ORIGINAL

# Hopping Green & Sams

Attorneys and Counselors

LUIMLO FROD

04 MGY -5 PM 4:39

Writer's Direct Dial Number (850) 425-2359 COHMISSION CLERK

November 5, 2004

### **BY HAND DELIVERY**

- 3

. -

CMP

Blanca Bayó Director, Office of the Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Re: Docket 040001-EI

Dear Ms. Bayó:

Enclosed for filing are the original and fifteen copies of Progress Energy Florida's Motion for Leave to File Revised Supplemental Testimony, along with the proffered Revised Supplemental Testimony and Exhibit of Javier Portuondo, in the above docket.

Please stamp and return the enclosed extra copy of this filing. If you have any questions regarding this filing, please give me a call at 425-2359.

Very truly yours,

NUMPER-OATE

5 NOV-5 3

**FPSC-COMMISSION CLERK** 

COM 5			ung .	
CTR orgetest		CGary	V. Perko	
ECR GVP/mee Enclosure				
	icate of Service			
OPC				
MMS				
RCA				
SCR				
SEC   RECOM	in the second			
OTH find U	か			
W EPSC-8	MMEACOF RECORD	<u>85</u>		DOCUMENT
/ ( ) Post Office Bo	ox 6526 Tallahassee, Florida 32314	123 South Calhoun Street (32301)	850.222.7500	850.224.8551 fax www.hg

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of Progress Energy Florida's Motion to File Revised Supplemental Testimony and accompanying Revised Supplemental Testimony and Exhibit of Javier Portuondo in Docket No. 040001-EI has been furnished by U.S. Mail or hand delivery (\*) to the following parties of record this  $5^{4}$  day of November, 2004.

William (Cochran) Keating (\*) Jennifer Rodan Adrienne Vining Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Ausley Law Firm Lee Willis/James Beasley P.O. Box 391 Tallahassee, FL 32302

Beggs & Lane Law Firm Jeffrey Stone/Russell Badders P.O. Box 12950 Pensacola, FL 32591-2950

John W. McWhirter, Jr. McWhirter Reeves 400 North Tampa St., Suite 2450 Tampa, FL 33602

Florida Power & Light Company Mr. Bill Walker 215 South Monroe St., Suite 810 Tallahassee, FL 32301-1859

Florida Power & Light Company Wade Litchfield/Natalie F. Smith 700 Universe Blvd. Juno Beach, FL 33408-0420

Florida Public Utilities Company John T. English/Geo.Bachman P. O. Box 3395 West Palm Beach, FL 33402

Gulf Power Company Ms. Susan D. Ritenour One Energy Place Pensacola, FL 32520-0780 Joe Regnery, Esq. Island Center 2701 North Rocky Point Drive Suite 1200 Tampa, FL 33607

McWhirter Law Firm (\*) Vicki Kaufman/Joseph McGlothlin 117 S. Gadsden St. Tallahassee, FL 32301

Messer Law Firm Norman H. Horton, Jr./Floyd Self P.O. Box 1876 Tallahassee, FL 32302-1876

Moyle Law Firm Jon C. Moyle/Bill Hollimon 118 N. Gadsden Street Tallahassee, FL 32301

Office of Public Counsel (\*) Rob Vandiver c/o The Florida Legislature 111 W. Madison St., #812 Tallahassee, FL 32399-1400 Phone: 850-488-9330

Progress Energy Florida, Inc. (\*) Ms. Bonnie E. Davis 106 East College Ave. Suite 800 Tallahassee, FL 32301-7740

Progress Energy Serv. Co., LLC James McGee P. O. Box 14042 St. Petersburg, FL 33733-4042 Steel Law Hector Law Firm John T. Butler 200 S. Biscayne Blvd, Suite 4000 Miami, FL 33131-2398

Tampa Electric Company Ms. Angela Llewellyn Regulatory Affairs P. O. Box 111 Tampa, FL 33601-0111

Thomas K. Churbuck 911 Tamarind Way Boca Raton, FL 33486

Van 1.1 Attorney/

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchased Power Cost Recovery Clause and Generating Performance Incentive Factor. Docket No. 040001-EI

Submitted for filing: November 5, 2004

## PROGRESS ENERGY FLORIDA'S MOTION FOR LEAVE TO FILE REVISED SUPPLEMENTAL TESTIMONY

Progress Energy Florida ("Progress Energy" or the "Company"), hereby moves the Prehearing Officer for leave to file the revised supplemental testimony and exhibit proffered herewith. In support of its motion, Progress Energy states:

1. On October 25, 2004, Progress Energy moved for leave to supplement the testimony and exhibits of Javier Portuondo filed on September 9, 2004. The purpose of the supplemental testimony and exhibit was to provide an updated reprojection in the calculation of its 2005 fuel cost factors to account for the additional fuel and purchased power costs that have and will be incurred by the Company as a result for the four hurricanes experienced by Florida in August and September.

2. Since the filing of Mr. Portuondo's October 25, 2004 supplemental testimony, Progress Energy has revised its estimate of incremental storm costs from approximately \$25,000,000 to approximately \$17,500,000. Use of this revised estimate in the calculation of 2005 fuel cost factors would decrease the factors proposed in Mr. Portuondo's October 25, 2004 supplemental testimony by 21 cents.

3. To ensure that the Progress Energy's fuel cost factors are based on the most recent information available, the Company seeks to file revised supplement testimony and exhibit based on the revised estimate of increment storm costs. This is consistent with, if not required by, the Commission's well established policy that a utility must inform the Commission of significant changes in projected fuel costs that have occurred subsequent to the preparation of its previously filed projections.

4. Counsel for Progress Energy has contacted counsel for Staff and intervenors and has been advised that Staff and FIPUG take no position on the Company's motion at this time but reserve the right to do so later, and that OPC objects to the motion.

WHEREFORE, Progress Energy respectfully requests that the Prehearing Officer grant the Company leave to file the revised supplemental testimony and exhibit proffered with this motion for consideration at the Commission's November hearing in this docket.

Respectfully submitted,

Bonnie E. Davis Florida Bar No. 335630 106 East College Avenue, Suite 800 Tallahassee, FL 32301 Telephone: 805-222-8738 Facsimile: 805-222-9768

and

- 2 -

James A. McGee Florida Bar No. 150483 Post Office Box 14042 St. Petersburg, Florida 33733-4042 Telephone: 727-820-5184 Facsimile: 727-820-5519

Attorneys for PROGRESS ENERGY FLORIDA, INC.