Kay Flynn		
From: Sent:	Mike Twomey [miketwomey@talstar.com] Wednesday, August 03, 2005 4:20 PM	URIGINAL
To:	Filings@psc.state.fl.us	
Cc:	John McWhirter; Robert Scheffel Wright; CHRISTENSEN.PATTY; Joseph McGlothlin; Tim Perry; Jennifer Brubaker; Jennifer Rodan; Gary L. Sasso; Michael Walls; John T. Burnett; Glenn, Alex; Michael Walls; everett.boyd@sablaw.com; dtriplett@carltonfields.com; daniel.frank@sablaw.com; paul.lewisjr@pgnmail.com; KSTorain@Potashcorp.com; richzambo@aol.com; ajenkins@mckennalong.com; james.mcgee@pgnmail.com; lisa.stright@pgnmail.com; CHRISTENSEN.PATTY@leg.state.fl.us; MARKS.JOHN@leg.state.fl.us	
Subject:	Re: Electronic filing in Docket No. 050078 - Progress Energy Base Rate Increase Case	
Attachments	: AARP 050078 PREHEARING-STATEMENT August 3, 2005.c	doc

Mike Twomey wrote:

32314-5256, (850) 421-9530, miketwomey@talstar.com is responsible for this electronic filing; COM 5 CTR The filing is to be made in Docket No. 0050078-EI, 2. ECR GCL In Re: Petition for rate increase by Florida Progress Energy Florida, Inc.; OPC The filing is made on behalf of AARP; 3. RCA SCR ____ The total number of pages is 3; and 4. SGA SEC Attached to this email in Word format is AARP Prehearing OTH 5. Statement

1. Michael B. Twomey, Post Office Box 5256, Tallahassee, Florida

Michael B. Twomey Post Office Box 5256 Tallahassee, Florida 32314-5256 (850) 421-9530 (850) 421-8543 - fax miketwomey@talstar.com Page 1 of 1



BEFORE THE PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Progress DOCKET NO. 050078-EI Energy Florida, Inc.

FILED: August 3, 2005

AARP'S PREHEARING STATEMENT

Pursuant to Order No. PSC-05-0487-PCO-EI, AARP files its Prehearing Statement.

A. All Known Witnesses

Stephen A. Stewart

B. All Known Exhibits

- SAS-1Regression Model-U.S.SAS-2Regression Model-PEFSAS-3Chart 1 "Comparison of Approved FPSC and Model Generated ROE"SAS-4Chart 2 "Comparison of Approved FPSC and Model Generated ROEwith Vander Weide Recommendation and MROE"SAS-5Regression Model –Florida SpecificSAS-6Analysis of Storm Reserve Fund
- C. AARP's Statement of Basic Position

AARP's basic position is that Florida Power & Light Company is not entitled to any rate increase, but, rather, should have its rates reduced by the annual revenue reduction being advocated by the Office of Public Counsel.

D. <u>AARP's Position on the Issues</u>

With the exception of the two issues listed below, AARP adopts as its own the positions on all of the issues taken by the Office of Public Counsel.

- **<u>ISSUE 13</u>**: Based on the decisions on foregoing issues, what are the appropriate depreciation rates and recovery/amortization schedules?
- **<u>POSITION</u>**: The depreciation reserve surplus found to exist by the Commission should be flowed back to the benefit of the customers over five years.
- **ISSUE 130:** Is PEF's requested \$50,000,000 annual accrual for storm damage for the projected test year appropriate?

DOCUMENT NUMBER-DATE

07522 AUG-3 8

FPSC-COMMISSION CLERK

<u>POSITION:</u> No. The annual accrual should be no greater than \$10 million.

Respectfully submitted this 3d day of August, 2005.

<u>/s/ Michael B. Twomey</u> Michael B. Twomey Attorney for AARP Post Office Box 5256 Tallahassee, Florida 32314-5256 Telephone: (850) 421-9530

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of this Petition to Intervene has been

furnished to the following this 3rd day of August, 2005, either by U.S. Mail or electronic message

attachment:

Jennifer Brubaker, Esquire Jennifer Rodan, Esquire Florida Public Service Commission Division of Legal Services 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

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/s/ Michael B. Twomey