

February 15, 2010

Via FedEx

Ms. Ann Cole, Commission Clerk Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

Dear Ms. Cole:

By order No. PSC-93-1522-FOF-EI, issued October 15, 1993 in Docket No. 930867-EI, Florida Power Corp. d/b/a Progress Energy Florida, Inc. was directed to file an annual report providing updated information on four specific items related to its self-insured program for transmission and distribution line ("T&D") property damage.

The following are changes since our last report for the required items:

- 1. Update on Efforts to Obtain Traditional T&D Insurance – Since our last report, the property insurance markets continue to be restrictive, especially for Gulf and Atlantic coast locations as a result of the 2004 and 2005 hurricane losses. Traditional insurance coverage for storm related damage to T&D facilities at reasonable costs and deductible levels on a stand-alone basis, remains effectively unavailable.
- 2. Status of the Proposed Industry-Wide T&D Program - An industry group consisting of the four Florida investor owned utilities (IOUs), along with other IOUs with T&D assets exposed to hurricane damage, was established to explore the feasibility of developing an insurance program to cover catastrophic storm damage to above ground distribution facilities. Details regarding this effort were outlined in our annual report dated February 15, 2008. This group is taking no further action at this time since it was determined by most members that the program was economically not feasible.

Progress Energy Florida remains a member of this group and will continue to monitor activity in this area.

<u>___</u> 3. Update on the Evaluation of Progress Energy Florida's Exposure and the Adequacy of Ê the Storm Damage Reserve - The storm damage reserve was depleted in 2004 by the unprecedented four hurricanes affecting Progress Energy Florida's service area. The Florida PSC approved the recovery of \$240.4 million in storm response costs incurred in S 2004, over a two year period. Subsequently, the PSC approved an agreement whereby the storm recovery surcharge would be extended by twelve months to allow the Company to replenish the storm reserve fund. 0001 \square

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Progress Energy Service Company, LLC P.O. Box 1551 Raleigh, NC 27602

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> As a result of the Florida PSC's January 11, 2010 decision in the recent retail rate case, PEF may not collect in base rates additional funds for it's storm damage reserve. In the event future storms cause the reserve to be depleted, PEF can petition the Florida PSC for implementation of an interim surcharge to cover any deficiency of it's storm reserve. The balance of the storm reserve as of December 31, 2010, was \$136 million.

4. <u>Feasibility and Cost-Effectiveness of a Risk Sharing Plan Among Investor-Owned</u> <u>Electric Utilities in Florida</u> – See Item 2 above.

As in the past, Progress Energy Florida requests that this letter serve as its annual report for 2010. If a significant change should occur in the Company's exposure, the adequacy of the storm damage reserves, or the cost and availability of traditional insurance, updated information will be provided to the Commission.

Thank you, and please let us know if there are questions regarding the above information.

Sincerely, Hauffille Gary Y. Little

Manager - Insurance Progress Energy Service Company, LLC

cc: Mr. Tim Devlin - FPSC
Mr. Will Garrett - Progress Energy Florida
Mr. Javier Portuondo - Progress Energy Service Company, LLC
Ms. Lisa Stright - Progress Energy Florida
Ms. Cynthia Lee - Progress Energy Florida