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September 9, 2002

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KYLE V. MITCHELL

Blanca Bayó Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399

Re:

Docket 020007-EI

Dear Ms. Bayó:

Enclosed for filing on behalf of Florida Power Corporation are the original and fifteen copies of it's Petition for Approval of Environmental Cost Recovery for Certain Environmental Compliance Activities in the above referenced docket. Also included is the Direct Testimony of James Javier Portuondo and Timothy Silar.

09546-02

By copies of this letter, these documents have been furnished to the parties listed on the attached service list.

If you have any questions please feel free to call me at 425-2359.

09545-02

Very truly yours,

Gary V. Perko

Breme GVP/jlm | Enclosures

each ti

cc: Certificate of Service

DOCUMENT NUMBER - DATE

09542 SEP-98

FPSC-COMMISSION CLERK

(x LM

MMS ____ SEC __L OTH ___

AUS

CMP

SC-BUREAU OF

CERTIFICATE OF SERVICE Docket No. 020007-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by United States Mail this day of September, 2002, to the following:

Robert Vandiver, Esq. Office of Public Counsel 111 West Madison Street Room 812 Tallahassee, FL 32399

Norman H. Horton, Esq. Floyd R. Self, Esq. Messer, Caparello & Self 215 South Monroe St. #701 Tallahassee, FL 32301

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Attorney

FLORIDA POWER CORPORATION

DOCKET NO. 020007-EI

Levelized Environmental Cost Recovery Factors January through December 2003

DIRECT TESTIMONY OF JAVIER PORTUONDO

Q.	Please	state	your	name	and	business	address.
----	---------------	-------	------	------	-----	----------	----------

A. My name is Javier Portuondo. My business address is Post Office Box 14042,St. Petersburg, Florida 33733.

Q. By whom are you employed and in what capacity?

A. I am employed by Progress Energy Service Company, LLC, as Manager of Regulatory Services - Florida.

Q. What are the duties and responsibilities of your position as Manager of Regulatory Services - Florida?

A. My duties and responsibilities include management of the regulatory accounting, fuel accounting, and pricing functions and activities for Florida Power Corporation ("Florida Power" or "the Company").

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Q. Please describe your educational background and professional experience.

A. I received a Bachelors of Science degree in Accounting from the University of South Florida. I have held my current position as Manger of Florida Power's Regulatory Services department since 1996. Before then, I held a number of financial and accounting positions within the Controller's department of the Company.

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to present for Commission review and approval Florida Power's calculation of its Environmental Cost Recovery (ECR) factors for application on customer billings during the period of January through December 2003. My testimony addresses the operating and maintenance ("O&M") expenses associated with Florida Power's environmental compliance activities for the period from October 2002 through December 2003.

Q. Are you sponsoring an exhibit in support of your testimony?

A. Yes. I am sponsoring Exhibit No. ___ (JP-1), consisting of Forms 42-1A through 42-5A, which shows Florida Power's projected environmental compliance costs from October 2002 through December 2002, and Exhibit No. ___ (JP-2), consisting of Forms 42-1P through 42-7P, which shows Florida Power's projected environmental compliance costs from January 2003 through December 2003 and the calculation of the ECR factors that the Company proposes to apply on customer bills in 2003 for the recovery of these costs.

Q. What are the projected costs of the environmental compliance activities for which Florida Power is seeking recovery?

The projected retail costs for environmental compliance which Florida Power is Α. seeking to recover for 2002 are \$61,403 and \$4,302,318 for 2003, as shown in Forms 42-1A and 42-1P of my exhibits. These costs and the environmental compliance activities to which they relate are described in the testimony of Florida Power witness Silar.

Q. Is Florida Power requesting recovery of any environmental compliance costs that the Company has already incurred?

Florida Power is requesting recovery of only the prospective Α. No. environmental compliance costs it will incur beginning in October 2002.

Q. What are the environmental compliance activities for which costs have been included in calculating Florida Power's ECR factors for 2003?

A. As described in the testimony of Mr. Silar, the environmental compliance activities whose costs have been included in calculating Florida Power's proposed ECR factors are transmission and distribution facility pollutant discharge investigation and remediation activities.

23

24

25

Q. Are any of these environmental compliance costs currently being recovered through Florida Power's base rates or its other cost recovery clauses?

No. None of these costs were included in the Minimum Filing Requirements Α. (MFRs) used by the Commission to set the Company's rates in its last fully

litigated base rate proceeding (1992). In addition, although the MFRs submitted by the Company in late 2001 in Docket No. 000824-EI were not used to set its base rates established in the settlement approved by the Commission in April of this year, \$25,000 of the environmental costs in question were included in the 2001 and 2002 budgets used to calculate those MFR's. None of these environmental compliance costs were included in any of Florida Power's cost recovery clauses.

Q. What are Florida Power's proposed ECR factors for the various rate groups and delivery voltages?

A. The computation of Florida Power's proposed ECR factors for customer billings in 2003 is shown on Form 42-7P of my exhibit JP-2. In summary, these factors are as follows:

14	Rate Class	ECR Factor
15	Residential	0.12 cents/kWh
16	General Service Non-Demand	
17	@ Secondary Voltage	0.12 cents/kWh
18	@ Primary Voltage	0.11 cents/kWh
19	@ Transmission Voltage	0.11 cents/kWh
20	General Service 100% Load Factor	0.12 cents/kWh
21	General Service Demand	
22	@ Secondary Voltage	0.12 cents/kWh
23	@ Primary Voltage	0.11 cents/kWh
24	@ Transmission Voltage	0.11 cents/kWh

1		Curtailable
2		@ Secondary Voltage 0.12 cents/kWh
3		@ Primary Voltage 0.11 cents/kWh
4		Interruptible
5		@ Secondary Voltage 0.12 cents/kWh
6		@ Primary Voltage 0.11 cents/kWh
7		@ Transmission Voltage 0.11 cents/kWh
8		Lighting 0.12 cents/kWh
9	i	
10	Q.	Please describe how the proposed ECR factors were developed.
11	A.	The ECR factors were calculated as shown on Forms 42-6P and 42-7P of my
12		exhibit JP2. The energy allocation factors were calculated by determining the
13		percentage each rate class contributes to total kilowatt-hour sales and then
14		adjusted for losses for each rate class. This information was obtained from
15		Florida Power's March 2001 load research study. Form 42-7P presents the
16		calculation of the proposed ECR factors by rate class.
17		
18	Q.	When is Florida Power requesting that the proposed ECR factors be
19		made effective?
20	A.	Florida Power is requesting that its proposed ECR factors be made effective
21		beginning with cycle 1 billings for the month of January 2003.
22		
23	Q.	Does this conclude your testimony?
24	Α.	Yes.

EXHIBIT 1 (JP-1)

ENVIRONMENTAL COST RECOVERY COMMISSION FORMS 42-1A THROUGH 42-5A

JANUARY 2002 - DECEMBER 2002 ESTIMATED/ACTUAL TRUE-UP

Form 42-1A

61,403

Florida Power Corporation

Environmental Cost Recovery Clause (ECRC)
Calculation of the Estimated/Actual True-Up Amount for the Period
January 2002 through December 2002

Line

(Line 1 - Line 2)

1 End of Period Actual True-Up
for the Period January 2001 to December 2001
(Form 42-2A, Lines 5 +6)

2 Estimated/Actual True-Up Amount Approved
for the Period January 2001 to December 2001

3 Final True-Up Amount to be Refunded/(Recovered) in
the Projection Period January 2003 to December 2003

Form 42 Schedule 2A

Florida Power Corporation

Environmental Cost Recovery Clause (ECRC) Calculation of the Estimated/Actual True-Up Amount for the Penod January 2002 through December 2002

End-of-Period True-Up Amount (in Dollars)

	(III Dollars)												End of
Line	January 02	February 02	March 02	Aprıl 02	May 02	June 02	July 02	August 02	September 02	October 02	November 02	December 02	Period Total
1 ECRC Revenues (net of Revenue Taxes)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2 True-Up Provision	0	0	0	0	0	0	0	0	0	0	0	0	0
3 ECRC Revenues Applicable to Period (Lines 1 + 2)	0	0	0	0	0	0	0	0	0	0	0	0	0
4 Junsdictional ECRC Costs													
a O & M Activities (Form 42-5A, Line 9)	0	0	0	0	0	0	0	0	0	20,431	20,429	20,498	61,358
b Capital Investment Projects (Form 42-7A, Line 9)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
c Total Jurisdictional ECRC Costs	0	0	0	0	0	0	0	0	0	20,431	20,429	20,498	61,358
5 Over/Under Recovery (Line 3 - Line 4c)	0	0	0	0	0	0	0	0	0	(20,431)	(20,429)	(20,498)	(61,358)
6 Interest Provision (Form 42-3A, Line 10)	0	0	0	0	0	0	0	0	0	(15)	(15)) (15)	(45)
7 Beginning Balance True-Up & Interest Provision a Deferred True-Up from January 2001 to December 2001	0	0	0	0	0	0	0	0	0	0	0	0	0
	0	0	0	0	0	0	0	0	0	0	0	0	0
8 True-Up Collected/(Refunded) (see Line 2)	0	0	0	0	0	0	0	0	0	0	0	0	0
9 End of Penod Total True-Up (Lines 5+6+7+7a+8)	0	0	0	0	0	0	0	0	0	(20,446)	(20,444)	(20,513)	(61,403)
10 Adjustments to Period Total True-Up including Interest	0	0	. 0	0_	0	0	0	0	0	0	0	. 0	0
11 End of Penod Total True-Up (Lines 9 + 10)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	(\$20.446)	(\$20,444)	(\$20.513)	(\$61.403)

Form 42-3A

End of

Elorida Power Corporation

Environmental Cost Recovery Clause (ECRC) Calculation of the Estimated/ActualTrue-Up Amount for the Penod January 2002 through December 2002

interest Provision (in Dollars)

Line	<u> </u>	January 02	February 02	March 02	April 02	May 02	June 02	July 02	August 02	September 02	October 02	November 02	December 02	Period Total
	1 Beginning True-Up Amount (Form 42-2A, Line 7 + 7a + 10)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
	2 Ending True-Up Amount Before Interest (Line 1 + Form 42-2A, Lines 5 + 8)	0	0	0	0	0	0	0	0	0	(20,431)	(20,429)	(20,498)	
	3 Total of Beginning & Ending True-Up (Lines 1 + 2)	0	0	0	0	0	0	0	0	0	(20,431)	(20,429)	(20,498)	
	4 Average True-Up Amount (Line 3 x 1/2)	0	0	0	0	0	0	0	0	0	(10,216)	(10,215)) (10,249)	
	5 Interest Rate (First Day of Reporting Business Month)	0 00%	0 00%	0 00%	0 00%	0.00%	0 00%	0 00%	0 00%	0 00%	1 74%	1 74%	1 74%	
	6 Interest Rate (First Day of Subsequent Business Month)	0 00%	0 00%	0 00%	0 00%	0.00%	0 00%	0 00%	0 00%	1 74%	1.74%	1 74%	1.74%	
	7 Total of Beginning & Ending Interest Rates (Lines 5 + 6)	0 00%	0.00%	0 00%	0.00%	0.00%	0 00%	0 00%	0 00%	1 74%	3 48%	3 48%	3 48%	
	8 Average Interest Rate (Line 7 x 1/2)	0 000%	0 000%	0 000%	0 000%	0 000%	0 000%	0 000%	0 000%	0 870%	1 740%	1 740%	1 740%	
	9 Monthly Average Interest Rate (Line 8 x 1/12)	0 000%	0 000%	0.000%	0.000%	0 000%	0 000%	0 000%	0 000%	0.073%	0 145%	0 145%	0 145%	
	10 Interest Provision for the Month (Line 4 x Line 9)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	(\$15)	(\$15)) (\$15)	(\$45)

Environmental Cost Recovery Clause (ECRC) Calculation of the Estimated/Actual True-Up Amount for the Period January 2002 through December 2002

Variance Report of O&M Activities (In Dollars)

		(1)	(2)	(3)	(4)
			Estimated	Varia Varia	nce
Line		Actual	Actual	Amount	Percent
1	Description of O&M Activities 1 Substation Environmental Investigation, Remediation, and Pollution Prevention 2 Distribution System Environmental Investigation, Remediation, and Pollution Prevention	36,000 27,000	36,000 27,000	0	· 0
2	Total O&M Activities	63,000	63,000	0	0
3	Recoverable Costs Allocated to Energy	63,000	63,000	0	0
4	Recoverable Costs Allocated to Demand	0	0	0	0

Notes:

Column (1) is the End of Period Totals on Form 42-5A

Column (2) = Estimated actual

Column (3) = Column (1) - Column (2)

Column (4) = Column (3) / Column (2)

Florida Power Corporation Environmental Cost Recovery Clause (ECRC) Calculation of the Estimated/Actual Period Amount January 2002 through December 2002

O&M Activities (in Dollars)

Line	January 02	February 02	March 02	April 02	May 02	June 02	July 02	August 02	September 02	October 02	November 02	December 02	End of Period Total	Method of C Demand	tassification Energy	
1 Description of O&M Activities																
Substation Environmental Investigation, Remediation, and Pollution Prevention Betribution System Environmental Investigation, Remediation, and Pollution Prevention	0	0	0	0	0	0	o 0	0	0	12,000 9,000	12,000 9,000	12,900 9,000	35,000 27,000		38,000 27,000	
2 Total of O&M Activities	0	0	0	0	0	0	0	0	0	21,000	21,000	21,000	63,000	\$0	\$83,000	
3 Recoverable Costs Allocated to Energy 4 Recoverable Costs Allocated to Demand	0	0	0	0	0	0	0	0	0	21,000 0	21,000 0	21,000 0	63,000 0			
S Retail Energy Jurisdictional Factor 6 Retail Demand Jurisdictional Factor	0 9774000	0 9774000	0.9774000	0.9774000	0.9774000	0.9774000	0.9774000	0.9748000	0 9749000	0 9729000	0.9728000	0.9761000				
7 Jurisdictional Energy Recoverable Costs (A) 8 Jurisdictional Dernand Recoverable Costs (B)	0	0	0	0	0	0	0	0	0	20,431 0	20,429 0	20,498 0	61,358 0			
9 Total Jurisdictional Recoverable Costs for O&M Activities (Lines 7 + 8)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$20,431	\$20,429	\$20,498	\$61,358			

Notes:

(A) Line 3 x Line 5 (B) Line 4 x Line 6

EXHIBIT 2 (JP-2)

ENVIRONMENTAL COST RECOVERY COMMISSION FORMS 42-1P THROUGH 42-7P

JANUARY 2003 - DECEMBER 2003

Environmental Cost Recovery Clause (ECRC)
Total Jurisdictional Amount to Be Recovered

For the Projected Period January 2003 through December 2003

ne		Energy (\$)	Demand (\$)	Total (\$)
1 Total Jurisdictional Rev. Req. fo	• • •			
•	orm 42-2P, Page 2 of 2, Lines 7 through 9)	\$4,299,178	\$0	\$4,299,178
	form 42-3P, Page 2 of 2, Line 7 through 9)	4 200 470	0	4.000.470
c Total Jurisdictional Rev. Rec	, for the projected period (Lines 1a + 1b)	4,299,178	0	4,299,178
2 True-up for Estimated Over/				
current period January 2002	<u> </u>	(04.400)	^	(004 400)
(Form 42-2E, Line 5 + 6 + 10))	(61,403)	0	(\$61,403)
3 Final True-up for the period	January 2001 to December 2001			
(Form 42-1A, Line 3)		0	0	\$0
4 Total Jurisdictional Amount t	o Be Recovered/(Refunded)			
in the Projection period Janu	• •			
(Line 1 - Line 2 - Line 3)		4,360,581	_0	\$4,360,581
5 Total Projected Jurisdictiona	-			• · · · · ·
(Line 4 x Revenue Tax Multi	olier of .00072)	4,363,721	0	\$4,363,721

Florida Power Corporation Environmental Cost Recovery Clause (ECRC) Calcutation of the Projected Period Amount January 2003 through December 2003

O&M Activities (in Dollars)

Line	Projected Jan-03	Projected Feb-03	Projected Mar-03	Projected Apr-03	Projected May-03	Projected Jun-03	Projected Jul-03	Projected Aug-03	Projected Sep-03	Projected Oct-03	Projected Nov-03	Projected Dec-03	End of Period Total	Method of Cl Demand	assification Energy
1 Description of O&M Activities															
Substation Environmental Investigation, Remediation, and Pollution Prevention Distribution System Environmental Investigation, Remediation, and Pollution	4,167	4,167	4,167	4,187	4,167	4,167	4,167	4,167	4,167	4,167	4,167	4,167	50,000		50,000
Prevention	383,250	383,250	383,250	363,250	363,250	383,250	383,250	383,250	363,250	383,250	363,250	383,250	4,359,000		4,359,000
2 Total of OSM Activities	367,417	367,417	387,417	367,417	367,417	367,417	367,417	367,417	367,417	387,417	367,417	367,417	4,409,000	\$0	\$4,409,000
3 Recoverable Costs Allocated to Energy 4 Recoverable Costs Allocated to Demand	367,417 0	367,417 0	387,417 0	367,417 0	387,417 0	367,417 0	367,417 0	367,417 0	367,417 0	367,417 0	387,417 0	367,417 0	4,409,000 0		
5 Retail Energy Jurisdictional Factor 6 Retail Demand Jurisdictional Factor	0.9759000	0,9746000	0.9747000	0.9763000	0.9757000	0.9763000	0.9752000	0.9750000	0.9747000	0.9731000	0.9731000	0 9765000			
7 Jurisdictional Energy Recoverable Costs (A) 8 Jurisdictional Demand Recoverable Costs (B)	358,562 0	358,084 0	358,121 0	358,709 0	358,488 0	358,709 0	358,305 0	358,231 0	358,121 0	357,533 0	357,533 0	358,782 0	4,299,178 0		
9 Total Jurisdictional Recoverable Costs for O&M Activities (Lines 7 + 8)	\$358,562	\$358,084	\$358,121	\$358,709	\$358,488	\$358,709	\$358,305	\$358,231	\$358,121	\$357,533	\$357,533	\$358,782	\$4,299,178		

Notes:

(A) Line 3 x Line 5 (B) Line 4 x Line 6

Form 42-3P

Florida Power Corporation Environmental Cost Recovery Clause (ECRC) Calculation of the Projected Period Amount January 2003 through December 2003

Capital Investment Projects-Recoverable Costs (in Dollars)

NOTUSED

Une	Projected Jan-03	Projected Feb-03	Projected Mar-03	Projected Apr-03	Projected May-03	Projected Jun-03	Projected Jul-03	Projected Aug-03	Projected Sep-03	Projected Oct-03	Projected Nov-03	Projected Dec-03	End of Period Total	Method of Ca Demand	assification Energy
1 Description of Investment Projects (A)															
Substation Environmental Investigation, Remediation, and Pollution Prevention Distribution System Environmental Investigation, Remediation, and Pollution	0	0	0	0	0	0	O	0	0	0	0	0	0		0
Prevention	0	0	0	0		0	0		0	0	0	0	<u> 0</u>		0
Total investment Projects - Recoverable Costs	0	0	0	C C	Q	0	0	0	0	0	0	0	۵	0	0
3 Recoverable Costs Allocated to Energy 4 Recoverable Costs Allocated to Demand	0	0	0	0 0	0 0	0	0	0	0	0	0	0 0	0 0		
5 Retail Energy Jurisdictional Factor 6 Retail Demand Jurisdictional Factor	0 9759000	0.9746000	0.9747000	0.9763000	0.9757000	0.9763000	0 9752000	0 9750000	0.9747000	0.9731000	0.9731000	0 9765000			
7 Jurisdictional Energy Recoverable Costs (B) 8 Jurisdictional Demand Recoverable Costs (C)	0	0	0	0	0	0	0	0	0	0	0	0 0	0 0		
9 Total Jurisdictional Recoverable Costs for Investment Projects (Lines 7 + 8)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0_	\$0	\$0	\$ 0	\$0		

- (A) Each project's Total System Recoverable Expenses on Form 42-8A, Line 14
 (B) Line 3 x Line 5
 (C) Line 4 x Line 6

Florida Power Corporation Environmental Cost Recovery Clause (ECRC) Calculation of the Projected Period Amount January 2003 through December 2003

Return on Capital investments, Depreciation, and Taxes

NOT USED

(in Dollars)

End of													
Line _	Projected Jan-03	Projected Feb-03	Projected Mar-03	Projected Apr-03	Projected May-03	Projected Jun-03	Projected Jul-03	Projected Aug-03	Projected Sep-03	Projected Oct-03	Projected Nov-03	Projected Dec-03	Period Total
1 Investments													
a Expenditures/Additions	0	0	0	0	0	0	0	0	n	n	0	0	n
b Clearings to Plant	0	Ó	Ō	ō	ō	ō	Ō	õ	ŏ	ō	ō	ō	ŏ
c Retirements	0	0	0	Ō	ō	Ō	0	ō	ō	0	Ō	ō	ō
d Other	0	0	0	. 0	0	0	0	0	0_	0	0	0	0
2 Plant-In-Service/Depreciation Base	0	0	0	•	0		0	٥	0	0	•	0	•
3 Less: Accumulated Depreciation	Õ	ŏ	0	0	0	0	0	Ö	0	0	0	0	0
4 CWIP - Non Interest Bearing		0	ŏ	ŏ		0	ŏ	0	0	0	0		0
5 Net Investment (Lines 2 -3 + 4)	0	0	0	0	0	0	0	0	0	0	0	0	0
6 Average Net Investment													
7 Return on Average Net Investment a Equity Component grossed up for taxes b Debt Component													
8 Investment Expenses a Depreciation b Amortization													
c Dismantiement d Property Expenses													
Other	0	0	0	0		0	0	0	0	0	0	0	0_
9 Total System Recoverable Expenses	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0

Notes:

Form 42-5P Page 1 of 2

Environmental Cost Recovery Clause (ECRC)

January 2003 through December 2003

Description and Progress Report for Environmental Compliance Activities and Projects

Project Title:

Substation Environmental Investigation, Remediation, and Pollution Prevention

Project No. 1

Project Description:

Chapter 376, Florida Statutes, requires that any person discharging a prohibited pollutant shall undertake to contain, remove, and abate the discharge to the satisfaction of the Florida Department of Environmental Protection. Similarly, Chapter 403, Florida Statutes provides that it is prohibited to cause pollution so as to harm or injure human health or welfare, animal, plant, or aquatic life or property. For Florida Power Corporation to continue to comply with these statutes, it is conducting environmental investigation, remediation, and pollution prevention activities associated with its substation facilities to determine the existence of pollutant discharges, and if present, their removal and remediation. Activities also include development and implementation of best management and pollution prevention measures at these facilities.

Project Accomplishments:

The environmental investigation, remediation, and pollution prevention activities described above have been initiated and investigation has begun at four Florida Power substation facilities

Project Fiscal Expenditures:

See below

Project Progress Summary:

N/A

Project Projections:

The estimated project fiscal expenditures for the period October 2002 through December 2002 are \$36,000. Project expenditures for January 1, 2003 through December 31, 2003 are estimated to be \$50,000.

Environmental Cost Recovery Clause (ECRC)
January 2003 through December 2003

Description and Progress Report for Environmental Compliance Activities and Projects Form 42-5P Page 2 of 2

Project Title:

Distribution System Environmental Investigation, Remediation, and Pollution Prevention

Project No. 2

Project Description:

Chapter 376, Florida Statutes, requires that any person discharging a prohibited pollutant shall undertake to contain, remove, and abate the discharge to the satisfaction of the Florida Department of Environmental Protection. Similarly, Chapter 403, Florida Statutes provides that it is prohibited to cause pollution so as to harm or injure human health or welfare, animal, plant, or aquatic life or property. For Florida Power Corporation to continue to comply with these statutes, it is conducting environmental investigation, remediation, and pollution prevention activities associated with its distribution system facilities to determine the existence of pollutant discharges, and if present, their removal and remediation. Activities also include development and implementation of best management and pollution prevention measures at these facilities.

Project Accomplishments:

The environmental investigation, remediation, and pollution prevention activities described above have been initiated and investigation has begun.

Project Fiscal Expenditures:

See below

Project Progress Summary:

N/A

Project Projections:

The estimated project fiscal expenditures for the period October 2002 through December 2002 are \$27,000. Project expenditures for January 1, 2003 through December 31, 2003 are estimated to be \$4,359,000.

Environmental Cost Recovery Clause (ECRC) Calculation of the Energy & Demand Allocation % by Rate Class January 2003 through December 2003

Rate Class	(1) Average 12CP Load Factor at Meter (%)	(2) Projected Sales at Meter (kWh)	(3) Projected Avg 12 CP at Meter (kW)	(4) Demand Loss Expansion Factor	(5) Energy Loss Expansion Factor	(6) Projected Sales at Generation (kWh)	(7) Projected Avg 12 CP at Generation (kW)	(8) Percentage of kWh Sales at Generation (%)	(9) Percentage of 12CP Demand at Generation (%)	(10) 12CP & 1/13 Allocation Factor (%)
Donista-Mail					·					
Residential RS-1, RST-1, RSL-1, RSL-2, RSS-1										
(Secondary)	51.700%	18,858,249,000	4,163,962	0 9373812	0.9373812	20,118,014,955	4,442,122	50 308%	62.320%	61.396%
General Service Non-Demand GS-1, GST-1										
Secondary	70 500%	1,175,262,000	190,301	0 9373812	0.9373812	1,253,771,678	203,014	3.135%	2.848%	2.870%
Primary	70.500%	7,023,000	1,137	0 9679000	0.9679000	7,255,915	1,175	0 018%	0 016%	0.017%
Transmission	70.500%	2,037,000	330	0.9779000	0 9779000	2,083,035	337	0 005%	0.005%	0 005%
General Service GS-2 (Secondary)	100.000%	78,224,000	8,930	0.9373812	0.9373812	83,449,508	9,526	0 209%	0.134%	0.139%
General Service Demand GSD-1 Transmission	82.000%	F 000 000	705	0.0770000	0.0770000	5 4 9 9 4 9 9	704		0.0400/	0.0400/
SS-1 Primary	88.800%	5,066,000 211,000	705 27	0.9779000 0.9679000	0.9779000 0.9679000	5,180,489 217,998	721 28	0.013% 0.001%	0.010% 0.000%	0.010% 0.000%
Transmission	88.800%	6,022,000	774	0.9679000	0.9779000	6,158,094	792	0.015%	0.000%	0.000%
SD-1 Secondary	82 000%	11.770.617.000	1,638,631	0.9373812	0.9373812	12.556.916.012	1,748,095	31,400%	24.525%	25.054%
Primary	82.000%	2,698,048,000	375,605	0.9679000	0.9679000	2,787,527,637	388,062	6 971%	5.444%	5.562%
Curtailable CS-1, CST-1, CS-2, CST-2, SS-3										
Secondary	116.900%	551,000	54	0.9373812	0.9373812	587,808	57	0.001%	0.001%	0.001%
Primary	116.900%	179,654,000	17,544	0.9679000	0.9679000	185,612,150	18,125	0.464%	0.254%	0.270%
SS-3 (Primary)	0.000%	1,405,000	0	0.9679000	0.9679000	1,451,596	0	0.004%	0.000%	0 000%
Interruptible IS-1, IST-1, IS-2, IST-2										
Secondary	97.500%	5,536,000	648	0.9373812	0.9373812	5,905,815	691	0.015%	0.010%	0.010%
Primary	97.500%	1,892,941,000	221,630	0.9679000	0.9679000	1,955,719,599	228,980	4.891%	3.212%	3.342%
Transmission	97.500%	487,834,000	57,117	0.9779000	0.9779000	498,858,779	58,408	1.247%	0.819%	0.852%
SS-2 Primary	119.600%	142,446,000	13,596	0.9679000	0 9679000	147,170,162	14,047	0.368%	0.197%	0.210%
Transmission	119.600%	70,033,000	6,684	0.9779000	0.9779000	71,615,707	6,836	0.179%	0.096%	0.102%
Lighting										
LS-1 (Secondary)	504.200%	283,625,000	6,422	0.9373812	0.9373812	302,571,675	6,850	0.757%	0.096%	0.147%
		27 004 704 000	0.704.007			00 000 000 010	7.407.007	400.00	400.00==*	400 00
		37,664,784,000	6,704,097			39,990,068,613	7,127,867	100.000%	100.000%	100.000%

Notes:

- (1) Average 12CP load factor based on load research data for the 12 months ended March 2001
- (2) Projected kWh sales for the period January 2003 to December 2003
- (3) Calculated: Column 2 / (8,760 hours x Column 1)
- (4) Based on system average line loss analysis for 2001
- (5) Based on system average line loss analysis for 2001 (6) Column 2 x Column 5
- (7) Column 3 x Column 4
- (8) Column 6/ Total Column 6
- (9) Column 7/ Total Column 7
- (10) Column 8 x 1/13 + Column 9 x 12/13

Environmental Cost Recovery Clause (ECRC) Calculation of the Energy & Demand Allocation % by Rate Class January 2003 through December 2003

Rate Class	(1) Percentage of kWh Sales at Generation (%)	(2) 12CP & 1/13 Allocation Factor (%)	(3) Energy- Related Costs	(4) Demand- Related Costs	(5) Total Environmental Costs	(6) Projected Sales at Meter	(7) Environmental Cost Recovery Factors
Train Class	(70)	(70)	(\$)	(\$)	(\$)	(kWh)	(c/kWh)
Residential RS-1, RST-1, RSL-1, RSL-2,							
RSS-1 (Secondary)	50.308%	61.396%	\$2,195,280	\$0	\$2,195,280	18,858,249,000	0.012
General Service Non-Demand GS-1, GST-1							
Secondary	3.135%	2.870%	\$136,812	\$0	\$136,812	1,175,262,000	0.012
Primary	0.018%	0.017%	\$792	\$0	\$792	7,023,000	0.011
Transmission	0.005%	0.005%	\$227	\$0	\$227	2,037,000	0.011
General Service							
GS-2 (Secondary)	0.209%	0.139%	\$9,106	\$0	\$9,106	78,224,000	0.012
General Service Demand							
GSD-1 Transmission	0.013%	0.010%	\$565	\$0	\$565	5,066,000	0.011
SS-1 Primary	0.001%	0.000%	\$24	\$0	\$24	211,000	0.011
Transmission	0.015%	0.011%	\$672	\$0	\$672	6,022,000	0.011
GSD-1 Secondary	31.400%	25.054%	\$1,370,212	\$0	\$1,370,212	11,770,617,000	0.012
Primary	6.971%	5.562%	\$304,175	\$0	\$304,175	2,698,048,000	0.011
Curtailable CS-1, CST-1, CS-2, CST-2, SS-3							
Secondary	0.001%	0.001%	\$64	\$0	\$64	551,000	0.012
Primary	0.464%	0.270%	\$20,254	\$0	\$20,254	179,654,000	0.011
\$S-3 (Primary)	0.004%	0.000%	\$158	\$0	\$158	1,405,000	0.011
<u>Interruptible</u> IS-1, IST-1, IS-2, IST-2							
Secondary	0.015%	0.010%	\$644	\$0	\$644	5,536,000	0.012
Primary	4.891%	3.342%	\$213,408	\$0	\$213,408	1,892,941,000	0.011
Transmission	1.247%	0.852%	\$54,436	\$0	\$54,436	487,834,000	0.011
SS-2 Primary	0.368%	0.210%	\$16,059	\$0	\$16,059	142,446,000	0.011
Transmission	0.179%	0.102%	\$7,815	\$0	\$7,815	70,033,000	0.011
<u>Lighting</u> LS-1 (Secondary)	0.757%	0.147%	\$33,017	\$0	\$33,017	283,625,000	0.012
	100.000%	100.000%	\$4,363,721	\$0	\$4,363,721	37,664,784,000	0.012

Notes: (1) From Form 42-6P, Column 8

⁽²⁾ From Form 42-6P, Column 8

⁽³⁾ Column 1 x Total Energy Jurisdictional Dollars from Form 42-1P, line 5

⁽⁴⁾ Column 2 x Total Demand Jurisdictional Dollars from Form 42-1P, line 5

⁽⁵⁾ Column 3 + Column 4

⁽⁶⁾ Projected kWh sales for the period January 2003 to December 2003 (7) Column 5/ Column 6 x 100