

**Dorothy Menasco**

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**From:** Mike Twomey [miketwomey@talstar.com]  
**Sent:** Tuesday, July 10, 2007 4:27 PM  
**To:** Filings@psc.state.fl.us  
**Subject:** Re: AARP e-filing (Dkt. 070052-EI)

**Attachments:** AARP Docket No. 070052 Prehearing statement final.doc



AARP Docket  
070052 Prehearing

Electronic Filing

**ORIGINAL**

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>>>> a. Person responsible for this electronic filing:

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>>>> b. Docket No. 070052-EI

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>>>> In re: Petition by Progress Energy Florida, Inc. to recover costs

>>>> of Crystal River Unit 3 uprate through fuel clause.

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>>>> c. Document being filed on behalf of AARP

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>>>> d. There are a total of 5 pages.

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>>>> e. The document attached for electronic filing is the Prehearing

>>>> Statement of AARP.



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition by Progress Energy )  
Florida, Inc. to recover costs of )  
Crystal River Unit 3 uprate through )  
fuel clause )  
\_\_\_\_\_)

DOCKET NO. 070052-EI

Filed: July 9, 2007

ORIGINAL

**AARP'S PREHEARING STATEMENT**

AARP, by its undersigned counsel, , pursuant to the Orders Establishing Procedure in this docket, Order No. PSC-07-0390-PCO-EI, issued May 2, 2007, and Order No. PSC-07-0466-PCO-EI, issued May 23, 2007, hereby submits this Prehearing Statement.

**APPEARANCES:**

Michael B. Twomey  
Post Office Box 5156  
Tallahassee, Fl 32314-5256  
On behalf of AARP

**1. WITNESSES:**

AARP has no witnesses.

**2. EXHIBITS:**

AARP has no prefiled exhibits.

**3. STATEMENT OF BASIC POSITION**

AARP adopts the basic position of the Office of Public Counsel.

**4. STATEMENT OF FACTUAL ISSUES AND POSITIONS**

**ISSUE 1:** Should the Commission authorize clause recovery in lieu of base rate recovery of the prudent and reasonable costs of the following:

**A. Phase 1 of PEF's CR3 Uprate Project?**

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AARP: No. AARP adopts the position of the Office of Public counsel on this issue.

**B. Phase 2 of PEF’s CR3 Uprate Project?**

AARP: No. AARP adopts the position of the Office of Public Counsel on this issue.

**C. Phase 3 of PEF’s CR3 Uprate Project, including:**

1. Nuclear Core Modifications, Secondary Systems, and Other Project-related Plant Additions/Modifications?

AARP: No. AARP adopts the position of the Office of Public Counsel on this issue.

2. The “point of discharge” cooling solution?

AARP: No. AARP adopts the position of the Office of Public Counsel on this issue.

3. Transmission upgrades associated with the CR3 Uprate Project?

AARP: No. AARP adopts the position of the Office of Public Counsel on this issue.

4. Other costs associated with phase 3 of the CR3 Uprate Project?

AARP: No. AARP adopts the position of the Office of Public Counsel on this issue.

**ISSUE 2:** **If the Commission authorizes clause recovery of the CR3 Uprate Project, which cost recovery clause, fuel or capacity, is appropriate for capitalized costs attributable to the uprate?**

AARP: No position.

**ISSUE 3:** **If the Commission authorizes clause recovery of the CR3 Uprate Project, what capital recovery periods should the Commission prescribe for the assets?**

AARP: AARP adopts the position of the Office of Public Counsel on this issue.

**ISSUE 4:** **Based on the recovery periods prescribed for the CR3 Uprate Project assets, what ratemaking adjustments, if any, are necessary?**

AARP: AARP adopts the position of the Office of Public Counsel on this issue.

**ISSUE 5:** If the Commission authorizes PEF clause recovery of the CR3 Uprate Project, what return on investment should the Commission authorize PEF to include?

AARP: AARP adopts the position of the Office of Public Counsel on this issue.

**ISSUE 6:** If the Commission authorizes clause recovery of the CR3 Uprate Project, how should the costs associated with the project be allocated between wholesale and retail jurisdictions for rate recovery purposes?

AARP: AARP adopts the position of the Office of Public Counsel on this issue.

**ISSUE 7:** If the Commission authorizes clause recovery of the CR3 Uprate Project, what reports, if any, should PEF be required to file with the Commission?

AARP: AARP adopts the position of the Office of Public Counsel on this issue.

**ISSUE 8:** Should this docket be closed?

AARP: AARP adopts the position of the Office of Public Counsel on this issue.

5. **STIPULATED ISSUES:**

None.

6. **PENDING MOTIONS:**

None.

7. **STATEMENT OF PARTY'S PENDING REQUESTS OR CLAIMS FOR CONFIDENTIALITY:**

AARP has no pending requests for claims for confidentiality.

8. **OBJECTIONS TO QUALIFICATIONS OF WITNESSES AS AN EXPERT:**

AARP does not expect to challenge the qualifications of any witness who has submitted direct testimony.

9. **STATEMENT OF COMPLIANCE WITH ORDER ESTABLISHING PROCEDURE:**

There are no requirements of the Order Establishing Procedure with which AARP cannot comply.

Dated this 9<sup>th</sup> day of July, 2007.

/s/ Michael B. Twomey  
Michael B. Twomey  
Post Office Box 5156  
Tallahassee, Fl 32314-5256  
On behalf of AARP

CERTIFICATE OF SERVICE

I, **HEREBY CERTIFY** that a true and correct copy of the foregoing document has been furnished by electronic mail and U.S. Mail on this 9<sup>th</sup> day of July, 2007, to the following:

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