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Public Service Commission

June 27, 2013

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Mr. Kenneth M. Rubin
Florida Power & Light Company
700 Universe Blvd.
Juno Beach, FL 33408

STAFF'S FIRST DATA REQUEST
via e-mail

Mr. Kenneth A. Hoffman
Florida Power & Light Company
215 South Monroe St.
Tallahassee, FL 32301

Re: Docket No. 130160-EI - Petition for declaratory statement regarding the inspection, repair and replacement of meter enclosures for smart meter analytical tool, by Florida Power & Light Company.

Dear Messrs. Rubin and Hoffman:

By this letter, the Commission staff requests that Florida Power & Light Company (FPL or utility) provide responses to the following data requests.

1. Paragraph 13 of the petition states, "FPL will not assert any ownership or other interest in the customer-owned enclosures by virtue of its inspection, repair or replacement of this equipment in connection with the further validation and refinement of the predictive tool." Please explain the phrase "other interest."
2. Referencing paragraph 14 of the petition, describe the equipment diagnostic data transmitted from the meter to FPL.
3. Referencing paragraph 14 of the petition, describe the deployment phase for the meters, including the average time from the installation of the smart meter, to the meter becoming fully operational, and to the point when the meter stopped communicating.
4. Referencing paragraph 14 of the petition, how many meters stopped communicating with FPL?
5. Referencing paragraph 14 of the petition, did all communication capabilities of the meters cease? If not, please describe what communications capabilities ceased and what capabilities continued.

6. Referencing paragraph 14 of the petition, describe the inspection process, including the entity or entities which conducted the inspection, the number of meters inspected, and the general locations in FPL's service area where the meters were inspected.

7. Referencing paragraph 14 of the petition, how many of the meters inspected had experienced heat damage? Please describe the nature of the damage to the meters.

8. Referencing paragraph 14 of the petition, describe the problems within the customer-owned meter enclosure which caused the heat damage to the inspected meters. Has FPL identified any modifications that can be made to existing meter enclosures that will reduce or eliminate the occurrence of overheating or other causes of meter failure?

9. Referencing paragraph 14 of the petition, please identify the members of the smart meter team, including any non-FPL members.

10. Referencing paragraph 14 of the petition, how many of the meters which stopped communicating experienced the identified data pattern? Please describe the data pattern that was observed.

11. Paragraph 15 of the petition states, "FPL identified a small number of FPL smart meters in the field displaying the communications data pattern. . ." How many smart meters were identified?

12. Referencing paragraph 15 of the petition, describe the inspection, including the entity or entities which conducted the inspection, the criteria used to select the meters inspected, the number of meters inspected, and the general locations in FPL's service area of the meters inspected.

13. Paragraph 15 of the petition states, " in 70% of the cases studied, damage within the customer-owned meter enclosure was causing overheating. . .". Please describe and explain the damage within the meter enclosure, and explain how the damage within the meter enclosure caused the meter to overheat.

14. Paragraph 15 of the petition states, "overheating that in turn was causing the communications failure and the probable ultimate failure of the meter itself." Please explain what caused the meter to overheat. Explain whether meters, which have experienced the communications failure, have failed. If so, how many meters have failed? If meters have failed, explain how the failure of the meters impacts the ability of FPL to accurately measure customer electric consumption. Please explain if the overheating meters are a safety concern.

15. Paragraph 16 of the petition states that, "FPL proposes to study a statistically significant random population of approximately 400 deployed smart meters displaying the data patterns that precede the communications failure, along with the enclosures housing those meters." Please explain how many meters, in total, are displaying the data pattern that precedes the communication failure.

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16. Referencing paragraphs 16 and 17 of the petition, describe the scope of the study/project to be conducted. Provide the timeline for the study/project, including milestones. Explain how and when the results of the study/project will be communicated to the Florida Public Service Commission.

17. Referencing paragraphs 16 and 17 of the petition, provide a breakdown of the cost components of the study/project, including the cost components to repair, if necessary, the 400 smart meters.

18. Referencing paragraph 17 of the petition, has FPL determined how it will notify the customer once the diagnostic tool identifies a problem? Has FPL determined the probable range of costs that a customer may incur to repair their equipment? Does FPL anticipate that it will achieve cost savings by early identification of a meter failure?

Please file FPL's response to Staff's First Data Request by Thursday, July 11, 2013, in this Docket with Ms. Ann Cole, Commission Clerk, Office of Commission Clerk, 2540 Shumard Oak Boulevard, Tallahassee, Florida, 32399-0850. Please feel free to contact me at (850) 413-6216 or kcowdery@psc.state.fl.us if you have any questions.

Sincerely,


Kathryn G.W. Cowdery
Senior Attorney

KC/ace

cc: Office of Commission Clerk