

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for increase in rates by Progress  
Energy Florida, Inc.

DOCKET NO. 090079-EI

DATED: AUGUST 31, 2009

RECEIVED FPSC  
09 AUG 31 PM 3:06  
COMMISSION  
CLERK

STAFF'S PREHEARING STATEMENT

Pursuant to Order No. PSC-09-0190-PCO-EI filed March 27, 2009, the Staff of the Florida Public Service Commission files its Prehearing Statement.

a. All Known Witnesses

Staff intends to offer the direct testimony of the following:

Rhonda L. Hicks                      Provide the number and types of PEF consumer complaints filed with the Commission.

Jocelyn Y. Stephens                To sponsor the staff audit of PEF's historical test year

b. All Known Exhibits

<b>Exhibit</b>	<b>Title</b>
RH-1	Florida PSC Complaints by Close Type
JYS-1	Audit Report Year Ended 12/31/2008

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 the rate increase, requested by Progress Energy Florida, Inc., a just and reasonable rate for its customers and is it in the public interest?

**POSITION:** No position pending evidence adduced at the hearing.

DOCUMENT NUMBER-DATE

09014 AUG 31 8

FPSC-COMMISSION CLERK

**TEST PERIOD AND FORECASTING**

**ISSUE 2:** Is PEF's projected test period of the twelve months ending December 31, 2010 appropriate?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 3:** What are the appropriate inflation, customer growth, and other trend factors for use in forecasting?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 4:** Are PEF's forecasts of customer growth, KWH by revenue class, and system KW for the projected test year appropriate?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 5:** Are PEF's forecasts of billing determinants by rate class for the projected test year appropriate?

**POSITION:** No position pending evidence adduced at the hearing.

**QUALITY OF SERVICE**

**ISSUE 6:** Is the quality and reliability of electric service provided by PEF adequate?

**POSITION:** No position pending evidence adduced at the hearing.

**DEPRECIATION STUDY**

**ISSUE 7:** Should the current-approved depreciation rates, capital recovery schedules, and amortization schedules be revised?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 8:** What are the appropriate capital recovery schedules?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 9:** Is PEF's calculation of the average remaining life appropriate?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 10:** What are the appropriate depreciation parameters (remaining life, net salvage percent, and reserve percent), amortizations, and resulting rates for each production unit, including but not limited to coal, steam, combined cycle, etc.?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 11:** What life spans should be used for PEF's coal plants?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 12:** What life spans should be used for PEF's combined cycle plants?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 13:** What are the appropriate depreciation parameters (remaining life, net salvage percent, and reserve percent), amortizations, and resulting rates for each transmission, distribution, and general plant account?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 14:** Based on the application of the depreciation parameters that the Commission has deemed appropriate to PEF's data, and a comparison of the calculated theoretical reserves to the book reserves, what are the resulting differences?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 15:** What, if any, corrective reserve measures should be taken with respect to the differences identified in the Issue 14?

**POSITION:** No position pending evidence adduced at the hearing.

---

**ISSUE 16:** What should be the implementation date for revised depreciation rates, capital recovery schedules, and amortization schedules?

**POSITION:** No position pending evidence adduced at the hearing.

#### **FOSSIL DISMANTLEMENT COST STUDY**

**ISSUE 17:** Should the current-approved annual dismantlement provision be revised?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 18:** What, if any, corrective reserve measures should be approved?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 19:** What is the appropriate annual provision for dismantlement?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 20:** Are PEF's assumptions in the fossil dismantlement study with regard to site restoration reasonable?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 21:** In future dismantlement studies filed with the Commission, should PEF consider alternative demolition approaches?

**POSITION:** No position pending evidence adduced at the hearing.

#### **NUCLEAR DECOMMISSIONING COST STUDY**

**ISSUE 22:** Should the currently approved annual nuclear decommissioning accruals be revised?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 23:** What is the appropriate annual decommissioning accrual in equal dollar amounts necessary to recover future decommissioning costs over the remaining life Crystal River Unit 3 (CR3)?

**POSITION:** No position pending evidence adduced at the hearing.

**RATE BASE**

**ISSUE 24:** Has the company removed all non-utility activities from rate base?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 25:** Should any adjustments be made to rate base related to the Bartow Repowering Project?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 26:** Should an adjustment be made to reflect any test year or post test year revenue requirement impacts of "The American Recovery and Reinvestment Act" signed into law by the President on February 17, 2009?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 27:** Is PEF's requested level of Plant in Service for the projected 2010 test year appropriate?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 28:** What adjustments, if any, should be made to accumulated depreciation to reflect revised depreciation rates, capital recovery schedules, and amortization schedules resulting from PEF's depreciation study?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 29:** Is PEF's requested level of Accumulated Depreciation and Amortization in the amount of \$4,437,117,000 for the 2010 projected test year appropriate?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 30:** Is PEF's requested level of CWIP – No AFUDC in the amount of \$151,145,000 for the projected 2010 test year appropriate?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 31:** Is PEF's requested level of Plant Held for Future Use in the amount of \$25,723,000 for the projected 2010 test year appropriate?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 32:** Is PEF's requested level of Nuclear Fuel – No AFUDC (net) in the amount of \$126,566,000 for the projected 2010 test year appropriate?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 33:** Should an adjustment be made to PEF's requested storm damage reserve, annual accrual of \$14.9 million, and target level of \$150 million?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 34:** Should any adjustments be made to PEF's fuel inventories?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 35:** Should unamortized rate case expense be included in Working Capital?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 36:** Has PEF appropriately reflected the impact of SFAS 143 (Asset Retirement Obligations) in its proposed working capital calculation?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 37:** Is PEF's requested level of Working Capital Allowance in the amount of (\$9,041,000) for the projected test year appropriate?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 38:** Is PEF's requested level of Rate Base in the amount of \$6,238,617,000 for the 2010 projected test year appropriate?

**POSITION:** No position pending evidence adduced at the hearing.

**COST OF CAPITAL**

**ISSUE 39:** What is the appropriate amount of accumulated deferred taxes to include in the capital structure for the projected test year?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 40:** What is the appropriate amount and cost rate of the unamortized investment tax credits to include in the capital structure for the projected test year?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 41:** Should PEF's requested pro forma adjustment to equity to offset off-balance sheet purchased power obligations be approved?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 42:** What is the appropriate equity ratio that should be used for PEF for purposes of setting rates in this proceeding?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 43:** Have rate base and capital structure been reconciled appropriately?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 44:** What is the appropriate capital structure for the projected test year?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 45:** What is the appropriate cost rate for short-term debt for the projected test year?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 46:** What is the appropriate cost rate for long-term debt for the projected test year?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 47:** What is the appropriate return on equity (ROE) for the projected test year?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 48:** What is the appropriate weighted average cost of capital including the proper components, amounts, and cost rates associated with the projected capital structure?

**POSITION:** No position pending evidence adduced at the hearing.

### **NET OPERATING INCOME**

**ISSUE 49:** Is PEF's projected level of total operating revenues in the amount of \$1,517,918,000 for the 2010 projected test year appropriate?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 50:** What are the appropriate adjustments to reflect the base rate increase for the Bartow Repowering Project authorized in Order No. PSC-09-0415-PAA-EI?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 51:** Has PEF made the appropriate test year adjustments to remove conservation revenues and expenses recoverable through the Conservation Cost Recovery Clause?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 52:** Has PEF made the appropriate test year adjustments to remove fuel and purchased power revenues and expenses recoverable through the Fuel and Purchased Power Cost Recovery Clause?

**POSITION:** No position pending evidence adduced at the hearing.



STAFF'S PREHEARING STATEMENT

DOCKET NO. 090079-EI

PAGE 9

**ISSUE 53:** Has PEF made the appropriate test year adjustments to remove capacity revenues and expenses recoverable through the Capacity Cost Recovery Clause?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 54:** Has PEF made the appropriate test year adjustments to remove environmental revenues and expenses recoverable through the Environmental Cost Recovery Clause?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 55:** Has PEF made the appropriate adjustments to remove charitable contributions?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 56:** Has PEF made the appropriate adjustments to remove Aviation cost for the test year?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 57:** Should an adjustment be made to advertising expenses?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 58:** Has PEF made the appropriate adjustments to remove lobbying expenses?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 59:** Is PEF's proposed allowance of \$2,412,100 for directors and officers liability insurance appropriate?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 60:** Is PEF's proposed allowance of \$3,669,000 for 2010 injuries and damages expense appropriate?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 61:** Is PEF's proposed allowance of \$23,228,000 for 2010 A&G office supplies and expenses appropriate?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 62:** Should an adjustment be made to PEF's proposed 2010 allowance for O&M expense to reflect productivity improvements, if any?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 63:** Should an adjustment be made to PEF's requested level of salaries and employee benefits for the 2010 projected test year?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 64:** Are PEF's proposed increases to average salaries for 2010 appropriate?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 65:** Are PEF's proposed increases in employee positions for 2010 appropriate?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 66:** Should the proposed 2010 allowance for incentive compensation be adjusted?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 67:** Should the Company's proposed 2010 allowance for employee benefit expense be adjusted?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 68:** Should an adjustment be made to the accrual for property damage for the 2010 projected test year?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 69:** Should an adjustment be made to PEF's 2010 generation O&M expense?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 70:** Should an adjustment be made to PEF's 2010 transmission O&M expense?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 71:** Should an adjustment be made to PEF's 2010 distribution O&M expense?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 72:** DROPPED

**ISSUE 73:** What is the appropriate amount and amortization period for PEF's rate case expense for the 2010 projected test year?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 74:** Should an adjustment be made to bad debt expense for the 2010 projected test year?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 75:** What adjustments, if any, should be made to the 2010 projected test year depreciation expense to reflect revised depreciation rates, capital recovery schedules, and amortization schedules resulting from PEF's depreciation study?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 76:** What is the appropriate amount of depreciation and fossil dismantlement expense for the 2010 projected test year?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 77:** What is the appropriate amount of nuclear decommissioning expense for the 2010 projected test year?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 78:** What adjustments, if any, should be made to the amortization of End of Life Material and Supplies inventories?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 79:** What adjustments, if any, should be made to the amortization of the costs associated with the last core of nuclear fuel?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 80:** Should an adjustment be made to taxes other than income taxes for the 2010 projected test year?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 81:** Is it appropriate to make a parent debt adjustment as per Rule 25-14.004, Florida Administrative Code?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 82:** Should an adjustment be made to Income Tax expense for the 2010 projected test year?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 83:** Is PEF's requested level of Operating Expenses in the amount of \$1,249,372,000 for the 2010 projected test year appropriate?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 84:** Is PEF's projected net operating income in the amount of \$268,546,000 for the 2010 projected test year appropriate?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 85:** Has PEF appropriately accounted for affiliated transactions? If not, what adjustment, if any, should be made?

**POSITION:** No position pending evidence adduced at the hearing.

#### **REVENUE REQUIREMENTS**

**ISSUE 86:** What is the appropriate projected test year revenue expansion factor and the appropriate net operating income multiplier, including the appropriate elements and rates for PEF?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 87:** Is PEF's requested annual operating revenue increase of \$499,997,000 for the 2010 projected test year appropriate?

**POSITION:** No position pending evidence adduced at the hearing.

#### **COST OF SERVICE AND RATE DESIGN**

**ISSUE 88:** Has PEF correctly calculated revenues at current rates for the projected test year?

**POSITION:** No. Revenues at current rates for the projected test year should be increased from \$1,448,466,000 to \$1,580,567,000, or by \$132,101,000, to account for the Bartow Repowering Project base rate increase approved by the Commission in Order No. PSC-09-0415-PAA-EI.

**ISSUE 89:** Is PEF's proposed separation of costs and revenues between the wholesale and retail jurisdictions appropriate?

**POSITION:** Yes. PEF's proposed separation of costs and revenues between the wholesale and retail jurisdictions is appropriate.

**ISSUE 90:** What is the appropriate Cost of Service Methodology to be used to allocate base rate and cost recovery costs to the rate classes?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 91:** If the Commission approves a cost allocation methodology other than the 12 CP and 1/13th Average Demand, should all cost recovery factors be adjusted to reflect the new cost of service methodology?

**POSITION:** Yes, if the Commission approves a cost allocation methodology other than the 12 CP and 1/13th Average Demand, all cost recovery factors should be adjusted to reflect the new cost of service methodology.

**ISSUE 92:** How should any change in revenue requirements approved by the Commission be allocated among the customer classes?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 93:** Is PEF's proposed treatment of unbilled revenue due to any recommended rate change appropriate?

**POSITION:** Yes.

**ISSUE 94:** Is PEF's proposed charge for Investigation of Unauthorized Use appropriate?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 95:** Should the Commission approve PEF's proposal to eliminate its IS-1, IST-1, CS-1, and CST-1 rate schedules and transfer the current customers to otherwise applicable rate schedules?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 96:** Is PEF's proposal to grandfather certain terms and conditions for existing IS-1, IST-1, CS-1, and CST-1 customers transferred to the IS-2, IST-2, CS-2, and CST-2 rate schedules appropriate?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 97:** Should PEF's proposal to close the RST-1 rate to new customers be approved?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 98:** Are PEF's proposed customer charges appropriate?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 99:** Are PEF's proposed service charges appropriate?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 100:** Is PEF's proposed charge for Temporary Service appropriate?

**POSITION:** Yes, PEF's proposed \$250 temporary service charge is appropriate.

**ISSUE 101:** Is PEF's proposed Premium Distribution Service charge appropriate?

**POSITION:** Yes, PEF's proposed Premium Distribution Service charges are appropriate.

**ISSUE 102:** Are PEF's proposed tariffed LS-1 lighting rate schedule charges for standard equipment appropriate?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 103:** Are PEF's proposed monthly fixed charge carrying rates to be applied to the installed cost of customer-requested distribution equipment, lighting service fixtures, and lighting service poles, for which there are no tariffed charges, appropriate?

**POSITION:** The methodology used by PEF to calculate the monthly fixed charge carrying rates is appropriate. To the extent any of the inputs used by PEF in the calculation are modified at the revenue requirements Agenda, PEF should recalculate the monthly fixed charge carrying rates using the approved inputs.

**ISSUE 104:** Are PEF's proposed delivery voltage credits appropriate?

**POSITION:** Yes, PEF's proposed delivery voltage credits are appropriate.

**ISSUE 105:** Are PEF's power factor charges and credits appropriate?

**POSITION:** Yes, PEF's proposed power factor charge and credit of \$0.25 per kilovolt-ampere is appropriate.

**ISSUE 106:** Is PEF's proposed lump sum payment for time-of-use metering costs appropriate?

**POSITION:** Yes, PEF's proposed \$90 lump sum payment contained in the RST-1 rate for time-of-use metering costs is appropriate.

**ISSUE 107:** What is the appropriate method of designing time of use rates for PEF?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 108:** What are the appropriate charges under the Firm, Interruptible, and Curtailable Standby Service rate schedules?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 109:** What is the appropriate level of the interruptible credit?

**POSITION:** No position pending evidence adduced at the hearing.



**ISSUE 110:** Should the interruptible credit be load factor adjusted?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 111:** What are the appropriate energy charges?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 112:** What are the appropriate demand charges?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 113:** What are the appropriate lighting charges?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 114:** Should PEF's proposal to revise its Leave Service Active (LSA) provision (tariff sheet No. 6.110) be approved?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 115:** What is the appropriate effective date for PEF's revised rates and charges?

**POSITION:** No position pending evidence adduced at the hearing.

#### **OTHER ISSUES**

**ISSUE 116:** Should any of the \$13,078,000 interim rate increase granted by Order No. PSC-09-0413-PCO-EI be refunded to the ratepayers?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 117:** Should PEF be required to file, within 90 days after the date of the final order in this docket, a description of all entries or adjustments to its annual report, earnings surveillance reports, and books and records which will be required as a result of the Commission's findings in this proceeding?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 118:** What are the appropriate guidelines for the pension fund regulatory asset?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 119:** Does the creation of a regulatory asset and the deferral of pension expenses from a period covered by the Stipulation approved by Order No. PSC-05-0945-S-EI to a future period violate the terms of the Stipulation and order?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 120:** Does the creation of a regulatory asset and the deferral of pension expenses from a period covered by the Stipulation and order to a future period constitute retroactive ratemaking?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 121:** Does the creation of a regulatory asset and the deferral of pension expenses from a period covered by the revenue sharing provisions of the Stipulation and order to a future period result in double recovery of those expenses?

**POSITION:** No position pending evidence adduced at the hearing.

**ISSUE 122:** Should this docket be closed?

**POSITION:** No position pending evidence adduced at the hearing.

e. Stipulated Issues

Staff is not aware of any 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-09-0190-PCO-EI

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

Respectfully submitted this 31st day of August, 2009.

  
\_\_\_\_\_  
KATHERINE E. FLEMING  
SENIOR ATTORNEY  
FLORIDA PUBLIC SERVICE COMMISSION  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850  
(850) 413-6218

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for increase in rates by Progress  
Energy Florida, Inc.

DOCKET NO. 090079-EI

DATED: AUGUST 31, 2009

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of STAFF'S PREHEARING STATEMENT on behalf of the Florida Public Service Commission, has been furnished to the following, by electronic and U.S. Mail, on this 31<sup>st</sup> day of August, 2009:

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

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

Florida Retail Federation  
Robert Scheffel Wright  
Young van Assenderp, P.A.  
225 South Adams Street, Suite 200  
Tallahassee, FL 32301

Florida Industrial Power Users Group  
Vicki G. Kaufman/Jon C. Moyle, Jr.  
Keefe Anchors Gordon & Moyle, PA  
118 North Gadsden Street  
Tallahassee, FL 32301

Office of the Attorney General  
Bill McCollum/Cecilia Bradley  
The Capitol, PL 01  
Tallahassee, FL 32399-1050

Office of Public Counsel  
J.R. Kelly/Charles Rehwinkel  
111 W. Madison Street, Room 812  
Tallahassee, FL 32399-1400

PCS Phosphate-White Springs  
James W. Brew/F. Alvin Taylor  
Brickfield Law Firm  
1025 Thomas Jefferson Street, NW  
Eighth Floor, West Tower  
Washington, D.C. 2007-5201

Richard D. Melson  
705 Piedmont Drive  
Tallahassee, FL 32317

Audrey Van Dyke  
Naval Facilities Engineering Command  
Litigation Headquarters  
720 Kennon Street, S.E. Building 36, Room  
136  
Washington Navy Yard, D.C. 20374

John T. Burnett/R. Alexander Glenn  
Progress Energy Services Company, LLC  
Post Office Box 14042  
St. Petersburg, FL 33733-4042

Kay Davoodi  
Naval Facilities Engineering Command  
Director, Utilities Rates and Studies Office  
1322 Patterson Avenue SE  
Washington Navy Yard, D.C. 20374-5065

Jim Selecky  
Brubaker & Associates, Inc.  
Post Office Box 412000  
St. Louis, MO 63141-2000

Dan Moore  
316 Maxwell Road, Suite 400  
Alpharetta, GA 30009

Stephanie Alexander  
Tripp Scott, P.A.  
200 West College Avenue, Suite 216  
Tallahassee, FL 32301



---

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