

JAMES E. "JIM" KING, JR.  
President



Harold McLean  
Public Counsel

**STATE OF FLORIDA  
OFFICE OF PUBLIC COUNSEL**

c/o THE FLORIDA LEGISLATURE  
111 WEST MADISON ST.  
ROOM 812  
TALLAHASSEE, FLORIDA 32399-1400  
850-488-9330

JOHNNIE BYRD  
Speaker



November 16, 2004

Ms. Blanca S. Bayó, Director  
Division of the Commission Clerk  
and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0870

**RE: Docket No. 041272-EI, In Re: Progress Energy Florida, Inc.'s  
petition for approval of storm cost recovery clause for extraordinary expenditures related  
to Hurricanes Charley, Frances, Jeanne, and Ivan**

Dear Ms. Bayó:

Enclosed for filing in the above-referenced docket are the original and fifteen (15) copies of the Office of Public Counsel's First Set of Interrogatories to Progress Energy Florida (Nos. 1-11) for filing in the above referenced docket.

Please indicate the time and date of receipt on the enclosed duplicate of this letter and return it to our office.

Sincerely,

A handwritten signature in black ink, appearing to read "Patricia A. Christensen".

Patricia A. Christensen  
Associate Public Counsel

PC/pwd  
Enclosures

DOCUMENT NUMBER-DATE  
12223 NOV 16 04  
FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Progress Energy Florida, Inc.'s )  
petition for approval of storm cost )  
recovery clause for extraordinary )  
expenditures related to Hurricanes )  
Charley, Frances, Jeanne, and Ivan )  
\_\_\_\_\_ )

Docket No. 041272-EI

Filed: November 16, 2004

OFFICE OF PUBLIC COUNSEL'S FIRST SET OF INTERROGATORIES TO  
PROGRESS ENERGY FLORIDA ( Nos. 1-11 )

Please take notice that the Citizens served the original and one copy of interrogatories (Nos. 1- 11) to Progress Energy Florida, (Progress Energy) on November 16, 2004. The interrogatories are to be answered under oath by Progress Energy and the answers are to be given in writing immediately following the question to which it responds. Please provide the name, address, and relationship to Progress Energy of those persons giving the answers to each of the interrogatories.

Thereafter, the original of the interrogatories, together with the answers, is to be served on the Citizens at the Office of Public Counsel, c/o the Florida Legislature, 111 West Madison Street, Claude Pepper Building, Room 812, Tallahassee, Florida 32399-1400. Copies are to be served on all parties in accordance with applicable Rules of Civil Procedure.

**INTERROGATORIES**

1. Please provide a description of the various categories for expenses that Progress Energy expects to recover through special storm recovery for 2004.

2. Please provide a description of the process used by Progress Energy to develop the storm recovery amounts requested in the docket.
3. In the calculation of special storm recovery expenses, please discuss your handling of the normal budgeted expenses for 2004 operations that are part of base rates.
4. Are the storm expenses identified for special recovery by the company, only those expenses that have been incurred by the company that exceed normal operational budgets? If so please, explain.
5. Please provide a list of all work orders and projects exceeding \$20,000 that are incomplete as of November 1, 2004, that the company intends to recover through special storm recovery.
6. Please provide a monthly breakdown of all expenditures of capital and expenses stated separately that have been charged to the 2004 storm account to date and the monthly forecast of future capital and expenses that the company expects to apply to storm recovery.
7. In terms of uncompleted projects, does the company intend to complete these projects within existing budgeting guidelines with existing personnel? If not, please describe the company's plans to complete such projects and the personnel it will use to complete them.
8. Please provide a descriptive list of all storm related projects that the company does not expect to complete by December 30, 2004, and provide a list of all such projects that exceed \$20,000.
9. Please discuss the potential for recovery of storm related damages through insurance claims.

10. Please state the amount of the company's storm recovery fund on an annual basis since January 1, 1990, to date and provide all annual additions and subtractions from that fund.

11. Please state the impact and describe the expected impact that 2004 storm recovery will have on the 2004 end of year annual depreciation report.

Respectfully submitted,



Patricia A. Christensen  
Florida Bar No. 0989789  
Associate Public Counsel  
Office of Public Counsel  
c/o The Florida Legislature  
Room 812, 111 W. Madison Street  
Tallahassee, Florida, 32399-1400  
(850) 488-9330

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by U.S. Mail on this 16th day of November, 2004, to the following:

Carlton Fields Law Firm  
Gary Sasso/James Wall/John Burnett  
P.O. Box 3239  
Tampa, FL 33607-5736

Progress Energy Service Company, LLC  
James McGee, Esquire  
100 Central Avenue  
St. Petersburg, FL 33701

Progress Energy Florida, Inc.  
Bonnie E. Davis, Esquire  
106 E. College Ave, Suite 800  
Tallahassee, FL 32301-7740

Florida Service Commission  
Jennifer Brubaker, Esquire  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

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Patricia A. Christensen  
Associate Public Counsel

