

SUPPLEMENTAL
AFFIDAVIT

OF

ROBERT E. BATHEN

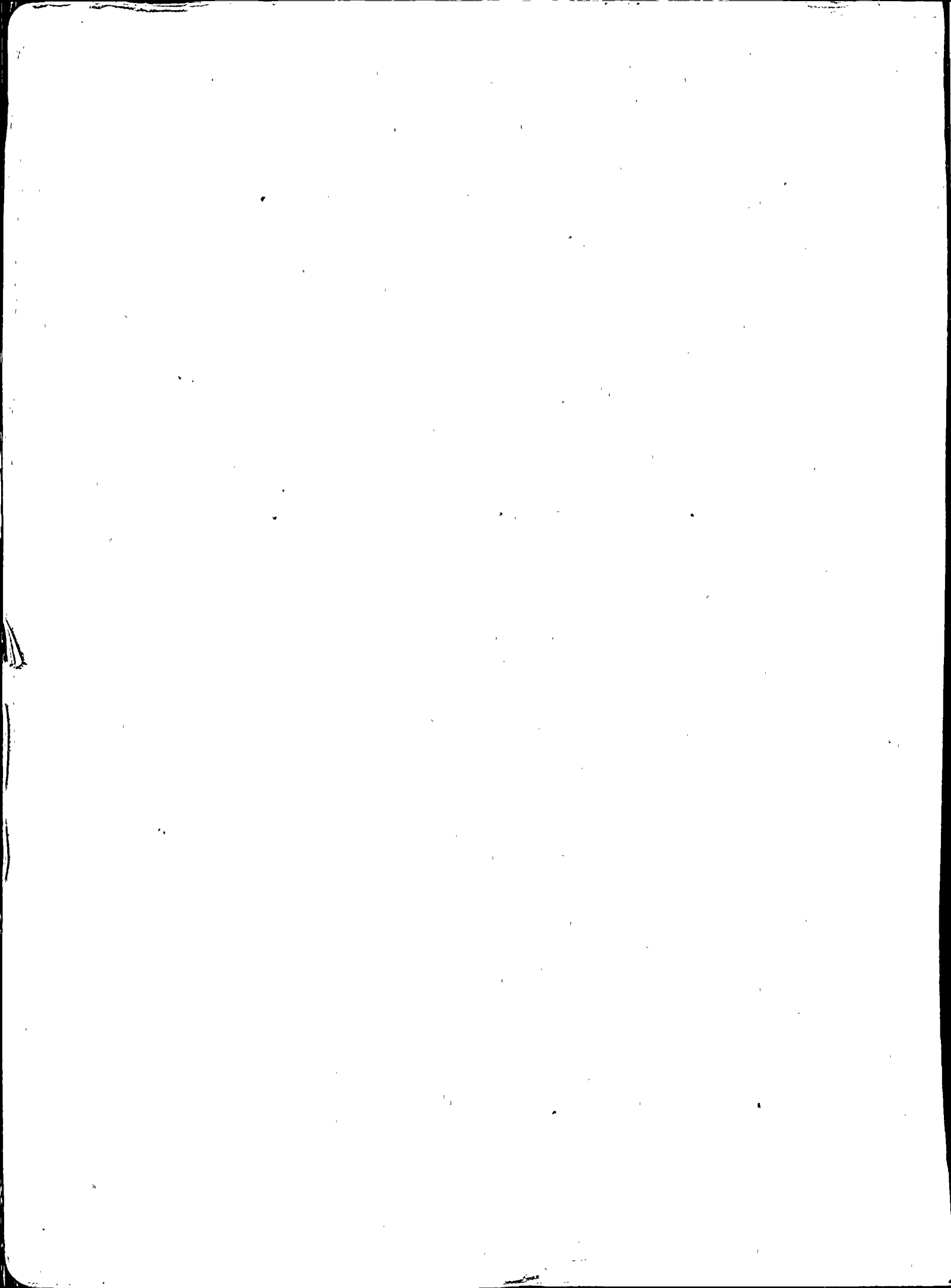
RE:

FLORIDA POWER & LIGHT COMPANY
NUCLEAR UNITS

NRC DOCKET NOS. 50-335A, 50-389A, 50-250A, and 50-251A.

BEFORE THE
NUCLEAR REGULATORY COMMISSION
of the
UNITED STATES

August 4, 1976



SUPPLEMENTAL
AFFIDAVIT
OF
ROBERT E. BATHEN

My name is Robert E. Bathen and my address is 1851 South Chickasaw Trail, Orlando, Florida. This affidavit is a supplement to my affidavit of April 14, 1976, in NRC Dockets No. P-636-A and No. 50-389-A, which affidavit and attached exhibits are incorporated and made a part hereof by reference.

The purpose of this supplemental affidavit is to set forth how, to my knowledge and belief, Florida Power & Light Company (FP&L) has exercised its dominance in the wholesale bulk power supply market in Florida, including its existing sole dominance of operating nuclear generating units, to engage in a long history of anti-competitive activities, continuing and accelerating to the present time. The accumulated effect of those anti-competitive activities presently places all municipal and cooperative electric systems in Florida in an unfavorable competitive situation and places certain municipal systems in the imminent position of deciding whether to sell their electric systems to FP&L. In fact, the citizens of Vero Beach are being asked to decide in an election scheduled for September 7, 1976, to provide for a change in the City Charter that would permit sale of the system to FP&L. Discussions regarding the possible purchase of the Fort Pierce electric system by FP&L have taken place between representatives of the City and FP&L. A newspaper reports that a spokesman for FP&L produced a "hasty estimate" that "there are about half a dozen community or cooperative electric utilities in our area

which might benefit by selling their plants to us." (See Doc. 1 attached to affidavit of Robert A. Jablon in Docket No. P-636-A.) The citizens of New Smyrna Beach, faced for years with refusals of FP&L to deal in matters affecting interconnection and interchange arrangements, wholesale rates under reasonable terms and conditions, absence of transmission service from FP&L and lack of access to nuclear generation and repeated offers to purchase or lease the system as alternatives to granting cooperation, turned down FP&L's offer to purchase the system at a very low price in a special election held in January, 1975. There is a long, repeated history of attempts by FP&L to purchase municipal systems in Florida. (See Exhibit L.)

The Justice Department, in its advice letter concerning Florida Power & Light Company (St. Lucie Plant, Unit No. 2), NRC Docket No. 50-389-A, dated 14 November 1973, stated (pp. 2-3):

"There is substantial and vigorous actual and potential competition among electric utilities in Florida in both bulk power supply and retail distribution markets. Florida law does not require electric utilities to restrict their service areas. The Florida Public Service Commission has approved certain voluntary territorial agreements between Applicant and neighboring systems. 2/

"Even where these territorial agreements exist, neighboring smaller systems do compete with Applicant at retail. They still compete to attract new loads who can choose to locate either in their service areas or in Applicant's. They still compete to extend service in developing areas on the fringes of their systems. Finally, they compete to stay in business; if their costs and retail rates become too high, their customers may force them to sell out to the Applicant.

"2/ Some territorial agreements involving the Applicant apparently have taken form of oral understandings and have never been submitted to the Commission."

To my knowledge and belief, the ability of municipal and cooperative electric systems to compete with FP&L has been seriously inhibited or precluded over a long historical period through the present time by virtue of FP&L's dominance in the wholesale bulk power supply market in Florida, and the following factors:

- (1) FP&L is the only utility in Florida whose customers are presently receiving the benefits of low cost nuclear energy.

That energy is being produced predominantly by the Company's Turkey Point 3 and 4 units which have been in service since November, 1972, and June, 1973, respectively, and to a lesser extent from the Company's St. Lucie No. 1 unit which is now commencing generation of power. These units were licensed under Section 104(b) of Atomic Energy Act as "research and development" units under operating licenses granted July 1972, April 1973 and March 1976 respectively. Consequently no antitrust review was conducted in connection with the issuance of construction permits or operating licenses for these units and no municipal or cooperative system was ever offered the opportunity to participate through joint ownership or direct purchase in the output of these units. The retention of the sole benefits of the output of these units constitutes such a difference in the costs to FP&L and corresponding rates to its customers

as to seriously inhibit, if not in fact preclude, meaningful competition with other utilities in the retail market of peninsular Florida. (See April 14, 1976 affidavit regarding cost differentials between nuclear and fossil fueled plants and attached Exhibit K showing residential bill comparisons for the months of April, May and June, 1976 prepared by FMUA.)

- (2) FP&L has refused to grant access by municipal systems to its planned South Dade nuclear units and although it had agreed with the Justice Department to grant access to its St. Lucie No. 2 unit, which is under construction, to cooperatives and two municipal systems, Homestead and New Smyrna Beach, its offer for access to those systems has been unreasonably low and insignificant. Therefore, irrespective of the outcome of Cities' petitions to intervene and gain access to the South Dade units, which were scheduled for 1983 and 1985 at the time Cities' petitioned to intervene and now reportedly may be delayed by the Company, Cities face the prospect of no low-cost nuclear energy to serve their customers, or insignificant amounts, for the present and for at least six years or more in the future.^{1/} As St. Lucie No. 1 reaches full commercial operating levels, the existing cost and rate disparities will become even more pronounced.

^{1/} The only exception being the small amount of nuclear generation to be shared by certain municipal and cooperative systems from a combined 10% ownership share of Florida Power Corporation's Crystal River No. 3 nuclear unit. (See original affidavit.)

- (3) Access by Cities to nuclear energy from these units, Turkey Point Nos. 3 and 4, St. Lucie 1, and other large, efficient generation of FP&L through purchase from the Company under wholesale for resale rates has either been refused or discouraged by FP&L, directly or through attempts to impose territorial limitations, and, presently, to the limited extent the Company currently makes such sales (to cooperatives, the Utilities Commission of the City of New Smyrna Beach, and the City of Homestead) the rate for such sales, at least since April 1, 1976, is so high relative to the Company's retail rates as to constitute a "price squeeze" and thus inhibit competition. (See documents included in Exhibit L and those attached to Cities' petition to intervene and request for hearing in Dockets No. 50-335-A, 50-389-A, 50-250-A, and 50-251-A regarding refusals or reluctance to sell under wholesale for resale tariffs and territorial limitations. Further, FP&L has caused price squeezes in the past. See Exhibit M and later discussion in this affidavit regarding price squeeze.)
- (4) FP&L is exercising its current complete monopoly of nuclear energy and its access to low-cost firm gas supply in making offers to purchase municipal systems which, because of their size and limited power supply alternatives, have installed smaller, less efficient fossil fueled plants over the years in order to

meet load, and since the O. P. E. C. oil embargo in October, 1973, have been faced with rapidly increased oil costs and gas supplies diminished to virtually nothing. The planning for large, efficient generating plants, particularly nuclear plants, requires long lead times and access to coordination. Throughout the lead time during which municipals might have brought on line large generating units, including nuclear units, to serve present load, FP&L has actively opposed coordinated planning and operation with municipal systems and others in a state-wide integrated pool; has opposed legislation that would permit joint municipal action, including joint financing; has refused up to the present date to grant access to its transmission system on a general commitment basis under a filed tariff or even on a case-by-case basis under reasonable terms and conditions. Cities have therefore been effectively blocked from developing competitive bulk power supply resources, and those in FP&L's service area now stand virtually defenseless against efforts by the Company to acquire their systems absent the relief requested in Cities' petition in Dockets P-636-A and 50-389-A and the relief requested in Cities' petition in Dockets 50-335-A, 50-389-A, 50-250-A, and 50-251-A. Municipal systems outside FP&L's system service area, although not subjected to efforts by the Company to directly purchase their systems, are nonetheless

subjected to the same citizen pressure to achieve lower costs and rates or to sell their systems. (See documents attached to original affidavit dated April 14, 1976, the discussion of alternatives on pp. 33-34 of the original affidavit, and the documents in Exhibit L.)

FP&L did not seek commercial licenses for Turkey Point 3 and 4 and St. Lucie 1 which would have required antitrust review before licensing, including an evaluation of the anti-competitive effects of FP&L not granting reasonable access and coordination. When systems did request access and coordination, as did New Smyrna Beach, Homestead and the cooperatives in St. Lucie 2, relying on negotiations between FP&L and the Department of Justice which began in late 1973, in spite of those negotiations and direct negotiations with FP&L, these systems have still not been able to secure such reasonable access and coordination. (See correspondence, Exhibit N, between representatives of the Utilities Commission, FP&L, and the Department of Justice through the Company's rejection dated November 20, 1974, of the Utilities Commission's proposal dated November 13, 1974. Thereafter negotiations took place over many months in which the parties were unable to reach agreement as to a reasonable participation share or as to transmission service, and that is the status to date. In fact, no reply has been received to date to my letter of April 21, 1976, to Mr. Ken Daniels regarding transmission service.)

The Price Squeeze

As previously noted, where FP&L is selling power to municipals and cooperatives at wholesale for resale rates on file with the Federal Power Commission, the wholesale rate and its terms and conditions are so unreasonably high and discriminatory as to make the resale for retail loads noncompetitive. For certain retail loads, it is impossible to compete with FP&L's retail rates, thus illustrating a classical "price squeeze." As compared to the complexities of analyzing all of the costs associated with service to small residential customers, where such costs as customer accounting and collecting and distribution costs are a smaller portion of the cost to serve, the price squeeze may clearly be evaluated by analyzing the ability to compete for large commercial and industrial loads where such distribution costs are a smaller portion of the cost to serve. Under the wholesale rates which have been in effect since April 1, 1976, there exists such a pervasive price squeeze that it is impossible to maintain retail rates of municipals competitive with those of FP&L under its GS-D rate (General Service - Demand), which is the rate applicable to most of its large commercial and industrial loads. Exhibit M includes the currently effective wholesale for resale rate SR-1 and the currently effective retail rate GS-D and accompanying fuel adjustment clauses. Also included in Exhibit M are two tables of eight pages each illustrating the price squeeze.

Table 1, Exhibit M, shows the monthly retail revenues that would be received under rate GS-D from 5,000 kW and 10,000 kW customers

under different load factors of 200, 400 and 600 hours use of demand (27% 55% and 82% monthly load factor). The lower load factors are those used by the Federal Power Commission in comparing bills between utilities to large customers and the highest load factor represents the high end of such customer load factor range (100% being maximum). Table 2 shows the same information for monthly loads of 100 kW and 500 kW. In addition to a range of load factors, these tables also show the revenues that would be received under the GS-D rate and following conditions:

- (a) GS-D Winter Rates and Summer Rates,
- (b) 100% and 95% coincidence of retail customers' monthly peak with municipal system's peak,
- (c) Outside a city where FP&L does not pay cities or collect from customers a franchise fee and inside a city where FP&L does pay a fee to a franchisor which is passed on to the customers, I have used 5% as the franchise tax adder to retail rates for calculating these tables where applicable.

The retail and wholesale fuel adjustment revenues shown on the tables in Exhibit M are the average charges to FP&L customers for the months of April, May and June, 1976. The totals on each page at line 8 are the revenues from the output, being retail sales.

The cost of the input to a municipal system to purchase the power and energy to supply the retail load is shown on lines 9-13. Not

included in this analysis, for simplicity, is the cost of purchasing demand and energy losses on the municipal system, which costs would increase the cost of input by as little as 1.5% to upward of 10% depending on the delivery voltage of the municipal system, the location of the retail customer on that system, and system characteristics.

Excluding the cost of losses the total cost of the input is shown on line 13 and the difference between that cost of the input and revenues from output is shown on line 14. At this point there have been included none of the cities' billing and accounting costs, meter costs, transformer costs, distribution line costs, administrative and general costs, depreciation, return on investment or payment for principal and interest on its system that might run from a low of 1.0 mills/kWh to the order of 5.0 mills/kWh. Nonetheless it can be seen from line 14, Table 1, pages 1 through 6, that a municipal customer would not even recover the cost to purchase its wholesale supply from FP&L to serve large customers except under the most favorable set of conditions, namely, extremely high load factor of 600 hours use; at summer rates only. Even in those instances which show positive margins of .93 mills/kWh for a 5,000 kW customer at 600 hours use and .81 mills/kWh for a 10,000 kW customer at 600 hours use inside the city at 100% coincidence (Table 1, page 7), and 1.24 mills/kWh for 5,000 kW and 1.13 mills/kWh for 10,000 kW at 95% coincidence (Table 1, page 8), these margins are not sufficient to recover losses and distribution costs.

Even to serve the smaller 500 kW to 1,000 kW retail loads, competition is not possible due to negative margins at the municipal delivery point except in the two most favorable conditions, namely, summer rates and inside the city where a franchise fee would be passed on, and even in those instances it appears that the small positive margins would not be adequate to cover distribution costs and losses.

There is no question therefore that a serious price squeeze exists that precludes competition. The Company, in its response to cooperatives' petition to intervene, stated in a footnote on page 13 as follows:

"22/ The Cooperatives complain that Applicant's wholesale rates are currently higher than its retail rates to general service customers. However, the Cooperatives are aware both that the wholesale rates now in effect have yet to be approved by the FPC, and thus are subject to refund, and that Applicant plans before the end of the summer to request higher retail rates. It is not, and cannot be, contended that Applicant has pursued any consistent policy of maintaining wholesale rates which are higher than its retail rates."

The New Smyrna Beach Utilities System has contended in the past that the Company had effectuated a price squeeze through its rates filed in FPC Docket E-8008 which went into effect in September, 1973, and which the Administrative Law Judge found "...have not been shown to be just and reasonable; and they are, therefore, found to be excessive or otherwise unlawful." However, almost three years later, the Federal Power Commission has not yet ruled on this case; therefore no refunds have been made, if any are to be made, and the rates complained of remained in effect until

April 1, 1976, when new, higher rates under the SR-1 rate went into effect subject to hearing and possible eventual refunds. This filing has been assigned FPC Docket No. ER76-211, and the New Smyrna Beach Utilities Commission has intervened and objected to this increase, in particular to the level of the increase and the ratchet provisions. The old rate and the new rate and the estimated cost to the Utilities Commission for a 12-month period are compared as follows:

	<u>Old Rate (SR)</u>	<u>New Rate (SR-1)</u>	<u>Increase</u>	
			<u>Rate</u>	<u>%</u>
Demand Charge	\$2.65/kW	\$3.73/kW	\$1.13/kW	42.5%
Energy Charge:				
Base Charge	7.50 mills/kWh	19.00 mills/kWh		
Fuel Adjustment*	<u>3.25 mills/kWh</u>	<u>(1.39)mills/kWh</u>		
Total Charge	15.75 mills/kWh	17.61 mills/kWh	1.86 mills/kWh	11.8%
Total Costs - 12 Months Ended Dec. 1976	\$1,491,731	\$1,873,671	\$386,940	25.95%
Demand Costs	\$ 484,028	\$ 751,932	\$267,904	55.3%
Energy Costs	\$1,007,703	\$1,126,739	\$119,036	11.8%

*Estimated Average - 12 months ended December, 1976.

As shown above, the total annual demand costs are some \$267,904 or \$22,325 per month higher than under the old rate. This 55.3% increase is due to the 42.5% increase in the rate and an 8.9% increase in billing demand resulting from the ratchet provision going from 60% to 75%. Further, the ratchet provision in the filed rate for partial requirements that will apply when power is taken over the parallel tie when it is completed is 100% of the highest demand in the previous eleven months.

As stated above, FP&L noted in its response to cooperatives' petition to intervene in South Date that "...the cooperatives are aware..."

that the Applicant plans before the end of the summer to request higher retail rates." Cities were not aware of such plans of FP&L prior to reading the Company's response to cooperatives' petition. Neither, to my knowledge or belief, are the citizens of Florida aware of such plans. Certainly the consultants, Ernst & Ernst, employed by the City of Vero Beach to analyze FP&L's proposal to purchase the system, were not made aware of such plans since their whole analysis was based on comparing existing Vero Beach rates to past and existing rates of FP&L. Of course, until the Company files new higher retail rates and such rates are actually placed into effect, Cities will not be able to evaluate to what extent such new rates would diminish the present price squeeze, nor will the citizens of Vero Beach know what the true difference in costs to them under FP&L or city ownership actually will be. (In that regard, the citizens of Vero Beach are entitled to know what the cost of service and resulting rates to them might be reduced if the City were free to pursue the alternatives outlined on page 34 of my original affidavit.)

One aspect of FP&L's filed SR-1 rate contains both the elements of price squeeze and further anti-competitive activity by the Company. That is the provision of the rate under "Demand" (First revised Sheet No. 5) which states:

"Where the Company supplies partial requirements of a customer at a point of delivery, the billing demand shall be the highest metered demand during the preceding eleven months adjusted to reflect service delivered under other appropriate rate schedules."

This is a 100% ratchet as compared to the 75% ratchet on demand for all-requirements service. The Company has submitted no cost justification

for this higher ratchet on partial requirements service, nor can one be made. It is designed to discourage and penalize parallel operation with the Company whereby a city can make most effective and efficient utilization of its power supply resources including partial requirements purchased from the Company. If the Company's cost of service can be recovered under the filed rate and a 75% ratchet for all-requirements service, its costs would be recovered or over-recovered under the same rate and a 75% ratchet for partial requirements service.

Robert E. Bathen

Robert E. Bathen

STATE OF FLORIDA)
COUNTY OF ORANGE)

On this the fourth day of August, 1976, before me, Thaddeus Szymankiewicz, the undersigned officer, personally appeared Robert E. Bathen, known to me to be the person whose name is subscribed to the above instrument and acknowledged that he executed the same for the purpose therein contained.

IN WITNESS WHEREOF, I have hereunto set my hand and official seal.

Thaddeus Szymankiewicz

NOTARY PUBLIC STATE OF FLORIDA AT LARGE
MY COMMISSION EXPIRES OCT. 26, 1977
BONDED THRU GENERAL INSURANCE UNDERWRITERS

LIST OF EXHIBITS

- EXHIBIT K - FMUA Comparison of Residential Electric Rates
April, May and June, 1976
- EXHIBIT L - Deposition Documents - Case No. 68-305 Civ J.,
In the United States District Court In and For The
Middle District of Florida, Jacksonville Division
- EXHIBIT M - Table 1 - Price Squeeze (Examples Showing Inability
of Municipalities to Sell Power for Industrial or
Commercial Loads of 5,000 KW to 10,000 KW at
Company's Present GS-D Retail Rates)
- Table 2 - Price Squeeze (Examples Showing Inability
of Municipalities to Sell Power for Industrial or
Commercial Loads of 500 KW to 1,000 KW at
Company's Present GS-D Retail Rates)
- Wholesale for Resale Rate Schedule SR-1 and
Retail Rate Schedule GS-D
- EXHIBIT N - Correspondence re St. Lucie 2 - Access, Coordination
and Transmission Service, November 14, 1973 -
April 1, 1976

June, 1976

G - Generate

COMPARISON OF RESIDENTIAL ELECTRIC RATES compiled by FLORIDA MUNICIPAL UTILITIES ASSOCIATION - Lakeland, Florida

CITY	G	500 KWH			1,000 KWH			2,000 KWH			3,000 KWH			OTHER CHARGES
		RES'DTL. BASE RATE	FUEL ADJ.	TOTAL	RES'DTL. BASE RATE	FUEL ADJ.	TOTAL	RES'DTL. BASE RATE	FUEL ADJ.	TOTAL	RES'DTL. BASE RATE	FUEL ADJ.	TOTAL	
ALACHUA		\$ 23.86	\$ cr. .90	\$ 22.96	\$ 42.71	\$ cr. 1.80	\$ 40.91	\$ 80.41	\$ cr. 3.60	\$ 76.81	\$ 113.11	\$ cr. 5.40	\$ 107.71	10% U.T.
BARTON		14.82	7.14	21.96	26.19	14.28	40.47	48.96	28.56	77.52	71.69	42.84	114.53	10% U.T.
BLOOMSTOWN		24.57	----	24.57	40.95	-----	40.95	72.85	-----	72.85	104.75	-----	104.75	5% U.T.
BUSHNELL		13.70	9.69	23.35	22.95	19.30	42.25	41.45	38.60	80.05	59.95	57.90	117.85	10% U.T.
MATTANOOCHIEE		12.00	2.46	14.46	19.50	4.92	24.42	32.00	9.84	41.84	44.50	14.96	59.46	None
CLIVISTON		16.10	5.00	21.10	28.10	10.00	38.10	50.60	20.00	70.60	73.10	30.00	103.10	None
FORT MEADE		22.57	cr. .90	21.67	41.07	cr. 1.80	39.27	78.07	cr. 3.60	74.47	115.07	cr. 5.40	109.67	10% U.T.
FORT PIERCE	G	13.44	9.13	22.57	22.94	18.27	41.21	41.94	36.54	78.48	60.94	54.81	115.75	10% U.T.
GALESVILLE	G	15.70	8.98	24.68	28.20	17.85	46.05	54.20	35.70	89.90	80.20	53.55	133.75	10% U.T.
GREEN COVE SPRINGS		24.40	----	24.40	44.40	----	44.40	80.90	----	80.90	115.90	----	115.90	10% U.T.
HAVANA		26.82	-----	26.82	47.82	-----	47.82	89.82	-----	89.82	131.82	-----	131.82	None
HOHESTEAD	G	15.17	9.50	24.67	27.17	19.00	46.17	51.17	38.00	89.17	75.17	57.00	132.17	None
JACKSONVILLE	G	11.25	9.50	20.75	18.38	19.00	37.38	30.13	38.00	68.13	41.13	57.00	98.13	10% U.T.
JACKSONVILLE BEACH		14.55	10.50	25.05	22.05	21.00	43.05	36.30	42.00	78.30	49.80	63.00	112.80	None
KEY WEST	G	14.44	8.15	22.59	24.44	16.30	40.74	43.44	32.60	76.04	60.44	48.90	109.34	None
KISSIMEE	G	21.42	4.94	26.36	36.47	9.87	46.34	63.27	11.74	75.01	90.07	21.61	111.68	8% U.T.
LAKE HELEN		14.21	-----	14.21	35.71	-----	35.71	78.71	-----	78.71	121.71	-----	121.71	None
LAKELAND	G	13.25	8.70	21.95	24.25	17.40	41.65	46.25	34.80	81.05	68.25	52.20	120.45	10% U.T.
LAKE WORTH	G	12.76	6.70	19.46	21.76	13.40	35.16	35.76	26.80	62.56	57.76	39.20	96.96	10% U.T.
LEESBURG		24.16	cr. .65	23.51	44.41	cr. 1.30	43.11	84.91	cr. 2.60	82.31	125.41	cr. 3.90	121.51	None
MOORE HAVEN		18.99	7.58	26.57	32.64	15.16	47.80	59.94	30.32	90.26	87.24	45.48	132.72	10% U.T.
MOUNT DORA		21.19	1.07	22.26	48.54	2.14	50.68	91.24	4.28	95.52	133.94	6.47	140.36	None
NEUBERRY		22.50	cr. .90	21.60	41.75	cr. 1.80	39.95	78.75	cr. 3.60	75.15	115.75	cr. 5.40	110.35	10% U.T.
NEW SHARNA BEACH	G	19.91	2.60	22.51	34.16	5.20	39.36	55.01	10.40	65.41	91.16	15.60	106.76	None
OCALA		23.30	cr. .90	22.40	41.25	cr. 1.80	39.45	77.15	cr. 3.60	73.55	113.95	cr. 5.40	108.55	None
ORLANDO	G	13.54	6.76	20.30	22.49	13.51	36.00	40.39	27.02	67.41	58.29	40.58	98.82	10% U.T.
QUINCY		17.06	-----	17.06	29.56	-----	29.56	54.56	-----	54.56	79.56	-----	79.56	10% U.T.
SAINT CLOUD	G	14.90	6.00	20.90	24.65	12.00	36.65	43.15	24.00	67.15	61.65	36.00	97.65	10% U.T.
SEBRING	G	14.92	5.55	20.47	24.92	11.09	36.01	43.92	22.18	66.10	62.92	33.27	96.19	5% U.T.
STARKE	G	15.50	6.98	22.48	26.78	12.04	38.82	54.25	22.16	76.41	81.73	32.20	114.02	10% U.T.
TALLAHASSEE	G	17.40	3.50	20.90	30.35	7.00	37.35	56.25	14.00	70.25	82.15	21.00	103.15	11% U.T.
VERO BEACH	G	15.93	9.17	25.10	26.65	18.34	44.99	48.08	36.68	84.76	69.52	55.02	124.54	10% U.T.
WAUCHULA	G	16.23	8.79	25.02	28.73	17.57	46.30	53.73	35.14	88.87	78.73	52.71	131.44	10% U.T.
WILLISTON		18.12	7.10	25.28	30.62	14.32	44.94	55.62	28.64	84.26	80.62	42.95	123.58	None
FLORIDA POWER CORP.	G	22.58	cr. 1.14	21.44	41.91	cr. 2.22	39.63	79.08	cr. 4.50	74.52	116.25	cr. 6.84	109.41	Add City Franchise Fee & Utility Tax
FLORIDA POWER & LIGHT CO.	G	18.35	cr. .21	18.14	33.29	cr. .47	32.87	61.96	cr. .84	61.12	90.63	cr. 1.26	89.37	
GULF POWER CORP.	G	19.25	cr. .41	18.82	34.05	cr. .86	33.99	64.15	cr. 1.72	62.43	93.45	cr. 2.58	90.87	
INAPA ELECTRIC CO.	G	20.65	2.14	22.80	36.99	4.29	41.28	68.36	8.58	76.94	99.73	12.87	112.60	

May, 1976

G - Generate

COMPARISON OF RESIDENTIAL ELECTRIC RATES compiled by FLORIDA MUNICIPAL UTILITIES ASSOCIATION - Lakeland, Florida

CITY	G	500 kWh			1,000 kWh			2,000 kWh			3,000 kWh			OTHER CHARGES
		RES'DTL. BASE RATE	FUEL ADJ.	TOTAL	RES'DTL. BASE RATE	FUEL ADJ.	TOTAL	RES'DTL. BASE RATE	FUEL ADJ.	TOTAL	RES'DTL. BASE RATE	FUEL ADJ.	TOTAL	
ALACHUA		\$ 23.86	\$cr. .86	\$ 23.00	\$ 42.71	\$cr. 1.71	\$ 41.00	\$ 80.41	\$cr. 3.42	\$ 76.99	\$113.11	\$cr. 5.13	\$107.98	10% U.T.
BARTON		14.82	7.11	21.93	26.19	14.22	40.41	48.96	28.44	77.40	71.69	42.66	114.35	10% U.T.
CLOUETSTOWN		24.57	-----	24.57	40.95	-----	40.95	72.85	-----	72.85	104.75	-----	104.75	5% U.T.
DUNNELL		13.70	9.20	22.90	22.95	18.40	41.35	41.45	36.80	78.25	59.95	55.20	115.15	10% U.T.
CHATTANOOCHEE		12.00	2.39	14.39	19.50	4.78	24.28	32.00	9.56	41.56	44.50	14.34	58.84	None
CLEWISTON		16.10	3.45	19.55	28.10	6.90	35.00	50.60	13.00	64.40	73.10	20.70	93.80	None
FORT MEADE		22.57	cr. .86	21.71	41.07	cr. 1.71	39.36	78.07	cr. 3.42	74.65	115.07	cr. 5.13	109.94	10% U.T.
FORT PIERCE	G	13.44	9.40	22.84	22.94	18.80	41.74	41.94	37.60	79.54	60.94	56.40	117.34	10% U.T.
CAINESVILLE	G	15.70	8.85	24.55	28.20	17.69	45.89	54.20	35.38	89.58	80.20	53.07	133.27	10% U.T.
GREEN COVE SPRINGS		24.40	cr. .50	23.90	44.40	cr. 1.00	43.40	80.90	cr. 2.00	78.90	115.90	cr. 3.00	112.90	10% U.T.
HAVANA		26.82	-----	26.82	47.82	-----	47.82	89.82	-----	89.82	131.82	-----	131.82	None
HONESTAD	G	15.17	9.50	24.67	27.17	19.00	46.17	51.17	38.00	89.17	75.17	57.00	132.17	None
JACKSONVILLE	G	11.25	10.00	21.25	18.38	20.00	38.38	30.13	40.00	70.13	41.13	60.00	101.13	10% U.T.
JACKSONVILLE BEACH		14.55	11.00	25.55	22.05	22.00	44.05	36.30	44.00	80.30	49.80	66.00	115.80	None
KEY WEST	G	13.29	7.75	21.04	22.54	15.50	38.04	40.14	31.00	71.14	54.90	46.50	101.40	None
KISSIMEE	G	21.42	4.76	26.18	36.47	9.52	45.99	63.27	19.04	82.31	90.07	28.56	118.63	5% U.T.
LAKE HELEN		14.21	-----	14.21	35.71	-----	35.71	78.71	-----	78.71	121.71	-----	121.71	None
LAKELAND	G	13.25	8.97	22.22	24.25	17.93	42.18	46.25	35.86	82.11	68.25	53.79	122.04	10% U.T.
LAKE WORTH	G	12.76	6.70	19.46	21.76	13.40	35.16	35.76	26.80	62.56	57.76	39.20	96.96	10% U.T.
LEESBURG		24.16	cr. .78	23.38	44.41	cr. 1.36	43.05	84.91	cr. 2.72	82.19	125.41	cr. 4.08	121.33	None
MOORE HAVEN		18.99	8.20	27.19	32.64	16.40	49.04	59.94	32.80	92.74	87.24	49.20	136.44	10% U.T.
MOUNT DORA		27.19	cr. 1.02	26.17	48.54	cr. 2.04	46.50	91.24	cr. 4.08	87.16	133.94	cr. 6.12	127.82	None
NEEDBERRY		22.50	cr. .86	21.64	41.75	cr. 1.71	40.04	78.75	cr. 3.42	75.33	115.75	cr. 5.13	110.62	10% U.T.
NEW SHYRNA BEACH	G	19.91	2.95	22.86	34.16	5.90	40.06	55.01	11.80	66.81	91.16	17.70	108.85	None
OCALA		23.30	cr. .86	22.44	41.25	cr. 1.71	39.54	77.15	cr. 3.42	73.73	113.95	cr. 5.13	108.92	None
ORLANDO	G	13.54	7.31	20.85	22.49	14.61	37.10	40.39	29.22	69.61	58.29	43.83	102.12	10% U.T.
QUINCY		17.06	-----	17.06	29.56	-----	29.56	54.56	-----	54.56	79.56	-----	79.56	10% U.T.
SAINT CLOUD	G	14.90	6.00	20.90	24.65	12.00	36.65	43.15	24.00	67.15	61.65	36.00	97.65	10% U.T.
SEBRING	G	14.92	7.08	22.00	24.92	14.16	39.08	43.92	28.32	72.24	62.92	42.18	105.10	5% U.T.
STARKE	G	15.50	6.98	22.48	26.78	12.04	38.79	54.25	22.16	76.41	81.75	32.29	114.04	10% U.T.
TALLAHASSEE	G	17.40	3.55	20.95	30.35	7.10	37.45	56.25	14.20	70.45	82.15	21.30	103.45	11% U.T.
VERO BEACH	G	15.93	9.26	25.19	26.65	18.52	45.17	48.08	37.04	85.12	69.52	55.56	125.08	10% U.T.
WAUCHULA	G	16.23	8.83	25.06	28.73	17.66	46.39	53.73	35.32	89.05	78.73	52.98	131.71	10% U.T.
WILLISTON		18.12	7.21	25.33	30.62	14.42	45.04	55.62	28.84	84.46	80.62	43.26	123.88	None
FLORIDA POWER CORP.	G	22.58	cr. 1.06	21.52	41.91	cr. 2.11	39.80	79.08	cr. 4.22	74.86	116.25	cr. 6.33	109.92	Add City
FLORIDA POWER & LIGHT CO.	G	18.35	cr. .66	17.69	33.33	cr. 1.32	32.01	62.53	cr. 2.64	59.89	91.73	cr. 3.96	87.77	Franchise
GULF POWER CORP.	G	19.25	cr. .53	18.72	34.85	cr. 1.05	33.80	64.15	cr. 2.10	62.05	93.45	cr. 3.15	90.30	Fee &
TAMPA ELECTRIC CO.	G	20.65	2.30	22.95	36.80	4.60	41.40	67.40	9.20	76.60	98.00	13.80	111.80	Utility fax

April, 1976

G - Generate

COMPARISON OF RESIDENTIAL ELECTRIC RATES compiled by FLORIDA MUNICIPAL UTILITIES ASSOCIATION - Lakeland, Florida

CITY	G	500 KWH			1,000 KWH			2,000 KWH			3,000 KWH			OTHER CHARGES
		RES'DTL. BASE RATE	FUEL ADJ.	TOTAL	RES'DTL. BASE RATE	FUEL ADJ.	TOTAL	RES'DTL. BASE RATE	FUEL ADJ.	TOTAL	RES'DTL. BASE RATE	FUEL ADJ.	TOTAL	
ALACHUA		\$ 23.86	\$ cr. .88	\$ 22.98	\$ 42.71	\$ cr. 1.76	\$ 40.95	\$ 80.41	\$ cr. 3.52	\$ 76.89	\$113.11	\$ cr. 5.28	\$107.83	10% U.T.
BARTON		14.82	7.56	22.38	26.19	15.11	41.30	48.96	30.22	79.18	71.69	45.33	117.02	10% U.T.
BLOUNTSTOWN		24.57	-----	24.57	40.95	-----	40.95	72.85	-----	72.85	104.75	-----	104.75	5% U.T.
BUSHNELL		13.70	10.25	23.95	22.95	20.50	43.45	41.45	41.00	82.45	59.95	61.50	121.45	10% U.T.
CHATTANOOCHEE		12.00	1.69	13.69	19.50	3.38	22.88	32.00	6.76	38.76	44.50	10.14	54.64	None
CLEVISTON		16.10	3.55	19.65	28.10	7.10	35.20	50.60	14.20	64.80	73.10	21.30	94.40	None
FORT MEADE		24.57	cr. .88	23.69	43.07	cr. 1.76	41.31	80.07	cr. 3.52	76.55	117.07	cr. 5.28	111.79	10% U.T.
FORT PIERCE	G	13.44	8.94	22.38	22.94	17.87	40.81	41.94	34.74	76.68	60.94	53.62	114.56	10% U.T.
GAINESVILLE	G	15.70	9.07	24.77	28.20	18.14	46.34	54.20	36.28	90.48	80.20	54.42	134.62	10% U.T.
GREEN COVE SPRINGS		24.40	-----	24.40	44.40	-----	44.40	80.90	-----	80.90	115.90	-----	115.90	10% U.T.
HAWAHA		26.82	-----	26.82	47.82	-----	47.82	89.82	-----	89.82	131.82	-----	131.82	None
HOUSTEAD	G	15.17	9.50	24.67	27.17	19.00	46.17	51.17	38.00	89.17	75.17	57.00	132.23	None
JACKSONVILLE	G	11.25	10.00	21.25	18.38	20.00	38.38	30.13	40.00	70.13	41.13	60.00	101.13	10% U.T.
JACKSONVILLE BEACH		14.55	11.00	25.55	22.05	22.00	44.05	36.30	44.00	80.30	49.80	66.00	115.80	None
KEY WEST	G	13.29	7.85	21.14	22.54	15.70	38.24	40.14	31.40	71.54	54.90	47.10	102.00	None
KISSIMEE	G	21.42	5.07	26.49	36.47	10.13	46.60	63.27	20.26	83.53	90.07	39.39	120.46	8% U.T.
LAKE HELEN		14.21	-----	14.21	35.71	-----	35.71	78.71	-----	78.71	121.71	-----	121.71	None
LAKELAND	G	13.25	8.53	21.78	24.25	17.06	41.31	46.25	34.12	80.37	68.25	51.10	119.43	10% U.T.
LAKE WORTH	G	12.76	10.15	22.91	21.76	20.30	42.06	35.76	40.60	76.36	57.76	60.90	118.66	10% U.T.
LEESBURG		24.16	cr. 2.39	21.77	44.41	cr. 4.78	39.63	84.91	cr. 9.56	75.35	125.41	cr. 14.34	111.07	None
MOORE HAVEN		18.99	3.80	22.79	32.64	7.60	40.24	59.94	15.20	75.14	87.24	22.80	110.04	10% U.T.
MOUNT DORA		21.19	cr. 1.05	20.14	48.54	cr. 2.10	46.44	91.24	cr. 4.20	87.04	133.94	cr. 6.60	127.34	None
NEEDHAM		22.50	cr. .88	21.62	41.75	cr. 1.76	39.99	78.75	cr. 3.52	75.23	115.75	cr. 5.28	110.47	10% U.T.
NEW SMYRNA BEACH	G	19.91	3.00	22.91	34.16	6.00	40.16	55.01	12.00	67.01	91.16	18.00	109.16	None
OCALA		23.30	cr. .88	22.42	41.25	cr. 1.76	39.49	77.15	cr. 3.52	73.63	113.05	cr. 5.28	107.77	None
ORLANDO	G	13.54	7.69	21.23	22.49	15.38	37.87	40.39	30.76	71.15	58.29	46.14	104.43	10% U.T.
QUINCY		17.06	-----	17.06	29.56	-----	29.56	54.56	-----	54.56	79.56	-----	79.56	10% U.T.
SAINT CLOUD	G	14.90	6.00	20.90	24.65	12.00	36.65	43.15	24.00	67.15	61.65	36.00	97.65	10% U.T.
SEORING	G	14.92	9.23	24.15	24.92	18.46	43.38	43.92	36.92	80.84	62.92	55.38	118.30	5% U.T.
STARKE	G	15.50	6.98	22.48	26.75	12.04	38.79	54.25	22.16	76.41	81.75	32.29	114.04	10% U.T.
TALLAHASSEE	G	17.40	5.05	22.45	30.35	10.10	40.45	56.25	20.20	76.45	82.15	30.30	112.45	11% U.T.
VERO BEACH	G	15.93	9.41	25.43	26.65	18.83	45.48	48.08	37.66	85.74	69.52	56.48	126.00	10% U.T.
WAUCHULA	G	16.23	-----	16.23	28.73	-----	28.73	53.73	-----	53.73	78.73	-----	78.73	10% U.T.
WILLISTON		18.12	7.19	25.31	30.62	14.37	44.99	55.62	28.74	84.36	80.62	43.11	123.73	None
FLORIDA POWER CORP.	G	22.58	cr. 1.05	21.53	41.91	cr. 2.10	38.71	79.08	cr. 4.20	74.88	116.25	cr. 6.30	109.95	Add City
FLORIDA POWER & LIGHT CO.	G	18.35	cr. .47	17.88	32.91	cr. .94	31.97	60.41	cr. 1.88	58.53	87.91	cr. 2.82	85.09	Franchise
GULF POWER CORP.	G	19.25	cr. .76	18.49	34.10	cr. 1.51	32.59	58.40	cr. 3.07	55.38	82.70	cr. 4.53	78.17	Fee &
TAMPA ELECTRIC CO.	G	20.65	1.93	22.58	36.80	3.80	40.66	67.40	7.72	75.12	98.00	11.58	109.58	Utility Tax