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July 25, 2011

Ann Cole, Director
Office of the Commission Clerk
PSC Recording & Filing
2540 Shumard Oak Blvd
Tallahassee, FL 32399

Re: In re: Nuclear Cost Recovery Clause
Docket No. 110009

Dear Ms. Cole:

Enclosed for filing on behalf of Progress Energy Florida, Inc. are the following:

1. Rebuttal Testimony of Thomas G. Foster (original and 15 copies); 05119-11
2. Rebuttal Testimony of Jon Franke (original and 15 copies); 05120-11
3. Rebuttal Testimony of John Elnitsky (original and 15 copies); 05121-11
4. Progress Energy Florida, Inc.'s Prehearing Statement (original and 15 copies); 05122-11
5. Progress Energy Florida, Inc.'s Sixteenth Request for Confidential Classification Regarding Portions of Progress Energy Florida, Inc.'s Prehearing Statement and Exhibit JE-12 and Exhibit JE-13 to John Elnitsky's Rebuttal Testimony (original and 7 copies attaching Exhibit B and Exhibit C); and 05123-11 through 05124-11
6. Progress Energy Florida, Inc.'s Notice of Filing the affidavit of John Elnitsky in support of Progress Energy Florida, Inc.'s Sixteenth Request for Confidential Classification. 05125-11

Sincerely,

Blaise N. Huhta

COM	_____
APA	1
ECR	3
GCL	1
RAD	1
SSC	_____
ADM	_____
OPC	_____
CLK	_____

Enclosures

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FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Cost Recovery
Clause

DOCKET NO. 110009-EI

Submitted for filing:
July 25, 2011

REBUTTAL TESTIMONY OF THOMAS G. FOSTER

ON BEHALF OF
PROGRESS ENERGY FLORIDA

COM 5
APA 1
ECR 2
GCL 1
RAD 1
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ADM
OPC
CLK Ct.RPR

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

IN RE: NUCLEAR COST RECOVERY CLAUSE

BY PROGRESS ENERGY FLORIDA

FPSC DOCKET NO. 110009-EI

REBUTTAL TESTIMONY OF THOMAS G. FOSTER

1 **I. INTRODUCTION AND QUALIFICATIONS**

2 **Q. Please state your name and business address.**

3 **A.** My name is Thomas G. Foster. My business address is 299 First Avenue North, St.
4 Petersburg, FL 33701.

5
6 **Q. By whom are you employed and in what capacity?**

7 **A.** I am employed by Progress Energy Service Company, LLC as Supervisor of
8 Regulatory Planning Florida.

9
10 **Q. What are your responsibilities in that position?**

11 **A.** I am responsible for regulatory planning and cost recovery for Progress Energy
12 Florida, Inc. ("PEF"). These responsibilities include: regulatory financial reports;
13 and analysis of state, federal and local regulations and their impact on PEF. In
14 this capacity, I am also responsible for the Levy County Nuclear Project ("LNP")
15 and Crystal River Unit 3 ("CR3") Uprate Project Cost Recovery
16 Actual/Estimated, Projection and True-up to Original filings, made as part of this
17 docket, in accordance with Rule 25-6.0423, Florida Administrative Code
18 (F.A.C.).

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1 **Q. Please describe your educational background and professional experience.**

2 A. I joined Progress Energy on October 31, 2005 as a Senior Financial analyst in the
3 Regulatory group. In that capacity I supported the preparation of testimony and
4 exhibits associated with various Dockets in front of the Florida Public Service
5 Commission (the "Commission"). In late 2008, I was promoted to Supervisor
6 Regulatory Planning. Prior to working at Progress I was the Supervisor in the Fixed
7 Asset group at Eckerd Drug. In this role I was responsible for ensuring proper
8 accounting for all fixed assets as well as various other accounting responsibilities. I
9 have 6 years of experience related to the operation and maintenance of power plants
10 obtained while serving in the United States Navy as a Nuclear operator. I received a
11 Bachelors of Science degree in Nuclear Engineering Technology from Thomas
12 Edison State College. I received a Masters of Business Administration with a focus
13 on finance from the University of South Florida and I am a Certified Public
14 Accountant in the State of Florida.

15
16 **Q. Did you file direct testimony in this proceeding?**

17 A. Yes, I did.

18
19 **Q. Have you reviewed the Intervenor and Staff Witness Testimony in this Docket?**

20 A. Yes. I reviewed this testimony and I provide rebuttal testimony to the testimony of
21 William R. Jacobs, Jr., Ph.D. ("Jacobs") filed on behalf of the Office of Public
22 Counsel ("OPC").
23

1 **II. PURPOSE AND SUMMARY OF REBUTTAL TESTIMONY.**

2 **Q. What is the purpose and summary of your rebuttal testimony?**

3 A. The purpose of my rebuttal testimony is to provide clarification regarding the
4 Company's proposed revisions to its rate management plan for the LNP and to correct
5 what I perceive to be mischaracterizations in Jacobs' direct testimony regarding the
6 proposed revisions to last years' rate management plan.

7
8 **Q. Are you sponsoring any exhibits in support of your rebuttal testimony?**

9 A. Yes. I am sponsoring the following exhibits, which were prepared under my
10 supervision:

- 11 • Exhibit No. ____ (TGF-7), Selected Pages of Commission Order No. PSC-09-
12 0783-FOF-EI related to the LNP rate management plan;
- 13 • Exhibit No. ____ (TGF-8), Selected Pages of Commission Order No. PSC-11-
14 0095-FOF-EI related to the LNP rate management plan; and
- 15 • Exhibit No. ____ (TGF-9), Schedule showing rate impacts of PEF's proposed rate
16 management plan compared to what they would be under the plan presented in
17 2010.

18 These exhibits are true and accurate.

19
20 **Q. Has Jacobs accurately described PEF's updated Rate Management Plan and the**
21 **history behind it?**

22 A. No. There are several statements in Jacobs' testimony that mischaracterize the
23 Commission's Orders on the LNP rate management and PEF's proposal itself.

1 First, he asserts that PEF is requesting accelerated recovery of the
2 Commission approved plan. (See Jacobs Test., p. 19, l. 17). What he is
3 mischaracterizing is the fact that the Commission has never evaluated or approved
4 how much will be recovered in 2012 prior to this Docket No. 110009-EI. In 2010,
5 the Commission declined to set a specific amortization schedule to be used for
6 recovery of the deferred balance. Order No. PSC-11-0095-FOF-EI, p. 46 (“We note
7 our approval of the rate management plan in Order No. PSC-09-0783FOF-EI did not
8 set or require a particular amortization schedule be used for any recovery of the
9 deferred balance.”). In fact, in Docket No. 090009-EI, PEF had originally proposed a
10 five year amortization schedule and Staff took the position that flexibility to manage
11 rates should be retained and PEF should be permitted to annually reconsider changes
12 to the recovery schedule. Order No. PSC-09-0783-FOF-EI, p. 38. Further, the
13 Commission required PEF to file updated rate management plan testimony and
14 schedules annually with its NCRC testimony filings. Id. This is exactly what PEF
15 has done. For evidence of this, one needs only to read the relevant Orders. In Order
16 No. PSC-09-0783-FOF-EI on page 38 the Commission decided:

17 We agree that PEF’s proposed rate management plan could
18 provide relief to ratepayers by decreasing rate impact during
19 2010 and that PEF shall be permitted to defer recovery of costs
20 that have been approved for recovery through the NCRC.
21 However, while PEF’s proposal suggests recovery of the
22 deferred balance over a five-year period, we find that greater
23 flexibility to manage rates shall be retained and that PEF shall
24 be permitted to annually reconsider changes to the deferred
25 amount and recovery schedule.

26 ...

27 Therefore, we approve a rate management plan whereby PEF
28 will be permitted to defer recovery of certain approved site
29 selection and preconstruction costs and then collect those costs

1 during subsequent years. The deferred costs shall be treated as
2 a regulatory asset with carrying charges applied pursuant to
3 Section 366.93(1)(f), F.S., and Rule 25-6.0423(5)(a), F.A.C.”

4 Thus, Jacobs has misinterpreted or mischaracterized these Orders by asserting the
5 Commission approved a specific amortization schedule.

6 Second, on page 19, lines 16-19 of Jacobs’ testimony, he asserts that PEF has
7 proposed accelerating recovery of \$115 million plus carrying charges. Thereafter, at
8 Jacobs’ deposition on July 15, 2011, it is my understanding that Jacobs corrected
9 portions of his testimony regarding the rate management plan to reflect that PEF is
10 actually asking for proposed accelerated recovery of approximately \$55 million plus
11 carrying costs, in addition to the \$60 million plus carrying costs on the unrecovered
12 investment as presented last year, not that PEF was accelerating recovery of \$115
13 million plus carrying charges as he had previously testified. (See Jacobs 2011 Depo.
14 Trans. p. 15:1-25; p. 16:1-25; p. 17:1-9). As such, the difference between what PEF
15 had shown last year for 2012 and has requested this year is less than \$55 million.

16 Third, beginning on page 19 line 25 and continuing on page 20 lines 1 through
17 6, Jacobs asserts that PEF is requesting to collect the remaining balance of the
18 deferral in 2012. Jacobs also corrected this mischaracterization of PEF’s proposal,
19 acknowledging that PEF does not propose to collect the entire deferred balance in
20 2012 during his deposition. (See id.). As can be seen on Exhibit No. ___ (TGF-2),
21 Appendix D, PEF is not requesting to recover all of the remaining deferred balance at
22 the end of 2012.

23 Fourth, Jacobs speculates that the updated rate plan is driven by some plot to
24 recover dollars and then cancel the plant. What he is forgetting is that these dollars
25 have already been approved for recovery. Their collection is not contingent upon a

1 continued project. As described in my May 2, 2011 direct testimony on pages 17-19,
2 PEF has updated its rate management plan exactly as the Commission requested and
3 when we considered the short and long term PEF believes it makes sense to recover
4 more of the deferred amount in 2012 than what PEF had presented in 2010. In the
5 short term, there is an opportunity to keep nuclear cost recovery clause ("NCRC")
6 rates relatively stable (in fact slightly lower) in 2012 while reducing pressure on
7 NCRC rates in the future. This makes a lot of sense when you consider the increased
8 spend required in 2013 and beyond for the LNP. It also has the advantage of
9 decreasing total carrying costs to the ratepayer.

10
11 **Q. Can you describe what the variances in customer rate impact will be between the**
12 **2010 plan and revised plan?**

13 **A.** Yes. This is illustrated in Exhibit No. __ (TGF-9) attached to my rebuttal testimony.
14 Looking at the near term, one can see that the 2011 Levy impact on residential rates is
15 \$4.99 and the estimated 2012 impact under our updated rate management plan is
16 \$4.47. This is a decrease in rates from 2011 to 2012 of just over 10%. It is true that
17 if you continue to defer more of what has already been approved as recoverable that
18 2012 rates will be even lower. However, PEF doesn't believe it is prudent to only
19 consider the current year when updating this rate management plan. In 2013 and
20 2014, there is expected to be a significant increase in spending associated with the
21 LNP. In this timeframe there will be pressure on rates and considering this, it does
22 not make sense to defer an additional \$57 million out to 2014 when rate pressure for
23 the LNP is expected to be higher.

1 **Q. On pages 20 and 21 of Jacobs' testimony, Jacobs summarizes his reasons for**
2 **objecting to PEF's updated rate management plan, do these reasons make sense?**

3 **A.** No. The revenues PEF has requested through its updated Rate Management Plan
4 have already been approved for recovery. This means it is not a question of whether
5 these dollars will be collected in rates at some point, it is only a question of when.
6 Additionally, the longer these collections are deferred, the more carrying costs will
7 accrue on them. Considering this fact with the information in Exhibit No. ___ (TGF-
8 9) regarding expected future rates, one can easily see how PEF's proposed plan
9 balance's short and long term rate impacts.

10
11 **Q. Jacobs goes on to list three other circumstances that impact customer rates as**
12 **reasons for objecting to PEF's proposed rate management plan in 2011, do you**
13 **agree with these reasons?**

14 **A.** No, none of these issues provide a basis for objecting to PEF's proposed rate
15 management plan in 2011. Jacobs makes reference to issues that OPC apparently has
16 in other dockets and makes the unremarkable observation that customer bills
17 currently have costs for the LNP in them, but these issues do nothing to address the
18 fact that PEF's updated plan is expected to reduce the LNP residential bill impact by
19 approximately 10% from 2011 levels while helping provide more flexibility in the
20 years to come when increased rate pressure from continued investment in the LNP is
21 expected.

22

1 Q. Does this conclude your testimony?

2 A. Yes, it does.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear cost recovery clause.

DOCKET NO. 090009-EI
ORDER NO. PSC-09-0783-FOF-EI
ISSUED: November 19, 2009

The following Commissioners participated in the disposition of this matter:

MATTHEW M. CARTER II, Chairman
LISA POLAK EDGAR
NANCY ARGENZIANO
NATHAN A. SKOP

FINAL ORDER APPROVING NUCLEAR COST RECOVERY AMOUNTS FOR
FLORIDA POWER & LIGHT COMPANY AND PROGRESS ENERGY FLORIDA, INC.

BY THE COMMISSION:

BACKGROUND

On March 2, 2009, Florida Power & Light Company (FPL) and Progress Energy Florida, Inc. (PEF) filed petitions seeking prudence review and recovery through the Capacity Cost Recovery Clause (CCRC) of the final true-up costs for certain nuclear power plant projects pursuant to Rule 25-6.0423, Florida Administrative Code, (F.A.C.) and Section 366.93, Florida Statutes (F.S.). On May 1, 2009, FPL and PEF filed petitions seeking approval to recover estimated 2009 costs and projected 2010 costs for both projects through the CCRC. PEF's May 1, 2009 petition also requested implementation of a rate management plan.

FPL's petition addressed two nuclear projects. The first FPL project is composed of uprate activities at its existing nuclear generating plants, Turkey Point Units 3 & 4 and St. Lucie Units 1 & 2. Collectively, these uprate activities are known as the extended power uprate project (EPU Project). FPL obtained an affirmative need determination for the EPU Project by Order No. PSC-08-0021-FOF-EI.¹ The second FPL project is the Turkey Point Units 6 & 7 project (TP67 project). FPL obtained an affirmative need determination for the TP67 project by Order No. PSC-08-0237-FOF-EI.²

PEF's petition also addressed two nuclear projects. The first PEF project is an extended uprate at the existing nuclear generating plant Crystal River Unit 3 (CR3 Uprate). PEF obtained

¹ Order No. PSC-08-0021-FOF-EI, issued January 7, 2008, in Docket No. 070602-EI, In re: Petition for determination of need for expansion of Turkey Point and St. Lucie nuclear power plants, for exemption from Bid Rule 25-22.082, F.A.C. and for cost recovery through the Commission's Nuclear Power Plant Cost Recovery Rule, Rule 25-6.0423, F.A.C.

² Order No. PSC-08-0237-FOF-EI, issued April 11, 2008, in Docket No. 070650-EI, In re: Petition to determine need for Turkey Point Nuclear Units 6 and 7 electrical power plant, by Florida Power & Light Company.

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ORDER NO.PSC-09-0783-FOF-EI
DOCKET NO. 090009-EI
PAGE 38

the ratepayer some immediate relief. PEF has proposed to defer certain site selection and preconstruction costs approved for recovery through the NCRC, and collect those costs over the next five years. Under PEF's proposal, a carrying charge would be applied to the deferred balance pursuant to the Statute and Rule. PCS Phosphate supported approval of a rate management plan, provided the 2009 preconstruction costs to be deferred are deemed reasonable. No other party took a position on this issue in their post-hearing briefs.

We agree that PEF's proposed rate management plan could provide relief to ratepayers by decreasing rate impact during 2010 and that PEF shall be permitted to defer recovery of costs that have been approved for recovery through the NCRC. However, while PEF's proposal suggests recovery of the deferred balance over a five-year period, we find that greater flexibility to manage rates shall be retained and that PEF shall be permitted to annually reconsider changes to the deferred amount and recovery schedule. Our approval of PEF's rate management plan requires PEF to file rate management plan testimony and schedules with its annual NCRC final true-up, estimated true-up, and projection testimony.

Consistent with our previous decisions herein, we find that the deferred balance shall be treated as a regulatory asset with a carrying charge applied pursuant to Section 366.93(1)(f), F.S., and Rule 25-6.0423(5)(a), F.A.C.

PEF's updated position includes a proposed deferral amount of \$273,889,606. This amount would be the 2010 beginning balance of a regulatory asset. As revised, PEF's plan includes recovery of \$36,618,113 of that regulatory asset during 2010. PEF proposes to recover the entire regulatory asset by 2014.

Therefore, we approve a rate management plan whereby PEF will be permitted to defer recovery of certain approved site selection and preconstruction costs and then collect those costs during subsequent years. The deferred costs shall be treated as a regulatory asset with carrying charges applied pursuant to Section 366.93(1)(f), F.S., and Rule 25-6.0423(5)(a), F.A.C. We approve \$273,889,606 as the January 1, 2010, beginning balance of the regulatory asset with \$36,618,113 of that balance being approved for inclusion in rates in 2010.

We next consider the question of what is the total jurisdictional amount to be included in establishing PEF's 2010 Capacity Cost Recovery Clause factor. This issue is a fall-out issue reflecting decisions on all prior issues that impact PEF's level of recovery in 2010. Based on our discussion above, we approve \$206,907,726 to be included in establishing PEF's 2010 CCRC factor. Below is a chart depicting the approved total jurisdictional amount to be included in establishing PEF's 2010 Capacity Cost Recovery Clause factor:

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear cost recovery clause.

DOCKET NO. 100009-EI
ORDER NO. PSC-11-0095-FOF-EI
ISSUED: February 2, 2011

The following Commissioners participated in the disposition of this matter:

ART GRAHAM, Chairman
LISA POLAK EDGAR
RONALD A. BRISÉ
EDUARDO BALBIS
JULIE I. BROWN

APPEARANCES:

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On behalf of Progress Energy Florida, Inc. (PEF)

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Power & Light Company, 700 Universe Boulevard, Juno Beach, Florida 33408-
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On behalf of Florida Power & Light Company (FPL)

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On behalf of Office of Public Counsel (OPC)

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On behalf of White Springs Agricultural Chemicals, Inc., d/b/a PCS Phosphate-
White Springs (PCS Phosphate)

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amount of \$25,056,735, projected O&M expenses of \$4,343,901 (\$3,823,883 jurisdictional), and carrying costs of \$46,378,959.

PEF - Total Jurisdictional Amount for PEF's 2011 Capacity Cost Recovery Clause Factor

This issue is primarily a fall-out issue that reflects decisions on all prior issues. In addition to these issues, PEF is requesting we approve an amortization of \$60,000,000 from the rate management deferred balance related to the LNP. This amount would be included in the 2011 NCRC recovery amount. The rate management deferred balance consists of previously approved LNP costs whose actual recovery has been deferred in an effort to manage annual rate impacts.

With the exception of PEF, no party addressed the deferred amount to be recovered during 2011. We note our approval of the rate management plan in Order No. PSC-09-0783-FOF-EI did not set or require a particular amortization schedule be used for any recovery of the deferred balance. However, we further note that the requested amount is consistent with PEF's original program goal of recovering all deferred amounts over a five-year period.

As shown in the table below, OPC, FIPUG, PCS Phosphate, and SACE argued for adjustments to PEF's 2011 recovery level in prior issues. Based on findings and approval in all prior issues, we do not it appropriate to make any adjustment to PEF's petition.

	Topic	PEF	OPC, PCS Phosphate, FIPUG	SACE
		Petition	With Adjustments	With Adjustments
	CR3 Uprate 2009 Final True-up	\$-244,765	-\$6,244,765	-\$6,244,765
	CR3 Uprate 2010 Estimated True-up	\$2,379,874	\$2,379,874	\$2,379,874
	CR3 Uprate 2011 Projections	\$13,871,686	\$13,871,686	\$13,871,686
	CR3 Uprate Subtotal	\$16,006,795	\$10,0006,795	\$10,0006,795
	LNP 2009 Final True-up	\$4,192,819	\$4,192,819	\$4,192,819
	LNP 2010 Estimated True-up	\$8,121,477	\$2,030,369	\$0
	LNP 2011 Projections	\$75,259,568	\$18,814,892	\$0
	Amortization of Deferrals	\$60,000,000	\$60,000,000	\$60,000,000
	LNP Subtotal	\$147,573,864	\$85,038,080	\$64,192,819
	NCRC Total 2011 Amount ¹⁶	\$163,580,660	\$95,044,875	\$74,199,614

¹⁶ Numbers do not add due to rounding.

2011-2014 RR's as filed May 2, 2011 (Millions)

	2011	2012	2013	2014
Preconstruction	\$49.9	\$36.8	\$160.0	\$666.2
Construction Carrying Cost	12.9	16.3	23.6	51.2
DTA	16.8	20.9	28.3	45.8
O&M	1.4	1.4	4.0	4.1
Subtotal	\$81.0	\$75.3	\$215.9	\$767.2
Prior Period Recovery	-	(55.0)	-	-
Rate Management Plan	60.0	115.0	62.3	-
Total Revenue Requirement	\$141.0	\$135.3	\$278.2	\$767.2
Est. Residential Rate Impact (\$ per 1000 kWh)	4.99	4.47	8.94	24.45

2011-2014 RR's if PEF reverted to 2010 version of Rate Management Plan (\$ Millions)

	2011	2012	2013	2014
Preconstruction	\$49.9	\$40.3	\$167.3	\$669.9
Construction Carrying Cost	12.9	16.3	23.6	51.2
DTA	16.8	19.5	25.5	44.3
O&M	1.4	1.4	4.0	4.1
Total	\$81.0	\$77.5	\$220.5	\$769.5
Prior Period Recovery	-	(55.0)	-	-
Rate Management Plan	60.0	60.0	60.0	57.3
Total Revenue Requirement	\$141.0	\$82.5	\$280.5	\$826.7
Est. Residential Rate Impact (\$ per 1000 kWh)	4.99	2.72	8.98	26.34
Rate Impact Variance (\$ per 1000 kWh)	0.00	1.75	(0.04)	(1.89)

Note: 2011 Residential Rate reflects the approved rate for 2011 at \$147M Revenue Requirement in Docket No. 100009-EI.