

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Petition for determination of need  
for Levy Units 1 and 2 nuclear power plants,  
by Progress Energy Florida, Inc.

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Docket No. 080148-EI

Submitted for Filing: April 17, 2008

**PROGRESS ENERGY FLORIDA'S RESPONSES TO  
WHITE SPRINGS' FIRST REQUEST FOR ADMISSIONS (NOS. 1-5)**

Progress Energy Florida, Inc. ("PEF"), responds to White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate – White Springs' ("White Springs") First Request for Admissions to PEF (Nos. 1-5), as follows:

**REQUEST FOR ADMISSIONS**

1. PEF anticipates that the ultimate costs of Levy units 1 and 2 will exceed the non-binding cost estimates contained in the petition if project delays are encountered due to any of the risk factors described in its petition and testimony.

**ANSWER:** PEF can neither admit nor deny that the ultimate costs of Levy units 1 and 2 will exceed the non-binding cost estimates contained in the petition and testimony if project delays are encountered due to any of the risk factors described in its petition and testimony because the request requires knowledge of future events and circumstances that have not yet occurred in order to answer it. PEF admits that the ultimate costs of Levy units 1 and 2 may exceed the non-binding cost estimates if project delays are encountered for any of the reasons PEF has specifically identified, or for reasons not specifically identified in the petition and testimony, but PEF cannot say whether the ultimate costs will be higher or lower than the non-binding cost estimates without knowing the nature and extent of the delay or delays, whether the delay or delays do indeed result in higher or additional costs, whether there will be any countervailing circumstances that offset or mitigate the delay or resulting costs if any, whether there will be reductions in costs in other areas, or whether some third party entity assumes or shares in the costs caused by any delay, among other factors that may affect the ultimate costs of Levy Units 1 and 2.

2. No Westinghouse AP1000 units have been constructed and entered into commercial service anywhere in the world.

**ANSWER:** As of the date of the answer to this request, PEF admits that no Westinghouse AP1000 unit has been constructed and entered into commercial service anywhere in the world, but China has selected the Westinghouse AP1000 design for at least three Westinghouse AP1000 units for commercial operation as early as 2013 to 2015, therefore, before Levy Units 1 and 2 are constructed and enter into commercial operation there likely will be a Westinghouse AP1000 unit that has been constructed and entered into commercial operation.

3. There is no established operating performance history for an AP 1000 nuclear plant system because none currently exist.

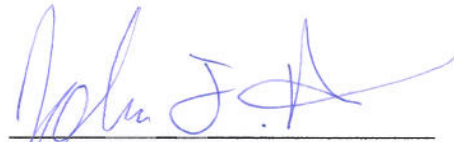
**ANSWER:** As of the date of the answer to this request, PEF admits that there is no established operating performance history for an AP1000 nuclear plant because no Westinghouse AP1000 unit has been constructed and entered into commercial service, but China has selected the Westinghouse AP1000 design for at least three Westinghouse AP1000 units for commercial operation as early as 2013 to 2015, therefore, before Levy Units 1 and 2 are constructed and enter into commercial operation there likely will be operating performance history for a Westinghouse AP1000 unit.

4. There is no established construction cost history for an AP 1000 nuclear plant system because none currently exist.

**ANSWER:** As of the date of the answer to this request, PEF admits that there is no established construction cost history for an AP1000 nuclear plant because no Westinghouse AP1000 unit has been constructed, but China has selected the Westinghouse AP1000 design for at least three Westinghouse AP1000 units for commercial operation as early as 2013 to 2015, therefore, before Levy Units 1 and 2 are constructed and enter into commercial operation there likely will be a construction cost history for a Westinghouse AP1000 unit.

5. Westinghouse is engaged in world-wide competition with Areva, General Electric and Hitachi to design and construct new commercial nuclear power plants.

**ANSWER:** PEF is without knowledge as to whether Westinghouse is engaged in world-wide competition with Areva, General Electric, and Hitachi to design and construct new commercial nuclear power plants because the request is not directed to PEF's business activities or PEF's knowledge of the activities of others in PEF's business but instead is directed to Westinghouse's business activities and the knowledge of the activities of entities in the same business as Westinghouse. PEF admits that Westinghouse, Areva, General Electric, and Hitachi each has a proprietary design for commercial nuclear power plants but PEF is without knowledge as to whether Westinghouse is in fact engaged in "world-wide" competition with Areva, General Electric, and Hitachi and the information necessary to answer this request is, if known at all, known to Westinghouse and is therefore not readily obtainable by PEF.



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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished electronically and by U.S. Mail this 17th day of April, 2008 to all parties of record as indicated below.



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