

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Power Plant Cost
Recovery Clause

Docket No. 080009-EI

Submitted for Filing: June 18, 2008

**PROGRESS ENERGY FLORIDA'S RESPONSES TO OPC'S
SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (Nos. 12-57)**

Progress Energy Florida, Inc., ("PEF" or "Company"), responds to OPC's Second Request for Production of Documents (Nos. 12-57), as follows:

GENERAL RESPONSES AND OBJECTIONS

PEF incorporates and restates its General Responses and Objections to OPC's Second Request for Production of Documents (Nos. 12-57), served on June 5, 2008, as if those responses and objections were fully set forth herein.

DOCUMENTS REQUESTED

12. Provide copies of the most recent internal audits, including all supporting workpapers, conducted by or on behalf of PEF regarding its accounting or cost oversight controls systems utilized for PEF's nuclear uprate project. Provide continuing internal audit reports and supporting workpapers during the present proceeding.

ANSWER: PEF incorporates and restates its general and specific objections to this request, served on June 5, 2008 as if those objections were fully set forth herein. Subject to and without waiving those objections or any of PEF's general objections, please see documents attached bearing Bates Numbers PEF-NCR-6971 through PEF-NCR-7301.

All documents responsive to this request are confidential. An unredacted copy will be filed with the Florida Public Service Commission along with PEF's Request for Confidential Classification. All redacted copies will also be produced and attached to PEF's Request for Confidential Classification.

13. Provide copies of the most recent audits performed by PEF's outside auditors, including all supporting workpapers, regarding PEF's accounting or cost oversight controls systems utilized for PEF's nuclear uprate project. Provide continuing outside auditor's reports and supporting workpapers during the present proceeding.

ANSWER: PEF incorporates and restates its general and specific objections to this request, served on June 5, 2008 as if those objections were fully set forth herein. Subject to and without waiving those objections or any of PEF's general objections, there are no external audit reports that have been performed on the CR3 Uprate project to date.

14. Provide a copy of all reports, findings, correspondence or other notices provided to PEF that indicated that PEF was not in full compliance with its accounting or cost oversight controls guidelines for properly accounting for its nuclear related project costs associated with this docket.

ANSWER: Please see documents attached bearing Bates Numbers PEF-NCR-6953 through PEF-NCR-6971. Also, please see PEF's response to Request 12.

15. Provide a copy of all guidance, e.g. narratives, procedures or instructions that address the beginning-to-end process used in developing all nuclear-related costs included in PEF's present nuclear cost filings in Docket No. 080009, submitted in March and May of 2008.

ANSWER: Please see documents attached bearing Bates Numbers PEF-NCR-6534 through PEF-NCR-6785, which is a copy of the Financial and Regulatory Procedures Manual that was developed to support Nuclear Cost recovery. Although this manual was originally developed to support the Levy projects, it is being amended/supplemented to also support the CR3 Uprate project.

16. Provide a copy of all electronic files that support the determination of PEF's nuclear plant costs included in Exhibits LC-1 and LC-2 of Ms. Cross's testimony.

ANSWER: Please see PEF's response to Question Number 33.

17. If not provided elsewhere, provide copies of all of PEF's accounting policies and procedures that address the accounting for PEF's nuclear plant related costs.

ANSWER: Please see documents attached bearing Bates Numbers PEF-NCR-6913 through PEF-NCR-6933. Please also see PEF's response to Request 15.

18. Provide a copy of all "REDACTED" information or cost data noted by PEF in Exhibits LC-1 and LC-2 of Ms. Cross's testimony. Provide all associated workpapers.

ANSWER: Please see attached, confidential Exhibits LC-1 and LC-2, which are subject to a pending confidentiality request filed on May 22, 2008.

19. Provide a copy of the accounting manual, instructions, guidelines, procedures and all other information explaining PEF's accounting system utilized to track the Crystal Unit 3 Uprate Costs included in the present filing.

ANSWER: The information used in PEF's filings is derived from a variety of systems including: Oracle, Business Objects, Passport, Power Plant, and PeopleSoft. Please also see PEF's response to Request 15.

20. Provide detailed information explaining the allocation process utilized by Progress Energy Service Company to allocate its service company costs to the Crystal Unit 3 Uprate Project.

ANSWER: This request is not applicable because Progress Energy Service Company does not allocate costs to the Crystal River Unit 3 Uprate Project. Service Company costs are being captured in Service Company projects when incurred and then directly charged in full to PEF Uprate projects. Attached are documents bearing Bates Numbers PEF-NCR-7285 through PEF-NCR-7290, which are an excerpt from the Resource Planning and Budgeting Policy and the associated Service Company Accounting Rules that describe the direct project billing process.

21. Provide all documentation, including workpapers, supporting the allocation of Progress Energy Service Company costs to the Crystal Unit 3 Uprate project, showing both actual and projected costs included in PEF's present filing.

ANSWER: Please see PEF's response to Request No. 20.

22. Regarding the determination of PEF's costs assigned to the Crystal Unit 3 Uprate Project, provide information supporting the determination of the incentive compensation costs (actual and budgeted) charged by Progress Energy Service Company and PEF to the uprate project by functional group and FERC account.

ANSWER: PEF incorporates and restates its general and specific objections to this request, served on June 5, 2008 as if those objections were fully set forth herein. Subject to and without waiving those objections or any of PEF's general objections, Progress Energy Service Company does not charge incentive compensation costs to the Crystal River Unit 3 Uprate Project.

During 2006 and 2007, PEF did not charge incentive compensation costs to the Uprate Project. PEF began charging employee incentive compensation costs to the Uprate project in 2008. Please see documents attached bearing Bates Numbers PEF-NCR-6948 through PEF-NCR-6952.

23. Provide a list of the cost escalators used by PEF to determine its projected costs of the Crystal 3 Uprate Project based upon the most recent actual costs incurred. Provide this information by FERC Account/Sub-Account and work order.

ANSWER: PEF does not use actual costs incurred to project costs, therefore it does not have any responsive documents in its possession, custody, or control.

24. Referring to Mr. Roderick's testimony on page 6, line 12, and regarding the \$9 million of capital expenditures for January to March 2008, provide detail information supporting the determination of the \$9 million of cost incurred. Specifically identify all costs associated with the MUR phase.

ANSWER: PEF incorporates and restates its general and specific objections to this request, served on June 5, 2008 as if those objections were fully set forth herein. Subject to and without waiving those objections or any of PEF's general objections, please see documents attached bearing Bates Numbers PEF-NCR-6934 through PEF-NCR-6945. Please also see PEF's response to Request number 33.

25. Regarding Mr. Roderick's testimony on page 10, lines 1 through 7, provide the project schedules, milestones, etc. that were utilized by PEF to develop the projected costs for the Crystal Unit 3 Uprate.

ANSWER: Please see PEF's response to Request 28, specifically Section 3.0.

26. Referring to Schedule TOR-7, footnote 2), provide information supporting the determination of the 15% adder for indirect costs.

ANSWER: PEF incorporates and restates its general and specific objections to this request, served on June 5, 2008 as if those objections were fully set forth herein. Subject to and without waiving those objections or any of PEF's general objections, the 15% adder was an estimate to cover burdens and indirect costs. This 15% figure is a conservative estimate of the average actual burdens, and was developed using the collective experience of the Nuclear Generation Group in developing cost estimates for nuclear projects.

27. Referring to page 10 of Mr. Roderick's testimony, lines 17 and 18, provide support for the determination of the \$364 million of fully-loaded costs.

ANSWER: Please see PEF's response to Request 33.

28. Provide a copy of the most recent Integrated Project Plan (IPP) associated with the CR 3 Uprate Project. Reference Mr. Roderick's testimony on pages 11 and 12.

ANSWER: Please see confidential documents attached bearing Bates Numbers PEF-NCR-04476 through PEF-NCR-04502, which are subject to a pending revised confidentiality request filed on June 11, 2008.

29. If not provided in PEF's response to item 18, provide a copy of the confidential document, Exhibit ___ (DLR-1) sponsored by Mr. Roderick.

ANSWER: Please see PEF's response to Request 28.

30. Provide information from the Business Analysis Package that addresses the current estimate of the cost associated with the CR 3 Uprate. Reference Mr. Roderick's testimony, page 11, lines 22 and 23.

ANSWER: There is no information from the Business Analysis Package ("BAP") to address the current estimate. That BAP addressed the original estimates.

31. During the pendency of this docket, provide copies of the regular updates of the IPP completed by PEF. Reference Mr. Roderick's testimony on page 12, lines 22 and 23 and page 13, lines 1 and 2.

ANSWER: PEF incorporates and restates its general and specific objections to this request, served on June 5, 2008 as if those objections were fully set forth herein. Subject to and without waiving those objections or any of PEF's general objections, PEF does not have any responsive documents in its possession, custody, or control.

32. Provide a copy of all workpapers (including electronic files) utilized by Mr. Roderick to support the development of his testimony and exhibits.

ANSWER: Please see PEF's responses to Request Numbers 28 and 54-57. Please also see PEF's responses to Request Number 3 to OPC's First Request for Production of Documents. In addition, please see PEF's Petition and Testimony filed in Docket 060642, PEF's need determination for the CR3 Uprate.

33. Provide a copy of all workpapers (including electronic files) utilized by Ms. Cross to support the development of her testimony and exhibits.

ANSWER: Please see documents attached bearing Bates Numbers PEF-NCR-6786 through PEF-NCR-6912.

Documents bearing Bates Numbers PEF-NCR-6786-6794, 6808-6809, 6811-6820, and 6831-6912, are not confidential and are attached hereto.

Documents bearing Bates Numbers PEF-NCR-6795-6807, 6810, and 6821-6830 are confidential. An unredacted copy will be filed with the Florida Public Service Commission along with PEF's Request for Confidential Classification. All redacted copies will also be produced and attached to PEF's Request for Confidential Classification.

Please also see attached CD containing electronic files, bearing Bates Number PEF-NCR-7301.

34. If not previously provided, provide information supporting the determination of the jurisdictional factors shown on Exhibit (LC-2), Schedule AE-4, lines 16 through 19.

ANSWER: The determination of the jurisdictional factors shown on exhibit (LC-2) are from the separation study prepared in compliance with the settlement agreement approved by Commission Order PSC- 05-0945-S-EI in docket 050078-EI. Please see documents attached bearing Bates Numbers PEF-NCR-7291 through PEF-NCR-7292.

35. Referring to Exhibit (LC-2), Schedule AE-6, provide information supporting the basis for and determination of the Non Cash Accruals (line 47) and Other (line 48) costs.

ANSWER: PEF incorporates and restates its general and specific objections to this request, served on June 5, 2008 as if those objections were fully set forth herein. Subject to and without waiving those objections or any of PEF's general objections, please see documents provided in response to Staff's Second Request for Production of Documents No. 33, which reflects all support for actuals from January to March 2008.

No supporting workpapers exist for the calculation of "Other costs" included on line 48 of Exhibit (LC-2), Schedule AE-6. This amount is calculated by multiplying line 45 "total generation costs" by the monthly joint owner percentage of 8.2194%.

For line 47 “Non-Cash Accruals”, historically the Company has used a 60 day lag on all cash payment projections. Consistent with support provided in response to Production of Document No. 33 to support the Actual-Estimated filings, it is assumed that 10% of any invoice will be paid in the current month; therefore the remaining 90% of the current month’s expenditures will be assumed to be accruals.

36. If not previously provided, provide an explanation of and information supporting the determination of the Jurisdictional NFR Costs included on line 4 of Exhibit (LC-2), Schedule AE-9.

ANSWER: PEF incorporates and restates its general and specific objections to this request, served on June 5, 2008 as if those objections were fully set forth herein. Subject to and without waiving those objections or any of PEF’s general objections, please see documents provided in response to Staff’s Second Request for Production of Documents No. 33, which reflects all support to the above question.

37. Regarding Appendix A of Exhibit (LC-2), lines 12 a. and b., provide information supporting the determination of the equity component of 11.16% and the debt component of 2.04%.

ANSWER: PEF incorporates and restates its general and specific objections to this request, served on June 5, 2008 as if those objections were fully set forth herein. Subject to and without waiving those objections or any of PEF’s general objections, the equity component (11.16%) and debt component (2.04%) that were used in Appendix A are consistent with the rates used to calculate revenue requirements that were approved in the settlement agreement by commission order PSC- 05-0945-S-EI in docket 050078-EI. Please see documents attached bearing Bates Numbers PEF-NCR-6946 through PEF-NCR-6947.

38. Provide a reconciliation of the CR3 uprate project costs included on page 5, lines 10 through 14 of Ms. Cross’s testimony in the Actual/Estimated Filing to the data shown on Exhibit (LC-2), Schedule AE-1, page 2, column (N).

ANSWER: PEF incorporates and restates its general and specific objections to this request, served on June 5, 2008 as if those objections were fully set forth herein. Subject to and without waiving those objections or any of PEF’s general objections, the costs included on page 5, lines 10 through 14 of Ms. Cross’s testimony in the Actual/Estimated Filing do not reflect the correct figures. The testimony should state “the estimated total return requirements for the CR3 uprate project are \$7.5 million for 2008 as reflected on Schedule AE-1, page 2 of 2, line 6. This amount includes \$6.0 million in carrying costs on the project construction balance, \$0.3 million for recoverable O&M expenses, a return on the deferred asset of \$0.06 million, and \$1.2 million in 2008 revenue requirements for the MUR phase of the project”, as shown on Exhibit (LC-2),

Schedule AE-1, page 2, column (N). The corrections to the testimony will not have any impact on cost recovery amounts since the amounts have been accurately reflected in Exhibit (LC-2).

39. Provide a reconciliation of the CR3 uprate project total return requirements included on page 5, line 20 of Ms. Cross's testimony in the Actual/Estimated Filing to the data shown on Exhibit (LC-2), Schedule AE-3, page 2, column (P), line 7.

ANSWER: PEF incorporates and restates its general and specific objections to this request, served on June 5, 2008 as if those objections were fully set forth herein. Subject to and without waiving those objections or any of PEF's general objections, the total return requirements included on page 5, line 20 of Ms. Cross's testimony in the Actual/Estimated Filing do not reflect the correct figures. The amount should state \$6M which is consistent with figures shown on Exhibit (LC-2), Schedule AE-3, page 2, column (P), line 7. The corrections to the testimony will not have any impact on cost recovery amounts since the amounts have been accurately reflected in Exhibit (LC-2).

40. Provide a reconciliation of the CR3 total return requirements included on page 5, line 20 through page 6, line 2 of Ms. Cross's testimony in the Actual/Estimated Filing to the data shown on Exhibit (LC-2), Schedule AE-3, page 2, column (P).

ANSWER: PEF incorporates and restates its general and specific objections to this request, served on June 5, 2008 as if those objections were fully set forth herein. Subject to and without waiving those objections or any of PEF's general objections, the total return requirements included on page 5, line 20 through page 6, line 2 of Ms. Cross's testimony in the Actual/Estimated Filing do not reflect the correct figures. The testimony should state "the \$6.0 million in Total Return Requirements in Schedule AE-3 represents the carrying costs on the average construction project balance. The beginning CWIP balance of \$32.1 million on this schedule on line 1 includes the costs for the MUR phase of the project which was placed in service in January 2008. The \$8.0 million reflected on line 2 reflects the transfer of the MUR project to Plant-in-Service. The \$4.1 million in adjustments on Line 3 represents carrying charges on the CWIP balance," as shown on Exhibit (LC-2), Schedule AE-3, page 2, column (P). The corrections to the testimony will not have any impact on cost recovery amounts since the amounts have been accurately reflected in Exhibit (LC-2).

41. If not previously provided, provide support for the determination of the Jurisdictional Factor (.93753) included on line 50 of Exhibit (LC-2), Schedule AE-6.

ANSWER: Please see the documents provided in response to OPC's Second Request for Production of Documents No. 34, which provides support for the determination of the jurisdictional factor included on line 50 of exhibit LC-2, Schedule AE-6.

42. Provide workpapers supporting the determination of the 6.85% equity component. Reference Exhibit (LC-2), Schedule AE-2, footnote (a).

ANSWER: Footnote (a) in Exhibit (LC-2), Schedule AE-2 does not reflect a correct statement. The footnote should read “The monthly equity component of 6.82% reflects an 11.75% return on equity.” This correction would also apply to any other schedules (true-up, actual estimated and projections) where we have included the same footnote. We have validated that while the footnote is incorrect, the formulas contained in the schedules do incorporate the accurate rate. Please see the document provided in response to OPC’s Second Request for Production of Documents No. 37, which provides support for the determination of the 6.82% equity component.

43. Provide workpapers supporting the determination of the “Other Adjustments” balance of \$1,071,287 amortized over twelve months. Reference Exhibit (LC-1), Schedule P-3A, page 2, line 3.

ANSWER: No such workpaper exists. The “Other Adjustments” balance of \$1,071,287 on (LC-1), Schedule P-3A, page 2, line 3 is calculated by adding line 6c from page 2 of Exhibit (WG-1) to line 6c from page 2 of Exhibit (LC-2).

44. Provide workpapers supporting the determination of the “Additions Construction” total of \$92.1 million included in Exhibit (LC-1), Schedule P-3B, page 2, line 3.

ANSWER: Please see documents provided in response to Staff’s Second Request for Production of Documents No. 33, which reflects all support to the above question.

45. Referring to Schedule P-6 of Exhibit (LC-1), page 1, lines 39 and 43, provide workpapers that support the determination of the generation construction costs of \$107.1 million.

ANSWER: Please see PEF’s response to Request 33.

46. Provide information supporting the determination of the Non Cash Accruals of \$3.0 million and the other cost of \$8.8 million included on Schedule P-6 of Exhibit (LC-1), page 1, lines 47 and 48.

ANSWER: No supporting workpapers exist for the calculation of “Other costs” included on line 47 of Exhibit (LC-1), Schedule P-6. This amount is calculated by multiplying line 45 “total generation costs” by the monthly joint owner percentage of 8.2194%.

For line 48 “Non-Cash Accruals”, historically the Company has used a 60 day lag on all cash payment projections. Consistent with support provided in response to Production of Document No. 33 to support the Actual-Estimated filings, it is assumed that 10% of any invoice will be paid in the current month; therefore the remaining 90% of the current month’s expenditures will be assumed to be accruals.

47. Referring to Exhibit (LC-1), Schedule TOR-1, page 1, line 5, provide an explanation and workpapers supporting the determination of the “Other Adjustments” totals of \$1,181,822 and \$1,233,443.

ANSWER: No such workpaper exists. As indicated in footnote (1) of Exhibit (LC-2), Schedule AE-1 and Exhibit (LC-1), Schedule P-1, the amounts on Exhibit (LC-3), Schedule TOR-1, page 1, line 5 represent the revenue requirements associated with the MUR as presented in Appendix A.

48. Provide detailed information supporting the determination of the costs shown on Exhibit (LC-1), Schedule TOR-3, TOR-3A and TOR-3B.

ANSWER: PEF incorporates and restates its general and specific objections to this request, served on June 5, 2008 as if those objections were fully set forth herein. Subject to and without waiving those objections or any of PEF’s general objections, please see documents provided in response to Production of Document No. 33, which reflects some support for the above question. Additionally, the majority of the information contained in Exhibit (LC-3), Schedules TOR-3, TOR-3A and TOR-3B is being derived from other Schedules contained in the same exhibit.

49. If not previously provided, provide detailed data supporting the determination of the Total Generation Costs, Non Cash Accruals and Other costs shown on Exhibit (LC-1), Schedule TOR-6, lines 49, 51 and 52.

ANSWER: PEF incorporates and restates its general and specific objections to this request, served on June 5, 2008 as if those objections were fully set forth herein. Subject to and without waiving those objections or any of PEF’s general objections, please see PEF’s response to Request 33.

51. Provide copies of all correspondence between PEF, or those representing PEF, and the Commission regarding the current docket, Docket No. 080009-EI.

ANSWER: PEF incorporates and restates its general and specific objections to this request, served on June 5, 2008 as if those objections were fully set forth herein. Subject to and without waiving those objections or any of PEF’s general objections, PEF does not have any responsive documents in its possession, custody, or control that are not publicly available.

52. Provide copies of all additional or supplemental filings made before the FPSC, related to the recovery of nuclear costs, by or on behalf of PEF during the present proceeding.

ANSWER: PEF incorporates and restates its general and specific objections to this request, served on June 5, 2008 as if those objections were fully set forth herein. Subject to and without waiving those objections or any of PEF's general objections, PEF does not have any responsive documents in its possession, custody, or control.

53. Provide copies of all PEF financial reports submitted to the FPSC during 2008 to date, and continuing during the present proceeding.

ANSWER: PEF incorporates and restates its general and specific objections to this request, served on June 5, 2008 as if those objections were fully set forth herein. Subject to and without waiving those objections or any of PEF's general objections, PEF has no responsive documents in its possession, custody, or control that are not publicly available.

54. Please provide the programs and procedures that PEF uses to manage and provide oversight of large capital projects. Include all procedures and policies used to manage and monitor project costs and schedule.

ANSWER: Please see documents attached bearing Bates Numbers PEF-NCR-5268 through PEF-NCR-6343.

Documents bearing Bates Numbers PEF-NCR-5268 through PEF-NCR-5807 and PEF-NCR-5814 through PEF-NCR-6343, are not confidential and are attached hereto.

Documents bearing Bates Numbers PEF-NCR-5807 through PEF-NCR-5815 are confidential. An unredacted copy will be filed with the Florida Public Service Commission along with PEF's Request for Confidential Classification. All redacted copies will also be produced and attached to PEF's Request for Confidential Classification.

55. Please provide the programs and procedures that PEF uses to manage and provide oversight of the development of large capital projects including procedures used by PEF to determine that the projects are feasible and cost effective.

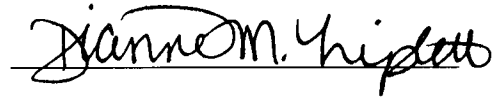
ANSWER: PEF incorporates and restates its general and specific objections to this request, served on June 5, 2008 as if those objections were fully set forth herein. Subject to and without waiving those objections or any of PEF's general objections, PEF's capitalization policy and approval process that governs large capital projects is included in PEF's responses to Question Numbers 15, 28, and 54.

56. Please provide the programs and procedures that PEF uses to request, evaluate and manage the bidding process for large capital projects.

ANSWER: Please see documents bearing Bates Numbers PEF-NCR-6344 through PEF-NCR-6532 that are not confidential and are attached hereto.

57. Please provide the programs and procedures that PEF uses to select and manage sole source contracts.

ANSWER: Please see documents attached bearing Bates Numbers PEF-NCR-6375 through PEF-NCR-6415.



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Progress Energy Florida, Inc.'s Responses to Citizens Second Request for Production (Nos. 12-57), in Docket No. 080009-EI has been furnished by regular U.S. mail to the following this 18th day of June, 2008.



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