

**Marguerite Lockard**

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**From:** Mike Twomey [miketwomey@talstar.com]  
**Sent:** Friday, June 29, 2007 4:39 PM  
**Cc:** ROBERTS.BRENDA; Filings@psc.state.fl.us; Beth Keating; Charles Gauthier; Dianne Triplett; James M. Walls; James W. Brew; John Burnett; John McWhirter; John Rogers; Karin S. Torain; Lisa Bennett; mike.halpin@dep.state.fl.us; Paul Lewis; R. Alexander Glenn; Schef Wright; McGLOTHLIN.JOSEPH  
**Subject:** Re: E-filing (Dikt. No. 070052-EI)  
**Attachments:** AARP preliminary list of issues CR 3 Uprate.doc



AARP  
ARG LIST

- > *Electronic Filing*
  - >
  - > *a. Person responsible for this electronic filing:*
  - >
  - > *Michael B. Twomey, P.O. Box 5256, Tallahassee, Florida*
  - > *32314-5256,*
  - > *miketwomey@talstar.com*
  - >
  - > *b. Docket No. 070052-EI*
  - >
  - > *In re: Petition by Progress Energy Florida, Inc. to recover*
  - > *costs of*
  - > *Crystal River Unit 3 uprate through fuel clause.*
  - >
  - > *c. Document being filed on behalf of AARP.*
  - >
  - > *d. There are a total of 2 pages.*
  - >
  - > *e. The document attached for electronic filing is AARP's*
- Preliminary**  
**> List of Issues.**
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  - > **Thank you.**
  - >

> **Mike Twomey**  
>  
> **850-421-9530**  
>  
>

DOCUMENT NUMBER-DATE  
05244 JUN 29 06  
FPSC-COMMISSION CLERK



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition by Progress Energy )  
Florida, Inc. to recover costs of ) DOCKET NO. 070052-EI  
Crystal River Unit 3 uprate through )  
fuel clause ) Filed: June 29, 2007  
\_\_\_\_\_)

**AARP'S PRELIMINARY LIST OF ISSUES**

AARP, through its undersigned counsel, hereby files its preliminary list of issues:

**ISSUE 1:** Should PEF recover the (prudent and reasonable) costs of the MUR phase of the CR3 uprate project through the fuel cost recovery clause or through base rates?

**ISSUE 2:** Should PEF recover the (prudent and reasonable) costs of Phase 2 of its CR3 uprate project through the fuel cost recovery clause or through base rates?

**ISSUE 3:** Should PEF recover the (prudent and reasonable) costs of Phase 3 of its CR3 uprate project through the fuel cost recovery clause or through base rates?

**ISSUE 4:** Should PEF recover the (prudent and reasonable) costs of the transmission upgrades associated with the CR3 uprate project through the fuel cost recovery clause or through base rates?

**ISSUE 5:** Should PEF recover the (prudent and reasonable) costs of the "point of discharge" cooling solution associated with the CR3 uprate project through the fuel cost recovery clause or through base rates?

**ISSUE 6:** What capital recovery periods should the Commission prescribe for the CR3 uprate assets?

**ISSUE 7:** What return on investment should the Commission authorize PEF to add to the costs of the CR3 uprate project:

- a. If the Commission directs PEF to recover the costs through base rates?
- b. If the Commission authorizes PEF to recover the costs through the fuel cost recovery clause?

**ISSUE 8:** If the Commission were to authorize accelerated recovery of costs through amortization periods shorter than tax lives, as PEF proposes, what ratemaking adjustments, if any, should the Commission require PEF to make to recognize the loss of deferred tax benefits?

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05244 JUN 29 06

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Respectfully,

/s/ Michael B. Twomey, Sr.  
Michael B. Twomey, Sr.  
Attorney for the AARP

CERTIFICATE OF SERVICE

**I HEREBY CERTIFY** that a true and correct copy of AARP's Preliminary List of

Issues has been furnished by electronic mail and U.S. Mail on this 29th day of June, 2007, to  
the following:

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