JAMES E. "JIM" KING, JR. President



Harold McLean Public Counsel STATE OF FLORIDA OFFICE OF PUBLIC COUNSEL

> c/o THE FLORIDA LEGISLATURE 111 WEST MADISON ST. ROOM 812 TALLAHASSEE, FLORIDA 32399-1400 850-488-9330

JOHNNIE BYRD Speaker



November 16, 2004

Ms. Blanca S. Bayó, Director Division of the Commission Clerk and Administrative Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0870

RE: Docket No. 041272-EI, In Re: Progress Energy Florida, Inc.'s petition for approval of storm cost recovery clause for extraordinary expenditures related to Hurricanes Charley, Frances, Jeanne, and Ivan

Dear Ms. Bayó:

Enclosed for filing in the above-referenced docket are the original and fifteen (15) copies of the Office of Public Counsel's First Set of Interrogatories to Progress Energy Florida (Nos. 1-11) for filing in the above referenced docket.

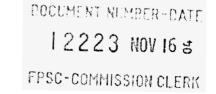
Please indicate the time and date of receipt on the enclosed duplicate of this letter and return it to our office.

Sincerely,

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Patricia A. Christensen Associate Public Counsel

PC/pwd Enclosures



## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Progress Energy Florida, Inc.'s petition for approval of storm cost recovery clause for extraordinary expenditures related to Hurricanes Charley, Frances, Jeanne, and Ivan Docket No. 041272-EI

Filed: November 16, 2004

## OFFICE OF PUBLIC COUNSEL'S FIRST SET OF INTERROGATORIES TO PROGRESS ENERGY FLORIDA (Nos. 1-11)

Please take notice that the Citizens served the original and one copy of interrogatories (Nos. 1-11) to Progress Energy Florida, (Progress Energy) on November 16, 2004. The interrogatories are to be answered under oath by Progress Energy and the answers are to be given in writing immediately following the question to which it responds. Please provide the name, address, and relationship to Progress Energy of those persons giving the answers to each of the interrogatories.

Thereafter, the original of the interrogatories, together with the answers, is to be served on the Citizens at the Office of Public Counsel, c/o the Florida Legislature, 111 West Madison Street, Claude Pepper Building, Room 812, Tallahassee, Florida 32399-1400. Copies are to be served on all parties in accordance with applicable Rules of Civil Procedure.

## **INTERROGATORIES**

1. Please provide a description of the various categories for expenses that Progress Energy expects to recover through special storm recovery for 2004. 2. Please provide a description of the process used by Progress Energy to develop the storm recovery amounts requested in the docket.

3. In the calculation of special storm recovery expenses, please discuss your handling of the normal budgeted expenses for 2004 operations that are part of base rates.

4. Are the storm expenses identified for special recovery by the company, only those expenses that have been incurred by the company that exceed normal operational budgets? If so please, explain.

5. Please provide a list of all work orders and projects exceeding \$20,000 that are incomplete as of November 1, 2004, that the company intends to recover through special storm recovery.

6. Please provide a monthly breakdown of all expenditures of capital and expenses stated separately that have been charged to the 2004 storm account to date and the monthly forecast of future capital and expenses that the company expects to apply to storm recovery.

7. In terms of uncompleted projects, does the company intend to complete these projects within existing budgeting guidelines with existing personnel? If not, please describe the company's plans to complete such projects and the personnel it will use to complete them.

8. Please provide a descriptive list of all storm related projects that the company does not expect to complete by December 30, 2004, and provide a list of all such projects that exceed \$20,000.

9. Please discuss the potential for recovery of storm related damages through insurance claims.

10. Please state the amount of the company's storm recovery fund on an annual basis since January 1, 1990, to date and provide all annual additions and subtractions from that fund.

11. Please state the impact and describe the expected impact that 2004 storm recovery will have on the 2004 end of year annual depreciation report.

Respectfully submitted,

Patricia A. Christensen Florida Bar No. 0989789 Associate Public Counsel Office of Public Counsel c/o The Florida Legislature Room 812, 111 W. Madison Street Tallahassee, Florida, 32399-1400 (850) 488-9330



## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been

furnished by U.S. Mail on this 16th day of November, 2004, to the following:

Carlton Fields Law Firm Gary Sasso/James Wall/John Burnett P.O. Box 3239 Tampa, FL 33607-5736

Progress Energy Service Company, LLC James McGee, Esquire 100 Central Avenue St. Petersburg, FL 33701

Progress Energy Florida, Inc. Bonnie E. Davis, Esquire 106 E. College Ave, Suite 800 Tallahassee, FL 32301-7740

Florida Service Commission Jennifer Brubaker, Esquire 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

Patricia A. Christensen

Associate Public Counsel