

BEFORE THE PUBLIC SERVICE COMMISSION

In re: Review of 2007 Electric Infrastructure Storm Hardening Plan filed pursuant to Rule 25-6.0342, F.A.C., submitted by Progress Energy Florida, Inc.

DOCKET NO. 070298-EI

DATED: September 14, 2007

COMMISSION
CLERK

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**PROGRESS ENERGY FLORIDA, INC.'S
PREHEARING STATEMENT**

Progress Energy Florida, Inc. (PEF) hereby submits its Prehearing Statement with respect to its Storm Hardening Plan and Supplemental Plan filed with the FPSC:

A. Known Witnesses - PEF intends to offer the direct testimony of:

<u>Witness - Direct</u>	<u>Subject Matter</u>	<u>Issues</u>
Jason Cutliffe	PEF's Storm Plan, Plan Supplement, and Issues Raised By Staff and Intervenors Regarding Same	14-26
Mickey Gunter	NESC standards and changes	14-17

CMP B. Known Exhibits - PEF intends to offer the following exhibits:

<u>COM</u>	<u>Exhibit No.</u>	<u>Witness</u>	<u>Description</u>
<u>CTR</u>	_____		
<u>ECR</u>	_____ (JC-1T)	Cutliffe	PEF's Storm Hardening Plan
<u>GCL</u>	<u>R</u> _____		
<u>OPC</u>	_____ (JC-2T)	Cutliffe	PEF's Plan Supplement
<u>RCA</u>	<u>I</u> _____		
<u>SCR</u>	_____ (JC-3T)	Cutliffe	Position Statements from Intervenors
<u>SGA</u>	_____		
<u>SEC</u>	_____		
<u>OTH</u>	_____		

DOCUMENT NUMBER-DATE

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<u> </u> (MG-1T)	Gunter	Resumé
<u> </u> (MG-2T)	Gunter	2007 NESC Rule 250C
<u> </u> (MG-3T)	Gunter	1977 NESC Rule 250C
<u> </u> (MG-4T)	Gunter	1987 NESC Rule 250C
<u> </u> (MG-5T)	Gunter	2005 Comments rejecting originally approved/modified NESC change proposals 2766, 2673 and 2798 in 2003.
<u> </u> (MG-6T)	Gunter	Original NESC change proposals 2766, 2673 and 2798 originally approved/modified in 2003 to eliminate 60' exemption.

C. Statement of Basic Position - PEF's Plan and Plan Supplement meet all the requirements of Rule 25-6.0342 and meet the desired objectives of enhancing reliability and reducing restoration costs and outage times in a prudent, practical, and cost-effective manner.

D.-F. Issues and Positions

PEF's positions on the issues identified in this proceeding are as follows.

Generic Storm Hardening Issues

14. ISSUE: Does the Company's Plan reasonably address the extent to which, at a minimum, the Plan complies with the National Electric Safety Code (ANSI C-2) [NESC] that is applicable pursuant to subsection 25-6.0345(2), F.A.C. [Rule 25-6.0342(3)(a)]

PEF: Yes. (Cutliffe/Gunter)

15. ISSUE: Does the Company's Plan reasonably address the extent to which the extreme wind loading standards specified by Figure 250-2(d) of the 2007 edition of the NESC are adopted for new distribution facility construction? [Rule 25-6.0342(3)(b)1]

PEF: Yes. (Cutliffe/Gunter)

16. ISSUE: Does the Company's Plan reasonably address the extent to which the extreme wind loading standards specified by Figure 250-2(d) of the 2007 edition of the NESC are adopted for major planned work on the distribution system, including expansion, rebuild, or relocation of existing facilities, assigned on or after the effective date of this rule distribution facility construction? [Rule 25-6.0342(3)(b)2]

PEF: Yes. (Cutliffe/Gunter)

17. ISSUE: Does the Company's Plan reasonably address the extent to which the extreme wind loading standards specified by Figure 250-2(d) of the 2007 edition of the NESC are adopted for distribution facilities serving critical infrastructure facilities and along major thoroughfares taking into account political and geographical boundaries and other applicable operational considerations? [Rule 256.0342(3)(b)3]

PEF: Yes. (Cutliffe/Gunter)

18. ISSUE: Does the Company's Plan reasonably address the extent to which its distribution facilities are designed to mitigate damage to underground and supporting overhead transmission and distribution facilities due to flooding and storm surges? [Rule 25-6.0342(3)(c)]

PEF: Yes. (Cutliffe)

19. ISSUE: Does the Company's Plan reasonably address the extent to which the placement of new and replacement distribution facilities facilitate safe and efficient access for installation and maintenance pursuant to Rule 25- 6.0341, F.A.C? [Rule 25-6.0342(3)(d)]

PEF: Yes. (Cutliffe)

20. ISSUE: Does the Company's Plan provide a detailed description of its deployment strategy including a description of the facilities affected; including technical design specifications, construction standards, and construction methodologies employed? [Rule 25-6.0342(4)(a)]

PEF: Yes. (Cutliffe)

21. ISSUE: Does the Company's Plan provide a detailed description of the communities and areas within the utility's service area where the electric infrastructure improvements, including facilities identified by the utility as critical infrastructure and along major thoroughfares pursuant to subparagraph (3)(b)3. are to be made? [Rule 25-6.0342(4)(b)]

PEF: Yes. (Cutliffe)

22. ISSUE: Does the Company's Plan provide a detailed description of the extent to which the electric infrastructure improvements involve joint use facilities on which third-party attachments exist? [Rule 25-6.0342(4)(c)]

PEF: Yes. (Cutliffe)

23. ISSUE: Does the Company's Plan provide a reasonable estimate of the costs and benefits to the utility of making the electric infrastructure improvements, including the effect on reducing storm restoration costs and customer outages? [Rule 25-6.0342(4)(d)]

PEF: Yes. (Cutliffe)

24. ISSUE: Does the Company's Plan provide a reasonable estimate of the costs and benefits, obtained pursuant to subsection (6) below, to third-party attachers affected by the electric infrastructure improvements, including the effect on reducing storm restoration costs and customer outages realized by the third-party attachers? [Rule 25-6.0342(4)(e)]

PEF: Yes. (Cutliffe)

25. ISSUE: Does the Company's Plan include reasonable written Attachment Standards and Procedures addressing safety, reliability, pole loading capacity, and engineering standards and procedures for attachments by others to the utility's electric transmission and distribution poles that meet or exceed the edition of the National Electrical Safety Code (ANSI C-2) that is applicable pursuant to Rule 25-6.034, F.A.C.? [Rule 25-6.0342(5)]

PEF: Yes. (Cutliffe)

26. ISSUE: Based on the resolution of the preceding issues, should the Commission find that the Company's Plan meets the desired objectives of enhancing reliability and reducing restoration costs and outage times in a prudent, practical, and cost-effective manner to the affected parties.[Rule 25-6.0342(1) and (2)]

PEF: Yes. (Cutliffe)

G. Stipulated Issues

PEF is not a party to any stipulations at this time.

H. Pending Motions

PEF has no pending motions at this time.

I. Requests for Confidentiality

PEF has no pending requests for confidential classification at this time.

J. Requirements of Order

PEF believes that this prehearing statement complies with all the requirements of the Order Establishing Procedure.

K. Objections to Qualifications

PEF has no objection to the qualifications of any expert witnesses in this proceeding at this time, subject to further discovery in this matter.

RESPECTFULLY SUBMITTED this 14th day of September, 2007.

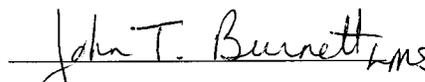
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via U.S.

Mail this 14th day of September, 2007 to all parties of record as indicated below.


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