Matilda Sanders

ORIGINAL

From: Mike Twomey [miketwomey@talstar.com]

Sent:

Monday, October 17, 2005 4:39 PM

To: Cc: Adrienne Vining; Filings@psc.state.fl.us

Andrew Maurey; Bernie Windham; Bill McNulty; Bob Trapp; Brenda Buchan; Daniel Lee;

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Perko; Javier Portuondo; Jeff Stone; Jim Beasley; Joe McGlothlin; John Butler; John McWhirter; Jon Moyle; Kory Dubin; Lee Willis; Lt. Col. Karen White; Major Craig Paulson; Patty Christensen; Paul Lewis; Russell Badders; Schef Wright; Tim Perry; Tricia Merchant

Subject:

Re: Docket No. 050001--AARP's Prehearing Statement

Attachments: AARP 050001 PREHEARING-STATEMENT October 17, 2005.doc

1.	1. Michael B. Twomey, Post Office Box 5256, Tallahassee, Florida				
323	314-5256, (850) 421-9530, <u>miketwomey@talstar.com</u> is	CMP			
responsible for this electronic filing;					
:	territorio de la companya de la com La companya de la co	CTR			
2.	The filing is to be made in Docket No. 0050001-EI,	ECR			
		GCL			
3.	The filing is made on behalf of AARP;	OPC			
		RCA			
4.	The total number of pages is 4; and	SCR			
		SGA			
5.	Attached to this email in Word format is AARP's Prehearing	SEC			
	tement	ОТН			

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COCUMENT NUMBER-DAT

10062 OCT 17:

ORIGINAL

BEFORE THE PUBLIC SERVICE COMMISSION

In Re: Fuel and Purchased Power)		
Cost Recovery Clause with)	DOCKET	Γ No. 050001-EI
Generating Performance Incentive)	FILED:	October 17, 2005
Factor)		
)		

AARP'S PREHEARING STATEMENT

Pursuant to Order No. PSC-05-0281-PCO-EI, filed March 15, 2005, AARP files its

Prehearing Statement.

A. All Known Witnesses

Stephen A. Stewart

FPL recovery of approximately \$30 million for St.

Lucie 2 steam generator sleeving

B. All Known Exhibits

None

C. AARP's Statement of Basic Position

AARP adopts as its basic position the basic position stated by the Office of Public Counsel.

D. AARP's Position on the Issues

With the exception of the single issue listed below, Issue 14F, AARP adopts as its own the positions on all of the issues taken by the Office of Public Counsel.

ISSUE 14F: Should the Commission approve FPL's request to recover through the fuel clause approximately \$30 million for its St. Lucie Unit 2 Steam Generator Sleeving Project?

POSITION: No. The approximately \$30 million sought by FPL as a fuel-related expense in this docket is a capital expenditure of the type that either was sought for recovery by the utility in its most recent base rate case, or, if it was not, should have been sought for recovery in that case. In any event, the \$30 million proposed

expenditure is not of the type previously authorized by this Commission for recovery through the fuel adjustment clauses and it should not be allowed here.

Respectfully submitted this 17th day of October, 2005.

/s/ Michael B. Twomey
Michael B. Twomey
Attorney for AARP
Post Office Box 5256
Tallahassee, Florida 32314-5256
Telephone: (850) 421-9530

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing document has been furnished by electronic mail and U.S. Mail on this 17th day of October 2005 to the following:

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_/s/ Michael B. Twomey Attorney