

Dorothy Menasco

100084 - EI

From: Clark, Eileen [Eileen.Clark@pgnmail.com]
Sent: Wednesday, April 21, 2010 10:57 AM
To: Filings@psc.state.fl.us
Cc: Kathryn Cowdery; Olivier, Marcia J; Burnett, John; Tibbetts, Arlene
Subject: Docket 100084 - Petition for Mid-Course Correction
Attachments: Document.pdf

This electronic filing is made by:

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Docket: 100084-EI

In re: Initiation of rulemaking to adopt Rule 25-6.0424, F.A.C., Petition for Mid-Course Correction

On behalf of Progress Energy Florida

Consisting of 3 pages

The attached document for filing is Progress Energy Florida, Inc.'s Comments to the Mid-Course Schedules

Eileen Clark
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4/21/2010



April 21, 2010

Via Electronic Filing

Ms. Ann Cole, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: *Initiation of rulemaking to adopt Rule 25-6.0424, F.A.C., Petition for Mid-Course Correction; Docket No. 100084-EI*

Dear Ms. Cole:

Please find enclosed on behalf of Progress Energy Florida, Inc. ("PEF") its comments on the Mid-Course E-Schedules (Form PSC/ECR 009-E) in the above referenced docket.

Thank you for your assistance. If you have any questions, please do not hesitate to call me at (727) 820-5184.

Sincerely,

A handwritten signature in black ink, appearing to read "John T. Burnett", written over a long horizontal line that extends to the right.

John T. Burnett
Associate General Counsel

JTB/lms

cc: Kathryn Cowdery (FPSC)

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**PROGRESS ENERGY FLORIDA, INC.'S COMMENTS TO THE MID-COURSE SCHEDULES
DOCKET NO. 100084-EI**

1. Schedule E1: PEF proposes to provide data for the remaining projected months in the year and include the actual true-up balance at the time of the midcourse filing on line 28 "True-up". Including actual data is not necessary since the purpose is to develop the fuel factor prospectively, and if we were to include both actual and estimated data, the fuel factor would be meaningless.
2. Schedule E1-A: On line 1 of E1-A, PEF proposes to show the actual true-up balance for the last actual month from the A-schedules. There would be nothing to show on line 2, because the final true-up balance is already captured in the total actual true-up balance on line 1. Furthermore, providing the prior year final true-up balance on line 2 would be meaningless since part of that amount has already been collected or refunded during actual months in the current year. The over/(under)recovery on line 3 (which would equal line 1) would then go over to line 28 "True-up" on Schedule E1. PEF suggests removing lines 2 & 3 in this schedule.
3. Schedule E1-B: PEF proposes to add a line at the bottom to accumulate the true-up balance. By doing this, the balance in the last actual month would tie to the balance that is reflected on Schedule E1-A, line 1. Note that the true-up balance would include any outstanding balance from prior years that has not yet been collected or refunded.
4. Schedule E1-B-1: Similar to Schedule E1 and E1-B, PEF proposes to only include the remaining projected months in the period. Actual data has already been compared to estimated data on the A-Schedule filings.
5. Schedule E1-C: PEF proposes to only include data for the remaining projected months in the period.
6. Schedules E1-D & E1-E: These schedules represent the factors prospectively. PEF suggests changing these schedules to show a comparison of current rates to proposed rates.
7. Schedule E2: PEF proposes to show both actual and estimated data in order to provide annual data all in one place.
8. Schedule E3: Since the actual data has already been provided in the A-schedules, PEF suggests not providing it again here. If, however, someone wants to see the total for the whole year, we could provide the data for all months, but have a subtotal for the projected months only. This subtotal would be the number that gets carried over to Schedule E1.
9. Schedule E4-E9: PEF proposes to provide projected months only. The actual data is on the A-Schedules.

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10. Schedule E10: PEF suggests providing current rates and proposed rates effective with the midcourse.
11. Capacity Schedules E12A-E: PEF has no comment at this time.