BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of Florida Power Corporation's Earnings, Including Effects of Proposed Acquisition of Florida Power Corporation by Carolina Power & Light DOCKET NO. 000824-EI

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CONFIDENTIAL
REBUTTAL TESTIMONY
OF
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ON BEHALF OF FLORIDA POWER CORPORATION

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1		Florida Power trading centers. The problem is that she fails to recognize that (1)
2		regulatory treatment of power marketing transactions differs in North Carolina
3		and Florida, and (2) CP&L has greater access to transmission than Florida Power
4		does and thus has more opportunities to take advantage of market transactions.
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6		When our integration teams studied the operations of the power trading
7	,	functions of the combined companies, they understood that Florida Power's
8		customers would benefit from the Company's efforts to optimize its generating
9		capacity. In contrast, shareholders will benefit from power sales in North
10		Carolina, subject to regulatory ROE limits.
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22	Q.	Ms. Brown argues (at p. 11) that Progress Energy acknowledged in internal
23		statements

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2		Is she correct?
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18	Q.	Certain witnesses argue that, under the Company's proposal customers will
19		pay for the original capital investment in the Company's assets and then will
20		pay again for those assets by subsidizing Progress Energy's acquisition costs.
21		Do you agree?
22	Α.	Not at all. This would occur (and then only figuratively) if we were asking the
23	~	Commission to incorporate goodwill into the Company's rate base, which we are