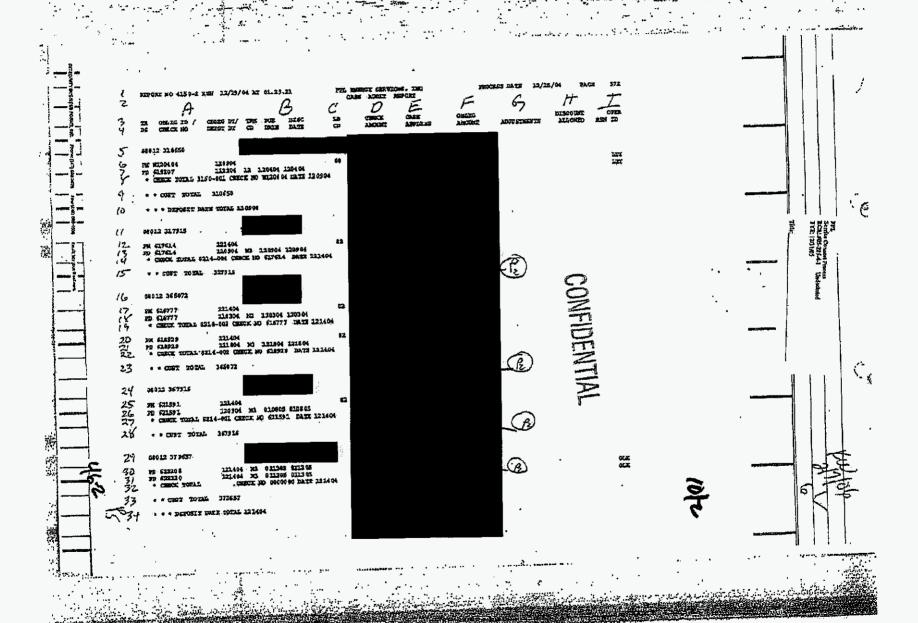
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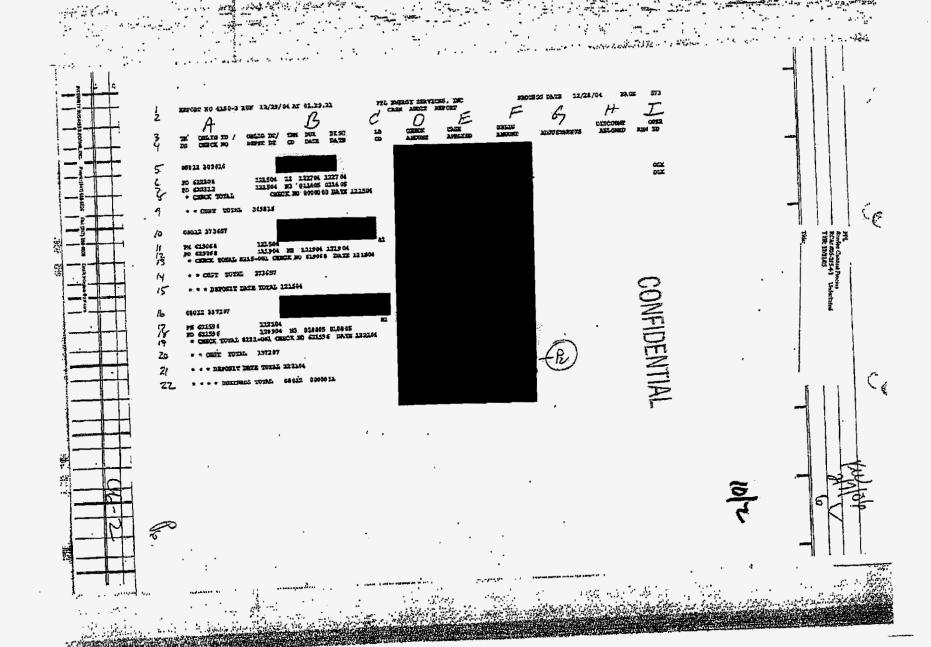


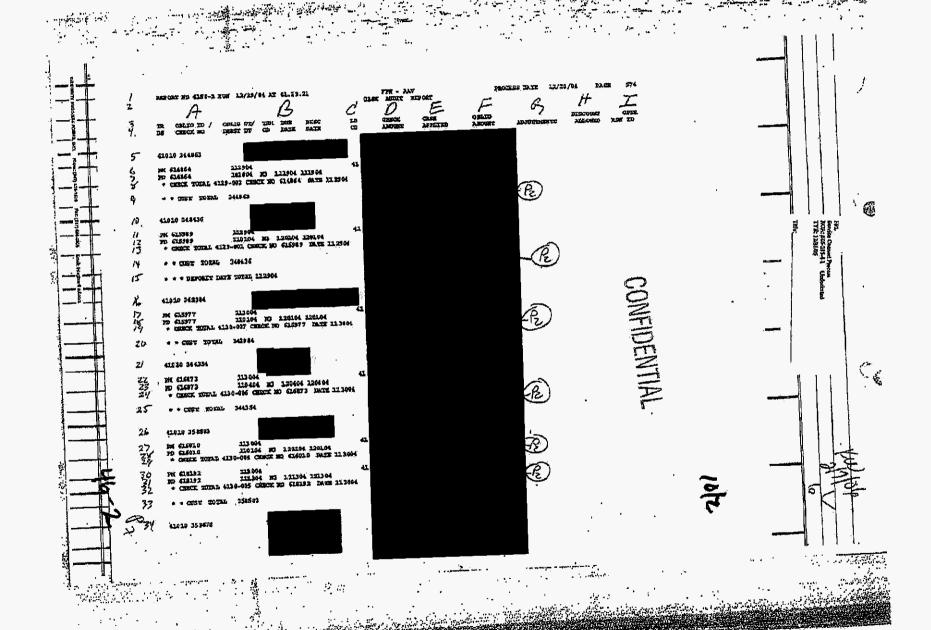


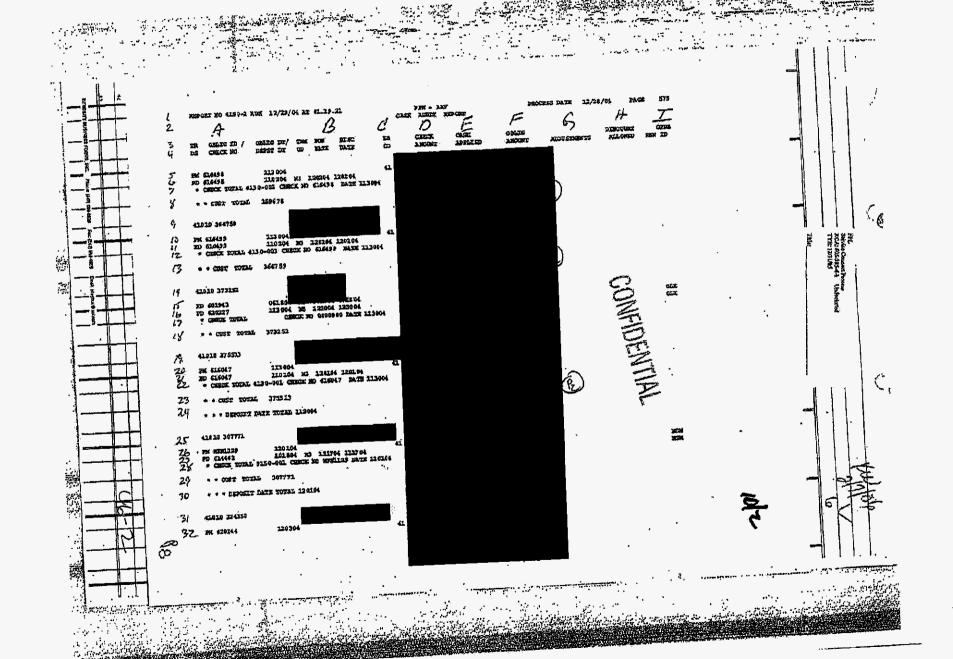


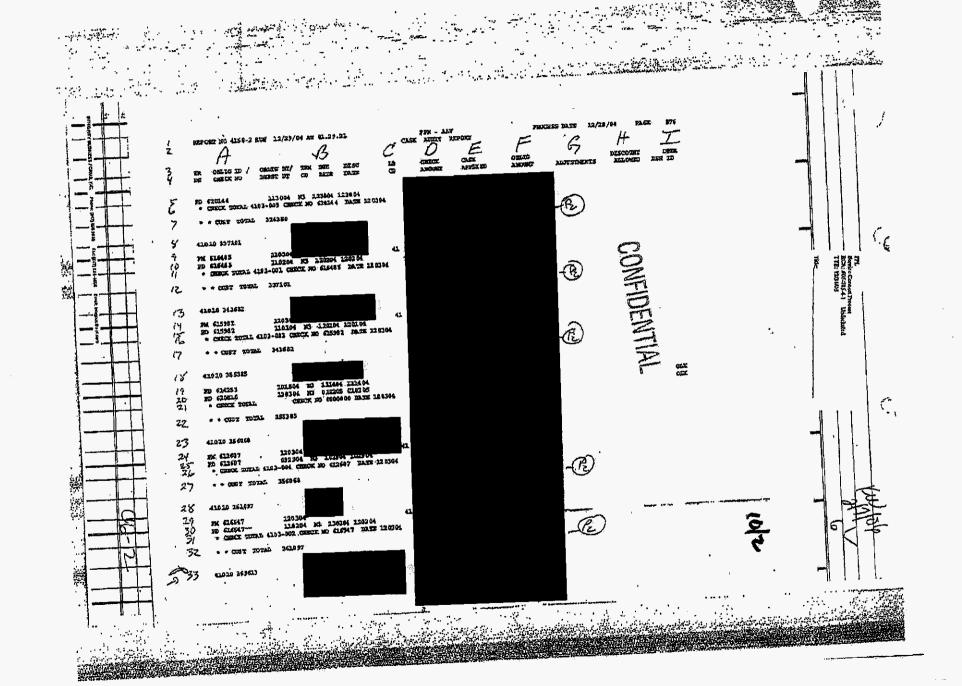


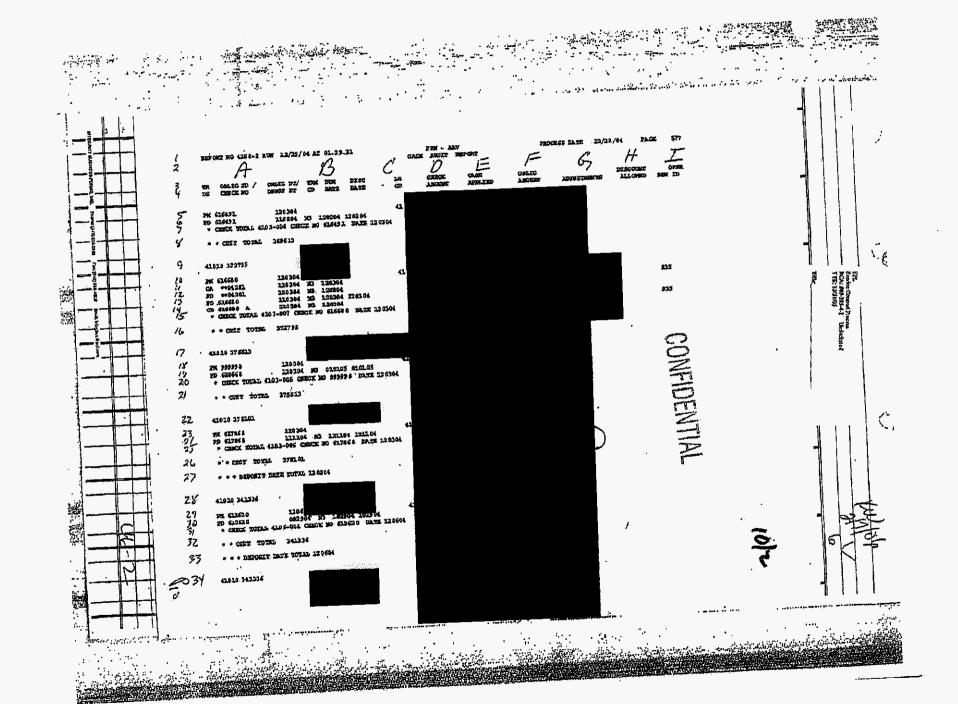


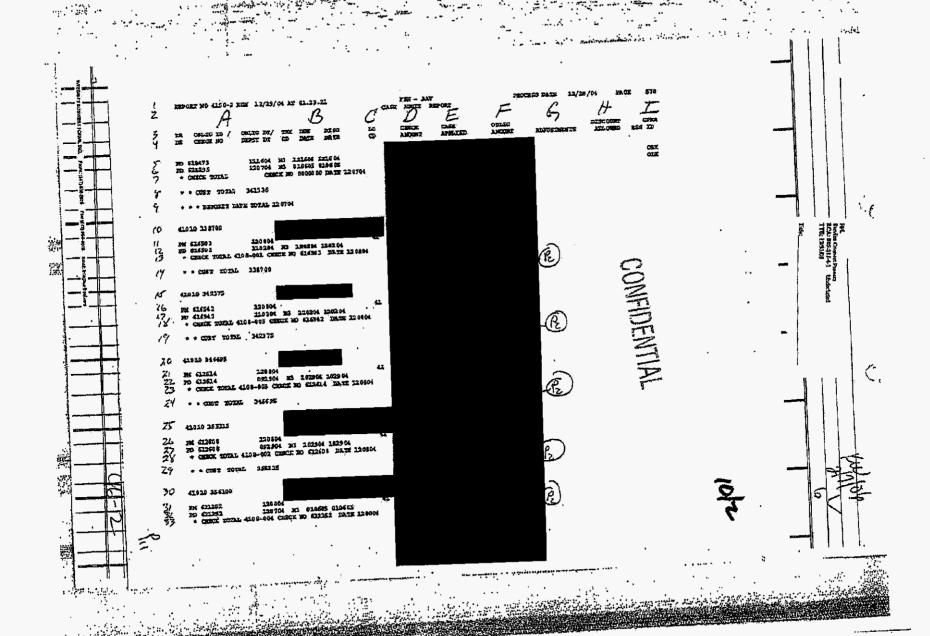


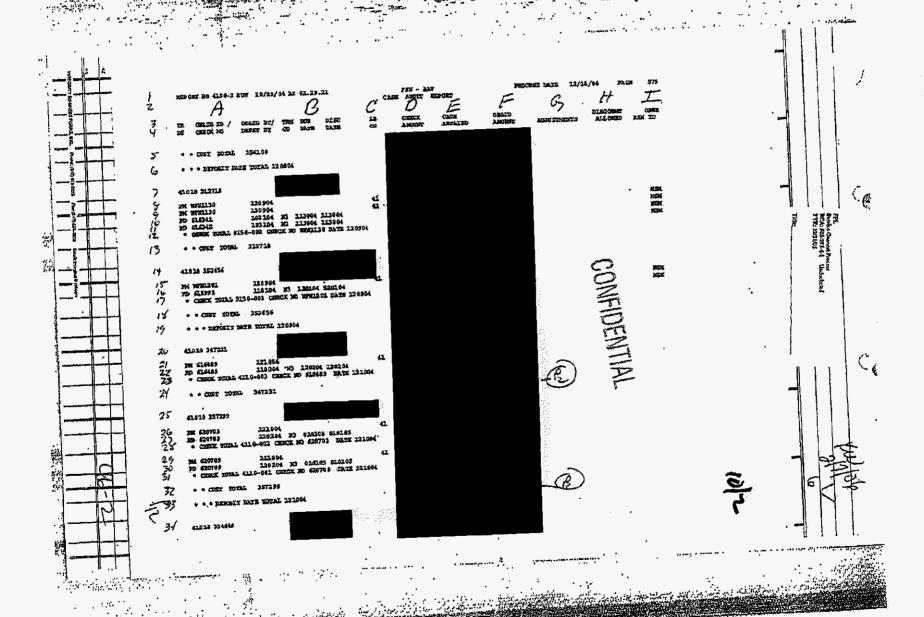


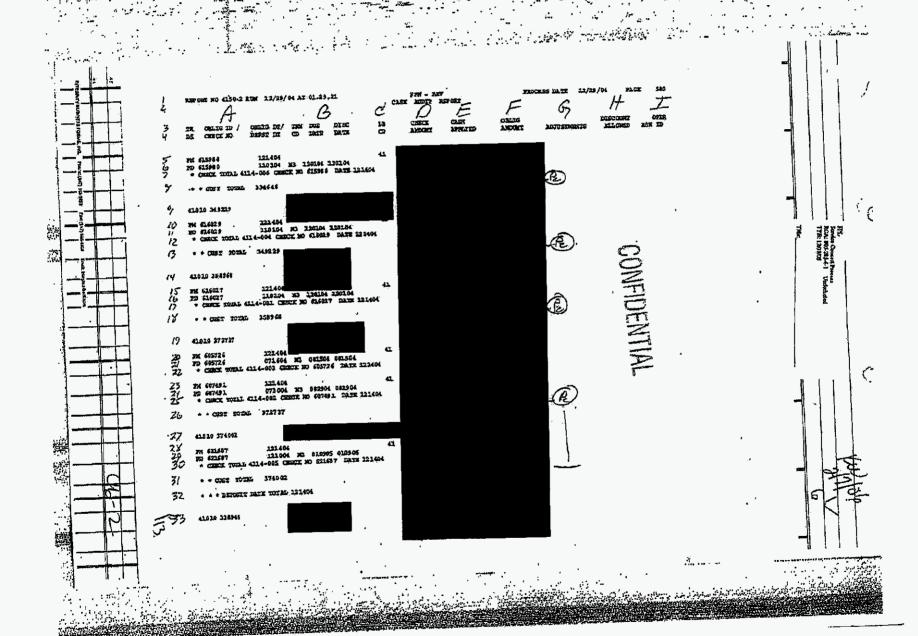


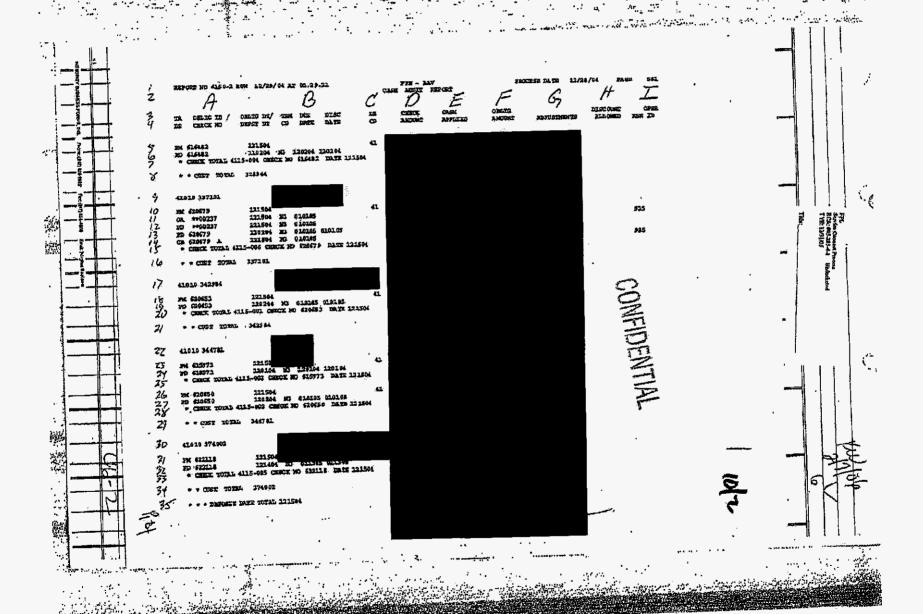


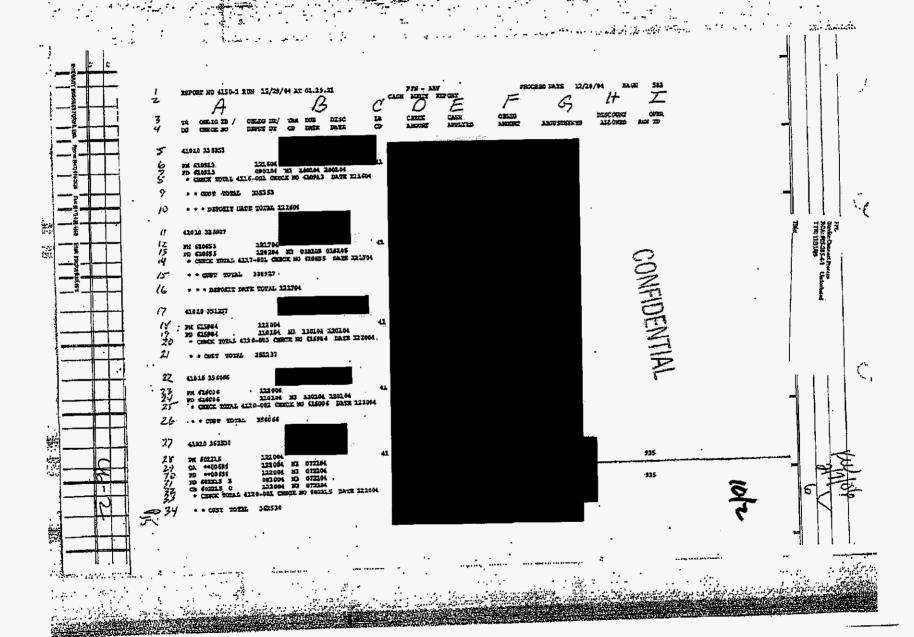


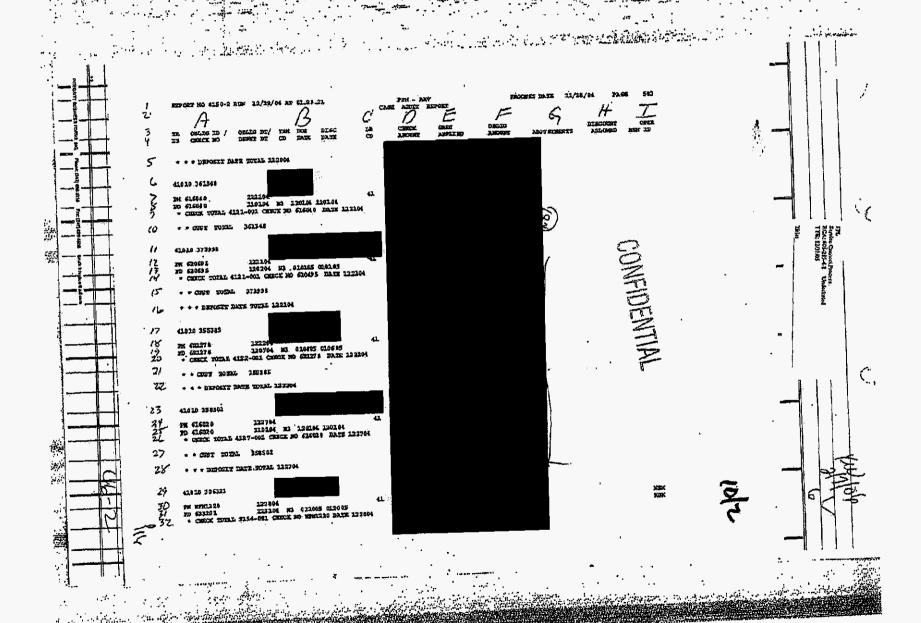


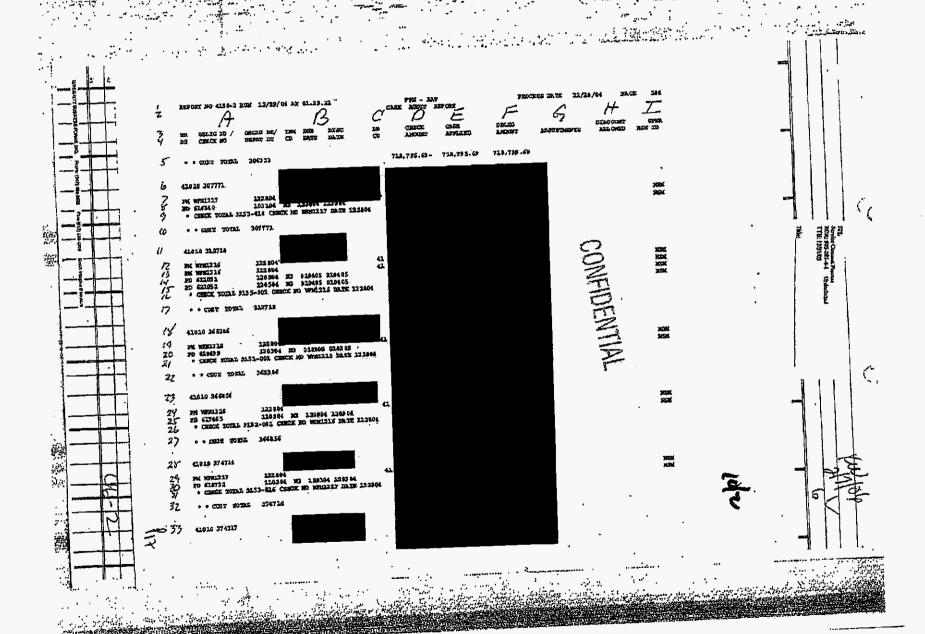


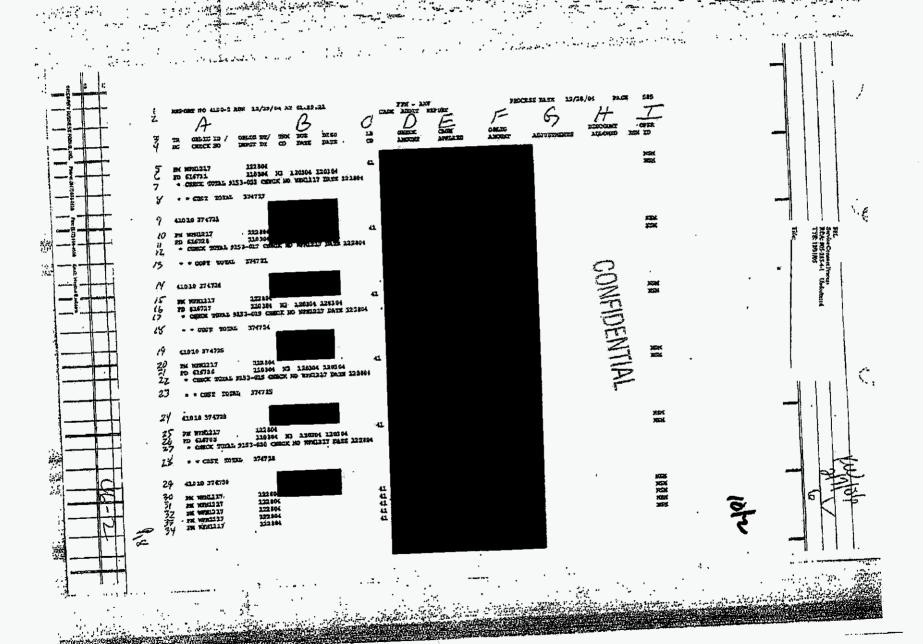


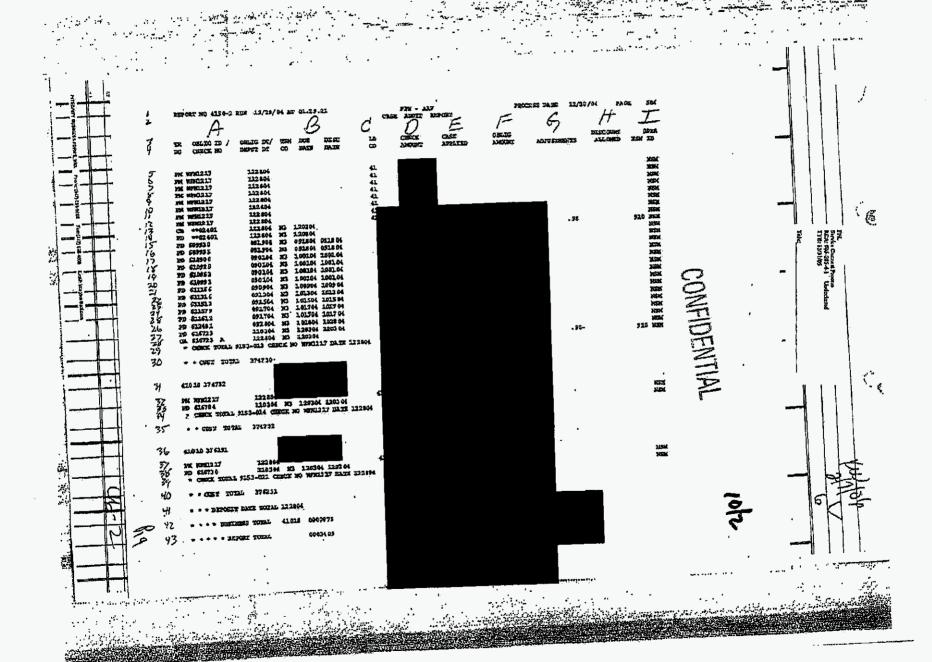




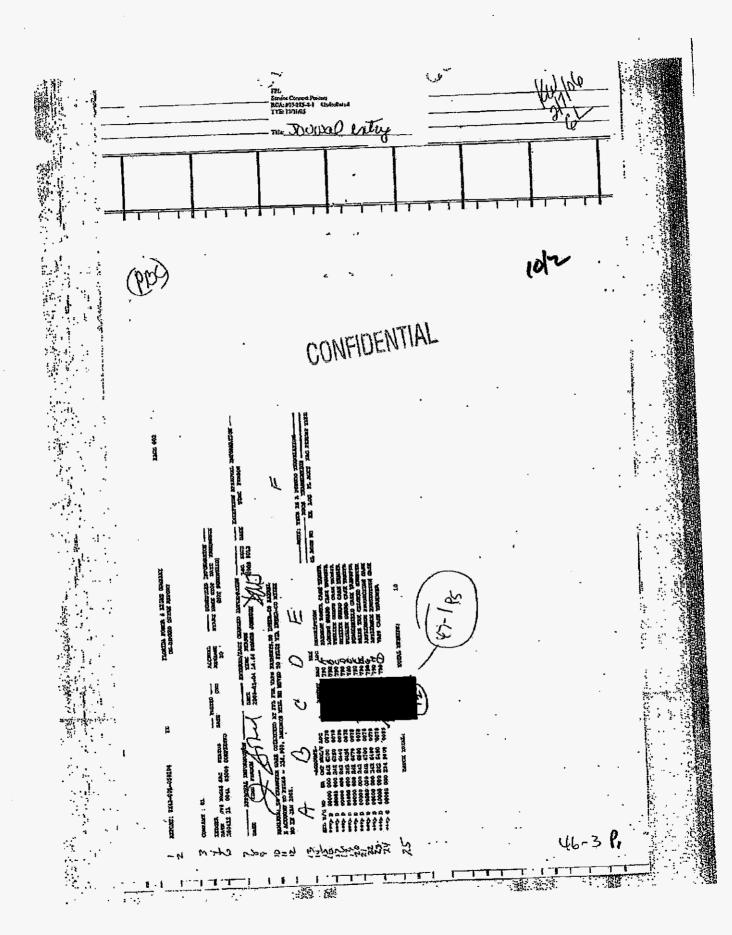


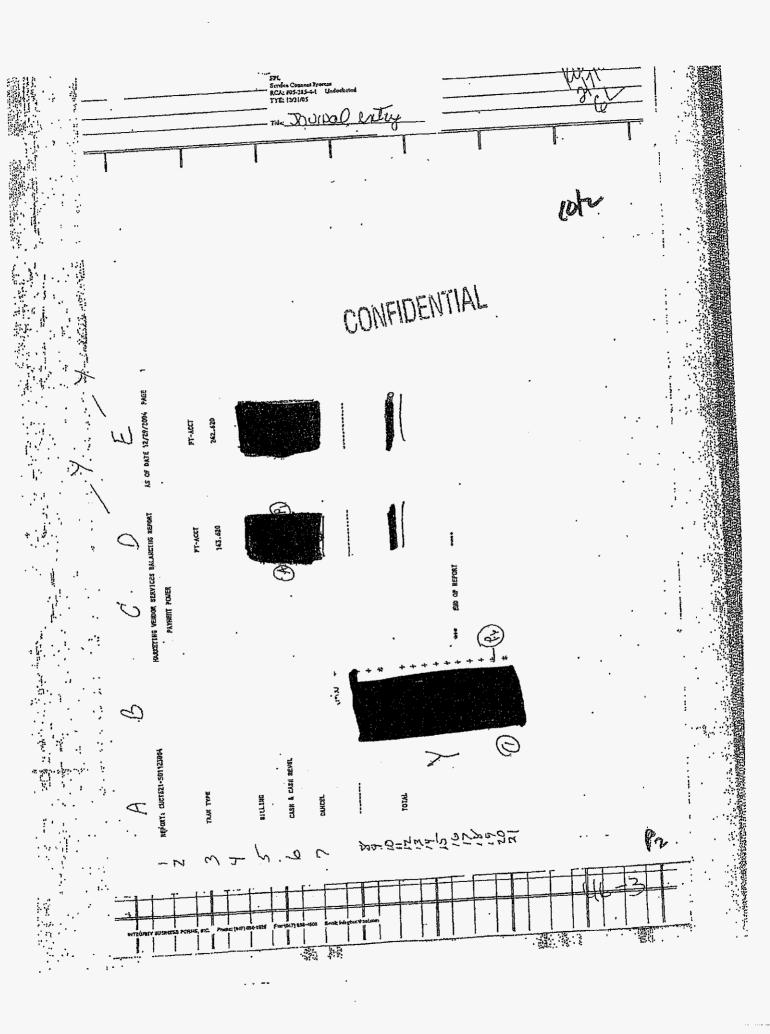


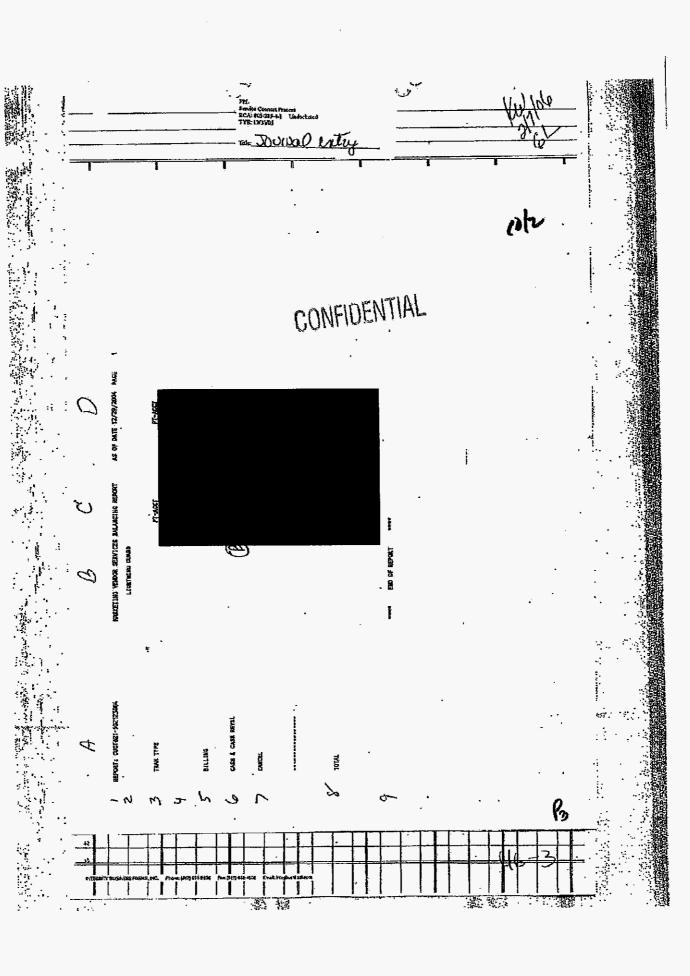


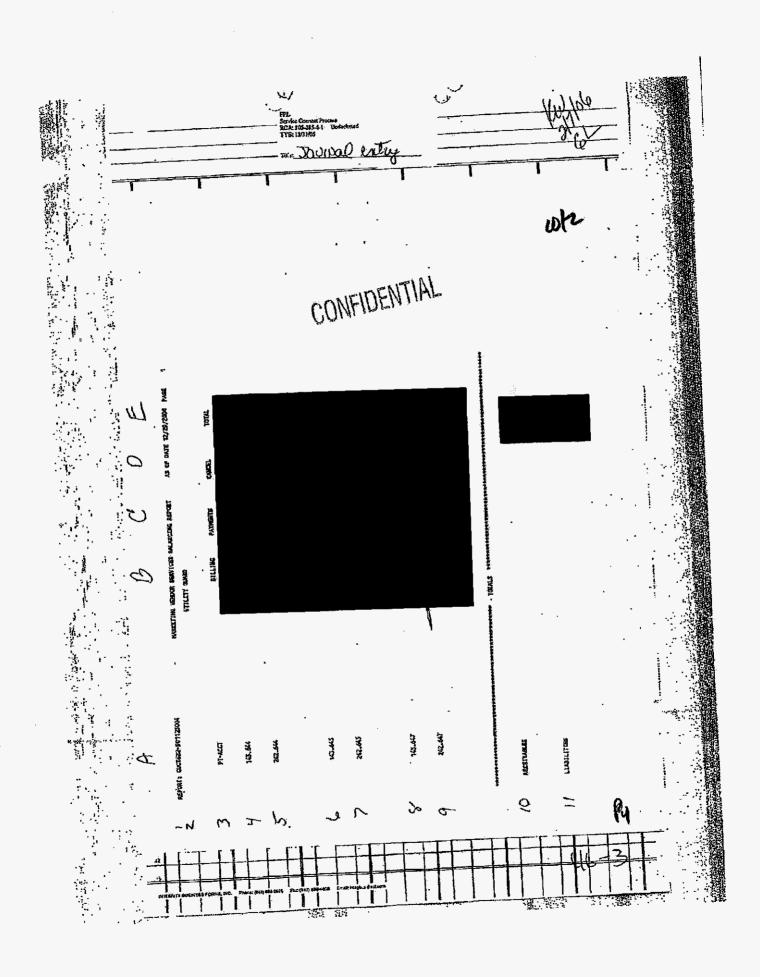


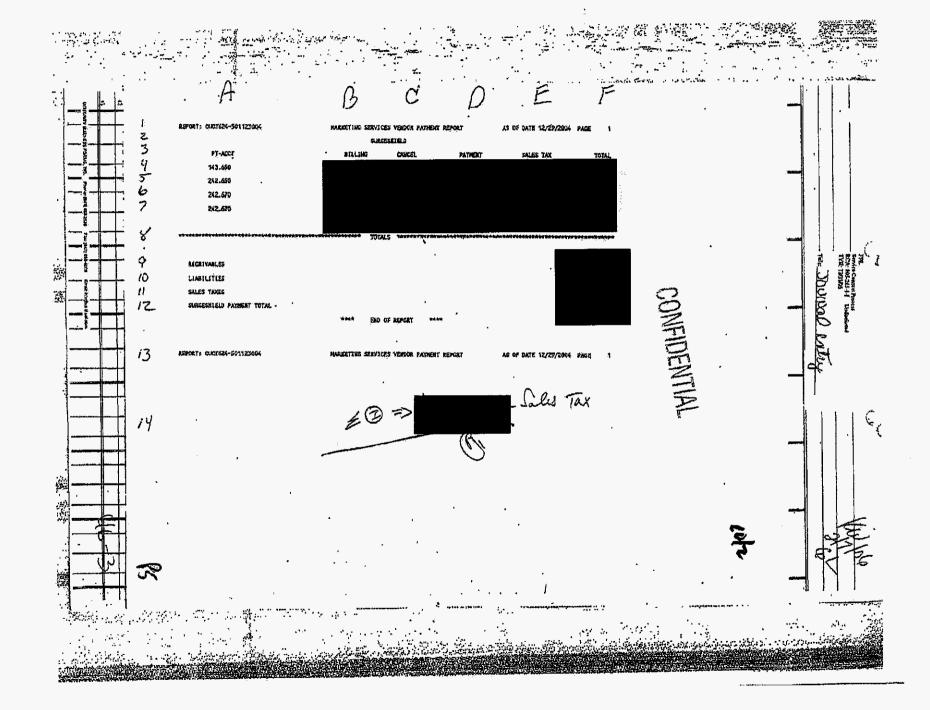
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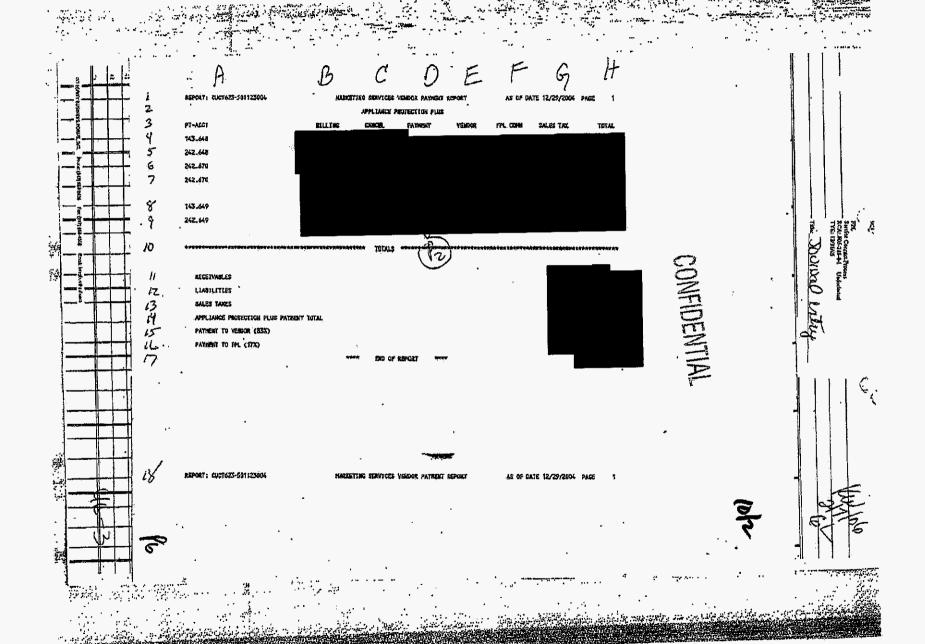


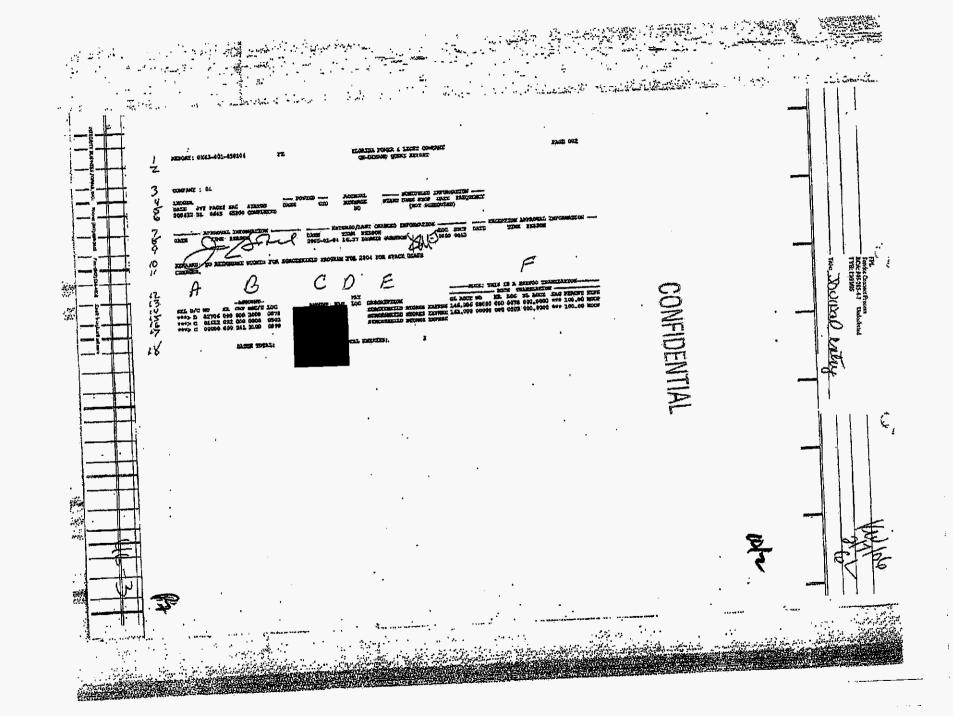


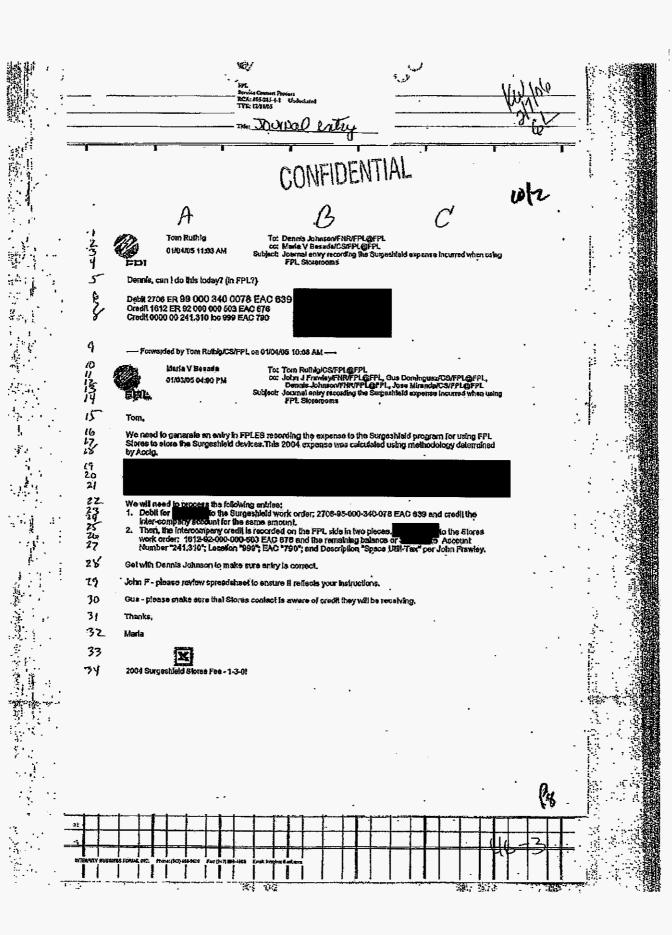




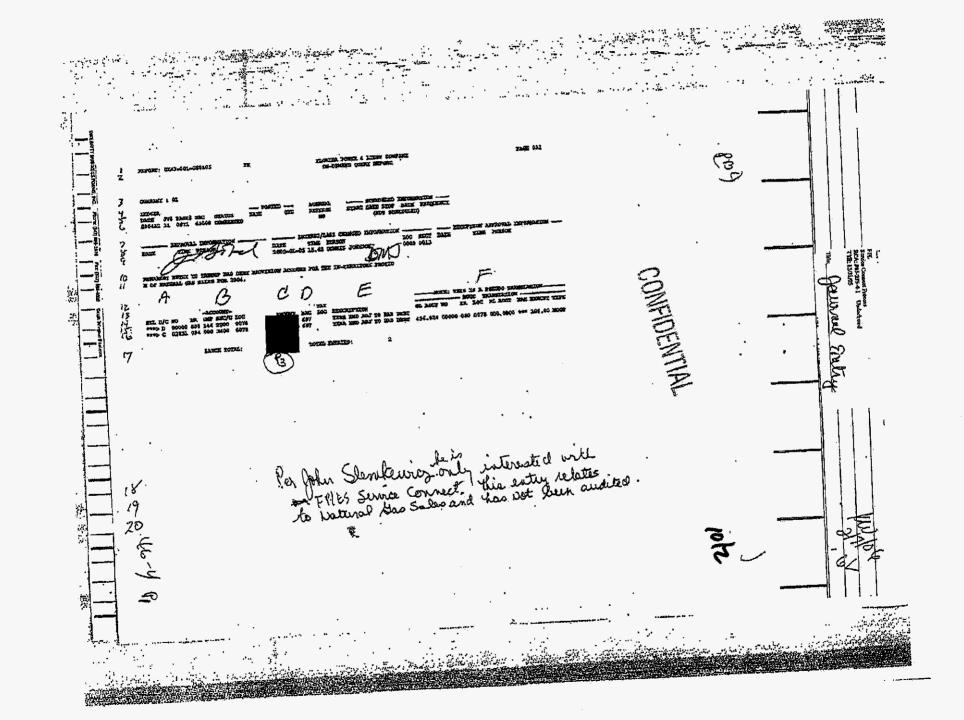


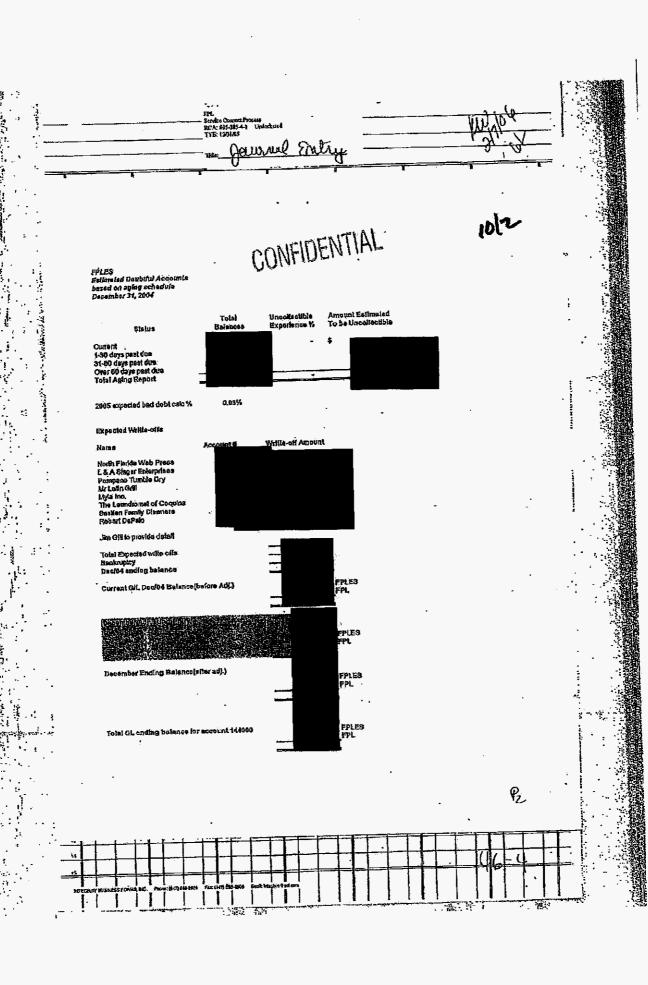


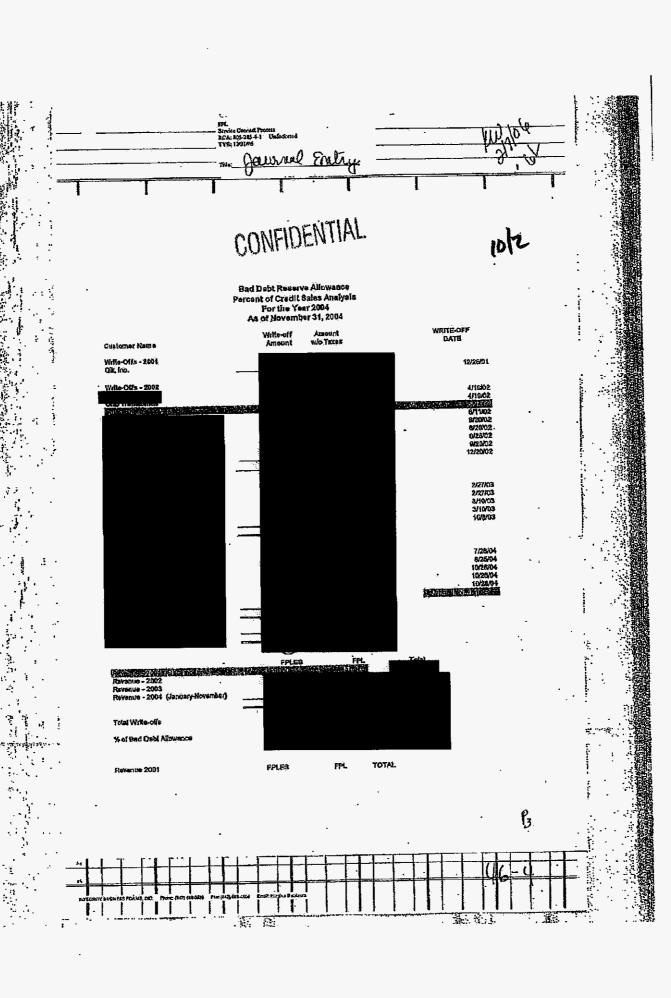




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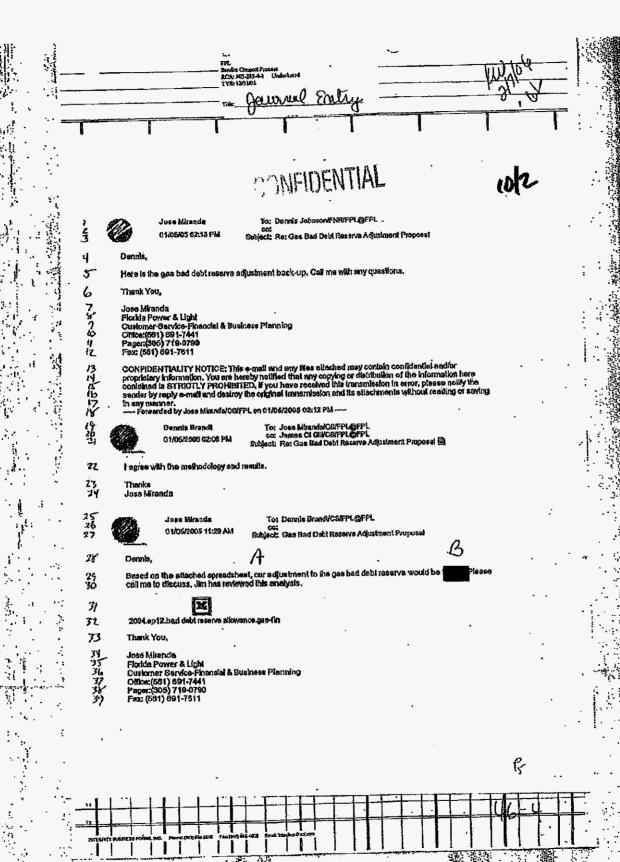




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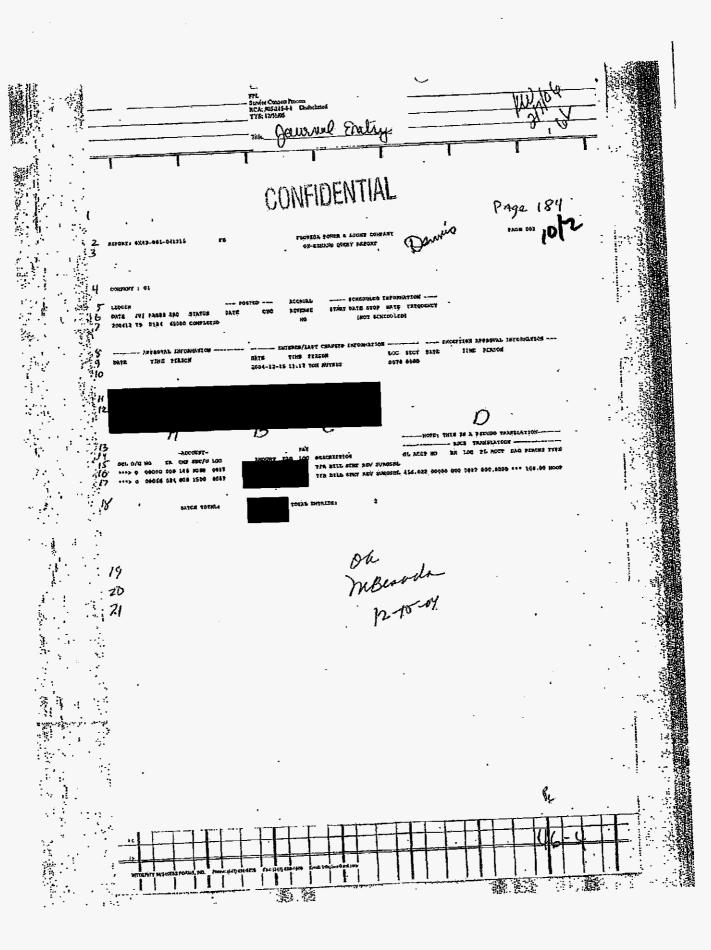
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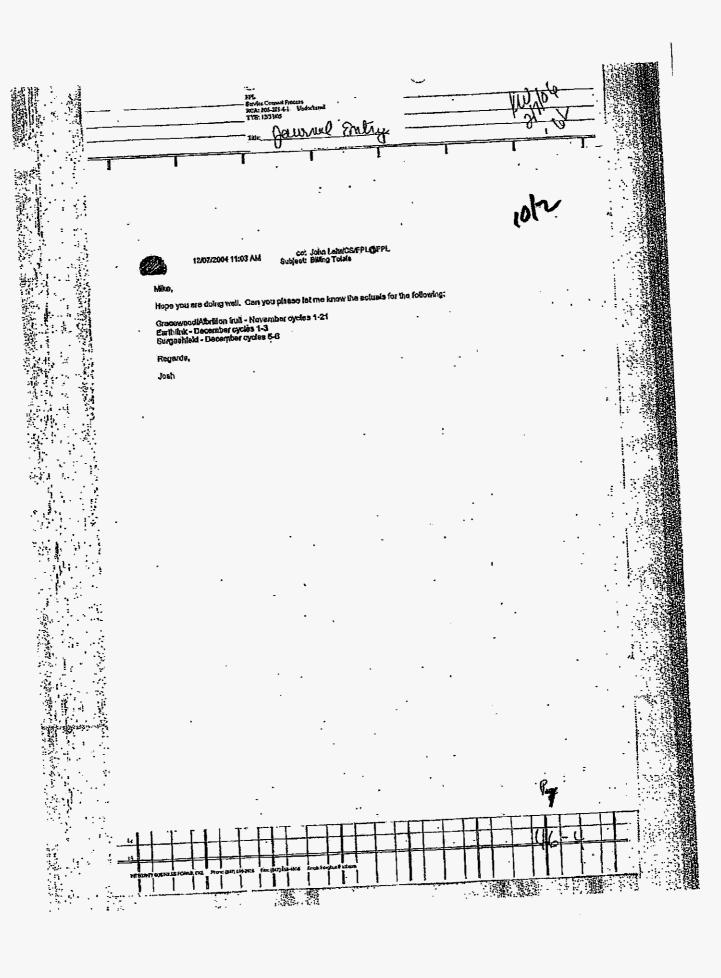
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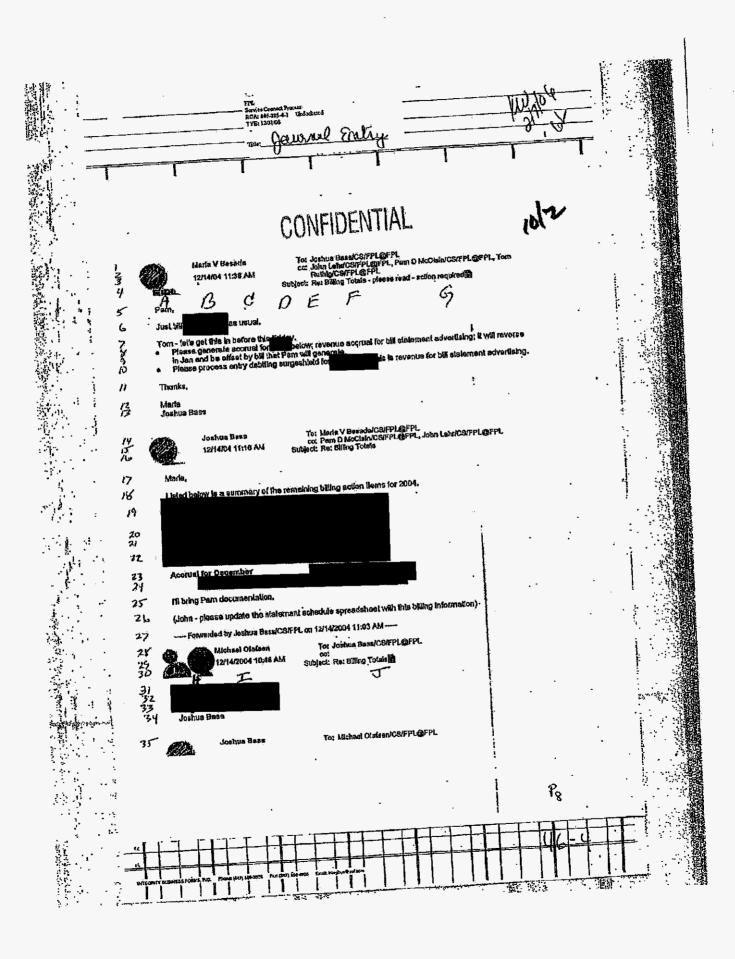
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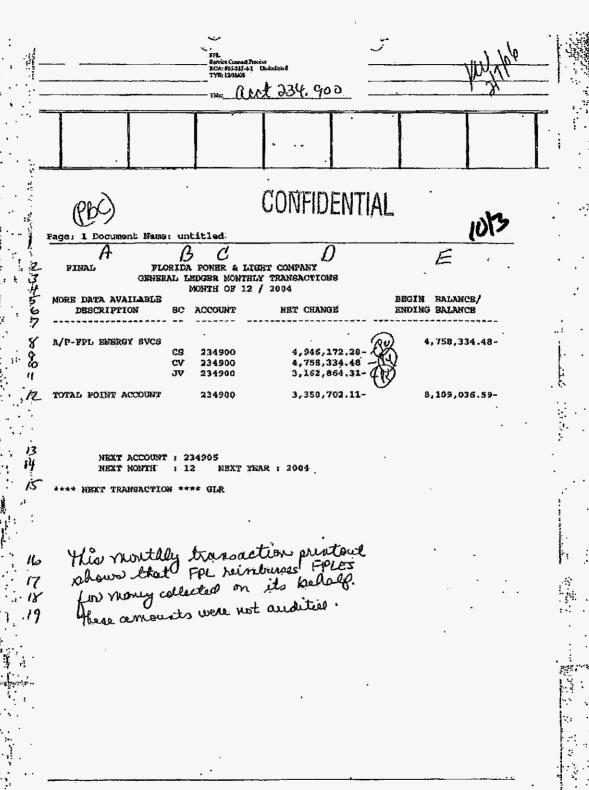
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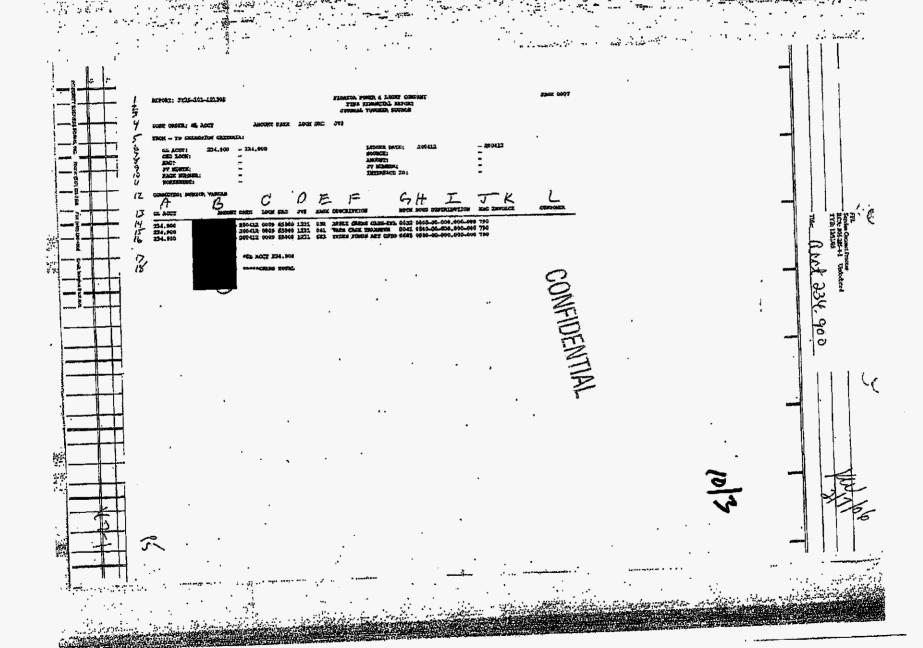
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10/3

BEGIN BALANCE/

ENDING BALANCE

FINAL FLORIDA POWER & LIGHT COMPANY
CÉNERAL LEDGER MONTHLY TRANSACTIONS
. MONTH OF 12 / 2004

MORE DATA AVAILABLE
DESCRIPTION SC ACCOUNT NET CHANGE

A/P-FPL ENERGY SVCS

CS 234905

CV 234905

JV 234905

TOTAL POINT ACCOUNT 234905

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.00

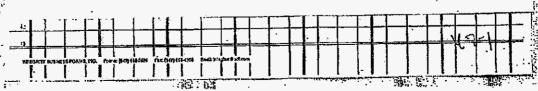
NEXT ACCOUNT : 234910

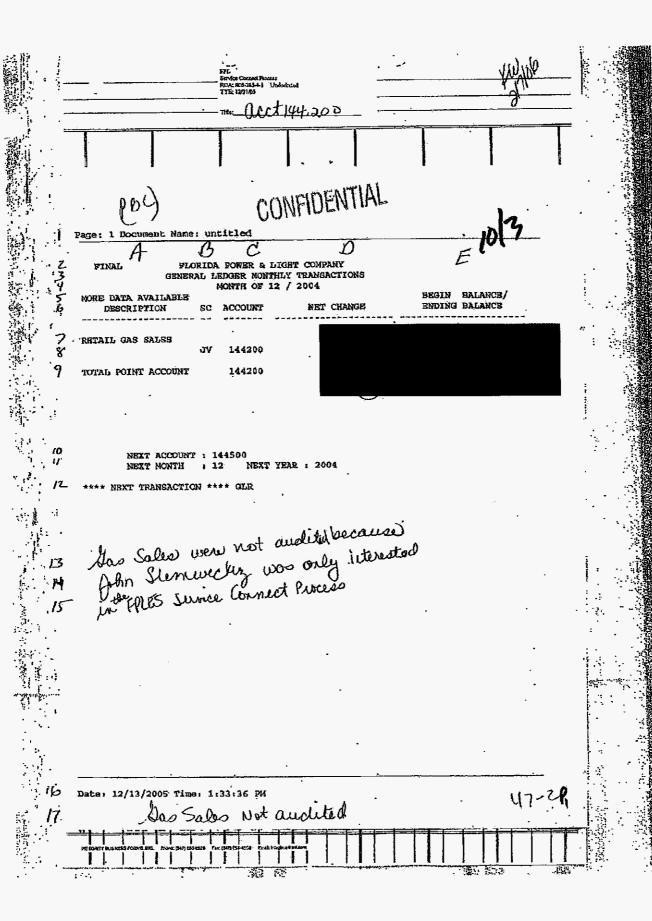
NEXT MONTH : 12 NEXT YEAR : 2004

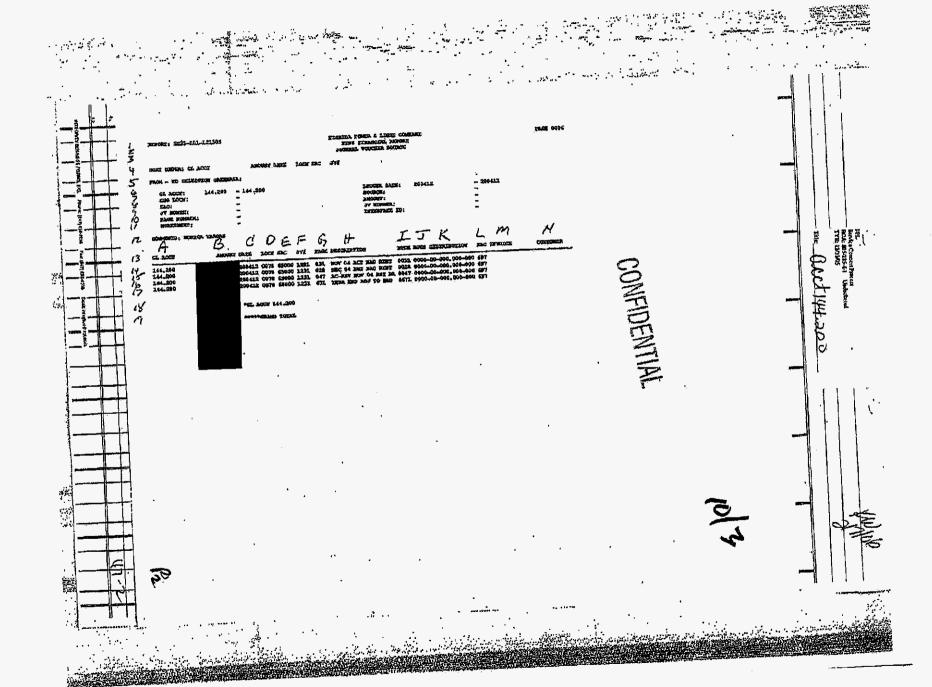
\*\*\*\* NEXT TRANSACTION \*\*\*\* GLR

Date: 12/13/2005 Time: 1:32:16 PM

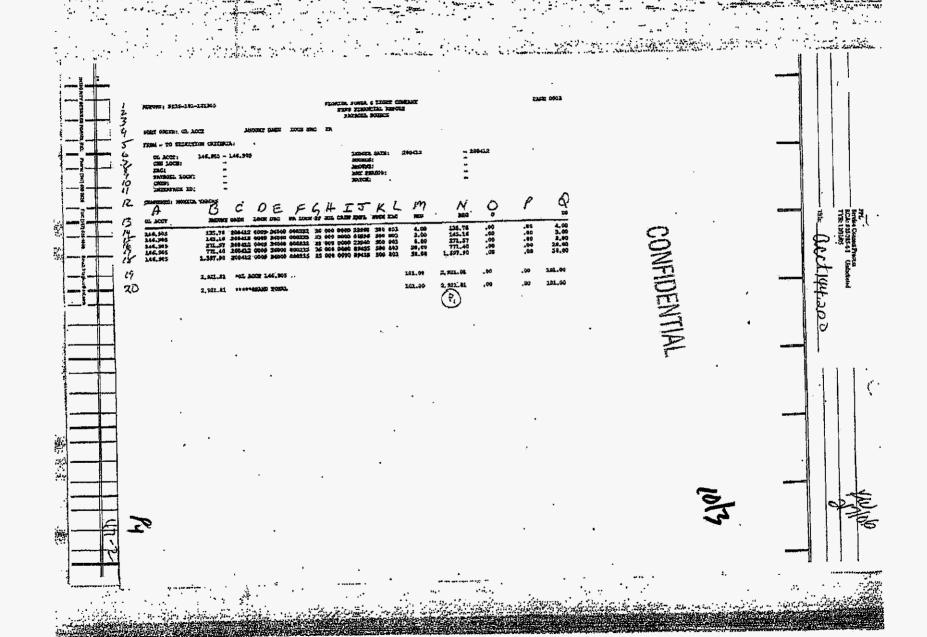
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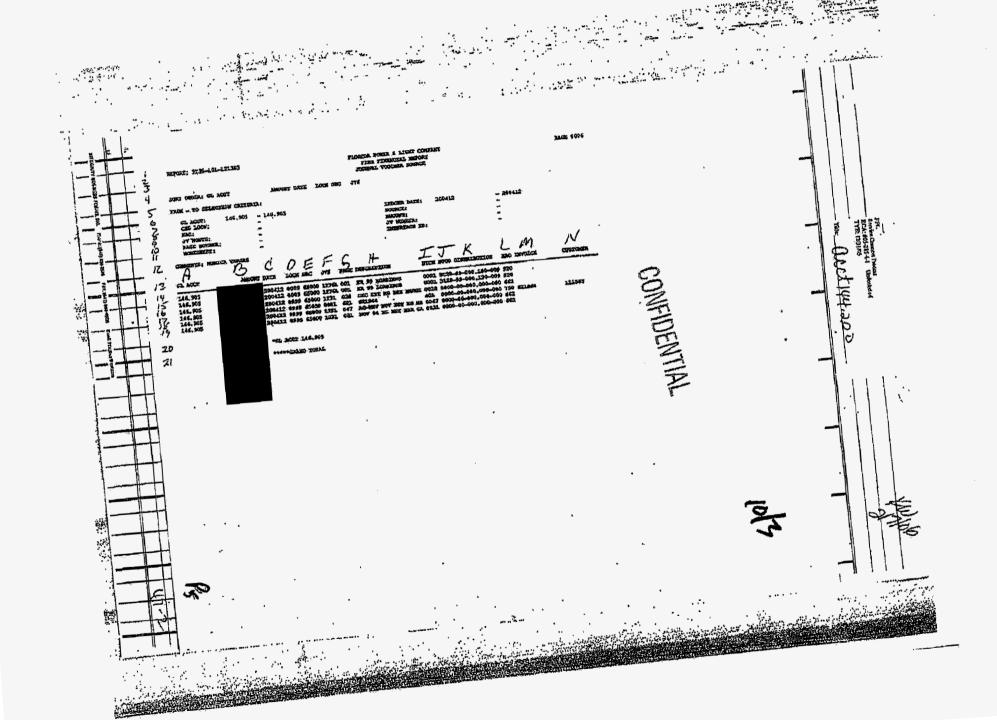






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2375	FINAL FLORIDA POWER & LIGHT COMPANY GENERAL LEDGER MONTHLY TRANSACTIONS  MORE DATA AVAILABLE DESCRIPTION  FLORIDA POWER & LIGHT COMPANY WONTH OF 12 / 2004  NET CHANGE	BEGIN EALANCE/ BHOING BALANCE	
	DESCRIPTION		
7840	A/R-FPLS-NE MKTS  CV 146905  JV 146905  PR 146905		
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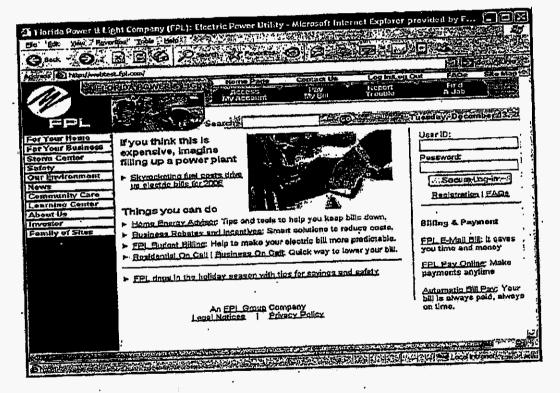
Florida Power & Light Company Ducket No. Undocketed FFLES Service Connect Process Audit Audit Request No. 5 Page 1 of 1

- Provide the analysis that shows the allocation of costs, overheads and adders for the time spent transfering the cell to connect services from the cell center.
  - 2) Provide printouts of web pages for web site if a customer asks to connect navy service.
  - 3) Provide support that this connection is not transferred to FPLES.
- 1) See altached analysis as requested.
  - See attached requested web pages. Note that the printouts of the web pages provided ituatrates a customer who is connecting service and is required to pay a deposit.
  - 3) There is no interface built between the FPL web site service connect process and the FPLES .Connect Services business. Moreover, none of the service connect transactions processed through the FPL web site are subsequently provided to the FPLES Connect Business. See attached web screen shots confirming this feet.

this was revised with the printouts provided. No further work heided.

- 3) This question was withdawn by Gabby Leon on 12/15/05.
- 4) This question was enswered in the 12/8/05 meeting.
- 5) This question was enswered in the 12/8/05 meeting.

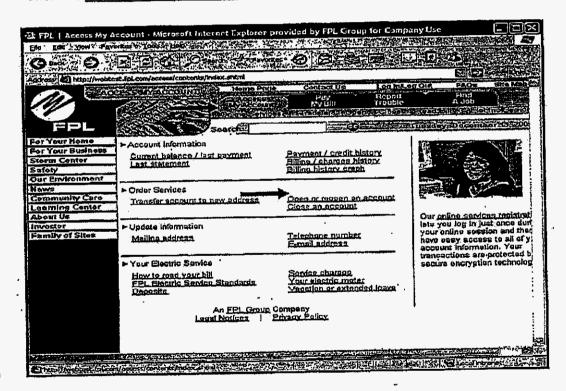
## Step1-Log into FPL.com



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49 (200)

Step 2- From the home page select the <u>Access My Account</u> tab and click on <u>Open or reopen an account</u>

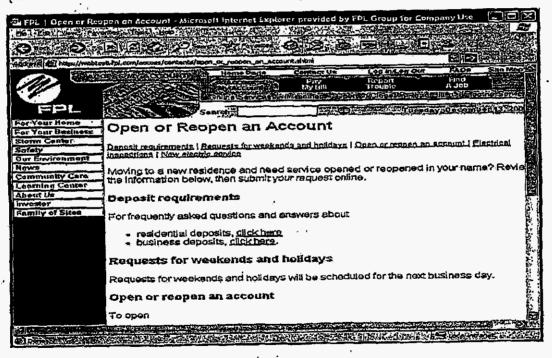


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Step 3- Once you click on <u>Open or reopen an account</u> this will take you to the content page to read about all the info you will need to connect service.

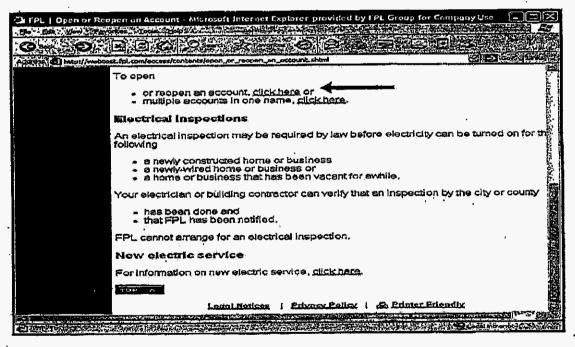
(continue to next slide for the rest of the page)





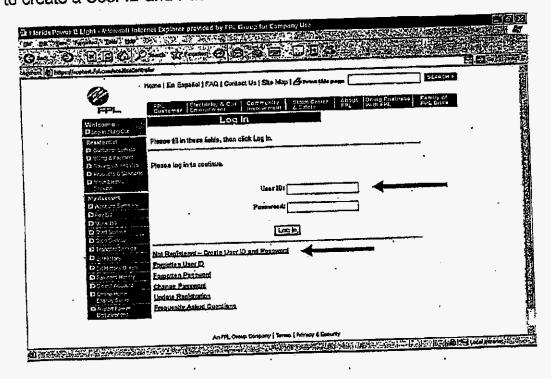


Step 3- Continue – towards the bottom of the <u>Open or reopen an account</u> page click on the link to start the application.



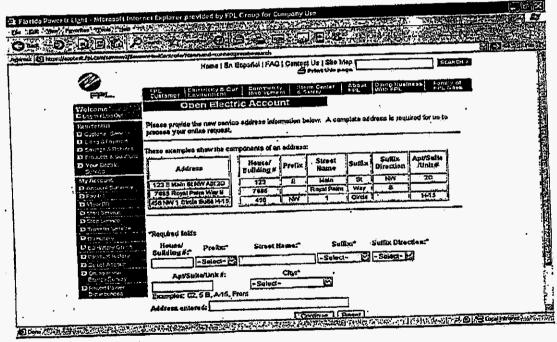
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Step 4 – You will be required to log in using your User ID and Password if not a registered user of the site you can select the first link to create a User ID and Password



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Step 5 – Once logged in you will be directed to the <u>Open Electric</u> <u>Account</u> application.



4 PMS

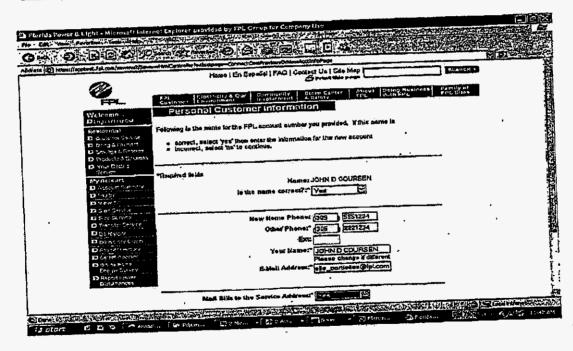
Step 6 – Once logged in you will be directed to the <u>Open Electric</u>

<u>Account application</u>. You will be required to enter your new address in the fields below and click <u>continue</u> when completed.

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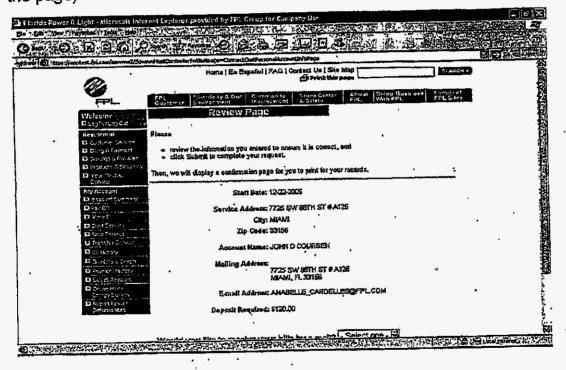
Step 7 - The next page will prompt the user to enter their previous account information or select the name format if they have never had service with FPL before. Welcome Dicyolicyca Residential ■ Cultip & Paymord the FPL Account #(f you have more than one account, places unto your main account #)
 AND the Social Security, Social insurance or Federal Tax ID # for the account holder. ID Savings & Records D Voir Buchts Service open the new account(s) in the SAME NAME and
 reduce the arrount of information we need from you. FPL Account #: 2663634088 U.S. Social Security, 04/822214
Social Improves or Federal Tax ID #: If you have NOT had an account with FPL, pleasu select the name format for your new account. We use this to determine the information we mad to complete your nequect. Hame Format |-SelectonoStep 8 – The next step prompts the customer to enter their <u>Personal</u> <u>Customer Information</u>. (continue to next slide for the rest of the screen)



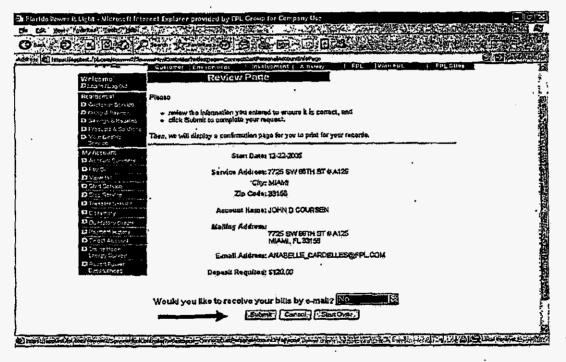
2/5

Step 8 - continue - After you enter Personal Customer Information you click continue. 21 Flacida Power B. Light - Microsoft Internet Explaner provided by FPL Group for Company Usi Required fields Name: JOHN D COURSEN is the mame control? Yes Kew Herne Phone: 305 | S661214 Other Phone: (305 ) 2221234 E-mail Address: elle\_cerdelles@fpl.com Mak Bills to the Service Address: Yes Lyou colected No above, please calect the Mailing Address Typic Malling Address Type: -Soloct oneStep 9 - The next step is to enter your Open Account Information and click continue. Welcome When in Alter St 13 Study & Payment Start Date: 12/22/2005 Click icon to select start date

Step 10 – The next page is the <u>Review Page</u> for the customer to verify the information they have entered (next slide will show you the rest of the page)



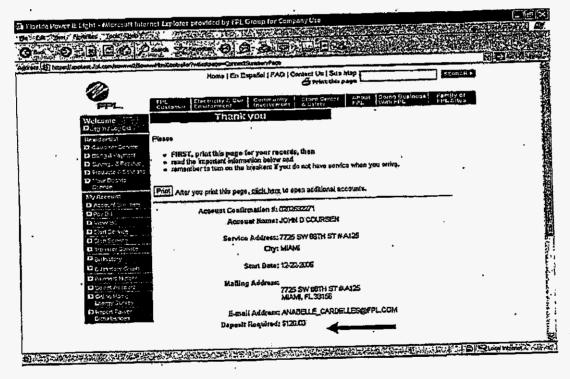
Step 10 – continue - The bottom of the <u>Review Page</u> will allow the customer to submit their order, cancel or start over if the information they have reviewed is not accurate.



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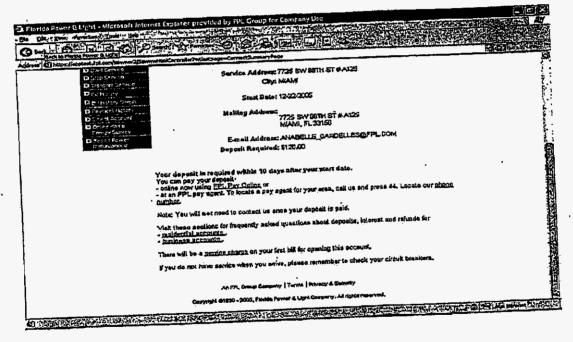
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Step 11 – The thank you page summarizes the customers order and advises them of their deposit requirements (continue to next slide for the rest of the page).



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## Step 11 - continue - The thank you - End of Process



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