Hopping Green & Sams

Attorneys and Counselors

October 13, 2006

BY HAND-DELIVERY

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

Re:

Docket No. 060007-EI

Dear Ms. Bayó:

On behalf of Progress Energy Florida, Inc. (PEF), I enclose for filing in the above docket the original and fifteen (15) copies of the following:

- PEF's Motion For Leave to File Supplemental Testimony; and
- Pre-filed Supplemental Direct Testimony of Thomas Lawery.

I also have included a diskette containing the motion and testimony in Microsoft Word Format. By copy of this letter, the enclosed documents have been furnished to the parties on the attached certificate of service.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning it to me. If you have any questions regarding this filing, please give me a call at 425-2359.

Counsel for PROGRESS ENERGY FLORIDA, INC.

cc: Certificate of Service

123 South Calhoun Street (32301)

Tallahassee, Florida 32314

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Progress Energy Florida, Inc.'s Motion For Leave to File Supplemental Testimony and Pre-filed Supplemental Direct Testimony of Thomas Lawery in Docket No. 060007-EI have been furnished by hand-delivery (*) or regular U.S. mail to the following this day of October, 2006.

Martha Carter Brown (*)
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

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

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Florida Industrial Power Users Group John W. McWhirter, Jr. c/o McWhirter Law Firm 400 North Tampa Street, Suite 2450 Tampa, FL 33602

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Florida Power & Light Co. R. Wade Litchfield, Esq. John T. Butler, Esq. 700 Universe Blvd. Juno Beach, FL 33408-0420 Florida Power & Light Co. Bill Walker 215 S. Monroe Street, Suite 810 Tallahassee, FL 32301

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Florida Retail Federation John Rogers Post Office Box 10024 Tallahassee, FL 32302

R. Alexander Glenn
Deputy General Counsel - Florida
Progress Energy Service Company, LLC
P.O. Box 14042
St. Petersburg, FL 33733

Attorney

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Environmental Cos	st Recovery)	Docke	t No. 060007-EI
Clause)		
)	Filed:	October 13, 2006

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

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

- 1. On September 1, 2006, PEF filed the direct testimony and exhibit of Thomas Lawery in support of PEF's request to recover the costs of installation and operation of modular cooling towers (MCTs) at PEF's Crystal River Plant. Such costs have been included in PEF's proposed ECRC factors subject to refund depending upon the Commission's final action on PEF's petition to recover the costs of the MCT Project in Docket No. 060162-EI.
- 2. In its recommendation in Docket No. 060162-EI, Commission Staff suggested that PEF provide an analysis of the cost savings resulting from the MCT Project with its annual projection filings in this docket. As stated in Mr. Lawery's direct testimony, such analyses were not available at the time of PEF's original projection filing but would be provided at a later date.

3. In accordance with Staff's recommendation in Docket No. 060162-EI, PEF seeks to file the supplemental testimony and exhibit of Mr. Lawery to present PEF's analysis of cost savings attributable to the MCT Project.

4. Undersigned counsel for PEF has attempted to contact counsel for Staff, Office of Public Counsel and intervenors to determine their positions on the motion. However, attempts to contact Staff, Office of Public Counsel and Florida Industrial Power Users Group were unsuccessful. Counsel for Florida Retail Federation (FRF) indicated that FRF would take whatever position OPC takes on the motion.

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

RESPECTFULLY SUBMITTED this day of October, 2006.

R. Alexander Glenn

Deputy General Counsel

John T. Burnett

Associate General Counsel

Progress Service Company, LLC

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