

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Examination of the outage and replacement fuel/power costs associated with the CR3 steam generator replacement project, by Progress Energy Florida, Inc.

DOCKET NO. 100437-EI  
ORDER NO. PSC-13-0084-PCO-EI  
ISSUED: February 13, 2013

SECOND REVISED ORDER ESTABLISHING PROCEDURE

**I. Background**

In the fall of 2009, during Refueling Outage 16, Progress Energy Florida, Inc. (PEF) replaced the Crystal River Unit 3 (CR3) nuclear power plant's existing steam generator. On October 2, 2009, PEF discovered a delamination (cracking of the layers of concrete) of a portion of CR3's containment building. CR3 was not returned to service in the timeframe planned by PEF for Refueling Outage 16 and the outage was extended.

During the Commission's 2010 fuel and purchased power cost recovery docket, PEF filed a motion to create a separate docket to investigate the prudence and reasonableness of PEF's actions concerning the delamination and to review the prudence of PEF's resulting fuel and purchased power replacement costs associated with the extended outage. PEF's motion was granted and this docket was opened by the Commission. The Office of Public Counsel (OPC), the Florida Industrial Power Users Group (FIPUG), White Springs Agricultural Chemicals, Inc., d/b/a PCS Phosphate – White Springs (PCS), and Southern Alliance for Clean Energy (SACE) have been granted intervention in this docket.

On January 24, 2011, the Prehearing Officer conducted the first of several status conferences regarding the establishment of a case schedule. By Order No. PSC-11-0108-PCO-EI, issued February 8, 2011, a case schedule was established based on PEF's March 31, 2011 anticipated return to service of CR3. Subsequently, in a status report and motion dated April 4, 2011, PEF notified the Commission that CR3 would not return to service on March 31, 2011, as anticipated. PEF explained that on March 14, 2011, it was in the process of completing the final stages of retensioning the CR3 containment building when PEF's surveillance and monitoring equipment alerted PEF to possible issues in the containment structure. PEF filed a detailed updated status report on June 27, 2011, indicating that during the March 14, 2011 retensioning, PEF discovered several additional delaminations to other bays of the containment structure. PEF reported that because of the March 14, 2011 delaminations, PEF estimated that CR3 would not return to service until 2014. PEF also reported that its initial analysis of the cost of repairs to the containment building were between \$900 million and \$1.4 billion.

On August 4, 2011, PEF filed a Second Motion to Establish Case Schedule. On August 5, 2011, OPC, FIPUG, and PCS filed objections to PEF's motion. At the August 8, 2011 status conference, the parties and Commission staff discussed the motion, objections, the scope

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of the docket, and possible hearing schedules. On August 23, 2011, a second Order Establishing Procedure, Order No. PSC-11-0352-PCO-EI, was issued dividing this docket into three phases and setting a case schedule. The three phases were 1) a prudence review of the events and decisions of PEF leading up to the October 2, 2009 delamination event; 2) a consideration of the prudence of PEF's decision to repair rather than decommission CR3; and 3) a prudence review of the decisions and events subsequent to the October 2, 2009 delamination leading up to the March 14, 2011 delamination event and the subsequent repair of the containment building.

On March 8, 2012, the Commission issued Order No. PSC-12-0104-FOF-EI, Final Order Approving Stipulation and Settlement Agreement, which settled Phase I of this docket. Subsequently, on January 20, 2012, PEF filed a petition to dismiss Phase I and stay Phases II and III. On March 14, 2012, PEF's request was granted in Order No. PSC-12-0115-PCO-EI. Order No. PSC-12-0115-PCO-EI also provided the Prehearing Officer with the sole discretion to determine when Phases II and III were ready to proceed.

On February 8, 2013, PEF filed a Motion to Lift Stay on Phase II of Docket No. 100437-EI and to Establish Procedural Case Schedule. In its Motion, PEF states that the decision to retire CR3 has been made by Duke Energy Board of Directors and that decision is now ripe for review by the Commission in this docket.

Having reviewed PEF's Motion, I agree that the stay must be lifted; however, I believe that not only is Phase II ripe for review, but Phase III as well. When Order No. PSC-11-0352-PCO-EI, was issued dividing this docket into three phases, it was issued with the understanding that CR3 was going to be repaired. As discussed during the August 8, 2011 Status Conference, PEF indicated that the Company was continuing to engage in negotiations with contractors to effectuate the repair of CR3.<sup>1</sup> Since the decision has been made to retire CR3, the OEP must be modified for the Commission's review of both phases at the same time.

This Order is issued pursuant to the authority granted by Rule 28-106.211, Florida Administrative Code (F.A.C.), which provides that the presiding officer before whom a case is pending may issue any orders necessary to effectuate discovery, prevent delay, and promote the just, speedy, and inexpensive determination of all aspects of the case.

## **II. General Filing Procedures**

In accordance with Rule 25-22.028, F.A.C., parties filing documents in this proceeding shall submit the original document and the appropriate number of copies to the Office of Commission Clerk for filing in the Commission's docket file. Filings may be made by mail, hand delivery, courier service, or in some instances electronically. Please refer to the rule for the requirements of filing on diskette for certain utilities. To the extent possible, all filings made electronically or on diskette shall be provided in Microsoft Word format. Filings pertaining to this docket should identify the assigned docket number and should be addressed to:

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<sup>1</sup> August 8, 2011, Status Conference, Tr. 6-9.

Office of Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Testimony and evidence admitted during one phase of this docket, upon proper motion, may be admitted into later phases of the docket.

### **III. Prefiled Testimony and Exhibits**

Each party shall file, in writing, all testimony and exhibits that it intends to sponsor, pursuant to the schedule set forth in Section VIII of this Order. An original and 15 copies of all testimony and exhibits shall be filed with the Office of Commission Clerk, by 5:00 p.m. on the date due. A copy of all prefiled testimony and exhibits shall be served by regular mail, overnight mail, or hand delivery to all other parties and staff no later than the date filed with the Commission. Failure of a party to timely prefile exhibits and testimony from any witness in accordance with the foregoing requirements may bar admission of such exhibits and testimony.

Testimony shall be typed on 8 ½ inch x 11 inch transcript-quality paper, double-spaced, with 25 numbered lines, on consecutively numbered pages, with left margins of at least 1.25 inches. All pages shall be filed on three-holed paper, unbound, and without tabs.

Each exhibit sponsored by a witness in support of his or her prefiled testimony shall be:

- (1) Attached to that witness' testimony when filed;
- (2) On three-holed paper, unbound, and without tabs;
- (3) Sequentially numbered beginning with 1 (any exhibits attached to subsequently filed testimony of the same witness shall continue the sequential numbering system);
- (4) Identified in the upper right-hand corner of each page by the docket number, a brief title, and the witness' initials followed by the exhibit's number; and
- (5) Paginated by showing in the upper right-hand corner of each page the page number followed by the total number of pages in the exhibit.

An example of the information to appear in the upper right-hand corner of the exhibit is as follows:

Docket No. 012345-EI  
Foreign Coal Shipments to Port of Tampa  
Exhibit BLW-1, Page 1 of 2

After an opportunity for opposing parties to object to introduction of the exhibits and to cross-examine the witness sponsoring them, exhibits may be offered into evidence at the hearing. PEF's pre-filed testimony and exhibits to be filed on the date indicated in Section VIII of this Order should at a minimum address the topics set out in Attachment A hereto, as well as all other

information it deems appropriate. The scope of this proceeding will be based upon the issues raised by the parties up to and during the Prehearing Conference, unless modified by the Commission.

#### **IV. Discovery Procedures**

##### **A. General Requirements**

Discovery shall be conducted in accordance with the provisions of Chapter 120, F.S., and the relevant provisions of Chapter 366, F.S., Rules 25-22, 25-40, and 28-106, F.A.C., and the Florida Rules of Civil Procedure (as applicable), as modified herein or as may be subsequently modified by the Prehearing Officer.

Unless subsequently modified by the Prehearing Officer, the following shall apply:

- (1) Discovery shall be completed by June 7, 2013.
- (2) Discovery requests shall be served by electronic mail.
- (3) Sets of interrogatories, requests for admissions, requests for production of documents, or other forms of discovery shall be numbered sequentially in order to facilitate their identification.
- (4) Within each set, discovery requests shall be numbered sequentially, and any discovery requests in subsequent sets shall continue the sequential numbering system.
- (5) Discovery responses shall be served within 15 calendar days (inclusive of mailing) of receipt of the discovery request. Discovery responses for interrogatories and requests for admission shall be served by electronic mail, hand delivery, or overnight mail. Parties are encouraged to serve discovery responses to requests for production electronically to all parties when possible. For discovery requests related to matters addressed in a utility's rebuttal testimony, the utility shall serve its responses to the requesting party within 4 days of the date of the request.
- (6) Each page of every document produced pursuant to requests for production of documents shall be identified individually through the use of a Bates Stamp or other equivalent method of sequential identification. Parties shall number their produced documents in an unbroken sequence through the final hearing.
- (7) Copies of discovery requests and responses shall be served on all parties and staff. In addition, copies of all responses to requests for production of documents shall be provided to the Commission staff at its Tallahassee office unless otherwise agreed.

Unless subsequently modified by the Prehearing Officer, the following shall apply:

- (1) Interrogatories, including all subparts, shall be limited to 500.
- (2) Requests for production of documents, including all subparts, shall be limited to 500.

- (3) Requests for admissions, including all subparts, shall be limited to 500.

When a discovery request is served and the respondent intends to seek clarification of any portion of the discovery request, the respondent shall request such clarification within 4 days of service of the discovery request. Further, any specific objections to a discovery request shall be made within 4 days of service of the discovery request. When a discovery request is served related to matters raised in the utility's rebuttal testimony and exhibits, and the respondent intends to seek clarification of any portion of the discovery request, the respondent shall request such clarification within 2 days of service of the discovery request. Further, any specific objections to a discovery request related to matters raised in the utility's rebuttal testimony and exhibits shall be made within 2 days of service of the discovery request. These procedures are intended to reduce delay in resolving discovery disputes.

B. Confidential Information Provided Pursuant to Discovery

Any information provided to the Commission staff pursuant to a discovery request by the staff or any other person and for which proprietary confidential business information status is requested pursuant to Section 366.093, F.S., and Rule 25-22.006, F.A.C., shall be treated by the Commission as confidential. The information shall be exempt from Section 119.07(1), F.S., pending a formal ruling on such request by the Commission or pending return of the information to the person providing the information. If no determination of confidentiality has been made and the information has not been made a part of the evidentiary record in this proceeding, it shall be returned to the person providing the information. If a determination of confidentiality has been made and the information was not entered into the record of this proceeding, it shall be returned to the person providing the information within the time period set forth in Section 366.093, F.S. The Commission may determine that continued possession of the information is necessary for the Commission to conduct its business.

When a person provides information that it maintains as proprietary confidential business information to the Office of Public Counsel pursuant to a discovery request by the Office of Public Counsel or any other party, that party may request a temporary protective order pursuant to Rule 25-22.006(6)(c), F.A.C., exempting the information from Section 119.07(1), F.S.

When a party other than the Commission staff or the Office of Public Counsel requests information through discovery that the respondent maintains as proprietary confidential business information, or when such a party would otherwise be entitled to copies of such information requested by other parties through discovery (e.g., interrogatory responses), that party and respondent shall endeavor in good faith to reach agreement that will allow for the exchange of such information on reasonable terms, as set forth in Rule 25-22.006(7)(b), F.A.C.

V. Prehearing Procedures

A. Prehearing Statements

All parties in this docket and the Commission staff shall file a prehearing statement pursuant to the schedule set forth in Section VIII of this Order. The original and seven copies of each prehearing statement shall be filed with the Office of Commission Clerk by 5:00 p.m. on the date due. A copy of the prehearing statement shall be served on all other parties and staff no later than the date it is filed with the Commission.

Each party's prehearing statement shall set forth the following information in the sequence listed below:

- (1) The name of all known witnesses whose testimony has been prefiled or who may be called by the party, along with subject matter of each such witness' testimony;
- (2) A description of all prefiled exhibits and other exhibits that may be used by the party in presenting its direct case (including individual components of a composite exhibit) and the witness sponsoring each;
- (3) A statement of the party's basic position in the proceeding;
- (4) A statement of each question of fact, question of law, and policy question that the party considers at issue, along with the party's position on each issue, and, where applicable, the names of the party's witness(es) who will address each issue. Parties who wish to maintain "no position at this time" on any particular issue or issues should refer to the requirements of subsection C, below;
- (5) A statement of issues to which the parties have stipulated;
- (6) A statement of all pending motions or other matters the party seeks action upon;
- (7) A statement identifying the party's pending requests or claims for confidentiality;
- (8) Any objections to a witness' qualifications as an expert. Failure to identify such objection will result in restriction of a party's ability to conduct voir dire absent a showing of good cause at the time the witness is offered for cross-examination at hearing; and
- (9) A statement as to any requirement set forth in this order that cannot be complied with, and the reasons therefore.

Failure of a party to timely file a prehearing statement shall be a waiver of any issue not raised by other parties or by the Commission. In addition, such failure shall preclude the party from presenting testimony in support of its position on each such issue.

B. Attendance at Prehearing Conference

Pursuant to Rule 28-106.209, F.A.C., a Prehearing Conference will be held for Phases II and III, June 6, 2013, at the Betty Easley Conference Center, 4075 Esplanade Way, Tallahassee, Florida. Unless excused by the Prehearing Officer for good cause shown, each party (or designated representative) shall personally appear at the Prehearing Conference. Failure of a party (or that party's representative) to appear shall constitute waiver of that party's issues and positions, and that party may be dismissed from the proceeding.

C. Waiver of Issues

Any issue not raised by a party either before or during the Prehearing Conference shall be waived by that party, except for good cause shown. A party seeking to raise a new issue related to an identified phase after the hearing for that phase shall demonstrate each of the following:

- (1) The party was unable to identify the issue because of the complexity of the matter.
- (2) Discovery or other prehearing procedures were not adequate to fully develop the issue.
- (3) Due diligence was exercised to obtain facts touching on the issue.
- (4) Information obtained subsequent to the Prehearing Conference was not previously available to enable the party to identify the issue.
- (5) Introduction of the issue would not be to the prejudice or surprise of any party.
- (6) The Commission has not ruled on that issue during a prior phase of the docket.

Specific reference shall be made to the information received and how it enabled the party to identify the issue.

Unless a matter is not at issue for that party, each party shall take a position on each issue by the time of the Prehearing Conference or by such later time as may be permitted by the Prehearing Officer. If a party is unable through diligence and good faith efforts to take a position on a matter at issue for that party, it shall explicitly state in its Prehearing Statement why it cannot take a position. If the Prehearing Officer finds that the party has acted diligently and in good faith to take a position, and further finds that the party's failure to take a position will not prejudice other parties or confuse the proceeding, the party may maintain "no position at this time" prior to hearing and thereafter identify its position in a post-hearing statement of issues. In the absence of such a finding by the Prehearing Officer, the party shall have waived the entire issue, and the party's position shall be shown as "no position" in the Prehearing Order. When an issue and position have been properly identified, any party may adopt that issue and position in its post-hearing statement. Commission staff may take "no position at this time" or a similar position on any issue without having to make the showing described above.



D. Motions to Strike Prefiled Testimony and Exhibits

Motions to strike any portion of the prefiled testimony and related portions of exhibits of any witness shall be made in writing no later than the Prehearing Conference. Motions to strike any portion of prefiled testimony and related portions of exhibits at hearing shall be considered untimely, absent good cause shown.

E. Demonstrative Exhibits

If a party wishes to use a demonstrative exhibit or other demonstrative tools at hearing, such materials must be identified by the time of the Prehearing Conference.

F. Official Recognition

Parties seeking official recognition of materials pursuant to Section 120.569(2)(i), F.S., shall notify all other parties and staff in writing no later than two business days prior to the first scheduled hearing date. Such notification shall identify all materials for which the party seeks official recognition, and to the extent such materials may not be readily available to all parties, such materials shall be provided along with the notification.

VI. Hearing Procedures

A. Attendance at Hearing

Unless excused by the Presiding Officer for good cause shown, each party (or designated representative) shall personally appear at the hearing. Failure of a party, or that party's representative, to appear shall constitute waiver of that party's issues, and that party may be dismissed from the proceeding.

Likewise, all witnesses are expected to be present at the hearing unless excused by the Presiding Officer upon the staff attorney's confirmation prior to the hearing date of the following:

- (1) All parties agree that the witness will not be needed for cross examination.
- (2) All Commissioners assigned to the panel do not have questions for the witness.

In the event a witness is excused in this manner, his or her testimony may be entered into the record as though read following the Commission's approval of the proposed stipulation of that witness' testimony.

B. Cross-Examination

The parties shall avoid duplicative or repetitious cross-examination. Further, friendly cross-examination will not be allowed. Cross-examination shall be limited to witnesses whose testimony is adverse to the party desiring to cross-examine. Any party conducting what appears



to be a friendly cross-examination of a witness should be prepared to indicate why that witness's direct testimony is adverse to its interests.

C. Use of Confidential Information at Hearing

It is the policy of this Commission that all Commission hearings be open to the public at all times. The Commission also recognizes its obligation pursuant to Section 366.093, F.S., to protect proprietary confidential business information from disclosure outside the proceeding. Therefore, any party wishing to use any proprietary confidential business information, as that term is defined in Section 366.093, F.S., at the hearing shall adhere to the following:

- (1) When confidential information is used in the hearing, parties must have copies for the Commissioners, necessary staff, and the court reporter, in red envelopes clearly marked with the nature of the contents. Any party wishing to examine the confidential material that is not subject to an order granting confidentiality shall be provided a copy in the same fashion as provided to the Commissioners, subject to execution of any appropriate protective agreement with the owner of the material.
- (2) Counsel and witnesses are cautioned to avoid verbalizing confidential information in such a way that would compromise confidentiality. Therefore, confidential information should be presented by written exhibit when reasonably possible.

At the conclusion of that portion of the hearing that involves confidential information, all copies of confidential exhibits shall be returned to the proffering party. If a confidential exhibit has been admitted into evidence, the copy provided to the court reporter shall be retained in the Office of Commission Clerk's confidential files. If such information is admitted into the evidentiary record at hearing and is not otherwise subject to a request for confidentiality filed with the Commission, the source of the information must file a request for confidential classification of the information within 21 days of the conclusion of the hearing, as set forth in Rule 25-22.006(8)(b), F.A.C., if continued confidentiality of the information is to be maintained.

**VII. Post-Hearing Procedures**

If the Commission (or assigned panel) does not render a bench decision at the hearing, it may allow each party to file a post-hearing statement of issues and positions pursuant to the schedule set forth in Section VIII of this Order. In such event, a summary of each position of no more than 50 words, set off with asterisks, shall be included in that statement. If a party's position has not changed since the issuance of the prehearing order, the post-hearing statement may simply restate the prehearing position. However, the position must be reduced to no more than 50 words. If a post-hearing statement is required and a party fails to file in conformance with the rule, that party shall have waived all issues and may be dismissed from the proceeding.

Pursuant to Rule 28-106.215, F.A.C., a party's proposed findings of fact and conclusions of law, if any, statement of issues and positions, and brief, shall together total no more than 50 pages and shall be filed at the same time, unless modified by the Presiding Officer.

**VIII. Controlling Dates**

The following dates have been established to govern the key activities for Phases II and III of this case:

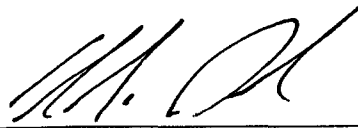
- |  |                    |
|--|--------------------|
| (1) Utility's testimony and exhibits       | March 18, 2013     |
| (2) Intervenors' testimony and exhibits    | May 10, 2013       |
| (3) Staff's testimony and exhibits, if any | May 17, 2013       |
| (4) Rebuttal testimony and exhibits        | May 31, 2013       |
| (5) Prehearing Statements                  | May 31, 2013       |
| (6) Prehearing Conference                  | June 6, 2013       |
| (7) Discovery deadline                     | June 7, 2013       |
| (8) Hearing                                | June 19 – 21, 2013 |
| (9) Briefs                                 | July 19, 2013      |

In addition, all parties should be on notice that the Prehearing Officer may exercise the discretion to schedule additional prehearing conferences or meetings of the parties as deemed appropriate. Such meetings will be properly noticed to afford the parties an opportunity to attend.

Based upon the foregoing, it is

ORDERED by Commissioner Eduardo E. Balbis, as Prehearing Officer, that the provisions of this Order shall govern this proceeding unless modified by the Commission.

By ORDER of Commissioner Eduardo E. Balbis, as Prehearing Officer, this 13th day  
of February, 2013.



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EDUARDO E. BALBIS  
Commissioner and Prehearing Officer  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399  
(850) 413-6770  
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Copies furnished: A copy of this document is provided to the parties of record at the time of issuance and, if applicable, interested persons.

KY

NOTICE OF FURTHER PROCEEDINGS OR JUDICIAL REVIEW

The Florida Public Service Commission is required by Section 120.569(1), Florida Statutes, to notify parties of any administrative hearing or judicial review of Commission orders that is available under Sections 120.57 or 120.68, Florida Statutes, as well as the procedures and time limits that apply. This notice should not be construed to mean all requests for an administrative hearing or judicial review will be granted or result in the relief sought.

Mediation may be available on a case-by-case basis. If mediation is conducted, it does not affect a substantially interested person's right to a hearing.

Any party adversely affected by this order, which is preliminary, procedural or intermediate in nature, may request: (1) reconsideration within 10 days pursuant to Rule 25-22.0376, Florida Administrative Code; or (2) judicial review by the Florida Supreme Court, in the case of an electric, gas or telephone utility, or the First District Court of Appeal, in the case of a water or wastewater utility. A motion for reconsideration shall be filed with the Office of Commission Clerk, in the form prescribed by Rule 25-22.0376, Florida Administrative Code. Judicial review of a preliminary, procedural or intermediate ruling or order is available if review of the final action will not provide an adequate remedy. Such review may be requested from the appropriate court, as described above, pursuant to Rule 9.100, Florida Rules of Appellate Procedure.

Attachment A

- 1) State the amount of replacement fuel costs, in dollars, that were incurred since October 2, 2009 (first delamination) to date and describe in detail how these costs have been recovered. In your testimony, state whether these costs were recovered as a result of the Settlement Agreement, NEIL payments, or through some other means.
- 2) State the amount of repair cost dollars (capital and O&M) that have been incurred since October 2, 2009 (first delamination) to date and describe in detail how these costs have been recovered to date. In your testimony, state whether these costs were recovered as a result of the Settlement Agreement, NEIL payments, or through some other means.
- 3) Provide a detailed description and chronology of the actions PEF's management has taken since October 2, 2009 to present to proceed in the decision to repair or retire CR-3. Testimony should include a detailed summary of management/board meetings, presentations made, individuals involved, dissenting opinions, etc.
- 4) Provide a detailed description of any events or actions that must be made in conjunction with the retirement of CR-3, such as construction of new gas units, approval by the NRC, etc. and identify how those costs were considered in the subsequent cost-effectiveness analyses.
- 5) Provide a detailed description and summary of all cost-effective analyses comparing the CR-3 repair vs. retire decision that were performed from October 2, 2009 to the present. Also describe changes to analyses that were made as time progressed and driving factors for each analysis.
- 6) Provide a detailed description and chronology of the actions taken pursuant to paragraph 10 of the Settlement Agreement requiring PEF to provide adequate notice and information to the Intervenor Parties regarding the repair vs. retire decision for CR-3.
- 7) Provide a detailed description and chronology of the actions pursuant to Paragraph 10 of the Settlement Agreement requiring the Intervenor Parties provide any written concerns regarding PEF's plans to repair or retire CR-3 including how these concerns were addressed by PEF's management.
- 8) Provide a detailed description and chronology of the actions between PEF and NEIL. Testimony should include a detailed summary of meetings, requested claims made by PEF, amounts, dates, and types of payments from NEIL, and any risk analyses performed by PEF in conjunction with accepting the mediator's proposal of \$530 million.
- 9) Provide a detailed description of the funding mechanism, i.e. surcharge/assessment to owners or funding from prior premiums used by NEIL to make payments on claims filed. Testimony should include a detailed description of the potential exposure to PEF pre and post merger with Duke Energy.

- 10) A detailed description of PEF's projected reserve margins over the next several years and a description of the alternatives, including additional DSM programs/incentives and renewable generation PEF is considering to replace the capacity of CR-3.
- 11) Sensitivity analyses of the most current cost-effectiveness analyses for the CR-3 repair vs. retire decision which should include, at a minimum, variations in fuel prices, variations in retirement dates for CR 1 & 2, various in-service dates of PEF's next planned generating unit, and variations in NEIL payments ranging from \$0 to PEF's full claims request.
- 12) Estimated revenue requirement and residential base rate impact in 2017 as a result of the deferred accounting treatment of CR-3 assets as described in the Settlement Agreement.