

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.

DOCKET NO. 080148-EI
DATED: MAY 1, 2008

COMMISSION
CLERK

STAFF'S PREHEARING STATEMENT

Pursuant to Order No. PSC-08-0151-PCO-EI, filed March 12, 2008, the Staff of the Florida Public Service Commission files its Prehearing Statement.

a. All Known Witnesses

Staff is not sponsoring any witnesses.

b. All Known Exhibits

Staff has no direct exhibits.

c. Staff's Statement of Basic Position

Staff's positions are preliminary and based on materials filed by the parties and on discovery. The preliminary positions are offered to assist the parties in preparing for the hearing. Staff's final positions will be based upon all the evidence in the record and may differ from the preliminary positions stated herein.

d. Staff's Position on the Issues

ISSUE 1: Is there a need for the proposed generating units, taking into account the need for electric system reliability and integrity, as this criterion is used in Section 403.519(4), Florida Statutes?

CMP _____

POSITION: No position pending evidence adduced at hearing.

COM 5 _____

ISSUE 2: Is there a need for the proposed generating units, taking into account the need for fuel diversity, as this criterion is used in Section 403.519(4), Florida Statutes?

CTR _____

POSITION: No position pending evidence adduced at hearing.

ECR _____

ISSUE 3: Is there a need for the proposed generating units, taking into account the need for base-load generating capacity, as this criterion is used in Section 403.519(4), Florida Statutes?

GCL _____

POSITION: No position pending evidence adduced at hearing.

OPC _____

FCA _____

OCR _____

OTA _____

OTC _____

OTD _____

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ISSUE 4: Is there a need for the proposed generating units, taking into account the need for adequate electricity at a reasonable cost, as this criterion is used in Section 403.519(4), Florida Statutes?

POSITION: No position pending evidence adduced at hearing.

ISSUE 5: Are there any renewable energy sources and technologies or conservation measures taken by or reasonably available to Progress Energy Florida, Inc. which might mitigate the need for the proposed generating units?

POSITION: No position pending evidence adduced at hearing.

ISSUE 6: Will the proposed generating units provide the most cost-effective source of power, as this criterion is used in Section 403.519(4), Florida Statutes?

POSITION: No position pending evidence adduced at hearing.

ISSUE 7: Based on the resolution of the foregoing issues, should the Commission grant Progress Energy Florida, Inc.'s petition to determine the need for the proposed generating units?

POSITION: No position pending evidence adduced at hearing.

ISSUE 8: Should this docket be closed?

POSITION: Staff has no position at this time.

Additional Issues

ISSUE 9: Should the Commission separately assess the need for each of the proposed generating units using the criteria set forth in Section 403.519(4), Florida Statutes? (WHITE SPRINGS 8; SACE 8)

POSITION: No position pending evidence adduced at hearing.

ISSUE 10: Should the Commission require, as a condition of granting a determination of need for the proposed units, that Progress Energy Florida, Inc. implement contractual and other strategies required to effectively manage the units' construction cost and schedule and the risks to consumers associated with cost overruns and project delays? (WHITE SPRINGS 10; SACE 10)

POSITION: No position pending evidence adduced at hearing.

e. Stipulated Issues

Staff is aware of no stipulated issues at this time.

f. Pending Motions

Staff has no pending motions at this time.

g. Pending Confidentiality Claims or Requests

Staff has no pending confidentiality claims or requests at this time.

h. Objections to Witness Qualifications as an Expert

Staff has no objections to any witness' qualifications as an expert in this proceeding.

i. Compliance with Order No. PSC-08-0151-PCO-EI

Staff has complied with all requirements of the Order Establishing Procedure entered in this docket.

Respectfully submitted this _____ day of May, 2008.



KATHERINE E. FLEMING
Senior Attorney
FLORIDA PUBLIC SERVICE COMMISSION
Gerald L. Gunter Building
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0863
Telephone: (850) 413-6218

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for determination of need for Levy Units 1 and 2 nuclear power plants, by Progress Energy Florida, Inc. | DOCKET NO. 080148-EI
| DATED: MAY 1, 2008

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of STAFF'S PREHEARING STATEMENT has been served by electronic and U. S. mail to John T. Burnett and R. Alexander Glenn, Progress Energy Service Company, LLC, Post Office Box 14042, St. Petersburg, Florida 33733-4042, and that a true copy thereof has been furnished to the following by electronic and U. S. mail this 1st day of May, 2008:

James W. Brew, c/o Brickfield Law Firm
PCS Phosphate - White Springs
1025 Thomas Jefferson St., NW
Eight Floor, West Tower
Washington DC 20007

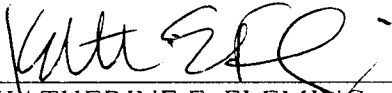
J.R. Kelly/Stephen Burgess
Office of Public Counsel
c/o The Florida Legislature
111 W. Madison St., Room 812
Tallahassee FL 32399-1400

Karin S. Torain
PCS Administration (USA), Inc.
Skokie Boulevard, Suite 400
Northbrook IL 60062

J. Michael Walls/Dianne M. Tripplett
Carlton Fields Law Firm
Post Office Box 3239
Tampa, Florida 33601-3239

Paul Lewis, Jr.
Progress Energy Florida, Inc.
106 East College Avenue, Suite 800
Tallahassee FL 32301-7740

E. Leon Jacobs, Jr.
Williams & Jacobs, LLC
1720 S. Gadsden St. MS 14, Suite 201
Tallahassee, FL 32301


KATHERINE E. FLEMING
Senior Attorney
FLORIDA PUBLIC SERVICE COMMISSION
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
(850) 413-6218

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