BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. <u>CleC162-E</u> (

In re: Petition of Progress Energy Florida, Inc. to recover modular cooling tower costs through the fuel cost recovery clause.

DIRECT TESTIMONY OF JAVIER PORTUONDO

February 24, 2006

Q. Please state your name and business address.

A. My name is Javier J. Portuondo. My business address is Post Office Box 14042, St. Petersburg, Florida 33733.

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

A. I am employed by Progress Energy Service Company, LLC, as Director of Regulatory Planning.

Q. What is the scope of your duties?

A. Currently, I am responsible for regulatory planning, cost recovery and pricing functions for both Progress Energy Florida (PEF or "Company") and Progress Energy Carolinas.

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- Q. Please describe your educational background and professional experience.
- A. I received a Bachelors of Science degree in Accounting from the University of South Florida. I began my employment with Florida Power Corporation in 1985. During my 20 years with Florida Power Corporation and PEF, I have held a number of financial and accounting positions. In 1993, I became Manager, Regulatory Services, and I recently became Director, Regulatory Planning.

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to support the Company's request for recovery of reasonably and prudently incurred costs of modular cooling towers that PEF plans to install and operate at its Crystal River plant. Specifically, I will explain why recovery of the cooling tower costs through the Fuel and Purchase Power Cost Recovery Clause ("Fuel Clause") is appropriate and consistent with established Commission policy. I also will present our analysis of the fuel savings associated with this project.

Q. Are you sponsoring any Exhibits with your direct testimony?

- A. Yes. I am sponsoring the following exhibits:
 - Exhibit No. __ (JP-1), which is an excerpt of Schedule C-6 of the minimum filing requirements (MFRs) that PEF submitted in its recent ratemaking proceeding in Docket No. 050078-EI;

- Exhibit No. __ (JP-2), which is an excerpt of Schedule B-8 of the MFRs submitted in Docket No. 050078-EI; and
- Exhibit No. ___ (JP-3), which is a table that provides PEF's projection of fuel cost savings expected to result from the modular cooling tower project.

Q. Please briefly describe the Modular Cooling Tower Project.

A. The purpose of the modular cooling tower project is to reduce fuel costs to customers by minimizing "de-rates" of PEF's Crystal River Units 1 and 2 necessary to comply with a permit limit on the temperature of cooling water discharged from the Crystal River plant ("thermal permit limit"). As discussed in more detail in the pre-filed testimony of Thomas Lawery, the project involves installation and operation of modular cooling towers in the summer months in order to reduce the discharge canal temperatures. This will enable PEF to reduce the number and extent of de-rates necessary to comply with the thermal permit limit and thereby reduce replacement fuel and purchase power costs.

Q. What is the basis for PEF's request to recover costs of the Modular Cooling Tower Project through the Fuel Clause?

A. Commission Order No. 14546 established comprehensive guidelines for the recovery of costs through the Fuel Clause. In that 1985 Order, the Commission recognized that certain unanticipated costs are appropriate for recovery through the Fuel Clause. Specifically, the Commission recognized that recovery is appropriate for:

Fossil fuel-related costs normally recovered through base rates but which were not recognized or anticipated in the cost levels used to determine current base rates and which, if expended, will result in fuel savings to customers. Recovery of such costs should be made on a case by case basis after Commission approval.

The Commission repeatedly has approved recovery of unanticipated costs through the Fuel Clause when those expenditures resulted in significant savings to the utility's ratepayers. See e.g., Order Nos. PSC-98-0412-FOF-EI, PSC-97-0359-FOF-EI, PSC-97-0359-FOF-EI, PSC-97-0359-FOF-EI, PSC-97-0359-FOF-EI, PSC-96-1172-FOF-EI, PSC-95-0450-FOF-EI, and PSC-94-1106-FOF-EI. As I will explain, the costs of the modular cooling tower project were unanticipated at the time of PEF's last rate case filing and will result in significant fuel cost savings to PEF's ratepayers. As such, the costs of this project qualify for recovery through the Fuel Clause under the policy set forth in Order No. 14546.

Q. Were you involved in PEF's last ratemaking proceeding in Docket No. 050078-EI?

A. Yes. I submitted pre-filed testimony in that docket and I was responsible for the preparation of the MFRs that PEF submitted on April 29, 2005.

Q. What are the projected costs of the modular cooling tower project?

A. As Mr. Lawery explains in his testimony, the project is estimated to cost approximately \$2 to \$3 million per year beginning in 2006. Annual costs are expected to include rental fees and other O&M expenditures. Additionally, in 2006, PEF expects to incur one-time capital expenses of approximately \$1.5 million to \$2 million for initial installation.

Q. Are the costs of the modular cooling tower project recovered through the base rates established in Docket No. 050078-EI?

A. No. The modular cooling tower project was not anticipated when PEF's current base rates were established in Docket No. 050078-EI. The Company's evaluation of the project was prompted by unusually high inlet water temperatures and associated de-rates during the summer of 2005. Thus, the costs of the project were not anticipated when the Company submitted its rate case MFRs in April 2005. This is demonstrated by Exhibit Nos. __ (JP-1) and __ (JP-2).

Exhibit No. __ (JP-1) is an excerpt (page 3) from MFR Schedule C-6. Among other things, Schedule C-6 presented the Company's projected operating budget for the 2006 test year. As shown on line 12 of Exhibit No. __ (JP-1),

the Company projected no rental costs associated with its fossil fuel-fired steam generating units. Had rental costs associated with the modular cooling towers been anticipated when the MFRs were filed, such costs would have been reflected on that line.

Exhibit No. __ (JP-2) is an excerpt (page 1) from MFR Schedule B-8. That schedule presented the monthly plant balances for the projected 2006 test year. Had PEF anticipated capital expenditures associated with the cooling tower project, the resulting plant addition would have been reflected on line 26 for FERC account 314. See 18 CFR Part 101, p. 382 (4-1-05 edition) (defining account 314 to include "all costs installed of main turbine-driven units and all accessory equipment" such as the "Cooling system, including towers[.]"). However, the monthly balances shown on that line do not include any increases that would accommodate plant additions for the modular cooling towers.

The costs of the modular cooling towers also were not anticipated when the Commission approved PEF's current base rates. As noted above, the Company's evaluation of the project was prompted by record high temperatures and de-rates in the summer of 2005. The evaluation was not completed until after the Commission approved PEF's current rates in September 2005.

- Q. You previously stated that the project will result in significant fuel cost savings to PEF's ratepayers. Please describe the Company's analysis of fuel cost savings.
- A. Fuel cost savings were analyzed based on the amount of avoided de-rates that are expected to result from the project. First, historical de-rate amounts attributable to the thermal limit were compiled for the years 2003-2005. Each hourly de-rate amount was distributed throughout the May-September period being evaluated based on the hourly load forecast for that period. The highest hourly de-rate amount recorded during the historical period was assigned to the hour with the highest projected load for the forecast period. The hour with the second highest de-rate amount was assigned to the hour with next highest projected load, and so forth. This pattern continued in order of descending de-rate volumes until each expected hour of de-rate had been assigned.

For modeling purposes, the data was summarized into a "typical" week profile for each month in the evaluation period. Avoided de-rates were capped at 330 MW based on the physical limitations of the modular cooling towers. The resulting profiles were then used as inputs to a dispatch simulation model, which projected total system costs. These costs were compared against a scenario in which no thermal de-rate parameters were imposed on the system. The difference in costs was then used to derive the \$/mwh benefit of avoiding thermal de-rates. This represents gross fuel savings. Because the

modular cooling towers are expected to use approximately 6 MWs of auxiliary power, the cost of this auxiliary power was subtracted from the gross fuel savings to arrive at net fuel savings.

Q. What are the results of the fuel cost savings analysis?

A. As shown in Exhibit No. __ (JP-3), the cooling tower project is projected to result in cumulative net fuel cost savings of approximately \$45 million over five years. Additionally, in each of the five years, annual fuel cost savings are projected to exceed the estimated costs of the project.

Q. How will the Company determine actual fuel cost savings resulting from implementation of the project?

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As discussed in Mr. Lawery's testimony, a computer model will be used to predict the amount of de-rates that would be necessary to ensure permit compliance without the modular cooling towers. Once the modular towers are installed and operating, avoided de-rates can be determined by comparing the actual amount of thermal de-rates with the modular towers to the amount predicted by the model without the rental towers. Fuel cost savings then can be determined based on the replacement energy costs that would have been incurred had the thermal de-rates not been avoided. Consistent with prior practice, this calculation will be performed by a unit commitment and dispatch model, which will calculate system fuel costs by performing two model runs, one with and one without the mWh de-rates.

Market purchases and sales will be held constant in each model run due to the uncertainty and difficulty in determining market purchases and sales "after-the-fact" in the model run with the de-rates. The fuel savings will be the difference in system fuel costs between the model output with the mWh de-rates and the model output without the mWh de-rates.

Q. How does the Company propose to recover the costs of the project?

A. PEF proposes to recover all capital and O&M costs incurred for the project to the extent such costs do not exceed cumulative fuel savings over the life of the project. Actual costs incurred for the project would be subject to Commission review for prudence and reasonableness as they are submitted for recovery through the Fuel Clause.

Q. Does this conclude your testimony?

A. Yes, it does.

FLORIDA PUBLIC SERVICE COMMISSION

PROGRESS ENERGY FLORIDA

DOCKET NO. 050078-EI

MINIMUM FILING REQUIREMENTS

SECTION C - NET OPERATING INCOME SCHEDULES
SECTION D - COST OF CAPITAL SCHEDULES



MODERN NEEDS RECORTS

Docket No. Witness: Javier Portuondo Exhibit No. ____ (JP-1)

Progress Energy Florida .

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Other Power Supply Expenses

2 289

4 418

297

5,398

5.147

17,556

3 047

5,827

10,435

4,865

24,335

153

3,304

5.517

7,016

5,248

22,098

11

Other Power Supply Exp - Operations

Oper Supv & Engineering

Trans Station Expenses

Misc Transmission Exps

Trans Overhead Line Expenses

Trans of Electricity by Others

Load Dispatching

Substation

Transmission Operations

SCHEDULE C-6	ō	Budgeted Versus Actual Operating Revenues and Expenses												
FLORIDA PUBL	IC SERVICE COMMISSION	Explanation	ovide the budgete		Type of data shown:									
Company, PRO	GRESS ENERGY FLORIDA INC		operating revenue historical five year and the prior year	period and the fo			XX I	ear Ended i nded	12/31/2006 12/31/2005 12/31/2004					
Docket No. 0500	078 E								1	Mitness: Portuo	ondo / DeSouza /	Williams / Youn	g / McDonald / Bazemo	
(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(1)	(3)	(K)	(F)	(M)	(N)	
Line Account		2000	2000	2001	2001	2002	2002	2003	2003	2004	2004	2005	2006	
No No	Account Title	Actual	Budget	Actual	Budget	Actual	Budget	Actual	Budget	Actual	Budget	Budget	Budget	
1 5012000	Fossil Steam Fuel	4,709	7,286	5,748	8,368	7,804	9,057	5,995	6,224	3,978	5,132	3,917	3,995	
2 5182390	Nuclear Fuel - Misc & Labor	53	29	1,322		1,575	1,652	1,577	1,634	1.590	1,640	1,594	1,618	
3 5472000	C1 Fuel NP	559	590	618	5,276	702	1,120	2,319	-	2,258	3,200	3,147	3,088	
4	Non-Recoverable Fuel Handling Expense	5,321	7,905	7,688	13,644	10,082	11,829	9,890	7,858	7,826	9,972	8,659	8,702	
5														
6	Operating Expenses - Other Base Recover	able												
7 5000000	Oper Supv & Engineering	20,933	15,776	19,460	17 254	2,173	3,648	1,475	3,990	1,638	2,418	2,352	2,494	
8 5020000	Steam Expenses	3,875	5,729	3,704	6,186	6,702	1,992	7,612	4,765	8,606	8,213	7,177	7,307	
9 5040000	Steam Trans - Cr - Steam Prod	(272)	(200)	(238)	(206)	-			-					
10 5050000	Electric Expenses	1,247	2,378	1,431	1,364	(65)	87	0	322	1	263	304	304	
11 5060000	Mrsc Stm Power Exp	18,988	13,596	11,149	13,446	21,826	17,648	21,683	25,068	18,287	20,010	21,240	24,698	
12 5070000	Rents	508	626	-	•									
13	Steam (FOS) Operations	45,279	38,905	35,507	38,044	30.636	23,375	30,771	35,146	28,533	30,904	31,073	34,803	
14 5170000	Oper Supv & Eng - Nuclear	36,749	40,794	30.071	35,215	211	(126)	136	42	6	(0)	376	386	
15 5190000	Nuclear Coolants & Water					2,931	2 407	2,872	3,157	2,682	3,183	3.020	3,054	
16 5200000	Steam Expenses - Nuclear	225	184	195	189	8,618	11,331	10,832	10,367	9,275	9,865	10,630	10,691	
17 5210000	Steam From Oth Source - Nuc	23		27		-		-	-					
18 5230000	Nuclear Electric Expenses									4	÷	13	11	
19 5240000	Misc Nuc Power Exp - Train	22,908	22,224	19,669	13,597	28,280	28,566	29,549	24,023	29,247	32,388	32,317	34,894	
20 5250000	Rents Nuclear	12	16	(0)										
21	Nuclear Operations	59,917	63.218	49,962	49,001	40,041	42,178	43,390	37,589	41,214	45,436	46,356	49,037	
22 5460000	Oper Supv & Engineering	6,484	7.622	7,213	9 849	2.716	7,102	7,465	9,855	8,387	7,570	6,200	6,753	
23 5480000	Generation Expenses	805	819	858	828	727		3.605	782	4,223	331	180	230	
24 5490000	Misc Oth Power Gen Exps	5 853	5,744	5,196	7,261	8.556	9,229	5,520	10,020	6,150	8,362	8,946	9,426	
25 5500000	Rents	165	350	325	6/6	-		-						
26	CT Operations	13,307	14,535	13,592	18,614	12,000	16,331	16,591	20,658	18,760	16,262	15,326	16,408	
27 5560000	Sys Con & Load Dispatch				12	4,532	6,411	4,889	5,247	5,066	6,037	2,684	2,839	

Recap Schedules Supporting Schedules

12

4,755

5.511

10,436

3.583

4,532

2.617

400

510

55

1.178

15,408

6,411

2,926

268

265

21.335

24,795

4,889

2,600

339

159

53

12,831

15,981

5,247

1,350

314

319

62

16,921

18,966

6,037

208

(2)

272

16,724

17,266

2,684

1,837

4,026

277

70

11,423

17,633

2,839

1,832

4,258

278

70

11,244

17,681

23

5,089

2,606

381

183

313

3 12,744

16,230

FLORIDA PUBLIC SERVICE COMMISSION

PROGRESS ENERGY FLORIDA

DOCKET NO. 050078-EI

MINIMUM FILING REQUIREMENTS

SECTION A - SUMMARY SCHEDULES SECTION B - RATE BASE SCHEDULES



INCHMEST SERVICE

FLORIDA PUBLIC SERVICE COMMISSION

Company PROGRESS ENERGY FLORIDA INC.

Provide the monthly plant balances for each account or sub-account to

which and individual depreciation rate is applied. These balances should

be the ones used to compute the monthly depreciation expenses excluding

Page 1 of 8 Progress Energy Florida

Docket No.

Type of Data Shown:

Witness: Javier Portuondo XX Projected Test Year Ended 12/31/2006 Exhibit No. ____(JP-2)

Page 2 of 2

Prior Year Ended 12/31/2005 _ Historical Test Year Ended 12/31/2004

any amortization/recovery schedules. Docket No 050078-EI (\$000)

Explanation:

															zemore, Williams, Young,	
	(A)	(9)	(Q)	(R)	(S)	(1)	(U)	(V)	(W)	(X)	(Y)	(Z)	(AA)	(AB)	(AC)	(AD)
	Account	Account	Dec-2005	Jan-2006	Feb-2006	Mar-2006	Apr-2006	May-2006	Jun-2005	Jul-2006	Aug-2006	Sep-2006	Oct-2006	Nov-2006	Dec-2006	
ries	Sub-account	Sub-account	Month	13-Month												
¥o.	Number	Title	. 1	2	3	4	5	6	7		9	10	11	12	13	Average
1																
2		Steam Production														
4	311	Andote Plant	38.595			244								****	10.000	38,84
5	312	Structures & Improvements Boiler Plant Equipment	36,595 106,791	38,562 107,017	38,719 107,247	38,768 107,515	38,811 107,811	38,846	38,879	38,905	38,928	38,948	38,964 109,257	38,984 109,537	39,000 109,790	108,30
£	314	Turbogenerator Units	96,166	96,306	96,485	96,741	97,056	108,103 97,381	108,367 97,683	108,615 97,974	108,833 58,234	109.058 98,508	98,754	99,113	99,440	97,68
1	315	Accessory Electric Equipment	26,080	26,083	26,091	26,106	25,126	. 26 14B	26,169	26,189	28,207	26,227	26,245	26,272	26,296	26.17
8	316 1	Miscellaneous Equipment	5,768	5 773	5,778	5,785	5,793	5.801	5.808	5,815	5,822	5,828	5,834	5.842	5,850	5.80
9	3162	Miscellaneous Equipment - 5 Year Amort	122	172	122	122	122	122	122	122	122	122	122	122	122	12
10	316 3	Mispellaneous Equipment - 7 Year Amort	192	193	193	194	194	195	195	195	195	195	196	196	196	19
11		Total Angote Plant	273,714	274,156	274,536	275,231	275,913	276,597	277,223	277,817	278,341	278,886	279,371	280,065	280,694	277,129
12																
13		Bartow Plant														
14	311	Structures & Improvements	19,805	19,981	20,123	20,236	20,326	20,399	20,457	20,503	20.540	20,570	20,594	20,613	20.528	20,36
15	312	Boller Plant Equipment	63,220	63,246	63,269	63,292	63,316	63,337	63,356	63,374	63,389	63,404	63,417	63,434	63,449	63,34
16	314	Turbogenerator Units	26,464	26,484	26,502	26,522	26.542	26,561	26,579	26,594	26,608	26,622	26.634	26,651	26,666	26,57
17	315	Accessory Electric Equipment	13,650	13,680	13.681	13,682	13,682	13.682	13,683	13,683	13,683	13,683	13,683	13,684	13,684	13,68
18	316.1	Miscellaneous Equipment	3,070	3,072	3,083	3,108	3,144	3, 184	3.222	3,259	3,293	3,339	3,363	3,414	3,460	3, 23 19
19 20	316.2	Miscellaneous Equipment - 5 Year Amon	192	193	193	194	194	195	195	195	195	196	196	196 182	196 163	17
21	316 3	Miscellaneous Equipment - 7 Year Amort Yotal Barlow Plant	126,594	167 126,823	127,022	173	175 127,360	177	179 127,670	180	181	181	182 128,069	129,172	128,264	127,56
22		LOTAL DIRECTAL CASE	120,334	120,023	127,022	127,207	127,300	121,335	127,070	121,105	127,000	127,300	120,009	120,112	720,201	
23		Crystal River 1 & 2 Plant														
24	311	Structures & Improvements	74,629	74,637	74,644	74,650	74,656	74,662	74,666	74,670	74,674	74,677	74,680	74,683	74,686	74,66
25	312	Boiler Plant Equipment	166,618	166.765	166,953	167,217	167,541	167,875	168,186	168,485	168,751	169,032	169,284	169,652	169,987	168,18
26	314	Turbogenerator Units	124,728	124,900	125,078	125,288	125,521	125,752	125,961	126,158	126,332	126,511	126,670	126,894	127,097	125,91
27	315	Accessory Electric Equipment	34,532	34,545	34,559	34,575	34,595	34,614	34,632	34,649	34,664	34,680	34,694	34,713	34,731	34,63
28	316.1	Misceffeneous Equipmen(5,956	5,963	5,970	5,975	5,980	5,985	5.988	5,991	5,994	5,996	5,998	6,000	6,002	5,98
29	316.2	Miscellaneous Equipment - 5 Year Amort	153	154	154	155	155	155	155	156	156	156	156	156	156	15
30	316 3	Miscellaneous Equipment - 7 Year Amort	98	98	98	98	98	98	98	98	9.8	98	98	98	98	9
31		Total Crystal River 1 & 2 Plant	406,714	407,062	407,455	407,958	408,546	409,140	409,687	410,207	410,668	411,149	411,578	412,196	412,757	409,62
32 33		Crystal River 4 & 5 Ptant														
34	311	Structures & Improvements	149.119	149,119	149,119	149,119	149,119	149,119	149,119	149,119	149,119	149,119	149,119	149,119	149,119	149,11
35	312	Boiler Plant Equipment	466,104	466,124	466,139	466,152	466,162	466,170	466,176	466,181	466,185	466,188	466,191	466,193	465,195	466,16
36	314	Turpogenerator Units	192,498	192,498	192,498	192,498	192,498	192,498	192,498	192,498	192,498	192,498	192,498	192,498	192,498	192,49
37	315	Accessory Electric Equipment	81,115	81,122	81,128	81,133	81,136	81,139	81,142	81,144	81,145	81,146	81,147	81,148	81,149	91,13
38	316 1	Miscellaneous Equipment	11,485	11,485	11.485	11.485	11,485	11,486	11,486	11,486	11,486	11,486	11,496	11,486	11,486	11,48
39	316.2	Miscellaneous Equipment - 5 Year Amore	242	243	243	243	243	243	243	243	243	243	243	243	243	24
40	316.3	Miscellaneous Equipment - 7 Year Amort	615	615	615	615	615	615	615	615	615	615	615	615	615	61
41		Total Crystel River 4 & 5 Plant	901,179	901,206	901,227	901.245	901.258	901,769	901,278	901,285	901,291	901,296	901,299	901,302	901,304	901,265

Docket No. ____ Progress Energy Florida Witness: Javier Portuondo Exhibit No. ___ (JP-3)

Modular Cooling Tower Project

YEAR	Estimated Fuel Cost Savings
2006	\$11,000,000
2007	\$11,000,000
2008	\$8,500,000
2009	\$8,000,000
2010	\$6,500,000
TOTAL	\$45,000,000