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Subject: Docket 120009 Filing
Attachments: Docket 120009 PEF Revised Position Statements.pdf



Docket 120009
EF Revised Posi.

Docket 120009

In re: Nuclear Cost Recovery Clause

1. Attached for filing is Progress Energy Florida, Inc.'s Revised Position Statements on Issues 2, 12, 16, 17, 18 & 19.
2. This document has five (5) pages.
3. This document is being filed on behalf of Progress Energy Florida, Inc.
4. This document is being filed by

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DOCUMENT NUMBER-DATE

06064 SEP-7 09

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Cost Recovery
Clause

Docket No. 120009-EI
Submitted for filing: September 7, 2012

**PROGRESS ENERGY FLORIDA, INC.'S REVISED POSITION STATEMENTS
ON ISSUES 2, 12, 16, 17, 18, & 19**

Progress Energy Florida, Inc.'s ("PEF" or the "Company"), pursuant to the Florida Public Service Commission's September 5, 2012 decision granting PEF's motion for deferral of the determination of the reasonableness of 2012 and 2013 projected construction expenditures and associated carrying costs for the Crystal River Unit 3 Uprate ("CR3 Uprate") project until the 2013 Nuclear Cost Recovery Clause ("NCRC") proceeding, hereby submits its Revised Position Statements on Issues 2, 12, 16, 17, 18, and 19 as follows:

PEF's Revised Position Statements

Issue 2: Should the Commission disallow recovery of any AFUDC on the Crystal River Unit 3 Uprate project in 2012 and 2013 due to the lack of a final decision to repair or retire Crystal River Unit 3? If yes, what amount should the Commission disallow, if any?

PEF Revised Position

The questions presented in this issue are moot for the 2012 Nuclear Cost Recovery Clause ("NCRC") hearing because on September 5, 2012 the Commission voted to approve PEF's motion requesting deferral of the Commission's review of the reasonableness of PEF's 2012 and 2013 CR3 Uprate project estimated and projected costs and associated carrying costs until the 2013 NCRC proceeding.

Issue 12: Should the Commission approve what PEF has submitted as its 2012 annual detailed analyses of the long-term feasibility of completing the Crystal River Unit 3 Uprate project, as provided for in Rule 25-6.0423, F.A.C? If not, what action, if any, should the Commission take?

PEF Revised Position:

This issue is moot for the 2012 NCRC hearing because on September 5, 2012 the Commission voted to approve PEF's motion requesting deferral of the Commission's review of the long-term feasibility of completing the CR3 Uprate project until the 2013 NCRC proceeding.

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Issue 16: Is it reasonable for PEF to incur or expend all of the estimated and projected Crystal River Unit 3 Uprate project expenditures in 2012 and 2013 in the absence of a final decision to repair or retire CR3?

PEF Revised Position:

This issue is moot for the 2012 NCRC hearing because on September 5, 2012 the Commission voted to approve PEF's motion requesting deferral of the Commission's review of the reasonableness of PEF's 2012 and 2013 CR3 Uprate project estimated and projected costs and associated carrying costs until the 2013 NCRC proceeding.

Issue 17: What system and jurisdictional amounts should the Commission approve as reasonably estimated 2012 costs and estimated true-up amounts for PEF's Crystal River Unit 3 Uprate project?

PEF Revised Position:

**Capital Costs (System) \$0; (Jurisdictional, net of joint owners) \$0.
O&M Costs (System) \$0; (Jurisdictional, net of joint owners) \$130.
Carrying Costs \$19,041,421 and a base revenue requirement credit of \$3,242,310.**

The Commission should also approve an estimated 2012 EPU project true-up under-recovery of \$6,186,144 to be included in setting the allowed 2013 NCRC recovery. The 2012 variance is the sum of an O&M under-projection of \$840, plus an under-projection of carrying charges of \$6,165,675 plus an over-projection of other adjustments of \$19,629.

Issue 18: What system and jurisdictional amounts should the Commission approve as reasonably projected 2013 costs for PEF's Crystal River Unit 3 Uprate project?

PEF Revised Position:

**Capital Costs (System) \$0; (Jurisdictional, net of joint owners) \$0.
O&M Costs (System) \$0; (Jurisdictional, net of joint owners) \$173
Carrying Costs \$30,352,822 and a base revenue requirement credit of \$3,587.**

Issue 19: What is the total jurisdictional amount to be included in establishing PEF's 2013 Capacity Cost Recovery Clause factor?

PEF Revised Position:

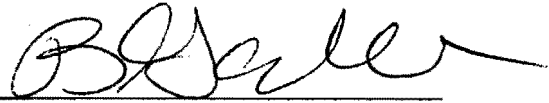
For the CR3 Uprate project, \$40,033,676 (before revenue tax multiplier) should be included in establishing PEF's 2013 Capacity Cost Recovery Factor ("CCRC"). Please see chart below for a further breakout of these costs.

For the LNP, an amount necessary to achieve the rates included in Exhibit 5 (\$3.45/1,000kWh on the residential bill) of the Settlement Agreement approved in Order No. PSC-12-104-FOF-EI page 147 should be included in establishing PEF's 2013 CCRC.

Breakout of CR3 Uprate Total Jurisdictional Amounts for 2013 CCRC Factor

TOPIC		Reference: PEF 2012 NCRC Filings	Reference: Motion for Deferral granted, September 5, 2012
CR 3 Uprate			
	CR3 Uprate 2011 Final True-up	\$ 3,498,125	\$ 3,498,125
	CR3 Uprate 2012 Estimated True-up	8,176,192	6,186,144
	CR3 Uprate 2013 Projections	37,295,806	30,349,407
	CR3 Uprate Subtotal	\$ 48,970,123	\$ 40,033,676
	Rev Tax Multiplier	1.00072	1.00072
CR3 Uprate Total		\$ 49,005,381	\$ 40,062,500

Respectfully submitted on this 7th day of September, 2012,



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY a true and correct copy of the foregoing has been furnished to counsel and parties of record as indicated below via electronic and U.S. Mail this 7th day of September, 2012.



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