

Hopping Green & Sams

Attorneys and Counselors

August 4, 2008

BY HAND-DELIVERY

Ann Cole
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

RECEIVED-FPSC
08 AUG -4 PM 2:22
COMMISSION
CLERK

Re: Docket No. 080007-EI

Dear Ms. Cole:

On behalf of Progress Energy Florida, Inc. (PEF), I enclose for filing in the above docket the original and fifteen (15) copies of the following:

- PEF's Petition for Approval of 2008 Environmental Cost Recovery Estimated/Actual True-up and Greenhouse Gas Inventory & Reporting Program;
- Pre-filed Direct Testimony of Lori Cross and Exhibit Nos. __ (LC-1) and (LC-2);
- Pre-filed Direct Testimony of Patricia Q. West;
- Pre-filed Direct Testimony of Don Ennis;
- Pre-filed Direct Testimony of Joseph McCallister;
- Pre-filed Direct Testimony of Dale Wilterdink and Exhibit No. __ (DW-1); and
- PEF's Second Request for Confidential Classification for a portion of Mr. McCallister's pre-filed testimony, along with a package labeled Exhibit "A" containing two redacted copies of Mr. McCallister's testimony and a separate CONFIDENTIAL envelope labeled Exhibit "B" containing one unredacted copy of Mr. McCallister's testimony with the confidential information highlighted in yellow.

By copy of this letter, the enclosed documents have been furnished to the parties on the attached certificate of service.

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 CLK

DOCUMENT NUMBER-DATE

06814 AUG-4 08

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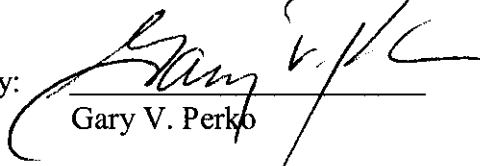
Ms. Ann Cole
August 4, 2008
Page 2

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning it to me. If you have any questions regarding this filing, please call me at 222-7500.

Very truly yours,

HOPPING GREEN & SAMS, P.A.

By:



Gary V. Perko

Attorneys for PROGRESS ENERGY FLORIDA, INC.

Enclosures
cc: Certificate of Service

Hopping Green & Sams

Attorneys and Counselors

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished to all counsel of record and interested parties as listed below by hand-delivery (*) or regular U.S. mail this 4th day of August, 2008.

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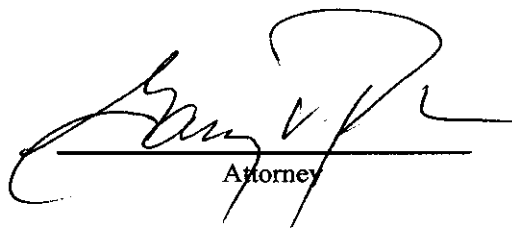
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Attorney

BEFORE THE PUBLIC SERVICE COMMISSION

In re: Environmental Cost Recovery Clause

Docket No. 080007-EI

Dated: August 4, 2008

**PROGRESS ENERGY FLORIDA'S PETITION FOR APPROVAL OF 2008
ENVIRONMENTAL COST RECOVERY ESTIMATED/ACTUAL TRUE-UP
AND GREENHOUSE GAS INVENTORY & REPORTING PROGRAM**

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Progress Energy Florida, Inc. ("the Company"), hereby petitions for approval of its environmental cost recovery clause ("ECRC") estimated/actual true-up for the period January 2008 to December 2008 and for approval of recovery of prudently incurred costs for its new Greenhouse Gas Inventory and Reporting Program. In support of this Petition, PEF states:

ESTIMATED/ACTUAL TRUE-UP

1. As discussed in the pre-filed testimony of Lori Cross filed contemporaneously with this Petition, PEF's total estimated/actual true-up for this period is an under-recovery, including interest, of \$9,872,429. This amount will be added to the final true-up over-recovery of \$5,562,717 for 2007 discussed in the testimony of Will Garrett filed on April 2, 2008, resulting in a net under-recovery of \$4,309,712. Documentation supporting the estimated/actual and net true-up under-recovery is contained in Commission Schedules 42-1E through 42-8E, which are provided as Exhibit No. ___ (LC-1) to Ms. Cross' pre-filed testimony. Additional cost information for specific ECRC programs are presented in the pre-filed testimony of Donald R. Ennis, Patricia Q. West, Dale Wilterdink, and Joseph McCallister which also are being filed contemporaneously with this Petition.

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06814 AUG-4 8

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2. The ECRC estimated/actual true-up presented in Ms. Cross' testimony and exhibits are consistent with the provisions of Section 366.8255, Florida Statutes, and with prior rulings by the Commission.

GREENHOUSE GAS INVENTORY & REPORTING PROGRAM

3. Pursuant to the Florida Climate Protection Act enacted by the 2008 Florida Legislature in Chapter 2008-277, Florida Laws, the Company is implementing a new Greenhouse Gas Inventory and Reporting Program. As discussed in the pre-filed testimony of Patricia Q. West, the new legislation specifically provides that prudently incurred costs for such activities are recoverable through the ECRC. Furthermore, the new project satisfies the requirements previously established by the Commission for approval of ECRC recovery insofar as: expenditures for the new program are being prudently incurred after April 13, 1993; the activities are legally required to comply with a governmentally imposed environmental law which was created, or whose effect was triggered, after the minimum filing requirements (MFRs) were submitted in the Company's last rate case (Docket No. 050078-EI); and none of the costs of the new program are being recovered through base rates or any other cost recovery mechanism.

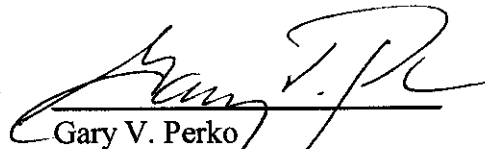
WHEREFORE, Progress Energy Florida, Inc., respectfully requests that the Commission: approve the Company's ECRC estimated/actual true-up for the period January 2008 through December 2008 as set forth in the testimony and supporting exhibits of Ms. Cross; and approve recovery through the ECRC of prudently incurred costs for the Company's new Greenhouse Gas Inventory and Reporting Program.

RESPECTFULLY SUBMITTED this 4th day of August, 2008.

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