

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Nuclear Power Plant Cost Recovery  
Clause.

DOCKET NO. 080119-EI

March 21, 2008

**CITIZENS' FIRST SET OF INTERROGATORIES  
TO PROGRESS ENERGY FLORIDA, INC. (Nos. 1-21)**

Pursuant to § 350.0611(1), Florida Statutes, Rule 28-106.206, Florida Administrative Code and Rule 1.340, Florida Rules of Civil Procedure, the Citizens of the State of Florida ("Citizens") by and through their undersigned attorney with the Office of Public Council ("OPC") hereby propound the following interrogatories to Progress Energy Florida, Inc. ("PEF," "Utility" or "Company"), to be answered on or before 30 days from the date of service, or at such other time and place as may be mutually agreed upon by counsel. Each interrogatory should be answered under oath by the most qualified and informed person to provide the most complete and accurate answer to each question, who is also included within the definition of Progress Energy Florida, Inc.

**DEFINITIONS**

As used herein, the following words shall have the meanings indicated:

- (i) "Progress Energy Florida, Inc." shall mean the company, including but not limited to any of its directors, employees, consultants, agents, representatives, attorneys (concerning nonprivileged matters, which privilege must be expressly identified and justified) and any other person or entity acting or purporting to act on behalf of the Company.

- (ii) "You" or "Your" means Progress Energy Florida, Inc. as defined above.
- (iii) "Affiliate" means any entity that directly or indirectly through one or more intermediaries, controls, is controlled by or is under common control with Progress Energy Florida, Inc., or shares a 5% or greater common ownership.
- (iv) "Identify" shall mean, with respect to any document or report; set forth the title, if any, describe the relevant page or pages and line or lines thereof (or annex a copy to the answer to these interrogatories, with appropriate designations of such page or pages and line or lines), and state the present location and custodian of the original and all copies of the documents, who prepared the document, and when it was prepared.

### **INSTRUCTIONS**

- A. Documents or reports to be identified shall include all documents in your possession, custody and control and all other documents of which you have knowledge.
- B. Each interrogatory is to be answered based upon the knowledge, information or belief of the Company, and any answer based upon information and belief is to state that it is given on such basis. If the complete answer to an interrogatory is

not known, so state and answers as fully as possible the part of the interrogatory to which an answer is known. For each answer, or part thereof, please identify the individual or individuals who provided the information or helped in providing the information contained in the responses, specifying the individual's business address, telephone number and the individual's relationship to the Company, and please identify the witness who will be sponsoring the responses and will be able to answer cross-examination questions concerning the response.

- C. If the requested information is not applicable, that response should be reported as well as the reason. If the requested information is not available, that response should be reported as well as the reason.
- D. If an interrogatory contained herein asks for information that has already been provided, please so state, indicating the date provided and, if applicable, the interrogatory number, the request of production number or staff data request that requested the information.
- E. To the extent an interrogatory calls for information which cannot now be precisely and completely furnished, such information as can be furnished should be included in the answer, together with a statement that further information cannot be furnished, and a statement as to the reasons therefore. If you expect to obtain further information between the time answers are served and the time of hearing, you are requested to state this fact in each answer, and provide such further information as soon as it is available. If the information which cannot now

be furnished is believed to be available to another person, identify such other person and the reasons for believing such person has the described information.

- F. In the event any interrogatory herein calls for information or for the identification of a document which you deem to be privileged, in whole or in part, the information should be given or the document identified to the fullest extent possible consistent with such claim of privilege and specify the grounds relied upon for the claim of privilege.
- G. If the respondent intends to seek clarification of any portion of the discovery request, the respondent shall request such clarification within 10 days of service of the discovery request. Further, any specific objection to a discovery request shall be made within 10 days of service of the discovery request.
- H. Separate answers shall be furnished for each interrogatory, although where the context permits, an interrogatory may be answered by reference to the answer furnished to another interrogatory.

## INTERROGATORIES

1. Did the company compare any of the CR3 uprate costs that are proposed for recovery in this docket with any nuclear uprate costs incurred by other nuclear plants that are in the process of construction or already completed? If the answer is yes, please state what comparisons were made, the name of the utility, the name of the plant, the type construction activity and the comparative costs for PEF CR3.
  
2. Please state the names of any affiliates that will provide services that will be billed to the CR3 uprate project. For each affiliate, provide the dollar amount billed, estimated, or projected, and a description of each service or cost incurred by each affiliate.
  
3. Please state the reasons upon which Mr. Roderick bases his belief that the MUR costs totaling \$8.7 million were reasonable and prudent as stated on page 11, lines 17-18 of his testimony.
  
4. Please state the reasons upon which Mr. Roderick bases his belief that the \$32.1 million spent by PEF for long-lead items associated with Phase II and Phase III is reasonable and prudent, as stated on page 12, lines 1-3 of his testimony.
  
5. Beginning on page 7 of his testimony, Mr. Roderick discusses Phase 2 of the uprate project. Does PEF intend to seek recovery of all, or any portion, of the costs for replacing the low pressure turbine and electrical generator or the steam generator through Rule 25-6.0423, F.A.C.?

6. If the answer to Interrogatory 5 above is that PEF intends to recover a portion of those costs, what portion does PEF intend to seek and how does PEF intend to calculate the portion for recovery under Rule 25-6.0423?

7. If the answer to Interrogatory 5 above is yes, what accounting treatment does PEF intend to apply to the existing low pressure turbine and electrical generator and the steam generator?

8. Please provide a more complete description of the turbine/generator retrofit project and in what phase of the overall uprate project these tasks fit.

9. Please explain to what the negative costs incurred in November and December 2006 relate.

10. Please explain why PEF did not include a negative interest component on the negative costs incurred in November and December 2006 to offset the AFUDC earned in 2007.

11. In response to Staff Interrogatory 12 in Docket No. 070052, PEF identified a projected cost for the MUR of \$6.45 million. Please provide a reconciliation by contract and line item of the projected cost of the MUR of \$8.7 million cited by Mr. Roderick on page 11, lines 17-18 of his testimony.

12. Please explain how PEF accounted for the regulatory and administrative costs incurred in litigating Docket No. 070052-EI. In your response, please include the account number to which these amounts were recorded.

a. Has PEF included any of these regulatory and administrative costs in the amounts for recovery in this current proceeding.

b. If yes, where are those amounts included and in what amounts.

13. Please identify which Crystal River generating units will be connected to the new cooling tower that is projected to be placed in service in 2011 or 2012.

14. Please explain what PEF plans to do with the existing cooling towers and the temporary modular cooling tower rentals after the addition of the new point of discharge cooling tower(s) are placed in service in 2011.

15. On page 18, line 19, of Mr. Roderick's direct testimony in Docket No. 070052-EI, he stated that PEF assumed an estimated cost of \$43 million to address the Point of Discharge (POD) issues at the discharge canal associated with the uprate project. He further stated that an optimal solution had not yet been identified but the Company will evaluate all reasonable options before making a final determination of how to address the POD issue.

a. Please state whether the company has arrived at its solution for the POD issues.

b. Please provide the current estimate of the cost that will be incurred to address the POD issues at the Crystal River facility.

c. Please describe all options considered for the POD issues, and explain whether any of the options are still under consideration, what options have been dismissed, and the reason(s) any of the options were dismissed.

16. Please provide a description and analysis of the projects that originally were segregated between Phases 2 and 3 in docket No. 070052-EI that have now been combined as part of Phase 2 for the nuclear cost recovery clause.

17. Please provide the current estimate of any transmission costs that directly relate to the CR3 uprate that PEF is or will request recovery through the nuclear cost recovery clause.

18. Please provide a reconciliation by contract and line item of the current estimate of transmission costs that directly relate to the CR3 uprate that PEF is or will request recovery of through the nuclear cost recovery clause and the \$89 million that was projected in Docket No. 070052-EI.

19. Please provide a reconciliation by contract and line item of the estimated \$87.77 million cost of the Balance of Plant (BOP) Phase 2 plant costs submitted in Docket No. 070052-EI and the current actual and estimates of those same costs.



20. Please provide a reconciliation by contract and line item of the estimated \$198.72 million cost of the Extended Power Uprate (EPU) Phase 3 plant costs submitted in Docket No. 070052-EI and the current actual and estimates of those same costs.

21. Please provide a breakdown and explanation of all costs included under the sub-category of project management for generation construction costs reflected on Schedule T-6, line 33. State whether the costs are internal PEF costs, affiliate costs, or outside contractual costs and include the amount estimated and incurred for each type of cost listed.

s/Stephen C. Burgess  
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Attorney for the Citizens  
of the State of Florida

**AFFIDAVIT**

STATE OF \_\_\_\_\_

COUNTY OF \_\_\_\_\_

BEFORE ME, the undersigned authority, personally appeared

\_\_\_\_\_, who deposed and stated that he/she

provided the answers to interrogatories \_\_\_\_\_

served on \_\_\_\_\_ by \_\_\_\_\_ on

\_\_\_\_\_ and that the responses are true and

correct to the best of his/her information and belief.

DATED at \_\_\_\_\_, \_\_\_\_\_, this day  
of \_\_\_\_\_, 2008.

Sworn to and subscribed before me this \_\_\_\_\_ day of  
\_\_\_\_\_, 2008.

\_\_\_\_\_  
NOTARY PUBLIC

State of \_\_\_\_\_ at Large

My Commission Expires: \_\_\_\_\_

**CERTIFICATE OF SERVICE**  
**DOCKET NO. 080119-EI**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing Citizens' First Set of Interrogatories (Nos. 1-21) to Progress Energy Florida, Inc., has been furnished by E-mail and by U. S. Mail to the following parties this 21<sup>st</sup> day of March, 2008:

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          s/Steve Burgess            
Steve Burgess  
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