

Eric Fryson

From: Rhonda Dulgar [rhonda@gbwlegal.com]
Sent: Monday, October 01, 2012 12:01 PM
To: Filings@psc.state.fl.us; ataylor@bbrslaw.com; Blaise N. Gamba; Bryan Anderson; Capt. Samuel Miller; diane.triplett@pgnmail.com; J. Michael Walls; James Whitlock; jbrew@bbrslaw.com; Jessica Cano; john_butler@fpl.com; john.burnett@pgnmail.com; John.Butler@fpl.com; Jon Moyle, Jr.; kelly.jr@leg.state.fl.us; Ken_Hoffman@fpl.com; Keino Young; Lisa Bennett; Matthew Bernier; McGLOTHLIN.JOSEPH; Michael Lawson; paul.lewisjr@pgnmail.com; rmiller@pcsphosphate.com; rehwinkel.charles@leg.state.fl.us; SAYLER.ERIK@leg.state.fl.us; Schef Wright; Vicki Kaufman
Cc: Rhonda Dulgar
Subject: Electronic Filing - Docket 120009-EI
Attachments: 120009.FRF.Post-Hearing Statement.10-1-12.pdf

a. Person responsible for this electronic filing:

Robert Scheffel Wright
 Gardner, Bist, Wiener, Wadsworth, Bowden,
 Bush, Dee, LaVia & Wright, P.A.
 1300 Thomaswood Drive
 Tallahassee, FL 32308
swright@gbwlegal.com
 (850) 385-0070

b. 120009-EI

In Re: Nuclear Cost Recovery Clause.

c. Document being filed on behalf of the Florida Retail Federation.

d. There are a total of 14 pages.

e. The document attached for electronic filing is the Petition to Intervene of the Florida Retail Federation.

(see attached file: 120009.FRF.Post-Hearing Statement.10-1-12.pdf)

Thank you for your attention and assistance in this matter.

Rhonda Dulgar**Secretary to Jay LaVia & Schef Wright**

Gardner, Bist, Wiener, Wadsworth, Bowden,
 Bush, Dee, LaVia & Wright, P.A.
 1300 Thomaswood Drive
 Tallahassee, Florida 32308
 Phone: 850-385-0070
 Fax: 850-385-5416
 Email: rhonda@gbwlegal.com
<http://www.gbwlegal.com/>

GBW Gardner, Bist, Wiener, Wadsworth, Bowden,
 Bush, Dee, LaVia & Wright, P.A. ATTORNEYS AT LAW

DOCUMENT NUMBER-DATE

06563 OCT-1 2

FPSC-COMMISSION CLERK

10/1/2012

CONFIDENTIALITY NOTICE: This communication is intended only for the exclusive use of the intended recipient(s) and contains information which is legally privileged and confidential. Furthermore this communication is protected by the Electronic Communication Privacy Act, 18 U.S.C. §§ 2510-2521 and any form of distribution, copying, forwarding or use of it or the information contained in or attached to it is strictly prohibited and may be unlawful. This communication may not be reviewed, distributed, printed, displayed, or re-transmitted without the sender's written consent. **ALL RIGHTS PROTECTED.** If you have received this communication in error please return it to the sender and then delete the entire communication and destroy any copies. Thank you.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Cost Recovery Clause.

DOCKET NO. 120009-EI

DATED: OCTOBER 1, 2012

**THE FLORIDA RETAIL FEDERATION'S
POST-HEARING STATEMENT OF ISSUES AND POSITIONS**

The Florida Retail Federation, pursuant to the First Order Revising Order Establishing Procedure in this docket, Order No. PSC-12-0078-PCO-EI, issued on June 29, 2012, hereby submits the Federation's Post-Hearing Statement of Issues and Positions.

SUMMARY OF POSITIONS

The Florida Retail Federation strongly supports nuclear power as a component of Florida's long-term electricity supply, but the FRF also strongly believes that the costs of nuclear projects should be accurately defined and that utilities proposing nuclear project should bear the risk of managing their nuclear projects prudently, as opposed to shifting those risks onto customers.

Progress Energy Florida – Levy Nuclear Project

On March 8, 2012, the Commission issued its final order approving a Stipulation and Settlement Agreement between Progress Energy Florida and the major parties representing consumers' interests in relation to PEF's nuclear projects. The Settlement Agreement addresses what costs can be recovered from customers and what rates PEF can charge to obtain recovery of those amounts, which are, naturally, subject to a true-up in the last year of the recovery period. That last year is currently expected to be 2017. Accordingly, PEF should recover only the amounts contemplated by, and approved by the Commission in its approval of, the Settlement Agreement.

Progress Energy Florida – Crystal River 3 Extended Power Uprate

DOCUMENT NUMBER-DATE

06563 OCT-1 2012

FPSC-COMMISSION CLERK

At this time, PEF has not made a final decision to repair or retire Crystal River Unit 3 (CR3), and it appears that a decision will not be made until well after the hearings in this year's NCRC Docket. The Florida Retail Federation strongly supports repairing CR3 and returning it to commercial service, provided, of course, that such repair is technically feasible and cost-effective for PEF's customers. However, given the current uncertainty surrounding the repair vs. retire decision, the FRF agrees with the Citizens that, until PEF has made an affirmative decision to repair CR3, PEF should minimize expenditures related to the CR3 EPU Project.

The FRF also agrees with the Citizens that, until the repair-retire decision has been made, the Commission should withhold any determination of reasonableness or prudence for expenditures on the CR3 EPU Project, and correspondingly defer its consideration of any CR3 EPU expenditures for cost recovery. Given that the repair-retire decision is not likely to be made until well after this year's NCRC hearings, the Commission should defer consideration of cost recovery for the CR3 EPU Project until the 2013 NCRC hearings, and should correspondingly defer allowing any cost recovery associated with the EPU Project until after full and appropriate consideration of all issues related to this Project, e.g., deferral of recovery until 2014.

Florida Power & Light Company – Turkey Point Nuclear Project

The Florida Retail Federation agrees with the Citizens of the State of Florida that, because FPL is pursuing an approach to the Turkey Point Units 6&7 Nuclear Project that limits expenses to minimal licensing activities, the FRF will join the Citizens in not contesting FPL's approach to the Turkey Point Units 6&7 Project at this time.

Florida Power & Light Company – Extended Power Uprate Projects

The Florida Retail Federation shares the concerns raised by the Citizens of the State of Florida regarding the dramatic cost overruns – approximately \$550 million in one year – experienced by FPL in connection with its Extended Power Uprate Project at its existing Turkey

Point nuclear units. The Commission should accordingly take appropriate action to protect FPL's customers from the consequences of FPL's actions. In this instance, appropriate protection would be to hold FPL to a definite cost estimate for the Turkey Point EPU Project.

STATEMENT OF ISSUES AND POSITIONS

Generic Legal Issue

Issue 1: Does Section 366.93, Florida Statutes, authorize the Commission to disallow recovery of all, or a portion of, the carrying costs prescribed by Section 366.93(2)(b), Florida Statutes? (Staff – in lieu of OPC's proposed issue 2)

Position: *Yes. Although Section 366.93, Florida Statutes, neither authorizes nor prohibits the disallowance of carrying charges per se, the Commission must have the inherent authority to disallow carrying charges associated with unreasonable or imprudently incurred costs.*

Discussion

Section 366.93, Florida Statutes, does not expressly authorize or prohibit the disallowance of carrying charges per se. However, this statute allows the Commission to disallow the recovery of any costs that the Commission determines to be unreasonable or imprudently incurred. This must inherently authorize the Commission to disallow recovery of carrying charges on costs that were unreasonable or imprudently incurred.*

Progress Energy Florida, Inc., Issues

PEF – Legal/Policy

Issue 2: Does the Commission have the authority to disallow recovery of any AFUDC equity on the Crystal River Unit 3 Uprate project in 2012 and 2013 due to the delay caused by the lack of implementation of a final decision to repair or retire Crystal River Unit 3? If yes, should the Commission exercise this authority and what amount should it disallow, if any? (OPC – contested)

Position: *Yes.*

Issue 3: Does the Commission have the authority to defer all determinations of prudence and reasonableness for the Crystal River Unit 3 Uprate project (and, thus, defer

cost recovery in 2013) until a final decision to repair or retire has been implemented? If yes, should the Commission exercise this authority? (OPC – contested)

Position: *Yes. The Commission has the authority to defer its determinations of prudence and reasonableness regarding the CR3 EPU project, and the Commission should defer its determinations until after the repair vs. retire decision is made, in order to give PEF proper incentives to scrutinize EPU costs.*

PEF – Levy Units 1 & 2 Project

Issue 4: Do PEF’s activities since January 2011 related to Levy Units 1 & 2 qualify as “siting, design, licensing, and construction” of a nuclear power plant as contemplated by Section 366.93, F.S.?

Position: *The Settlement Agreement executed by PEF and several Consumer Parties provides that the Consumer Parties do not oppose PEF obtaining the Combined Operating License for the LNP and PEF’s recovery of the costs of doing so.*

Issue 5: Should the Commission approve what PEF has submitted as its 2012 annual detailed analysis of the long-term feasibility of completing the Levy Units 1 & 2 project, as provided for in Rule 25-6.0423, F.A.C.? If not, what action, if any, should the Commission take?

Position: *The Settlement Agreement executed by PEF and several Consumer Parties provides that the Consumer Parties do not oppose PEF obtaining the Combined Operating License for the LNP and PEF’s recovery of the costs of doing so. PEF must still demonstrate the long-term feasibility of the LNP.*

Discussion

The Settlement Agreement executed by PEF and several Consumer Parties, including the FRF, provides that the Consumer Parties do not oppose PEF obtaining the COL for the LNP, nor PEF’s recovering the cost of doing so. This does not relieve PEF from demonstrating the long-term feasibility of the LNP in accordance with Commission rules. The FRF believes that the critical long-term feasibility issue relative to the LNP will, however, come in future proceedings, if and when, PEF proposes to increase actual spending on the construction of the LNP, as opposed to simply obtaining the COL.

Issue 6: What is the current total estimated all-inclusive cost (including AFUDC and sunk costs) of the proposed Levy Units 1 & 2 nuclear project?

Position: *The FRF does not, presently, dispute PEF's assertion that the current total estimated all inclusive cost for the LNP, including AFUDC and sunk costs, as of 2012 is approximately \$24.1 billion. However, given the track record of ever-escalating LNP cost estimates, the FRF doubts the accuracy of this estimate.*

Issue 7: What is the current estimated planned commercial operation date of the planned Levy Units 1 & 2 nuclear facility?

Position: *In view of the pattern of further and further postponements of the LNP's projected operation date, the FRF doubts that the LNP units will come into service in 2024 and 2025 as asserted by PEF. This issue will become critical if and when PEF seeks recovery of actual LNP construction costs.*

Issue 8: Should the Commission find that, for 2011, PEF's project management, contracting, accounting and cost oversight controls were reasonable and prudent for the Levy Units 1 & 2 project? If not, what action, if any, should the Commission take?

Position: *The FRF does not oppose recovery of costs within the parameters of the Settlement Agreement executed by PEF and Consumer Parties in January 2012.*

Issue 9: What system and jurisdictional amounts should the Commission approve as PEF's final 2011 prudently incurred costs and final true-up amounts for the Levy Units 1 & 2 project?

Position: *The amounts to be recovered for the LNP through the Nuclear Cost Recovery Clause in 2013 are specified in the Settlement Agreement executed by PEF and Consumer Parties in January 2012.*

Discussion

See the Stipulation and Settlement Agreement approved by Commission Order No. PSC-12-0104-FOF-EI, issued on March 8, 2012. Paragraph 4 of the Settlement Agreement specifies the NCRC rates to be charged for the Levy Nuclear Project beginning in January 2013, as well as the conceptual basis for computing those amounts and the time period over which recovery is to be made. Ultimately, the Commission will have to determine the actual (as opposed to the

estimated) balance of Levy costs and carrying costs, with any true-up being made in the final year of such recovery.

Issue 10: What system and jurisdictional amounts should the Commission approve as reasonably estimated 2012 costs and estimated true-up amounts for PEF's Levy Units 1 & 2 project?

Position: *The amounts to be recovered for the LNP through the Nuclear Cost Recovery Clause in 2013 are specified in the Settlement Agreement executed by PEF and Consumer Parties in January 2012.*

Discussion

See the Stipulation and Settlement Agreement approved by Commission Order No. PSC-12-0104-FOF-EI, issued on March 8, 2012. Paragraph 4 of the Settlement Agreement specifies the NCRC rates to be charged for the Levy Nuclear Project beginning in January 2013, as well as the conceptual basis for computing those amounts and the time period over which recovery is to be made. Ultimately, the Commission will have to determine the actual (as opposed to the estimated) balance of Levy costs and carrying costs, with any true-up being made in the final year of such recovery.

Issue 11: What system and jurisdictional amounts should the Commission approve as reasonably projected 2013 costs for PEF's Levy Units 1 & 2 project?

Position: *The amounts to be recovered for the LNP through the Nuclear Cost Recovery Clause in 2013 are specified in the Settlement Agreement executed by PEF and Consumer Parties in January 2012.*

Discussion

See the Stipulation and Settlement Agreement approved by Commission Order No. PSC-12-0104-FOF-EI, issued on March 8, 2012. Paragraph 4 of the Settlement Agreement specifies the NCRC rates to be charged for the Levy Nuclear Project beginning in January 2013, as well as the conceptual basis for computing those amounts and the time period over which recovery is to be made. Ultimately, although perhaps not in the 2012 NCRC hearings, the Commission will

have to determine the actual (as opposed to the estimated) balance of Levy costs and carrying costs, with any true-up being made in the final year of such recovery.

PEF – Crystal River Unit 3 Uprate Project

Issue 12: Should the Commission approve what PEF has submitted as its 2012 annual detailed analyses of the long-term feasibility of completing the Crystal River Unit 3 Uprate project, as provided for in Rule 25-6.0423, F.A.C.? If not, what action, if any, should the Commission take?

Position: *No. Until a final decision to repair or retire has been implemented, the Commission should defer approving what PEF submitted as its 2012 annual detailed analyses of the long-term feasibility of completing the CR3 EPU project. Until the repair-retire decision has been made, this issue is not ripe.*

Issue 13: Should the Commission find that, for 2011, PEF's project management, contracting, accounting and cost oversight controls were reasonable and prudent for the Crystal River Unit 3 Uprate project? If not, what action, if any, should the Commission take?

Position: *No. Until a final decision to repair or retire has been implemented, the Commission should defer any decisions regarding whether PEF's project management, contracting, accounting and cost oversight controls for the DR3 EPU project were reasonable and prudent*

Issue 14: Were all of the actual Crystal River Unit 3 Uprate project expenditures prudently incurred or expended in 2011 in the absence of a final decision to repair or retire Crystal River Unit 3 in 2011?

Position: *No. Until a final decision to repair or retire has been implemented, the Commission should defer any determination of the prudence of 2011 expenditures.*

Issue 15: What system and jurisdictional amounts should the Commission approve as PEF's 2011 prudently incurred costs and final true-up amounts for the Crystal River Unit 3 Uprate project?

Position: *No. Until a final decision to repair or retire has been implemented, the Commission should defer approval of PEF's requested 2011 costs and true-up amounts.*

Issue 16: Is it reasonable for PEF to incur or expend all of the estimated and projected Crystal River Unit 3 Uprate project expenditures in 2012 and 2013 in the absence of a final decision to repair or retire CR3?

Position: *No. Until a final decision to repair or retire has been made and implemented, PEF should cease incurring any costs for the CR3 EPU project per se, and the Commission should require any amounts collected to be held subject to refund after a final prudence determination.*

Issue 17: What system and jurisdictional amounts should the Commission approve as reasonably estimated 2012 costs and estimated true-up amounts for PEF's Crystal River Unit 3 Uprate project?

Position: *None. The Commission should defer consideration of allowing recovery of any CR3 Extended Power Uprate costs until the 2013 NCRC hearings, and defer any possible recovery of CR3 EPU costs until at least 2014.*

Issue 18: What system and jurisdictional amounts should the Commission approve as reasonably projected 2013 costs for PEF's Crystal River Unit 3 Uprate project?

Position: *None. The Commission should defer consideration of allowing recovery of any CR3 Extended Power Uprate costs until the 2013 NCRC hearings, and defer any possible recovery of CR3 EPU costs until at least 2014.*

PEF – Final Fall-out Issue

Issue 19: What is the total jurisdictional amount to be included in establishing PEF's 2013 Capacity Cost Recovery Clause factor?

Position: *The total jurisdictional amount to be included in PEF's 2013 Capacity Cost Recovery Clause factor is the amount of LNP costs specified in the January 2012 Settlement Agreement between PEF and Consumer Parties approved by the Commission.*

Discussion

The total jurisdictional amount to be included in PEF's 2013 Capacity Cost Recovery Clause factor is the amount of LNP costs specified in the January 2012 Settlement Agreement between PEF and Consumer Parties approved by the Commission. The Commission should defer consideration of allowing recovery of any CR3 Extended Power Uprate costs until the 2013 NCRC hearings, and defer any possible recovery of CR3 EPU costs until at least 2014.

Florida Power & Light Company Issues

FPL – Turkey Point Units 6 & 7 Project

Issue 20: Do FPL's activities since January 2011 related to Turkey Point Units 6 & 7 qualify as "siting, design, licensing, and construction" of a nuclear power plant as contemplated by Section 366.93, F.S.?

Position: *No position on this issue as stated. The FRF does not oppose FPL's recovery of limited licensing costs for Turkey Point 6&7 at this time.*

Issue 21: Should the Commission approve what FPL has submitted as its 2012 annual detailed analyses of the long-term feasibility of completing the Turkey Point Units 6 & 7 project, as provided for in Rule 25-6.0423, F.A.C.? If not, what action, if any, should the Commission take?

Position: *No position.*

Issue 22: What is the current total estimated all-inclusive cost (including AFUDC and sunk costs) of the proposed Turkey Point Units 6 & 7 nuclear project?

Position: *The FRF does not, presently, dispute FPL's estimate of \$18.7 Billion as the all-inclusive cost of the Turkey Point 6&7 project. However, the FRF doubts the accuracy of this estimate.*

Discussion

In view of the facts that FPL will not commit to this value, as well as the general pattern of ever-increasing nuclear construction costs, the FRF doubts that the cost of the Turkey Point 6&7 project, if it is ever constructed, will be as low as the \$18.7 Billion that FPL represents. Since FPL is presently only incurring relatively minimal licensing costs, this issue is not critical at this time. However, this issue will become critical in future proceedings, if and when, FPL proposes to increase actual spending on the construction of the Turkey Point 6&7 project, as opposed to simply obtaining a license for the project.

Issue 23: What is the current estimated planned commercial operation date of the planned Turkey Point Units 6 & 7 nuclear facility?

Position: *No position as to what the estimated planned commercial operation date for the Turkey Point Units 6&7 nuclear facility may be. However, the FRF has concerns regarding the accuracy of any projected in-service date for this project.*

Issue 24: Should the Commission find that FPL's 2011 project management, contracting, accounting and cost oversight controls were reasonable and prudent for the Turkey Point Units 6 & 7 project?

Position: *No position.*

Issue 25: What system and jurisdictional amounts should the Commission approve as FPL's final 2011 prudently incurred costs and final true-up amounts for the Turkey Point Units 6 & 7 project?

Position: *No position.*

Issue 26: What system and jurisdictional amounts should the Commission approve as reasonably estimated 2012 costs and estimated true-up amounts for FPL's Turkey Point Units 6 & 7 project?

Position: *No position.*

Issue 27: What system and jurisdictional amounts should the Commission approve as reasonably projected 2013 costs for FPL's Turkey Point Units 6 & 7 project?

Position: *No position.*

FPL – St. Lucie Units 1&2 and Turkey Point Units 3&4 Extend Power Uprate Project

Issue 28: Should the Commission approve what FPL has submitted as its 2012 annual detailed analyses of the long-term feasibility of completing FPL's Extended Power Uprate project, as provided for in Rule 25-6.0423, F.A.C.? If not, what action, if any, should the Commission take?

Position: *No. FPL's analyses fail to separate the feasibility of the Turkey Point and St. Lucie EPU projects and accordingly are distorted, and the Commission should reject them.*

Discussion

The cost overruns experienced by FPL for its Turkey Point EPU project, in the last year alone, are approximately the cost of a new 2-on-1 combined cycle power plant. For FPL to assert that such cost overruns should be evaluated in an aggregated manner with the St. Lucie EPU costs is inappropriate and invites the Commission to ignore reality. Surely, the Commission would never consider two separate power plant construction projects together, if one were more or less on budget and the other were grossly over-budget. The Commission should accept the feasibility of the Turkey Point EPU project sponsored by the Citizens' witness Brian Smith.

Issue 28A: Based on the evidence, under current circumstances, should the Commission evaluate the economic feasibility of the Turkey Point and St. Lucie Extended Power Uprate activities separately? (OPC – contested)

Position: *Yes. At a minimum, FPL is obligated to manage the construction of each project separately, consistent with its duty to provide safe, adequate and reliable service at the lowest possible cost.*

Discussion

The Commission has regularly stated the position that a utility, having obtained a determination of need, is still under an affirmative obligation to manage the project in a reasonable and prudent manner. It necessarily follows that, if it were shown to be uneconomic to continue spending on one of the EPU projects, e.g., Turkey Point, then such spending should be suspended or terminated, because, by definition, it would not be reasonable and prudent to continue spending on an uneconomic project. Therefore, the Commission should evaluate the economic feasibility of the Turkey Point and St. Lucie EPU projects/activities separately.

Issue 29: Should the Commission find that FPL's 2011 project management, contracting, accounting and cost oversight controls were reasonable and prudent for FPL's Extended Power Uprate project?

Position: *No. FPL's cost overruns of \$550 million, in one year, are, in practical terms, prima facie evidence of imprudence. Moreover, evidence shows that FPL ignored predictions by its consultants that, had it been heeded, could have reduced the magnitude of these cost overruns.*

Issue 29A: Should the Commission find that FPL managed the extended power uprate activities at Turkey Point in a reasonable and prudent manner? If not, what action should the Commission take? (OPC – contested)

Position: *No. See position on Issue 29.*

Issue 30: What system and jurisdictional amounts should the Commission approve as FPL's final 2011 prudently incurred costs and final true-up amounts for FPL's Extended Power Uprate project?

Position: *The Commission should allow recovery of the reasonable and prudent costs for the EPU projects, but the Commission should mandate that FPL will not be allowed to recover any costs for the Turkey Point EPU project greater than its current, 2012, estimate.*

Issue 31: What system and jurisdictional amounts should the Commission approve as reasonably estimated 2012 costs and estimated true-up amounts for FPL's Extended Power Uprate project?

Position: *See position on Issue 30.*

Issue 32: What system and jurisdictional amounts should the Commission approve as reasonably projected 2013 costs for FPL's Extended Power Uprate project?

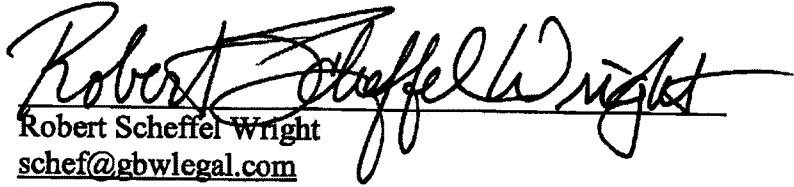
Position: *See position on Issue 30.*

FPL – Final Fall-out Issue

Issue 33: What is the total jurisdictional amount to be included in establishing FPL's 2013 Capacity Cost Recovery Clause factor?

Position: *See positions on Issues 25-27 and Issue 30.*

Respectfully submitted this 1st day of October, 2012.

A handwritten signature in black ink that reads "Robert Scheffel Wright". The signature is written in a cursive style with a horizontal line drawn through the middle of the text.

Robert Scheffel Wright
schef@gbwlegal.com

John T. LaVia, III
jlavia@gbwlegal.com

Gardner, Bist, Wiener, Wadsworth, Bowden, Bush,
Dee, LaVia & Wright, P.A.

1300 Thomaswood Drive
Tallahassee, Florida 32308
Telephone (850) 385-0070
Facsimile (850) 385-5416

Attorneys for the Florida Retail Federation

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing has been filed electronically with the Office of the Commission Clerk and that a copy has been furnished to the following by electronic mail on this 1st day of October, 2012.

James W. Brew/F. Alvin Taylor
Brickfield, Burchette, Ritts & Stone, P.C.
1025 Thomas Jefferson Street, N.W.
Eighth Floor West Tower
Washington, DC 20007

Matthew Bernier
Carlton Fields Law Firm
215 South Monroe St., Suite 500
Tallahassee, FL 32301

Captain Samuel Miller
USAF/AFLOA/JACL/ULFSC
139 Barnes Drive, Suite 1
Tyndall AGB, FL 32403-5319

J. Michael Walls/Blaise N. Gamba
Carlton Fields Law Firm
P.O. Box 3239
Tampa, FL 33601-3239

Vicki Gordon Kaufman/Jon C. Moyle, Jr.
Moyle Law Firm
118 North Gadsden Street
Tallahassee, FL 32301

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

Charles J. Rehwinkel/J.R. Kelly
Joseph A. McGlothlin/Erik L. Sayler
Office of Public Counsel
111 W. Madison Street, Room 812
Tallahassee, FL 32399

John T. Burnett/Dianne M. Triplett
R. Alexander Glenn
Progress Energy Florida
P.O. Box 14042
St. Petersburg, FL 33733

Michael Lawson/Keino Young
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

Bryan S. Anderson/Jessica Cano
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408-0420

Randy B. Miller
White Springs Agricultural Chemicals, Inc.
P.O. Box 300
15843 Southeast 78th Street
White Springs, FL 32096

James S. Whitlock
Gary A. Davis & Associates
61 North Andrews Avenue
P.O. Box 649
Hot Springs, NC 28743


Attorney