In re: Nuclear cost recovery clause.
|DOCKET NO. 090009-EI
FILED: July 27, 2009

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Direct Testimony of Jeffery A. Small, have been served by U.S. Mail this $27^{\text {th }}$ day of July, 2009, to the following:

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## CERTIFICATE OF SERVICE

DOCKET NO. 090009-EI
PAGE 2
White Springs Agricultural Chemicals, Inc.
Randy B. Miller
P. O. Box 300

White Springs, FL 32096



## 

Capital Circle Office Center • 2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850
-M-E-M-O-R-A-N-D-U-M-

DATE: July 27, 2009
TO: Ann Cole, Clerk, Office of Commission Clerk
$\begin{array}{ll}\text { FROM: } & \text { Keino Young, Senior Attomey, Office of the General Counsel } \\ \text { RE: } & \text { Docket No. 090009-EI - Nuclear Cost Recovery Clause. }\end{array}$

Attached for filing in the above-referenced docket are the original and six copies of the Direct Testimony of JEFFERY A. SMALL, on behalf of Commission Staff.

## KY

DOCKET NO. 090009-EI: Nuclear cost recovery clause for Progress Energy Florida, Inc.

WITNESS: Direct Testimony Of Jeffery A. Sma11, Appearing On Behalf Of the Staff of the Florida Public Service Commission

DATE FILED: July 27, 2009

## Q. Please state your name and business address.

A. My name is Jeffery A. Small and my business address is 4950 West Kennedy Blvd, Tampa, Florida, 33609.
Q. By whom are you presently employed and in what capacity?
A. I am employed by the Florida Public Service Commission as a Professional Accountant Specialist in the Division of Regulatory Compliance.
Q. How long have you been employed by the Commission?
A. I have been employed by the Florida Public Service Commission (FPSC) since January 1994.
Q. Briefly review your educational and professional background.
A. I have a Bachelor of Science degree in Accounting from the University of South Florida. I am also a Certified Public Accountant licensed in the State of Florida and I am a member of the American and Florida Institutes of Certified Public Accountants.

## Q. Please describe your current responsibilities.

A. Currently, I am a Professional Accountant Specialist with the responsibilities of planning and directing the most complex investigative audits. Some of my past audits include cross-subsidization issues, anti-competitive behavior, and predatory pricing. I also am responsible for creating audit work programs to meet a specific audit purpose and integrating EDP applications into these programs.
Q. Have you presented expert testimony before this Commission or any other regulatory agency?
A. Yes. I testified in the Southern States Utilities, Inc. rate case, Docket No. 950495-WS, the transfer application of Cypress Lakes Utilities, Inc., Docket No. 971220 -WS, and the Utilities, Inc. of Florida rate case, Docket No. 020071-WS.
Q. Have you provided testimony before the Commission in a prior Nuclear Cost Recovery Clause (NCRC) docket.
A. Yes, I provided testimony in the Progress Energy Florida, Inc., Nuclear Cost Recovery Clause filing, Docket No. 080009-EI.
Q. What was the purpose of your testimony in Docket No. 080009-EI?
A. The purpose of my testimony was to sponsor the staff audit reports of Progress Energy Florida, Inc. (PEF, Utility, or Company) in Docket No. 080009-EI which addressed the Utility's application for nuclear cost recovery in 2007. We issued three audit reports on PEF in that docket. The first audit report was issued May 30, 2008, to address the 2007 power uprate costs for the Crystal River Unit 3 nuclear power plant. The second audit report was issued July 25, 2008, to address the pre-construction costs as of December 31, 2007, for Levy County Units 1 \& 2. The third audit report was issued July 25, 2008, to address the site selection costs as of December 31, 2007, for Levy County Units $1 \& 2$. The three audit reports were included as separate exhibits with my testimony.
Q. Was your testimony entered into the record for Docket No. 080009-EI?
A. Yes, however, the second audit report which was issued July 25, 2008, to address the pre-construction costs as of December 31, 2007, for Levy County Units $1 \& 2$ is being resubmitted in this docket because the issue regarding land costs was deferred and was to be addressed in Docket No. 090009-EI.

## Q. What is the purpose of your testimony today?

A. The purpose of my testimony is to sponsor three staff audit reports of PEF which address the Utility's application for nuclear cost recovery in 2007 and 2008. The first audit report was issued July 25,2008 , and addressed the pre-construction cost as of December 31, 2007, for Levy County Units $1 \& 2$. This audit report is filed with my testimony and is identified as Exhibit JAS-1. The second audit report was issued April 3, 2009, to address the

2008 power uprate costs for the Crystal River Unit 3 nuclear power plant. This audit report is filed with my testimony and is identified as Exhibit JAS-2. The third audit report was issued June 10,2009 , to address the site selection, pre-construction and construction costs as of December 31, 2008, for Levy County Units $1 \& 2$. This audit report is filed with my testimony and is identified as Exhibit JAS-3.

## Q. Were these audits prepared by you or under your direction?

A. Yes, these audits were prepared by me or under my direction.

## Q. Please describe the work you performed in these audits.

A. For the first audit report, to address the prior period pre-construction costs as of December 31, 2007, for Levy County Units $1 \& 2$, we reconciled the Company's filing to the general ledger and verified that the costs incurred were posted to the proper account, as prescribed by Rule $25-6.014$, Florida Administrative Code. We reconciled and recalculated a sample of the monthly revenue requirement accruals displayed on Schedule T-I to the supporting schedules in the Company's 2007 Nuclear Cost Recovery Clause (NCRC) filing. We reconciled and recalculated a sample of the carrying cost accruals displayed on Schedule T-3 to the supporting schedules in the Company's 2007 NCRC filing. We recalculated a sample of the AFUDC balances displayed as "Other Adjustments" in the filing and reconciled the rates applied by the Company to its approved AFUDC rates in Commission Order No. PSC-05-0945-FOF-El, issued September 28, 2005. We reconciled and recalculated a sample of the monthly deferred tax carrying cost accruals displayed on Schedule T-3A to the supporting schedules in the Company's 2007 NCRC filing. We recalculated a sample of the monthly carrying cost balances for deferred tax assets based on the equity and debt components established in Order No. PSC-05-0945-FOF-E1. We reconciled and recalculated a sample of the monthly CPI accruals displayed on Schedule T-3B to the supporting schedules in the Company's 2007 NCRC filing. We recalculated the Company's Consumer Price Index
(CPI) rate and reconciled the component balances to the Company's general ledger. We recalculated a sample of monthly jurisdictional nuclear construction expenditures displayed on Schedule T-6 of the Company's 2007 NCRC filing. We sampled and verified the construction and transmission cost expenditures and traced the invoiced amounts to supporting documentation. We reconciled the jurisdictional factors applied by the Company to the eligible carrying cost to the factors approved in Order No. PSC-06-0972-FOF-EI, issued November 22, 2006, in Docket No. 060007-El.

For the second audit report, to address the uprate cost as of December 31, 2008, for Crystal River Unit 3, we reconciled the Company's filing to the general ledger and verified that the costs incurred were posted to the proper account, as prescribed by Rule $25-6.014$, Florida Administrative Code. We reconciled and recalculated a sample of the monthly revenue requirement accruals displayed on Schedule T-1 to the supporting schedules in the Company's 2008 NCRC filing. We also reconciled and recalculated a sample of the carrying cost accruals displayed on Schedule T-3 to the supporting schedules in the Company's 2008 NCRC filing. We recalculated a sample of the Allowance for Funds Used During Construction (AFUDC) balances displayed as "Other Cost" in the filing and reconciled the rates applied by the Company to its approved AFUDC rates in Commission Order No. PSC-05-0945-FOF-EI, issued September 28, 2005. We reconciled and recalculated a sample of the monthly deferred tax carrying cost accruals displayed on Schedule T-3A to the supporting schedules in the Company's 2008 NCRC filing. We recalculated a sample of the monthly carrying cost balances for deferred tax assets based on the equity and debt components established in Commission Order No. PSC-05-0945-FOF-El. We reconciled and recalculated a sample of the monthly CPI accruals displayed on Schedule T-3B to the supporting schedules in the Company's 2008 NCRC filing. We recalculated the Company's CPI rate and reconciled the component balances to the Company's general ledger. We recalculated a sample of the
monthly jurisdictional O\&M costs accruals displayed on Schedule T-4 of the Company's 2008 filing. We sampled and verified the administrative and general cost accruals and traced the invoiced amounts to supporting documentation. We recalculated a sample of monthly jurisdictional nuclear construction accruals displayed on Schedule T-6 of the Company's 2008 NCRC filing. We sampled and verified the project management and power block engineering accruals and traced the invoiced amounts to supporting documentation. We sampled Company salary expense accruals and the respective overhead the Company applied. We recalculated and verified the joint owner billings that reduced the Company's eligible carrying cost for the CR3 Uprate project. We reconciled the jurisdictional factors applied by the Company to the eligible carrying cost to the factors approved in Commission Order No. PSC-06-0972-FOF-El, issued November 22, 2006. We reconciled and recalculated a sample of the monthly true-ups displayed on Schedule T-9 to the supporting schedules in the Company's 2008 NCRC filing.

For the third audit report, to address the site selection, pre-construction and construction costs as of December 31, 2008, for Levy County Units $1 \& 2$, we reconciled the Company's filing to the general ledger and verified that the costs incurred were posted to the proper account, as prescribed by Rule $25-6.014$, Florida Administrative Code. We reconciled and recalculated a sample of the monthly revenue requirement accruals displayed on Schedule T-I to the supporting schedules in the Company's 2008 NCRC filing. We reconciled the monthly site selection and preconstruction carrying cost balances displayed on Schedule T-2 to the supporting schedules in the Company's 2008 NCRC filing. We recalculated the schedule and reconciled the AFUDC rates applied by the Company to the rates approved in Order No. PSC-05-0945-FOF-EI, issued September 28, 2005. We reconciled the monthly construction carrying cost balances displayed on Schedule T-3 to the supporting schedules in the Company's 2008 NCRC filing. We recalculated the schedule and reconciled the AFUDC
rates applied by the Company to the rates approved in Order No. PSC-05-0945-FOF-EI. We recalculated a sample of the monthly recoverable O\&M expenditures displayed on Schedule T-4 of the Company's 2008 NCRC filing. We sampled and verified the O\&M cost accruals and traced the invoiced amounts to supporting documentation. We verified the Company salary expense accruals and recalculated the respective overhead burdens the Company applied. We reconciled the jurisdictional factors applied by the Company to the eligible carrying cost to the factors approved in Order No. PSC-06-0972-FOF-EI, issued November 22, 2006, in Docket No. 060007-EI. We recalculated a sample of monthly jurisdictional nuclear construction accruals displayed on Schedule T-6 of the Company's 2008 NCRC filing. We sampled and verified the generation and transmission cost accruals and traced the invoiced amounts to supporting documentation. We verified a sample of Company salary expense accruals and recalculated a sample of the respective overhead burdens that the Company applied. We reconciled the jurisdictional factors applied by the Company to the eligible carrying cost to the factors approved in Order No. PSC-06-0972-FOF-EI, issued November 22, 2006, in Docket No. 060007-EI.
Q. Please review the audit findings in the audit report, JAS-1, which addresses the prior period pre-construction costs as of December 31, 2007 for Levy County Units $1 \boldsymbol{\&}$ 2.

## A. Audit Finding No. 1

Audit Finding No. 1 concerns the utility's calculation and allocation of the cost of the land purchased for generation, transmission and future use purposes. I provide two alternative methods of allocating the costs between generation, allocation and future use purposes for the Commission to consider. In addition, I disclose the existence of a contingent deferred purchase price related to the purchase of one of the land parcels. This is discussed in greater detail in Exhibit JAS-1, Finding No. 1.
Q. Please review the audit findings in the audit report, JAS-2, which addresses the 2008 power uprate costs for the Crystal River Unit 3 nuclear power plant.
A. Audit Finding No. 1

Audit Finding No. 1 provides information concerning the Company's correction of a calculation error in its 2007 filing. This is discussed in greater detail in Exhibit JAS-2, Finding No. 1.

## A. Audit Finding No. 2

Audit Finding No. 2 provides information concerning the underbilling of the Company's joint owners during 2007 and 2008. This underbilling of the uprate costs was corrected in March 2009. This is discussed in greater detail in Exhibit JAS-2, Finding No. 2.

## A. Audit Finding No. 3

Audit Finding No. 3 provides information concerning potential royalty payments from contractors that could reduce the overall cost of the CR3 Uprate in future periods. This is discussed in greater detail in Exhibit JAS-2, Finding No. 3.

## A. Audit Finding No. 4

Audit Finding No. 4 provides information concerning the Company's adjustment to transfer the cost associated with the Measurement Uncertainty Recapture (MUR) phase of the CR3 Uprate from Construction Work in Progress to plant-in-service in 2008. This is discussed in greater detail in Exhibit JAS-2, Finding No. 4.
Q. Please review the audit findings in the audit report, JAS-3, which addresses the site selection, pre-construction and construction costs as of December 31, 2008 for Levy County Units 1 \& 2.
A. There are no findings in the third audit report, JAS-3.
Q. Does this conclude your testimony?
A. Yes, it does.

FLORIDA PUBLIC SERVICE COMMISSION
DIVISION OF REGULATORY COMPLIANCE \& CONSUMER ASSISTANCE BUREAU OF AUDITING

Tampa District Office

## PROGRESS ENERGY FLORIDA, INC.

## NUCLEAR COST RECOVERY CLAUSE

LEVY COUNTY UNITS 1 \& 2
PRE-CONSTRUCTION COST
AS OF DECEMBER 31, 2007
DOCKET NO. 080009-EI
AUDIT CONTROL NO. 08-087-2-1


Jeffery A. Small, Audit Manager


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[^0]
# Docket No. 090009-EI <br> Exhibit JAS-1 (Page 3 of 14) <br> LEvy Units 1 Ś ${ }^{2}$ Pree-Construction Cost AUDITOR'S REPORT 

JULY 17, 2008

## TO: FLORIDA PUBLIC SERVICE COMMISSION AND OTHER INTERESTED PARTIES

We have performed the procedures described later in this report to meet the agreed upon objectives set forth by the Division of Economic Regulation in its audit service request dated March 27, 2008. We have applied these procedures to the attached schedules prepared by Progress Energy Florida, Inc. in support of its 2007 filings for Nuclear Cost Recovery Clause relief in Docket No. 080009-EI.

This audit was performed following general standards and field work standards found in the AICPA Statements on Standards for Attestation Engagements. This report is based on agreed upon procedures which are only for internal Commission use.

## OBJECTIVES AND PROCEDURES

Levy Units $1 \& 2$ Pre-Construction Cost

## GENERAL

To verify that the company's 2007 Nuclear Cost Recovery Clause (NCRC) filings in Docket No. 080009-El are consistent and in compliance with Section 366.93, F.S. and Chapter 25-6.0423, F.A.C.

## SPECIFIC

1. Objective: Verify that the company's filing is properly recorded on its books and records according to the Code of Federal Regulations (CFR) Uniform System of Accounts. (USOA)
Procedures: We reconciled the company's filing to the general ledger and verified that the costs incurred were posted to the proper USoA account.
2. Objective: Verify that Schedule T-1 is accurately calculated and that it includes the correct balances from the supporting schedules of the company's 2007 NCRC filing. Procedures: We reconciled and recalculated a sample of the monthly revenue requirement accruals displayed on Schedule T-1 to the supporting schedules in the company's 2007 NCRC filing.
3. Objective: Verify that the carrying cost amounts displayed on Schedule T-3, which rolls forward to Schedule T-1, are accurately calculated and that they include the correct balances from the supporting schedules of the company's 2007 NCRC filing. Procedures: We reconciled and recalculated a sample of the carrying cost accruals displayed on Schedule T-3 to the supporting schedules in the company's 2007 NCRC filing. We recalculated a sample of the Allowance for Funds Used During Construction (AFUDC) balances displayed as Other Adjustments in the filing and reconciled the rates applied by the company to its approved AFUDC rates in Order No. PSC-05-0945-FOF-EI, issued September 28, 2005.
4. Objective: Verify that the Deferred Tax Return Requirement amount displayed on Schedule T-3A, which rolls forward to Schedule T-1, is accurately calculated and that it includes the correct balances from the supporting schedules of the company's 2007 NCRC filing.
Procedures: We reconciled and recalculated a sample of the monthly deferred tax carrying cost accruals displayed on Schedule T-3A to the supporting schedules in the company's 2007 NCRC filing. We recalculated a sample of the monthly carrying cost balances for deferred tax assets based on the equity and debt components established in Order No. PSC-05-0945-FOF-EI.
5. Objective: Verify that the Construction Period Interest (CPI) amount displayed on Schedule T-3B, which rolls forward to Schedule T-3A, is accurately calculated and that it includes the correct balances from the supporting schedules of the company's 2007 NCRC filing.

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Procedures: We reconciled and recalculated vy Snitnile of thene-nonstryctipn Coctuals displayed on Schedule T-3B to the supporting schedules in the company's 2007 NCRC filing. We recalculated the company's CPI rate and reconciled the component balances to the company's general ledger.
6. Objective: Verify that the jurisdictional nuclear construction amounts, displayed on Schedule T-6 of the company's 2007 filing, which rolls forward to Schedule T-3, are accurately calculated and are supported by original source documentation.
Procedures: We recalculated a sample of monthly jurisdictional nuclear construction expenditures displayed on Schedule T-6 of the company's 2007 NCRC filing. We sampled and verified the construction and transmission cost expenditures and traced the invoiced amounts to supporting documentation. We reconciled the jurisdictional factors applied by the company to the eligible carrying cost to the factors approved in Order No. PSC-06-0972-FOF-EI, issued November 22, 2006, in Docket No. 060007-El. Audit Finding No. 1 discusses our analysis and discloses additional information concerning the company's balances for generation, transmission and future use land.

## AUDIT FINDING NO. 1

## SUBJECT: LAND AND LAND RIGHTS

AUDIT ANALYSIS: The company's filing and general ledger include the following balances for land and land rights for the Levy Units 1 and 2 nuclear plant projects.

| Acct No. | Project No. | Description | Land Cost |  | Other Cost |  |
| :--- | :--- | :--- | ---: | ---: | ---: | ---: |
| 1071000 | 20059051 |  | Tand - Generation Land | $\$ 52,008,983$ |  | $\$ 521,276$ |

The "Other Cost" balances above include company cost outside of the closing process related to the land purchased.
The company's calculations of the above future use and transmission use land balances are displayed below.

| Land Purchases | Amount | Acres | Price/Acre |
| :---: | :---: | :---: | :---: |
| Rayonier land price | \$46,579,500 | 3,105.00 | \$15,000 |
| Closing cost | 1,617,172 |  |  |
| Totals | \$48,196,672 |  |  |
| Lybass land price | \$39,084,959 | 2,159.00 | \$18,103 |
| Closing cost | 1,325,947 |  |  |
| Totals | \$40,410,906 |  |  |
| Lybass purchase | Land Use | Total Percent | Used/Useful Percent |
| Generation | 94.08 | 4.36\% | 29.92\% |
| Transmission | 220.39 | 10.21\% | 70.08\% |
| Future Use | 1,844.53 | 85.43\% |  |
| Totals | 2,159.00 | 100.00\% | 100.00\% |
| Future Use | Amount |  |  |
| Fair market value | \$15,000 |  |  |
| Future use acreage | 1,844.53 |  |  |
| Total Future Use Value | \$27,667,950 |  |  |
| Transmission Use | Amount |  |  |
| Total Lybass Cost | \$40,410,906 |  |  |
| Future Use Value | 27,667,950 |  |  |
| Remaining Value | \$12,742,956 |  |  |
| Transmission Percent | 70.08\% |  |  |
| Total Transmission Value | \$8,930,645 |  |  |

(Small differences are attributed to rounding errors)
The company cited 18 CFR 101, Electric Plant Instruction 7G as justification and support for its valuation and allocation methodology.

When the purchase of land for electric operations requires the purchase of more land than needed for such purposes, the charge to the specific land account shall be based

Docket No. 090009-EI
Exhibit JAS (Page 7 of 14)
Levy Units $1 \& 2$ Pre-Construction Cost upon the cost of the land purchased, less the fair market value of that portion of the land which is not to be used in electric operations.

The company asserts that the purchase price it paid for the Lybass property was above its fair market value (FMV) because the sale was influenced by the previous purchase of the Rayonier property. The company therefore used the $\$ 15,000$ per acre price of the Rayonier purchase as the FMV multiplier to determine the land held for future use balance of $\$ 27,667,950$. The remaining Lybass purchase price of $\$ 12,742,956$ was allocated between the generation and transmission land accounts based on percentage of estimated use.

Other applicable CFR citations include 18 CFR 101, Definitions 9 and 23.
Cost means the amount of money actually paid for property or services.
Original cost, as applied to electric plant, means the cost of such property to the person first devoting it to public senvice.

A first alternative valuation method would use $\$ 18,103$, the actual FMV per acre purchase price of the Lybass property, to determine the future use land balance. The Lybass property contains the entire land area that is designated by the company for future use and the valuation method is supported by all three of the CFR citations referenced above. The following reflects our calculated generation, transmission and future use land balances.

| Description | Land Cost | Other Cost | Total Land |
| :---: | :---: | :---: | :---: |
| Land-Generation | \$50,296,511 | \$521,276 | \$50,817,787 |
| Land - Transmission | 4,919,043 | 10,780 | 4,929,823 |
| Land - Held for Future Use | 33,392,024 | 0 | 33,392,024 |
| Total Land | \$88,607,578 | \$532,056 | \$89,139,634 |
| Future Use | Amount |  |  |
| Fair market value | \$18,103 |  |  |
| Future use acreage | 1,844.53 |  |  |
| Total Future Use Value | \$33,392,024 |  |  |
| Transmission Use | Amount |  |  |
| Total Lybass Cost | \$40,410,906 |  |  |
| Future Use Value | 33,392,024 |  |  |
| Remaining Value | \$7,018,882 |  |  |
| Transmission Percent | 70.08\% |  |  |
| Total Transmission Value | \$4,919,043 |  |  |

(Small differences are attributed to rounding errors)

A second alternative valuation rnethod would use $\$ 16,526$, the average FMV per acre purchase price of both the Rayonier and Lybass properties, to determine the future use land balance. This method would treat the entire land purchase as one transaction, which is the ultimate use for the two parcels of land purchased. The following reflects our calculated generation, transmission and future use land balances.

Docket No. 090009-EI
Exhibit JAS (Page 8 of 14)
Levy Units 1 \& 2 Pre-Construction Cost

| Description | Land Cost | Other Cost | Total Land |
| :---: | :---: | :---: | :---: |
| Land-Generation | \$54,378,639 | \$521,276 | \$54,899,915 |
| Land - Transmission | 3,746,236 | 10,780 | 3,757,016 |
| Land - Held for Future Use | 30,482,703 | $\underline{0}$ | 30,482,703 |
| Total Land | \$88,607,578 | \$532,056 | \$89,139,634 |
| Land Purchases | Amount | Acres | Price/Acre |
| Rayonier land cost | \$46,579,500 | 3,105,00 | \$15,000 |
| Closing cosi | 1,617,172 |  |  |
| Totals | \$48,196,672 |  |  |
| Lybass land cost | \$39,084,959 | 2,159.00 | \$18,103 |
| Closing cost | 1,325,947 |  |  |
| Totals | \$40,410,906 |  |  |
| Combined land cost | \$86,990,406 | 5,264.00 | \$16,526 |
| Closing cost | 2,943,119 |  |  |
| Totals | \$89,933,525 |  |  |
|  |  | Total | Used/Useful |
| Lybass Site | Land Use | Percent | Percent |
| Generation | 94.08 | 4.36\% | 29.92\% |
| Transmission | 220.39 | 10.21\% | 70.08\% |
| Future Use | 1,844.53 | 85.43\% |  |
| Totals | 2,159.00 | 100.00\% | 100.00\% |


| Future Use | Amount |
| :--- | ---: |
| Fair market value | $\$ 15,000$ |
| Future use acreage | $1,844,53$ |
| Total Future Use Value | $\$ 27,667,950$ |


| Transmission Use | Amount |
| :---: | :---: |
| Total Lybass Cost | $\$ 40,410,906$ |
| Future Use Value | $\underline{27,667,950}$ |
| Remaining Value | $\$ 12,742,956$ |
| Transmission Percent | $\underline{70,08 \%}$ |
| Total Transmission Value | $\$ 8,930,645$ |

(Small differences are attributed to rounding errors)

## Additional information

During our review of supporting documentation for the land purchases it was discovered that the land balances reflected in the filing are overstated by $\$ 127,073$ as described below.

1. The company, in response to Document Request No. LV-10-07-PC, identified an invoice totaling $\$ 20,612$ for a survey that was paid twice. The company stated that it would correct the duplicate billing when it receives reimbursement from the vendor.
2. The company, in response to Document Request No. LV-11-07-PC, identified the "Other Cost" balance of $\$ 10,780$ included in the schedules above as a PEF Administrative Overhead allocation that should not have been charged to the land projects. The company
provided evidence that it removed and reclassified the amount in June 2008.
3. The company, in response to Document Request No. LV-12-07-PC, identified a $\$ 95,681$ accrual that is included in the land balance that should have been reversed in 2007. The company provided evidence that it removed the accrual in June 2008.
None of the three land valuation methods and resulting balances described earlier in this finding includes the additional information discussed above.

The sales contract to purchase the Rayonier property ${ }^{2}$ and the direct testimony of Daniel Roderick ${ }^{3}$ indicate that the contract terms of the Rayonier property sale included a deferred purchase price of The contingent liability becomes due when PEF has received the Combined Construction and Operation License issued by the U.S. Nuclear Regulatory Commission. The company has not included any accounting entries in the current filing or its general ledger that records the deferred purchase contingent liability.

## EFFECT ON THE FILING:

| Action | Effect | Amount |
| :---: | :---: | :---: |
| Accept company land valuation | None | \$0 |
| Accept first alternative valuation | Reduce generation land balance | (\$1,712,472) |
|  | Reduce transmission land balance | $(\$ 4,011,602)$ |
|  | Increase future use land balance | \$5,724,074 |
|  | Net | \$0 |
| Accept second alternative valuation | Increase generation land balance | \$2,369,656 |
|  | Reduce transmission land balance | (\$5,184,409) |
|  | Increase future use land balance | \$2,814,753 |
|  | Net | \$0 |
| Accept additional information finding | Reduce generation land balance | (\$20,612) |
|  | Reduce generation land balance | $(\$ 95,681)$ |
|  | Reduce transmission land balance | (\$10,780) |
|  |  | $(\$ 127,073)$ |

EFFECT ON THE GENERAL LEDGER: An alternative valuation adjustment would only apply to the balances of the individual projects within Acct. No. 1071000 with a net effect of $\$ 0$ on the account. The additional information adjustments have already been made or will be made by the company in 2008.

We defer the appropriate treatment of the deferred purchase contingent liability to the analyst in this proceeding.

[^1]
## EXHIBIT 1

Levy County Nuctear Filing
Pre-Construction Conts and Carrying Costs on Constructlon Cost Balance [Section (5)(c)1.a.]
Schectule T-1 Trute-up Filing: Rotall Revenue Requirements Summay $\qquad$
FLORIDA PUBLIC SERVICE COMMISSION
EXPLAMATION: Prowide the calcuiation of the actual true-up of
total retail reverute requirernents based on ackual expentwres for the current year and the previousty filed expendituras

For the Year Ended 12/3t/2007 COMPANY: for such current year.
Progre
DOCKET NO.:



3. Recoverable O\&M Reverue Requirements (Schedule T-4, line 24)
4. Deferred Tax Lability Carrying Cosi (Schedule T-3A, ine 8) P (20) (285) (504) (004) (1,841)
5. Other Adjustments
6. Totai Period Revenua Requirements (Lines 1 though 5)

|  | 284.596 | 400.773 | 482.739 | 513.835 | 1711.443 |
| :--- | :--- | :--- | :--- | :--- | :--- | :--- |

7. Total Return Requirements from most recenl Projections
8. Difference (Line 6-Line 7)


## EXHIBIT 2

Levy County Nuclear Filing


## EXHIBIT 3



## EXHIBIT 4



## EXHIBIT 5


Levy Units 1 \& 2 Pre-Construction Cost

FLORIDA PUBLIC SERVICE COMMISSION DIVISION OF REGULATORY COMPLIANCE BUREAU OF AUDITING

Tampa District Office

PROGRESS ENERGY FLORIDA, INC.
NUCLEAR COST RECOVERY CLAUSE
CRYSTAL RIVER UNIT THREE - UPRATE
AS OF DECEMBER 31, 2008
DOCKET NO. 090009-EI
AUDIT CONTROL NO. 08-248-2-3

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# Docket No. 090009-EI <br> Exhibit JAS-2 (Page 3 of 26) <br> DIVISION OF REGULATORYCOIVIVELHANCE Three - Uprate AUDITOR'S REPORT 

APRIL 23, 2009

## TO: FLORIDA PUBLIC SERVICE COMMISSION AND OTHER INTERESTED PARTIES

We have performed the procedures described later in this report to meet the agreed upon objectives set forth by the Division of Economic Regulation in its audit service request dated January 12, 2009. We have applied these procedures to the attached schedules prepared by Progress Energy Florida, Inc. in support of its 2008 filing for Nuclear Cost Recovery Clause relief in Docket No. 090009-EI.

This audit was performed following general standards and field work standards found in the AICPA Statements on Standards for Attestation Engagements. This report is based on agreed upon procedures and the report is intended only for internal Commission use.

Docket No. 090009-EI
Exhibit JAS-2 (Page 4 of 26)
Crystal River Unit Three - Uprate

## OBJECTIVES AND PROCEDURES

## GENERAL

To verify that the cornpany's 2008 Nuclear Cost Recovery Clause (NCRC) filings in Docket No. 090009-EI are consistent and in compliance with Section 366.93, F.S. and Chapter 25-6.0423, F.A.C.

## SPECIFIC

1. Obiective: Verify that the company's filing is properly recorded on its books and records according to the Code of Federal Regulations (CFR) Uniform System of Accounts. (USoA)
Procedures: We reconciled the company's filing to the general ledger and verified that the costs incurred were posted to the proper account.
2. Obiective: Verify that Schedule T-1 is accurately calculated and that it includes the correct balances from the supporting schedules of the company's 2008 NCRC filing. Procedures: We reconciled and recalculated a sample of the monthly revenue requirement accruals displayed on Schedule T-1 to the supporting schedules in the company's 2008 NCRC filing.
3. Obiective: Verify that the carrying cost amounts displayed on Schedule T-3, which rolls forward to Schedule T-1, are accurately calculated and that they include the correct balances from the supporting schedules of the company's 2008 NCRC filing. Procedures: We reconciled and recalculated a sample of the carrying cost accruals displayed on Schedule T-3 to the supporting schedules in the company's 2008 NCRC filing. We recalculated a sample of the Allowance for Funds Used During Construction (AFUDC) balances displayed as Other Cost in the filing and reconciled the rates applied by the company to the approved AFUDC rates in Order No. PSC-$05-0945-F O F-E I$, issued September 28, 2005. Audit Finding No. 3 provides information concerning the company's adjustment to remove the cost associated with the Measurement Uncertainty Recapture (MUR) phase of the CR3 Uprate that was transferred to plant-in-service in 2008.
4. Obiective: Verify that the Deferred Tax Return Requirement amount displayed on Schedule T-3A, which rolls forward to Schedule T-1, is accurately calculated and that it includes the correct balances from the supporting schedules of the company's 2008 NCRC filing.
Procedures: We reconciled and recalculated a sample of the monthly deferred tax carrying cost accruals displayed on Schedule T-3A to the supporting schedules in the company's 2008 NCRC filing. We recalculated a sample of the monthly carrying cost balances for deferred tax assets based on the equity and debt components established in Order No. PSC-05-0945-FOF-EI.
5. Obiective: Verify that the Construction Period Interest (CPI) amount displayed on
 that it includes the correct balances from the supporting schedules of the company's 2008 NCRC filing.
Procedures: We reconciled and recalculated a sample of the monthly CPI accruals displayed on Schedule T-3B to the supporting schedules in the company's 2008 NCRC filing. We recalculated the company's CPI rate and reconciled the component balances to the company's general ledger. Audit Finding No. 1 provides information concerning the company's deferred tax carrying cost calculation reflected on Schedule T-3B of the filing.
6. Obiective: Verify that the Recoverable Operation and Maintenance Expense Costs (O\&M) displayed on Schedule T-4, which rolls forward to Schedule T-1, are accurately calculated and are supported by original source documentation.
Procedures: We recalculated a sample of the monthly jurisdictional O\&M costs accruals displayed on Schedule T-4 of the company's 2008 filing. We sampled and verified the administrative and general cost accruals and traced the invoiced amounts to supporting documentation.
7. Objective: Verify that the jurisdictional nuclear construction amounts, displayed on Schedule T-6 of the company's 2008 filing, which rolls forward to Schedule T-3, are accurately calculated and are supported by original source documentation.
Procedures: We recalculated a sample of monthly jurisdictional nuclear construction accruals displayed on Schedule T-6 of the company's 2008 NCRC filing. We sampled and verified the project management and power block engineering accruals and traced the invoiced amounts to supporting documentation. We sampled company salary expense accruals and the respective overhead burdens the company applied. We recalculated and verified the joint owner billings that reduced the company's eligible carrying cost for the CR3 Uprate project. We reconciled the jurisdictional factors applied by the company to the eligible carrying cost to the factors approved in Order No. PSC-06-0972-FOF-EI, issued November 22, 2006. Audit Finding No. 2 provides information concerning the company's joint owner billings reflected on Schedule T-6 of the filing. Audit Finding No. 3 provides information concerning potential royalty payments from contractors that could reduce the overall cost of the CR3 Uprate in future periods.
8. Obiective: Verify that Schedule T-9 is accurately calculated and that it includes the correct balances from the supporting schedules of the company's 2008 NCRC filing. Procedures: We reconciled and recalculated a sample of the monthly true-ups displayed on Schedule T-9 to the supporting schedules in the company's 2008 NCRC filing.

## AUDIT FINDING NO. 1

## SUBJECT: DEFERRED TAX CARRYING COST

AUDIT ANALYSIS: In its filing, Schedule T-3B, the company included the following balances.

| Beginning <br> $@ 01 / 01 / 2008$ | January <br> Additions | Ending Baiance <br> @01/31/08 | Average |
| :---: | :---: | :---: | :---: |
| $\$ 35,719,834$ | $\$ 2,158,001$ | $\$ 37,877,835$ | $\$ 36,798,835$ |

The average monthly balance on this schedule is used to calculate a monthly Construction Period Interest (CPI) accrual which is carried forward to Schedule T-3A and included in the calculation of the Deferred Tax Carrying Cost on the accrued construction cost balance.

Our audit procedures included reconciling the beginning balances used in the current company filing to the ending balances displayed in the prior company filing in Docket No. 080009-El. We found that the December 2007 ending balance for accrued construction cost was $\$ 32,096,703$ on Schedule T-3B, which does not reconcile with the beginning balance displayed in the company's calculation above. ${ }^{2}$

The company provided the following response for the difference that we found.
The calculation on T-3B Line 5 was incorrect in the 2006 and 2007 True-Up Filings because CPI was being calculated on a cash accounting basis using T-3, Line 1. CPI is actually calculated on an accrual accounting basis so the Total Jurisdictional Generation Cost (less non-cash accruals) on T-6 should be used on T-3B. The corrected 2006 and 2007 schedules are attached and the January 1, 2008 beginning balance reflected these corrections in the Estimated/Actual filing in Docket 080009, Exhibit LC-2.

We verified that the Actual/Estimated schedules for year 2008 provided by the company in its response contained the corrected December 2007 ending balance of $\$ 35,719,834$. $^{3}$

We evaluated the company's adjustment and its affect on the 2008 Total Revenue Requirement of $\$ 7,555,938$ which is displayed on Schedule T-1. Using the company's corrected calculation in the current filing ${ }^{4}$, we removed the company's beginning balance of $\$ 35,719,834$ for January 2008 which is displayed on Schedule T-3B and replaced it with the actual beginning balance of $\$ 32,096,703$ from the prior years filing.

[^3]Docket No. 090009-EI
Exhibit JAS-2 (Page 7 of 26)
We calculated a revised Total Revenue Requirement of $\$ 7,550,893$ Whatich would decrease the current period Total Revenue Requirement by $\$ 5,045$. ( $\$ 7,555,938$ $\$ 7,550,893$ )

Additionally, we estimate that, had the company revised and corrected the two prior year filings for 2006 and 2007 in the current 2008 filing, the current period Total Revenue Requirement would be $\$ 7,564,213$, which is $\$ 8,275$ above the current requested revenue requirement of $\$ 7,555,938$. $(\$ 7,564,213-\$ 7,555,938)$

Our calculations of the differences discussed above are displayed on the following page.

EFFECT ON THE FILING: None, informational only.


Docket No. 090009-EI
Exhibit JAS-2 (Page 9 of 26)
Crystal River Unit Three - Uprate

## AUDIT FINDING NO. 2

## SUBJECT: JOINT OWNER BILLINGS

AUDIT ANALYSIS: The Company's 2008 filing, Schedule T-6, included $\$ 5,194,525$ for joint owner billings by Progress Energy Florida, Inc. (PEF) for the Crystal River Unit 3 (CR3) Uprate project costs.

We provided information to Corrimission staff on an error we found in the company's calculation of joint owner billings in its 2007 filing in our report issued May 27, 2008. ${ }^{5}$ The company explained the cause for the error and indicated that it would correct and true-up the error we found and all subsequent errors discovered in the 2008 period in its 2008 filing.

Our audit procedures included an analysis and recalculation of the joint owner billing cost displayed in the company's filing. We also requested verification and support for the error correction that is discussed above.

We have determined that the company did not correct the error in its power plant billing system until September 2008. The initial $\$ 32,645$ unrecovered joint owner billing error that we discovered in December 2007 has increased to $\$ 191,974$ as of September 2008 when the error in the company's power plant billing system was finally corrected. See the attached schedule for details and our calculations.

The company did not bill the joint owners for the unrecovered cost determined above until March 15, 2009. Therefore, the net generation costs $\$ 46,823,983$ reflected on Schedule T-6 of the filing in 2008 is overstated by $\$ 191,974$ which represents the amount owed by the company's joint owners as of December 31, 2008.

We estimate that the effect of the joint owner billing error on the company's filing is as follows.

1. The total jurisdictional construction cost carried forward to Schedule T-3 of the filing is overstated by $\$ 135,528$. $\left(\$ 191,974 \times .70597\right.$ jurisdictional factor) ${ }^{6}$
2. The total return requirement calculated on Schedule T-3 and carried forward to Schedule T-1 is overstated by $\$ 1,426$. [ $(\$ 135,528 \times 0.8895 \%$ gross equity rate $)+(\$ 135,528 \times$ $0.1626 \%$ debt rate)]

EFFECT ON THE FILING: None, informational only.

[^4]| Schedule T-6 | Jan-08 | Feb-08 | Mar-08 | Apr-08 | May-08 | Jun-08 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Construction Additions | \$3,095,762 | \$3,342,526 | \$2,543,921 | \$3,308,930 | \$3,583,164 | \$9,371,103 |
| Joint-Owner Billing calculated at 8.2194\% | \$254,453 | \$274,736 | \$209,095 | \$271,974 | \$294,515 | \$770,248 |
| Joint Owner Billing per Sch. T-6 | \$294,728 | \$262,087 | \$199,912 | \$264,720 | \$272,504 | \$691,641 |
| Company corrections | (44,710) | $\underline{0}$ | $\underline{0}$ | $\underline{0}$ | $\underline{0}$ | $\underline{0}$ |
| Adjusted Joint Owner Billing | \$250,018 | \$262,087 | \$199,912 | \$264,720 | \$272,504 | \$691,641 |
| Difference | \$4,435 | \$12,649 | \$9,183 | \$7,254 | \$22,011 | \$78,607 |
| Schedule T-6 | Jul-08 | Aug-08 | Sep-08 | Oct-08 | Nov-08 | Dec-08 |
| Construction Additions | \$4,700,414 | \$6,342,159 | \$1,453,962 | \$4,960,645 | \$10,108,879 | \$12,325,839 |
| Joint-Owner Billing calculated at 8.2194\% | \$386,346 | \$521,287 | \$119,507 | \$407,735 | \$830,889 | \$1,013,110 |
| Joint Owner Billing per Sch. T-6 | \$376,823 | \$505,619 | \$174,077 | \$353,165 | \$786,168 | \$1,013,082 |
| Company corrections | $\underline{0}$ | $\underline{0}$ | $\underline{0}$ | $\underline{0}$ | 44,710 | $\underline{0}$ |
| Adjusted Joint Owner Billing | \$376,823 | \$505,619 | \$174,077 | \$353,165 | \$830,878 | \$1,013,082 |
| Difference | \$9,523 | \$15,668 | $(\$ 54,570)$ | \$54,570 | \$11 | \$28 |
| Sum of January to December 2008 difference |  | \$159,370 |  |  |  |  |
| Remove September - December difference |  | 39 | (not material) |  |  |  |
| Sum of January to August 2008 error |  | \$159,330 |  |  |  |  |
| Add December 2007 error |  | 32,645 |  |  |  |  |
| Total Joint Owner billing error |  | \$191,975 |  |  |  |  |

- Docket No. 090009-EI

Exhibit JAS-2 (Page 11 of 26) REDACTED
Crystal River Unit Three - Uprate

## AUDIT FINDING NO. 3

## SUB.JECT:



AUDIT ANALYSIS: The Company has executed two contracts with Areva NP, Inc. for the Crystal River Unit 3 (CR3) extended power uprate (EPU) project. The two contracts include the following language concerning

1. Contract No. 101659, Work Authorization No. 84, Amendment No. 3, Change Order No. 7. Effective date of December 8, 2008.

2. Contract No. 101659, Work Authorization No. 93. Effective date of October 18, 2007.



The first Areva contract above has a firm fixed price of for the work provided by the contractor for the CR3 EPU, excluding subsequent amendments or change orders if applicable.

The second Areva contract above has a firm fixed price of , ,000 for the work provided by the contractor for the CR3 EPU, excluding subsequent work authorizations, amendments or change orders when applicable.

The company stated that the two Areva contracts are the only EPU contracts that contain and that it has not received any to date under the terms of the contracts.

EFFECT ON THE FILING: None, informational only.

## AUDIT FINDING NO. 4

## SUBJECT: CAPITAL ASSET TRANSFER TO PLANT IN SERVICE

AUDIT ANALYSIS: The Compariy's 2008 filing, Schedule T-3, includes a reduction of $\$ 7,872,244$ in jurisdictional costs associated with the Measurement Uncertainty Recapture (MUR) phase of the CR3 Uprate project that was placed in service in January 2008.

On September 19, 2008, PEF filed a petition to increase its base rates to recover $\$ 8,030,267$ of jurisdictional cost associated with the MUR that was placed in service in Jarıuary 2008. ${ }^{7}$ The company's petition was approved in Order No. PSC-08-0779-TRF-EI, issued November 26, 2008. The order also put the company on notice that, if the approved amount was revised based on a final audit and review of the 2008 construction expenditures then the annual revenue requirement would have to be recalculated. It would also require a corresponding true-up of the revenues already collected and a revision to the related tariffs.

Our audit procedures included steps to reconcile the filing to the Commission approved MUR recovery balance discussed above. We have determined that there is a difference of $\$ 158,023$ of jurisdictional cost between the filing and the amount approved in the order referenced above. (\$8,030,267-\$7,872,244)

The company explained that the difference can be attributed to the following issues and provided the schedule on the following page to reconcile the difference.

1. The MUR recovery amount requested and approved in the order was based on the company's balances portrayed in the Estimated/Actual NCRC filing for 2008. ${ }^{8}$
2. The company stated that after the base rate increase was approved on November 26, 2008, a further analysis of the MUR phase cost resulted in adjustments to the in-service amounts originally requested.
3. The base rate revenue requirements approved in the order were $\$ 1,297,979$ while the adjusted base rate revenue requirements reflected in the filing are $\$ 1,310,243$. The difference of $\$ 12,264$ would not impact the base rate increases as approved.

We reviewed and recalculated the company's assertions above and have determined that the difference, as noted above, would increase the base rates approved in the order by 0.934 percent. ( $\$ 12,264 / \$ 1,279,979$ )

EFFECT ON THE FILING: None, informational only

[^5]|  | Base Rate | NCRC | Difference | Explanation of NCRC Amounts |
| :--- | ---: | ---: | ---: | :--- |
| Gross Plant in Service | $\$ 9,332,412$ | $\$ 9,099,111$ | $(\$ 233,301)$ | Actual amount spent was $\$ 9,643,060$ including $\$ 543,949$ incurred for cost of <br> removal which should be excluded. $(\$ 9,643,060-\$ 543,949=\$ 9,099,111)$ |
| Less Joint Owner Allocation | $(767,068)$ | $\underline{(702,319)}$ | $\underline{64,749}$ | Joint Owners do not pay AFUDC so calculation should be excluded. |
| PEF Portion of MUR Cost | $\$ 8,565,344$ | $\$ 8,396,792$ | $(\$ 168,552)$ |  |
| Jurisdictional Amount $(93.753 \%)$ | $\$ 8,030,267$ | $\$ 7,872,244$ | $\mathbf{( \$ 1 5 8 , 0 2 3 )}$ |  |



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EXHIBIT 2
Page 1 of 2

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EXHIBIT 2
Page 2 of 2

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EXHIBIT 3
Page 1 of 2


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## EXHIBIT 4

Page 1 of 2

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## EXHIBIT 4

Page 2 of 2

## CRYTTA. RNER UWT 3 UPRATE


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EXHIBIT 5


## EXHIBIT 6



## EXHIBIT 7

Page 1 of 2

| FLORIDA PUBLIC SERVICE COMMISSION EXPLANATION: |  |  |  |  |  |  |  |  |
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| Line Na. | Demgription | $\begin{gathered} \text { (A) } \\ \text { Acturul } \\ \text { Jerumy } \end{gathered}$ |  | $\begin{gathered} \text { (C) } \\ \text { Metuan } \\ \text { Merch } \end{gathered}$ | (D) <br> Actua Apint | $\begin{aligned} & \text { (E) } \\ & \text { Actual } \end{aligned}$ | $\begin{gathered} \text { netual } \\ \text { jume } \\ \hline \end{gathered}$ | $\begin{aligned} & \text { (G) } \\ & \text { s Month } \\ & \text { Toted } \end{aligned}$ |
| 1 | NFR Rovenues (nat of Revenve Taxes) | 30 | 50 | 30 | 50 | 30 | *0 | 40 |
| 2 | True-Up Provtaion | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 3 | NFR Reveruys Applicuble to Puriod (Linest $1+2$ ) | 30 | 8 | 40 | 30 | 80 | 50 | * |
| 4 |  | 348,753 | 432,025 | 47903 | 430.623 | 536,256 | 583,065 | 2.473.224 |
| 3 | Overtunder) Recovery inu-up provition (Une 3-Line 4) | (368, 753) | (452,025) | (479,506) | (438,428) | (398,256) | (383,905) | $\{2,174,224\}$ |
| 0 | Interem Prowtaion | 0 | 0 | 0 | 0 | 0 | 0 |  |
| 7 | Begiming Bulance True-up a intereat Provision | 0 | 0 | 0 | 0 | 0 | 0 |  |
| - | Daterred True-up | 0 | 0 | 0 | 0 | 0 | 0 | 09 |
| - | True-Up Collected (Replunded) (See Line 2) | 0 | 0 | 0 | 0 | 0 | 0 |  |
| 9 | End of Priod Truatup | 40 | 5 | 5 | 30 | 5 | 5 |  |

## CRYTAL ROVER UNIT 3 UPPATE

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 Truo-Up Filing: Calevtation of the Finni True-up Amount for the PwiodScheduin 7.


# FLORIDA PUBLIC SERVICE COMMISSION <br> DIVISION OF REGULATORY COMPLIANCE BUREAU OF AUDITING 

Tampa District Office

PROGRESS ENERGY FLORIDA, INC.
NUCLEAR COST RECOVERY CLAUSE
LEVY COUNTY UNITS 1 \& 2
AS OF DECEMBER 31, 2008
DOCKET NO. 090009-EI
AUDIT CONTROL NO. 08-248-2-1


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2. 2008 SCHEDULE T-2 - CARRYING COST ON SITE SELECTION AND PRECONSTRUCTION COST BALANCE ..... 7
3. 2008 SCHEDULE T-3 - CARRYING COST ON CONSTRUCTION COST BALANCE ..... 9
4. 2008 SCHEDULE T-3A - DEFERRED TAX CARRYING COST ..... 11
5. 2008 SCHEDULE T-4 - RECOVERABLE O\&M EXPENDITURES ..... 13
6. 2008 SCHEDULE T-6 - CAPITAL EXPENDITURES ..... 14
7. 2008 SCHEDULE T-9 - FINAL TRUE-UP ..... 15
[^6]Docket No. 090009-EI
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DIVISION OF REGULATORY COM欮LAANEE\& 2
AUDITOR'S REPORT
JUNE 10, 2009

## TO: FLORIDA PUBLIC SERVICE COMMISSION AND OTHER INTERESTED PARTIES

We have performed the procedures described later in this report to meet the agreed upon objectives set forth by the Division of Economic Regulation in its audit service request dated January 12, 2009. We have applied these procedures to the attached schedules prepared by Progress Energy Florida, Inc. in support of its 2008 Nuclear Cost Recovery Clause relief of its site selection, preconstruction and construction cost expenditures in Docket No. 090009-El.

This audit was performed following general standards and field work standards found in the AICPA Statements on Standards for Attestation Engagements. This report is based on agreed upon procedures and the report is intended only for internal Commission use.

## OBJECTIVES AND PROCEDURES

## GENERAL

To verify that the company's 2008 Nuclear Cost Recovery Clause (NCRC) filings in Docket No. 090009-El are consistent and in compliance with Section 366.93, F.S., and Rule 25-6.0423, F.A.C.

## SPECIFIC

1. Objective: Verify that the company's filing is properly recorded on its books and records according to the Code of Federal Regulations (CFR) Uniform System of Accounts (USoA).
Procedures: We reconciled the company's filing to the general ledger and verified that the costs incurred were posted to the proper account.
2. Objective: Verify that Schedule T-1 is accurately calculated and that it includes the correct balances from the supporting schedules of the company's 2008 NCRC filing. Procedures: We reconciled and recalculated a sample of the monthly revenue requirement accruals displayed on Schedule T-1 to the supporting schedules in the company's 2008 NCRC filing.
3. Objective: Verify that Schedule T-2 is accurately calculated and that it includes the correct balances from the supporting schedules of the company's 2008 NCRC filing. Procedures: We reconciled the monthly site selection and preconstruction carrying cost balances displayed on Schedule T-2 to the supporting schedules in the company's 2008 NCRC filing. We recalculated the schedule and reconciled the Allowance for Funds Used During Construction (AFUDC) rates applied by the company to the rates approved in Order No. PSC-05-0945-FOF-EI, issued September 28, 2005.
4. Objective: Verify that Schedule T-3 is accurately calculated and that it includes the correct balances from the supporting schedules of the company's 2008 NCRC filing. Procedures: We reconciled the monthly construction carrying cost balances displayed on Schedule T-3 to the supporting schedules in the company's 2008 NCRC filing. We recalculated the schedule and reconciled the AFUDC rates applied by the company to the rates approved in Order No. PSC-05-0945-FOF-EI.
5. Objective: Verify that the Deferred Tax Return Requirement amount displayed on Schedule T-3A, which rolls forward to Schedule T-1, is accurately calculated and that it includes the correct balances from the supporting schedules of the company's 2008 NCRC filing.
Procedures: We reconciled and recalculated a sample of the monthly deferred tax carrying cost accruals displayed on Schedule T-3A to the supporting schedules in the company's 2008 NCRC filing. We recalculated a sample of the monthly carrying cost balances for deferred tax assets based on the equity and debt components

Docket No. 090009-EI
Exhibit JAS-3 (Page 5 of 17)
established in Order No. PSC-05-0945-FOFLeyy County Units 1 \& 2
6. Objective: Verify that the Recoverable O\&M Expenditure amount displayed on Schedule T-4, which rolls forward to Schedule T-1, is accurately calculated and that it includes the correct balances from the supporting schedules of the company's 2008 NCRC filing.
Procedures: We recalculated a sample of the monthly recoverable O\&M expenditures displayed on Schedule T-4 of the company's 2008 NCRC filing. We sampled and verified the O\&M cost accruals and traced the invoiced amounts to supporting documentation. We verified company salary expense accruals and recalculated the respective overhead burdens the company applied. We reconciled the jurisdictional factors applied by the company to the eligible carrying cost to the factors approved in Order No. PSC-06-0972-FOF-EI, issued November 22, 2006, in Docket No. 060007-EI.
7. Objective: Verify that the jurisdictional nuclear construction amounts, displayed on Schedule T-6, which rolls forward to Schedules T-2 and T-3, are accurately calculated and are supported by original source documentation.
Procedures: We recalculated a sample of monthly jurisdictional nuclear construction accruals displayed on Schedule T-6 of the company's 2008 NCRC filing. We sampled and verified the generation and transmission cost accruals and traced the invoiced amounts to supporting documentation. We verified a sample of company salary expense accruals and recalculated a sample of the respective overhead burdens that the company applied. We reconciled the jurisdictional factors applied by the company to the eligible carrying cost to the factors approved in Order No. PSC-06-0972-FOF-EI, issued November 22, 2006, in Docket No. 060007-EI.

## EXHIBIT 1

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## EXHIBIT 1

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LEVY COUNTY NUCLEAR 1 and 2
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## EXHIBIT 2

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LEW COUNTY NUCLEAR 4 and 2


## EXHIBIT 2

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## EXHIBIT 3

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## EXHIBIT 3

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(a) The montly Equify Conponant of $865 \%$ reflects pn $14.70 \%$ retum on equity.




## EXHIBIT 4

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EXHIBIT 4
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LEVY COUNTY NUCLEAR 4 and 2


EXHIBIT 5


## EXHIBIT 6



## EXHIBIT 7

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## LEVY COUNTY NUCLEAR 1 and 2

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## EXHIBIT 7

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## LEYY COUNTY MUCLEAR 1 and 2

she SelactionPre-Construction Costs and Carrying Costa on Construction Cost Bafance True-Up Fithng: Catculation of the Final True-up Amount for the Pertod
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[^0]:    ${ }^{1}$ Schedules included in the company's filing that did not contain information reviewed by the audit staff is not incorporated in this report.

[^1]:    ${ }^{2}$ Purchase and Sale Agreement, executed November 16, 2006, Page 21, Paragraph 44.
    ${ }^{3}$ Confidential Testimony of Daniel L. Roderick on Behalf of Progress Energy Flonida, filed March 11, 2008, Docket No. 080148-El, Page 11. Lines 21-22.

[^2]:    'Schedules included in the company's filing that did not contain information reviewed by the audit staff is not incorporated in this report.

[^3]:    ${ }^{2}$ See Direct Testimony of Will Garret, Exhibit WG-1, Schedule T-3B, Page 2, Commission Clerk Document No. $01514-8$, filed on February 28, 2008.
    ${ }^{3}$ See Direct Testimony of Lori Cross, Exhibit LC-2, Schedule AE-3B, Page 1, Commission Clerk Document No. 03561-8, filed on May 1, 2008.
    ${ }^{4}$ The company's adjustment did not affect the nuclear cost recovery amount that was approved in Order No. PSC-08-0749-FOF-El, issued November 12, 2008, for the NCRC filings in 2006 or 2007 in Docket No. 080009-EI.

[^4]:    ${ }^{5}$ See Direct Testimony of Jeffery Small, Exhibit JAS-1. Page 6, Commission Clerk Document No. 06094-8, filed on August 6, 2008.
    ${ }^{6}$ See the Jurisdictional Separation Study that was included in the "Settlement Agreement" which was approved in Order No. PSC-05-0495-S-EI, issued September 28, 2005 in Docket No. 05007-EI.

[^5]:    ${ }^{7}$ See Progress Energy Florida, Inc's Petition for Expedited Commission Approval of Base Rate Increase for Cost Associated with the MUR Phase of the CR3 Uprate Project, Docket No. 080603-El. Commission Clerk Document No. 08840-08, filed on September 19, 2008.
    ${ }^{8}$ See Direct Testimony of Lori Cross, Exhibit LC-2, Appendix A. Commission Clerk Document No. 03561-8, filed on May 1, 2008.

[^6]:    ${ }^{1}$ Schedules included in the company's filing that did not contain information reviewed by the auditor are excluded from this report.

[^7]:    Levy County Units 1 \& 2

