# Hopping Green & Sams

Attorneys and Counselors

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COMMISSION CLERK

October 14, 2011

# BY HAND-DELIVERY

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

Re:

Docket No. 110007-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 Notice of Revision to Testimony and Exhibit;
- Attachment A Revised Schedules for Exhibit No. \_\_ (TGF-3) originally filed on August 26, 2010; and
- Attachment B List or Revisions to Direct Testimony of Thomas G. Foster originally filed on August 26, 2011.

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

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 give one of us a call at 222-7500.

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Very truly yours

Gary V. Perko

Attorneys for Progress Energy Florida, Inc.

07565 oct 14=

# BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Environmental cost recovery clause.

DOCKET NO. 110007-EI

DATED: OCTOBER 14, 2011

# PROGRESS ENERGY FLORIDA'S NOTICE OF FILING REVISIONS TO TESTIMONY AND EXHIBIT

PROGRESS ENERGY FLORIDA, INC., ("PEF"), hereby provides notice of filing revisions to the testimony of Thomas G. Foster and Exhibit No. \_\_ (TGF-3) filed on August 26, 2011, as further described below:

- 1. The revisions reflect PEF's agreement with Staff to utilize a three year (rather than one year) amortization period for the proposed regulatory asset associated with PEF's remaining CAIR NOx allowances. Changing the amortization period results in a reduction of PEF's 2012 revenue requirements by \$13,892,463.
- 2. PEF also has corrected two minor math errors that are described in PEF's response to Staff Interrogatory No.18b. The impact of correcting the math errors is to increase 2012 revenue requirements by \$26,250.
- 3. The combined impact of the revisions described above is to reduce 2012 revenue requirements by \$13,866,213 and to reduce PEF's proposed residential ECRC rates from \$5.83/mWh to \$5.45/mWh. These changes are reflected in Revised Forms 42-1P, 42-2P, 42-3P, 42-4P page 5 of 16, 42-5P page 5 of 18 and 42-7P of Exhibit No. \_ (TGF-3), which are provided in Attachment "A" to this Notice. Corresponding revisions to Mr. Foster's testimony are specified in Attachment "B" to this Notice.

DOCUMENT NUMBER-DATE

07565 OCT 14 =

DATED this day of October, 2011.

HOPPING GREEN & SAMS, P.A.

By:

Gary V. Perko /

Florida Bar No. 855898

P.O. Box 6526

Tallahassee, FL 32301

(850) 222-7500

Attorneys for Progress Energy Florida, Inc.

# **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic-mail and regular U.S. mail this 14<sup>th</sup> day of October, 2011.

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Attorney /

# **ATTACHMENT "A"**

Revised Schedules to Exhibit No. \_\_ (TGF-3) originally filed on August 26, 2011

Environmental Cost Recovery Clause (ECRC)
Total Jurisdictional Amount to be Recovered
For the Projected Period
JANUARY 2012 - DECEMBER 2012
(in Dollars)

Line		Energy (\$)	Transmission Demand (\$)	Distribution Demand (\$)	Production Demand (\$)	Total (\$)
; 	Total Jurisdictional Rev. Req. for the projected period  a Projected O&M Activities (Form 42-2P, Lines 7 through 9)  b Projected Capital Projects (Form 42-3P, Lines 7 through 9)  c Total Jurisdictional Rev. Req. for the projected period (Lines 1a + 1b)	\$ 38,872,301 161,060,912 199,933,213	\$ 1,384,728 0 1,384,728	\$ 2,426,549 1,689 2,428,238	\$ 1,101,172 2,455,320 3,556,492	\$ 43,784,750 163,517,921 207,302,671
2	True-up for Estimated Over/(Under) Recovery for the current period January 2011 - December 2011 (Form 42-2E, Line 5 + 6 + 10)	2,339,353	(2,105,287)	283,939	2,034,333	2,552,337
3	Final True-up for the period January 2010 - December 2010 (Form 42-1A, Line 3)	5,926,762	(331,768)	(100,916)	738,761	6,232,839
4	Total Jurisdictional Amount to Be Recovered/(Refunded) in the Projection period January 2012 - December 2012 (Line 1 - Line 2 - Line 3)	191,667,099	3,821,783	2,245,215	783,397	198,517,495
5	Total Projected Jurisdictional Amount Adjusted for Taxes (Line 4 x Revenue Tax Multiplier of 1.00072)	\$ 191,805,099	\$ 3,824,535	\$ 2,246,832	\$ 783,962	\$ 198,660,428

Docket No. 110007-EI Progress Energy Florida Witness: T.G. Foster Exhibit No. (TGF-3) Page 2 of 40

Revised Form 42-2P

# PROGRESS ENERGY FLORIDA Environmental Cost Recovery Clause (ECRC) Calculation of the Projected Period Amount JANUARY 2012 - DECEMBER 2012

### O&M Activities (in Dollars)

	(in Dollars)							End of						
Line	Description	Projected Jan - 12	Projected Feb - 12	Projected Mar - 12	Projected Apr - 12	Projected May - 12	Projected Jun - 12	Projected Jul - 12	Projected Aug - 12	Projected Sep - 12	Projected Oct - 12	Projected Nov - 12	Projected Dec - 12	Period Total
1	Description of O&M Activities													
	1 Transmission Substation Environmental Investigation,												405.007	
	Remediation, and Pollution Prevention	\$ 165,997	\$ 165,997	\$ 165,997	\$ 165,997	\$ 165,997	\$ 165,997	165,997	\$ 165,997 \$	165,997	\$ 165,997	\$ 165,997	165,997	\$ 1,991,964
	1a Distribution Substation Environmental Investigation, Remediation, and Pollution Prevention	174,976	174,976	174,976	174,976	174,976	174.976	174,976	174.976	174,976	174,976	174,976	174,976	2,099,712
	Distribution System Environmental Investigation,	114,010	114,010	114,010	174,070	114,010	,	71.4,070	,	,•=	,	,	,	-,,
	Remediation, and Pollution Prevention	0	0	20,000	0	0	0	0	0	20,000	291,000	0	0	331,000
	3 Pipeline Integrity Management, Review/Update Plan and													
	Risk Assessments - Intm	166,083	166,083	166,083	166,083	166,083	66,083	66,083	66,083	141,083	141,083	141,083	66,087	1,518,000
	4 Above Ground Tank Secondary Containment - Pkg	0	0	0	0	0	0	0	0	0	0	0	0	0
	5 SO2 & NOx Emissions Allowances - Energy	601,203	595,228	607,694	595,992	614,848	618,309	621,182	622,113	616,725	611,841	615,265	614,576	7,334,975
	6 Phase II Cooling Water Intake 316(b) - Base	0	0	0	0	0	0	0	0	0	0	0	0	O O
	6a Phase II Cooling Water Intake 316(b) - Intm	40.500	0	5 000	0	0	5 000	Q D	0	5,000	0	0 21,600	9,600	0 90,700
	7.2 CAIR - Peaking 7.4 CAIR Crystal River - Base	19,500 862,800	25,000 957,376	5,000	1.074.554	1.045.445	5,000 974,883	920,402	1,257,179	1,010,441	966,388	1,537,144	1,426,492	13,399,625
	7.4 CAIR Crystal River - Energy	1,615,668	1,500,473	1,356,520 1,695,076	1,413,960	1,620,966	1,644,777	1,769,652	1,788,552	1,668,222	667,943	1,114,725	1,947,962	18,447,976
	7.4 CAIR Crystal River - A&G	14,336	15.896	20,804	24,119	23,675	23,427	28,714	23,902	18,547	18.547	18.547	23.359	253.875
	8 Arsenic Groundwater Standard - Base	14,555	0,000	10,554	24,119	25,5,0	20,727	20,1.4	20,502	10,041	0	15,517	0	0
	9 Sea Turtle - Coastal Street Lighting - Distrib	416	416	416	416	416	416	416	416	416	416	416	416	4,992
	11 Modular Cooling Towers - Base	Ō	0	0	0	Ō	Õ	0	Ō	0	0	0	0	0
	12 Greenhouse Gas Inventory and Reporting - Energy	ō	ŏ	ō	ō	ō	ō	ō	ō	ō	ō	ò	0	0
	13 Mercury Total Daily Maximum Loads Monitoring - Energy	0	0	0	0	0	o	0	0	0	0	0	0	0
	14 Hazardous Air Pollutants (HAPs) ICR Program - Energy	0	0	. 0	0	0	0	0	0	0	0	0	O	0
	15 Effluent Limitation Guidelines ICR Program - Energy	0	0	0	0	0	0	0	0	0	0	0	0	0
	16 Nat. Pollutant Discharge Elimination Sys. (NPDES)-Energy	2,000	63,000	83,000	67,000	63,000	49,500	30,000	15,000	75,500	77,500	75,000	47,500	648,000
	17 Maximum Achievable Control Technology (MACT)-Energy	50,000	50,000	50,000	50,000	75,000	25,000	0	0	0	0	0		300,000
2	Total of Q&M Activities	3,672,980	3,714,445	4,355,567	3,733,097	3,950,406	3,748,368	3,777,421	4,114,219	3,896,908	3,115,691	3,864,753	4,476,965	46,420,519
3	Recoverable Costs Allocated to Energy	2,268,872	2,208,700	2,435,770	2,126,952	2,373,814	2,337,586	2,420,833	2,425,665	2,360,447	1,357,284	1,804,989	2,610,038	26,730,951
4	Recoverable Costs Allocated to Demand - Transm	165,997	165,997	165,997	165,997	165,997	165,997	165,997	165,997	165,997	165,997	165,997	165,997	1,991,964
	Recoverable Costs Allocated to Demand - Distrib	175,392	175.392	195,392	175,392	175,392	175,392	175,392	175,392	195,392	466,392	175,392	175,392	2,435,704
	Recoverable Costs Allocated to Demand - Prod-Base	862,800	957.376	1,366,520	1,074,554	1,045,445	974.883	920,402	1,257,179	1,010,441	966,388	1,537,144	1,426,492	13,399,625
	Recoverable Costs Allocated to Demand - Prod-Intm	166,083	166,083	166,083	166,083	166,083	66,083	66,083	66,083	141,083	141,083	141,083	66,087	1,518,000
	Recoverable Costs Allocated to Demand - Prod-Peaking	19,500	25,000	5,000	Û	0	5,000	0	0	5,000	0	21,600	9,600	90,700
	Recoverable Costs Allocated to Demand - A&G	14,336	15,896	20,804	24,119	23,675	23,427	28,714	23,902	18,547	18,547	18,547	23,359	253,875
5	Retail Energy Jurisdictional Factor	0.98770	0.97210	0.97650	0.97800	0.97820	0.97850	0.97700	0.97590	0.97460	0.97390	0.97450	0.97730	
6	Retail Transmission Demand Jurisdictional Factor	0.69516	0.69516	0.69516	0.69516	0.69516	0.69516	0.69516	0.69516	0.69516	0.69516	0.69516	0.69516	
-	Retail Distribution Demand Jurisdictional Factor	0.99624	0.99624	0.99624	0.99624	0.99624	0.99624	0.99624	0.99624	0.99624	0.99624	0.99624	0.99624	
	Retail Production Demand Jurisdictional Factor - Base	0.92792	0.92792	0.92792	0.92792	0.92792	0.92792	0.92792	0.92792	0.92792	0.92792	0.92792	0.92792	
	Retail Production Demand Jurisdictional Factor - Intm	0.72541	0.72541	0.72541	0.72541	0.72541	0.72541	0.72541	0.72541	0.72541	0.72541	0.72541	0.72541	
	Retail Production Demand Jurisdictional Factor - Peaking	0.91972	0.91972	0.91972	0.91972	0.91972	0.91972	0.91972	0.91972	0.91972	0.91972	0.91972	0.91972	
	Retail Production Demand Jurisdictional Factor - A&G	0.92374	0.92374	0.92374	0.92374	0.92374	0.92374	0.92374	0.92374	0.92374	0.92374	0.92374	0.92374	
7	Jurisdictional Energy Recoverable Costs (A)	2,240,965	2,147,078	2,378,530	2,080,159	2,322,065	2,287,328	2,365,154	2,367,206	2,300,492	1,321,859	1,758,962	2,550,790	26,120,588
8	Jurisdictional Demand Recoverable Costs - Transm (B)	115,394	115,394	115,394	115,394	115,394	115,394	115,394	115,394	115,394	115,394	115,394	115,394	1,384,728
	Jurisdictional Demand Recoverable Costs - Distrib (B)	174,733	174,733	194,657	174,733	174,733	174.733	174,733	174,733	194,657	464,638	174,733	174,733	2,426,549
	Jurisdictional Demand Recoverable Costs - Prod-Base (B)	800,609	888,368	1,268,021	997,100	970,089	904,614	854,059	1,166,562	937,609	896,731	1,426,347	1,323,671	12,433,780
	Jurisdictional Demand Recoverable Costs - Prod-Intm (B)	120,478	120,478	120,478	120,478	120,478	47 937	47,937	47,937	102,343	102,343	102,343	47,940	1,101,170
	Jurisdictional Demand Recoverable Costs - Prod-Peaking (B)	17,935	22,993	4,599	0	0	4,599	0	0	4,599	0	19,866	8,829	83,420
	Jurisdictional Demand Recoverable Costs - A&G (B)	13,243	14,684	19,218	22,280	21,869	21,540	26,524	22,080	17,133	17,133	17,133	21,577	234,515
9	Total Jurisdictional Recoverable Costs for O&M													
	Activities (Lines 7 + 8)	\$ 3,483,357	\$ 3,483,728	5 4,100,897	\$ 3,510,144	5 3,724,628	\$ 3,556,245	3,583,801	\$ 3,893,912 \$	3,672,227	\$ 2,918,098	\$ 3,614,778	4,242,934	\$ 43,784,750

### Notes:

(A) Line 3 x Line 5 (B) Line 4 x Line 6

# PROGRESS ENERGY FLORIDA Environmental Cost Recovery Clause (ECRC) Calculation of the Projected Period Amount JANUARY 2012 - DECEMBER 2012 Capital Investment Projects-Recoverable Costs

-	Dallan
ÇIN	Dollars

Line	Description	Projected Jan - 12	Projected Feb - 12	Projected Mar - 12	Projected Apr - 12	Projected May - 12	Projected Jun - 12	Projected Jul - 12	Projected Aug - 12	Projected Sep - 12	Projected Oct - 12	Projected Nov - 12	Projected Dec - 12	End of Period Total
1	Description of investment Projects (A)											•		
	3.1 Pipeiine Integrity Management - Bartow/Anclote Pipeline-Intermediate	\$ 38,028	\$ 37.954	\$ 37,879	\$ 37.805	<b>\$</b> 37,731	\$ 37.658	\$ 37.583	\$ 37,510	\$ 37.436	\$ 37.361	\$ 37,285	\$ 37,212	<b>\$</b> 451.442
	4.1 Above Ground Tank Secondary Containment - Peaking	140,364	140.051	139,737	139,423	139,112	138,799	138,487	138 174	137,860	137.548	137.235	136.924	1,663,714
	4.2 Above Ground Tank Secondary Containment - Base	32,345	32,292	32,236	32,180	32,125	32,070	32,015	31,959	31,903	31,849	31,794	31,738	384,506
	4.3 Above Ground Tank Secondary Containment - Intermediate	3,058	3,054	3,049	3,045	3,039	3,034	3,030	3 024	3,020	3,015	3,010	3,005	36,383
	5 SO2 & NOX Emissions Allowances - Energy	234,764	229,292	223,790	218,264	212,704	207,065	201,397	195,710	190,045	184,427	178,814	173,190	2,449,462
	7.1 CAIR Anciote- Intermediate	0	0	C	0	0	0	0	0	0	0	0	0	0
	7.2 CAIR CT's - Peaking	21,092	21,057	21,025	20,994	20,962	20,929	20,898	20,864	20,832	20,800	20,768	20,734	250,955
	7.3 CAIR Crystal River - Base	2,644	2,644	2,644	2,644	2,644	2,644	2,644	2,644	2,644	2,644	2,644	2,644	31,728
	7.4 CAIR Crystal River AFUDC - Base	14,241,599	14,225,042	14,201,549	14,191,474	14,213,641	14,250,578	14,249,116	14,225,446	14,201,781	14,193,357	14,203,902	14,246,224	170,643,709
	7.4 CAIR Crystal River - Energy 9 Sea Turtle - Coastal Street Lighting -Distribution	5,408 142	5,408	5,408	5,408	5,408	5,408	5,408	5,408	5,408	5,408	5,408	5,408	64,897
	10.1 Underground Storage Tanks-Base	1.757	142 1.755	142 1,752	142 1.749	142 1,746	141 1.744	141 1,741	141 1,738	141 1.735	141 1.733	141 1.730	139 1,727	1,695
	10.1 Underground Storage Tanks-base 10.2 Underground Storage Tanks-Intermediate	1,757 846	1,735 845	1,752	1,749 841	1,740 839	837	835	1,736 834	1,735	1,733	1,730	1,727 826	20,907 10.033
	11 Modular Cooling Towers - Base	438	438	438	438	438	438	438	438	438	438	438	438	5,256
	11.1 Crystal River Thermal Discharge Compliance Project AFUDC - Base	3.978	3.974	3.970	3.964	3.960	3,955	3,951	3,946	3.941	3.937	3,932	3.927	47,435
	16 National Pollutant Discharge Elimination System (NPDES)-Intermediate	148	5,562	11,844	14,551	17,454	19,411	20,201	20,292	20,383	20,472	20,561	20,646	191,525
2	Total Investment Projects - Recoverable Costs	14,726,611	14,709,510	14,686,305	14,672,922	14,691,945	14,724,711	14,717,885	14,688,128	14,658,398	14,643,960	14,648,489	14,684,782	176,253,647
3	Recoverable Costs Allocated to Energy	240,172	234,700	229,198	223,672	218,112	212,473	206,805	201,118	195,453	189,835	184,222	178,598	2,514,359
4	Recoverable Costs Allocated to Demand - Distribution	142	142	142	142	142	141	141	141	141	141	141	139	1,695
	Recoverable Costs Allocated to Demand - Production - Base	14,282,761	14,266,145	14,242,589	14,232,449	14,254,554	14,291,429	14,289,905	14,266,171	14,242,442	14,233,958	14,244,440	14,286,698	171,133,541
	Recoverable Costs Allocated to Demand - Production - Intermediate	42,080	47,415	53,614	56,242	59,063	60,940	61,649	61,660	61,670	61,678	61,683	61,689	689,383
	Recoverable Costs Allocated to Demand - Production - Peaking	161,456	161,108	160,762	180,417	160,074	159,728	159,385	159,038	158,692	158,348	158,003	157,658	1,914,669
5	Retail Energy Jurisdictional Factor	0.98770	0.97210	0.97650	0.97800	0.97820	0.97850	0.97700	0.97590	0.97460	0.97390	0.97450	0.97730	
6	Retail Distribution Demand Jurisdictional Factor	0.99624	0.99624	0.99624	0.99624	0.99624	0.99624	0.99624	0.99624	0.99624	0.99624	0.99624	0.99624	
	Retail Demand Jurisdictional Factor - Production - Base	0.92792	0.92792	0.92792		0.92792	0.92792	0.92792	0.92792	0.92792	0.92792	0,92792	0.92792	
	Retail Demand Jurisdictional Factor - Production - Intermediate	0.72541	0.72541	0.72541		0.72541	0.72541	0.72541	0.72541	0.72541	0.72541	0.72541	0.72541	
	Retail Demand Jurisdictional Factor - Production - Peaking	0.91972	0.91972	0.91972	0.91972	0.91972	0.91972	0.91972	0.91972	0.91972	0.91972	0.91972	0.91972	
7	Jurisdictional Energy Recoverable Costs (B)	237,218	228,152	223,812	218,751	213,357	207,905	202,049	196,271	190,489	184,880	179,524	174,544	2,456,953
8	Jurisdictional Demand Recoverable Costs - Distribution (C)	141	141	141	141	141	140	140	140	140	140	140	138	1,689
	Jurisdictional Demand Recoverable Costs - Production - Base (C)	13,253,260	13,237,841	13,215,983	13,206,574	13,227,086	13,261,303	13,259,889	13,237,865	13,215,847	13,207,974	13,217,701	13,256,913	158,798,235
	Jurisdictional Demand Recoverable Costs - Production - Intermediate (C)	30,525	34,395	38,892	40,799	42,845	44,206	44,721	44,729	44,736	44,742	44,745	44,750	500,085
	Jurisdictional Demand Recoverable Costs - Production - Peaking (C)	148,494	148,174	147,856	147,539	147,223	146,905	146,590	146,270	145,952	145,636	145,319	145,001	1,760,959
	Total Jurisdictional Recoverable Costs for													
a	Investment Projects (Lines 7 + 8)	\$ 13,669,639	\$ 13,648,704	\$ 13,626,685	\$ 13,613,804	\$ 13,630,653	\$ 13,660,460	\$ 13,653,388	\$ 13,625,276	\$ 13,597,164	\$ 13,583,373	\$ 13,587,430	\$ 13,621 <b>,348</b>	\$ 163,517,921
	. , ,													

- (A) Each project's Total System Recoverable Expenses on Form 42-4P, Line 9; Line 5 for Project 5 Allowances and Project 7.4 Reagents.

  (B) Line 3 x Line 5

  (C) Line 4 x Line 6

### Environmental Cost Recovery Clause (ECRC) Calculation of the Projected Period Amount JANUARY 2012 - DECEMBER 2012

### Schedule of Amortization and Return Deferred Gain on Sales of Emissions Allowances (Project 5)

### (in Dollars)

•:	Danadation	Beginning of Period Amount	Projected Jan - 12	Projected Feb - 12	Projected Mar - 12	Projected	Projected	Projected Jun - 12	Projected Jul - 12	Projected	Projected	Projected Oct - 12	Projected	Projected	End of Period
Line	Description	Feliud Amount	Jan - 12	150 - 15	Mar - 12	Apr - 12	May - 12	Jun - 12	Jul - 12	Aug - 12	Sep - 12	0 <del>0</del> 12	Nov - 12	Dec - 12	Total
1	Working Capital Dr (Cr)														
	a. 1581001 SO <sub>2</sub> Emission Allowance Inventory	\$ 4,972,187	\$ 4,954,700	\$ 4,943,189	\$ 4,919,212 \$	4,905,326	4,873,792 \$	4,838,797 \$	4,800,929 \$	4,762,130 \$	4,728,719	4,700,192	4,668,241 \$	4,636,979	\$ 4,636,979
	b. 25401FL Auctioned SO <sub>2</sub> Allowance	(1,554,395)	(1,511,726)	(1,469,057)	(1,426,388)	(1,386,941)	(1,343,889)	(1,300,798)	(1,257,726)	(1,214,655)	(1,171,583)	(1,128,512)	(1,085,440)	(1,042,369)	(1,042,369)
	c. 1581902 NO <sub>x</sub> Emission Allowance Inventory	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	d. 1823403 NO <sub>x</sub> Emission Allowance Regulatory Asset (A)	22,549,875	21,923,489	21,297,104	20,670,719	20,044,333	19,417,948	18,791,562	18,165,177	17,538,792	16,912,406	16,286,021	15,659,635	15,033,250	15.033,250
2	Total Working Capital	25,967,667	25,366,463	24,771,236	24,163,542	23,562,718	22,947,870	22,329,561	21,708,380	21,086,267	20,469,542	19,857,701	19,242,436	18,627,860	18,627,860
3	Average Net Investment		25,667,065	25,068,850	24,467,389	23,863,130	23,255,294	22,638,716	22,018,971	21,397,323	20,777,904	20,163,621	19,550,068	18,935,148	
	Return on Average Net Working Capital Balance (B)														
•	a. Equity Component Grossed Up For Taxes 8.02%	•	171,615	167.615	163,593	159,553	155,489	151,367	147,223	143,066	138,925	134,818	130,715	126,604	1,790,583
	b. Debt Component (Line 6 x Rate x 1/12) 2.95%	•	63,149	61,677	60,197	58,711	57,215	55,698	54,174	52,644	51,120	49,609	48,099	46,586	656,879
5	Total Return Component (C)	-	234,764	229,292	223,790	218,264	212,704	207,065	201,397	195,710	190,045	184,427	178,814	173,190	2,449,462
	Expense Dr (Cr)														
•	a, 5090001 SO <sub>2</sub> Allowance Expense		17.487	11,511	23.977	13,886	31,534	34,995	37.868	38,799	33,411	28.527	31.951	31,262	c44 250
	b. 4074004 SO <sub>2</sub> Allowance Amortization Expense					-	• • • • • • • • • • • • • • • • • • • •	-		.,					335,208
	•		(42,669)	(42,669)	(42,669)	(44,279)	(43,071)	(43,071)	(43,071)	(43,071)	(43,071)	(43,071)	(43,071)	(43,071)	(516,858)
_	c. 5091003 NO <sub>X</sub> Allowance Expense	_	626,385	626,385	626,385	626,385	626,385	626,385	626,385	626,385	626,385	626,385	626,385	626,385	7,516,625
'	Net Expense (D)	-	601,203	595,228	607,694	595,992	614,848	618,309	621,182	622,113	816,725	611,841	615.265	614,576	7,334,975
	Total System Recoverable Expenses (Lines 5 + 7)		835.967	824,520	831.484	814,256	827.552	825.374	822.579	817.823	806.770	796,268	794,079	787.766	9.784,437
	a. Recoverable costs allocated to Energy		635,967	824,520	831,484	814,256	827,552	825,374	822,579	817,823	806,770	796,268	794,079	787,766	9,784,437
	b. Recoverable costs allocated to Demand		0	0	0	0	0	0	0	0	O O	0	0	0	0
	Energy Jurisdictional Factor		0.98770	0.97210	0.97650	0,97800	0.97820	0.97850	0.97700	0.97590	0.97460	0.97390	0.97450	0.97730	
10	Demand Jurisdictional Factor		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
11	Retail Energy-Related Recoverable Costs (E)		825,685	801,516	811, <del>944</del>	796,343	809,511	807,628	803,659	798,113	786,278	775,486	773,830	769,884	9,559,876
12	Retail Demand-Related Recoverable Costs (F)		٥	0	ū	c	0	٥	0	٥	0	0	0	o	0
13	Total Jurisdictional Recoverable Costs (Lines 11 + 12)	-	\$ 825,685	801.516	\$ 811,944 \$	796,343 \$	809,511 \$	807.628 S	803.659 \$	798,113 S	786.278 S	775.486 <b>\$</b>	773.830 S	769 884 9	9,559,876
	• • • • •	_										,	* 1 71-1-7	,	-,000,0

- Notes:

  (A) As further described in the testimony of witnesses West and Foster, PEF expects the Cross-State Air Polition Rule (CSAPR) to impact the value of NOx allowances not used in 2011. PEF is reflecting the CSAPR impact by moving this investment to a regulatory asset to be amortized into rates over a 3 year period and be fully recovered by year end 2014.
- (C) Line 5 is reported on Capital Schedule
- (D) Line 7 is reported on O&M Schedule
  (E) Line 8a x Line 9.
  (F) Line 8b x Line 10.

Progress Energy Florida Witness: T.G. Foster Exhibit No.\_\_(TGF-3)

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# Environmental Cost Recovery Clause (ECRC) JANUARY 2012 - DECEMBER 2012

Description and Progress Report for Environmental Compliance Activities and Projects

Project Title: Project No. 5

SO<sub>2</sub> and NO<sub>x</sub> Emissions

# **Project Description:**

In accordance with Title IV of the Clean Air Act, CFR 40 Part 73 and Part 76, and Florida Administrative Code Rule 62-214 and the Clean Air Interstate Rule, PEF manages SO<sub>2</sub> and NOx emissions allowance inventory for the purpose of offsetting sulfur dioxide and nitrogen oxides emissions in compliance with the Federal Acid Rain Program. On 7/6/11, the EPA issued the Cross-State Air Pollution Rule (CSAPR) which serves as a replacement rule to CAIR. CSAPR significantly alters SO2 and NOx allowance programs. Under CAIR, Florida is required to comply with annual SO2 and NOx emission requirements and seasonal requirements regulating NOx emissions during the ozone season. Under CSAPR, Florida is no longer included in the group of states required to comply with annual emissions requirements. It is only covered by the ozone season portions of the CSAPR rule. CSAPR replaces CAIR starting 1/1/12. The effective compliance date for Florida is 5/1/12 (beginning of the ozone season). Further discussion of CSAPR is included in the testimony of Patricia Q. West.

# **Project Accomplishments:**

For purposes of compliance with an affected unit's sulfur dioxide ( $SO_2$ ) and nitrogen oxides ( $NO_X$  emissions requirements under the Acid Rain Program, air quality compliance costs are administered by an authorized account representative who evaluates a variety of resources and options. Activities performed include purchases of  $SO_2$  and  $NO_X$  emissions allowances as well as auctions and transfers of  $SO_2$  emissions allowances. Under the new CSAPR rule, emission allowances previously issued to utility companies under the Acid Rain Program have no value as of 1/1/12. Any  $NO_X$  allowances issued under the Acid Rain Program not used by the end of 2011 are not expected to be useful for compliance with the CSAPR rule. As such, PEF has reflected movement of these capital investments from the  $NO_X$  allowance inventory to a regulatory asset to be recovered in rates in 2012.  $SO_2$  allowances will still have value under the existing acid rain program requirements.

## Project Fiscal Expenditures:

January 1, 2011 to December 31, 2011: Project expenditures are estimated to be approximately \$0.3 million lower than originally projected. This variance is primarily driven by lower than anticipated NO<sub>X</sub> allowance prices partially offset by higher than projected NO<sub>X</sub> allowance usage.

# **Project Progress Summary:**

PEF continually evaluates its compliance strategy to manage the most cost effective program and to mitigate higher gas prices which can impact the fuel mix as it relates to emissions as a result of residual oil.

# **Project Projections:**

For the period January 2012 through December 2012  $SO_2$  expenditures are expected to be approximately \$0.3 million.  $NO_X$  expenses under the new seasonal program cannot be projected at this time, however PEF is reflecting approximately \$7.5 million in amortization of the 2011 estimated year end  $NO_X$  allowance balance due to the discontinuation of the existing program.

# Environmental Cost Recovery Clause (ECRC) Calculation of Environmental Cost Recovery Clause Rate Factors by Rate Class JANUARY 2012 - DECEMBER 2012

Rate Class	(1) mWh Sales at Source Energy Allocate (%)	(2) 12CP Transmission or Demand Allocator (%)	(3) 12CP & 1/13th AD Demand Allocator (%)	(4) NCP Distribution Allocator (%)	(5) Energy- Related Costs (\$)	(6) Transmission Demand Costs (\$)	(7) Distribution Demand Costs (\$)	(8) Production Demand Costs (\$)	(9) Total Environmental Costs (\$)	(10) Projected Effective Sales at Meter Level (mWh)	(11) Environmental Cost Recovery Factors (cents/kWh)
		(1-7	(:-7	(14)	(4)	<u> </u>	(*)	(*/	(4)	(11111)	(Cellarkiti)
Residential RS-1, RST-1, RSL-1, RSL-2,	BCC 4						-				
Secondary	50,6029	% 62.710%	61.779%	63.663%	\$97,056,294	\$2,398,376	\$1,430,396	\$484,322	\$101,369,389	18,600,869	0.545
General Service Non-Deman	d										
GS-1, GST-1	_										
Secondary										1,209,225	0.539
Primary										5,940	0.534
Transmission	3.3179	2 0000	2.0520/	2.5400/	#C 004 4F0	#444.700	670 740	400.140		4,255	_ 0.528
TOTAL GS	3.317	% 2.922%	2.952%	3.549%	<b>\$</b> 6,361,459	\$111,736	\$79,740	\$23,142	\$6,576,077	1,219,420	-
General Service GS-2 Secondary	0.007										
G3-2 Secondary	0.3279	% 0.200%	0.210%	0.149%	\$627,325	\$7,658	\$3,338	\$1,646	\$639,967	120,227	0.532
General Service Demand GSD-1, GSDT-1, SS-1											
Secondary										40.000.074	0.504
Primary										12,082,271 2,280,315	0.534 0.529
Transmission										9,192	0.523
TOTAL GSD	38.9489	% 30.363%	31.023%	28.881%	\$74,703,564	\$1,161,228	\$648,898	\$243,208	\$76,756,898	14,371,778	. 0.020
<u>Curtailable</u> CS-1, CST-1, CS-2, CST-2, C	S-3, CST-3, SS-3										
Secondary										-	0.528
Primary										159,935	0.523
Transmission											0.517
TOTAL CS	0.4259	% 0.309%	0.318%	0.716%	\$814,532	<b>\$1</b> 1,813	\$16,083	\$2,491	\$844,919	159,935	
Interruptible IS-1, IST-1, IS-2, IST-2, SS-2											
Secondary										109,609	0.520
Primary										1,501,477	0.515
Transmission										422,008	0.510
TOTAL IS	5.4059	% 3.380%	3.536%	2.117%	\$10,367,851	\$129,283	\$47,561	\$27,722	\$10,572,417	2,033,093	•
<u>Lighting</u>											
LS-1 Secondary	0.9779	% 0.116% 	0.182%	0.926%	\$1,874,075	\$4,441	\$20,816	\$1,430	\$1,900,761	359,167	0.529
	100.0009	% 100.000%	100.000%	100.000%	\$191,805,099	\$3,824,535	\$2,246,832	\$783.962	\$198,660,428	36,864,489	0.539

Notes:

(1) From Form 42-6P, Column 9

(2) From Form 42-6P, Column 10

(3) From Form 42-6P, Column 11

(4) From Form 42-6P, Column 12

(5) Column 1 x Total Energy Jurisdictional Dollars from Form 42-1P, line 5

(6) Column 2 x Total Transmission Demand Jurisdictional Dollars from Form 42-1P, line 5

(7) Column 4 x Total Distribution Demand Jurisdictional Dollars from Form 42-1P, line 5

(8) Column 3 x Total Production Demand Jurisdictional Dollars from Form 42-1P, line 5

(9) Column 5 + Column 6 + Column 7 + Column 8

(10) Projected kWh sales at secondary voltage level for the period January 2012 to December 2012

(11) (Column 9/ Column 10)/10

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	REVIESIONS TO TESTIMONY OF THOMAS G. FOSTER ORIGINALLY FILED ON AUGUST 26, 2011							
PAGE/LINE	REIVISION	REASON FOR CHANGE						
1/2	Add "REVISED" before "DIRECT"	Denote this is revised testimony.						
1/7	Strike "August 26" and replace with "October 14"	Update date filed.						
3/8	Strike "212.5" replace with "198.7"	Change revenue requirements consistent with 3 year amortization of Nox allowance balance and errata corrections.						
7/11	Strike "2012" replace with "three years from 2012-2014" and strike "The" replace with "One third of the"	Change language to be consistent with 3 year amortization of Nox allowance balance.						
7/12	Strike "until"	Change language to be consistent with 3 year amortization of Nox allowance balance.						
7/12	Strike "completely recovered at year end."	Change language to be consistent with 3 year amortization of Nox allowance balance.						
7/18	After the word "balance," add "based on allowance usage, one third of"	Change language to be consistent with 3 year amortization of Nox allowance balance.						
7/19	After the word "amortized" add "in 2012"	Change language to be consistent with 3 year amortization of Nox allowance balance.						
8/3	Strike "58.5" and replace with "43.8"	Change revenue requirements consistent with 3 year amortization of Nox allowance balance and errata corrections.						
8/9	Strike "162.7" and replace with "163.5"	Change revenue requirements consistent with 3 year amortization of Nox allowance balance and errata corrections.						
8/19	Strike "221.2" replace with "207.3"	Change revenue requirements consistent with 3 year amortization of Nox allowance balance and errata corrections.						
10	ECRC Factors Column	Change ECRC factors based on updated revenue requirements in the following table.						
11/9	Strike "0.577" replace with "0.539"	Change ECRC factor based on updated revenue requirements.						
11/10	Strike "221.2" replace with "207.3"	Change revenue requirements consistent with 3 year amortization of Nox allowance balance and errata corrections.						

# ATTACHMENT B (Continued)

	ECRC FACTORS						
	ECRC FACTORS						
RATE CLASS	12CP & 1/13AD						
Residential	0.545 cents/kWh						
General Service Non-Demand	<del>1</del>						
@ Secondary Voltage	0.539 cents/kWh						
@ Primary Voltage	0.534 cents/kWh						
@ Transmission Voltage	0.528 cents/kWh						
General Service 100% Load Factor	0.532 cents/kWh						
General Service Demand							
@ Secondary Voltage	0.534 cents/kWh						
@ Primary Voltage	0.529 cents/kWh						
@ Transmission Voltage	0.523 cents/kWh						
Curtailable							
@ Secondary Voltage	0.528 cents/kWh						
@ Primary Voltage	0.523 cents/kWh						
@ Transmission Voltage	0.517 cents/kWh						
Interruptible							
@ Secondary Voltage	0.520 cents/kWh						
@ Primary Voltage	0.515 cents/kWh						
@ Transmission Voltage	0.510 cents/kWh						
Lighting	0.529 cents/kWh						