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Subject: e-filing, Docket No. 080009-EI for AARP
Attachments: AARP Prehearing statement Docket 080009.doc



AARP
ring statement

- > Electronic Filing
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- > a. Person responsible for this electronic filing:
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- >
- > b. Docket No. 080009-EI
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- > In re: Nuclear Cost Recovery Clause.
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- > c. Document being filed on behalf of AARP
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- > d. There are a total of 10 pages.
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- > e. The document attached for electronic filing is the Prehearing
- > Statement of AARP.
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- > See attached file.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Nuclear Cost Recovery)
Clause.)
_____)

Docket No. 080009-EI

FILED: August 22, 2008

PREHEARING STATEMENT OF AARP

AARP, through the undersigned, pursuant to the Order Establishing Procedure in this docket, Order No. PSC-08-0211-PCO-EI-PCO-EI, issued March 31, 2008, hereby submits its Prehearing Statement.

APPEARANCES:

Michael B. Twomey
Post Office Box 5256
Tallahassee, Florida 32314-5256

1. **WITNESSES:**

None

2. **EXHIBITS:**

None

3. **STATEMENT OF BASIC POSITION**

AARP adopts the statement of basic position taken by the Office of Public Counsel (“OPC”).

4. **STATEMENT OF FACTUAL ISSUES AND POSITIONS**

ISSUE 1A: **Should Progress Energy Florida, Inc. and Florida Power & Light Company be allowed to recover through the Nuclear Cost Recovery Clause revenue requirements for a phase or portion of a system associated with a power plant, after such phases or portion of the project has been placed into commercial service, or should such phases or portion of the project be recovered through base rates?**

AARP: Same as OPC.

DOCUMENT NUMBER-DATE

07654 AUG 22 08

ISSUE 1B: If recovery of costs for a phase or portion of a system associated with a power plant that is in commercial service continues through the Nuclear Cost Recovery Clause, how should the revenue requirements for that phase or portion be determined?

AARP: Same as OPC.

ISSUE 1C: How should the completion of site clearing work be determined for purposes of distinguishing between pre-construction and construction costs for recovery under the clause?

AARP: Same as OPC.

ISSUE 1D: Should a utility be required to inform the Commission of any change in ownership or control of any asset which was afforded cost recovery under the Nuclear Cost Recovery Clause?

AARP: Same as OPC.

ISSUE 1E: What is the appropriate procedure to reduce and refund NPCR charges to retail customers when a utility sells a portion of a nuclear unit to a municipality or another investor owned utility?

AARP: Same as OPC.

2007 PROJECT MANAGEMENT, CONTRACTING, AND OVERSIGHT CONTROLS

Florida Power & Light Company

ISSUE 2A: Should the Commission find that for the year 2007, FPL's project management, contracting, and oversight controls were reasonable and prudent for the Turkey Point 6 & 7 project and for the Extended Power Uprate (EPU) project?

AARP: Same as OPC.

ISSUE 2B: Should the Commission find that for the year 2007, FPL's accounting and costs oversight controls were reasonable and prudent for the Turkey Point 6 & 7 project and for the EPU project?

AARP: No position.

Progress Energy Florida, Inc.

ISSUE 3A: Should the Commission find that for the year 2007, PEF's project management, contracting, and oversight controls were reasonable and

prudent for Levy Units 1 & 2 project and the Crystal River 3 Uprate project?

AARP: Same as OPC.

ISSUE 3B: Should the Commission find that for the year 2007, PEF's accounting and costs oversight controls were reasonable and prudent for Levy Units 1 & 2 project and the Crystal River 3 Uprate project?

AARP: Same as OPC.

COMPANY SPECIFIC SITE SELECTION COSTS

Florida Power & Light

ISSUE 4A: Should the Commission grant FPL's request to include the review and approval for recovery through the Nuclear Cost Recovery Clause of prudently incurred site selection costs for the Turkey Point Unit 6 & 7 project?

AARP: Same as OPC.

ISSUE 4B: What amount should the Commission approve as FPL's final 2007 true-up of prudently incurred site selection costs for the Turkey Point Units 6 & 7 project?

AARP: Same as OPC.

Progress Energy Florida

ISSUE 5A: Should the Commission grant PEF's request to include the review and approval for recovery through the Nuclear Cost Recovery Clause of prudently incurred site selection costs for the Levy Units 1 & 2 project?

AARP: Same as OPC.

ISSUE 5B: What amount should the Commission approve as PEF's final 2007 true-up of prudently incurred site selection costs for the Levy Units 1 & 2 Project?

AARP: Same as OPC.

ISSUE 5C: What amount should the Commission approve as PEF's actual 2008 site selection costs for the Levy Units 1 & 2 Project?

AARP: Same as OPC.

**COMPANY SPECIFIC TRUE UP PRECONSTRUCTION AND
CONSTRUCTION COSTS (2007)**

Florida Power & Light

ISSUE 6A: What amount should the Commission approve as FPL's final 2007 true-up of prudently incurred preconstruction costs for the Turkey Point Units 6 & 7 project?

AARP: Same as OPC.

ISSUE 6B: What total amount should the Commission approve as FPL's final 2007 true-up to be recovered for the Turkey Point Units 6 & 7 project?

AARP: Same as OPC.

ISSUE 6C: What amount should the Commission approve as FPL's final 2007 true-up of prudently incurred construction costs for the EPU project?

AARP: Same as OPC.

ISSUE 6D: What amount should the Commission approve as carrying charges on FPL's prudently incurred constructions costs for EPU project?

AARP: No position.

ISSUE 6E: What amount should the Commission approve as FPL's final 2007 true-up to be recovered for the EPU project?

AARP: No position.

ISSUE 6F: Has FPL demonstrated that the uprate-related costs it seeks to recover in this docket are incremental to those it would incur in conjunction with providing safe and reliable service during the period associated with the extension of its operating license, had there been no uprate project?

AARP: Same as OPC.

Progress Energy Florida

ISSUE 7A: What amount should the Commission approve as PEF's final 2007 true-up of prudently incurred preconstruction costs for the Levy Units 1 & 2 project?

AARP: Same as OPC.

ISSUE 7B: What amount should the Commission approve as PEF's final 2007 true-up of

prudently incurred construction costs for the Levy Units 1 & 2 project?

AARP: Same as OPC.

ISSUE 7C: **What amount should the Commission approve as carrying charges on PEF's prudently incurred construction costs for the Levy Units 1 & 2 project?**

AARP: Same as OPC.

ISSUE 7D: **What amount should the Commission approve as PEF's final 2007 true-up to be recovered for the Levy Units 1 & 2 project?**

AARP: Same as OPC.

ISSUE 7E: **What amount should the Commission approve as PEF's final 2007 true-up of prudently incurred construction costs for the Crystal River 3 Uprate project?**

AARP: Same as OPC.

ISSUE 7F: **What amount should the Commission approve as carrying charges on PEF's prudently incurred 2007 construction costs for the Crystal River 3 Uprate?**

AARP: Same as OPC.

ISSUE 7G: **What amount should the Commission approve as PEF's final 2007 true-up to be recovered for the Crystal River 3 Uprate project?**

AARP: Same as OPC.

ISSUE 7H: **Has PEF demonstrated that the uprate-related costs it seeks to recover in this docket are incremental to those it would incur in conjunction with providing safe and reliable service during the period associated with the extension of its operating license, had there been no uprate project?**

AARP: Same as OPC.

**COMPANY SPECIFIC ACTUAL/ESTIMATED PRECONSTRUCTION AND
CONSTRUCTION COSTS (2008)**

Florida Power & Light

ISSUE 8A: **What amount should the Commission approve as FPL's 2008 actual and estimated costs to be recovered for the Turkey Point Units 6 & 7 project?**

AARP: Same as OPC.

ISSUE 8B: What total amount should the Commission approve as FPL's 2008 actual and estimated costs to be recovered for the Turkey Point Units 6 & 7 project?

AARP: Same as OPC.

ISSUE 8C: What amount should the Commission approve as FPLs 2008 actual and estimated construction costs for the EPU project?

AARP: Same as OPC.

ISSUE 8D: What amount should the Commission approve as carrying charges on FPL's 2008 actual and estimated construction costs for the EPU project?

AARP: No position.

ISSUE 8E: What total amount should the Commission approve as FPL's 2008 actual and estimated costs to be recovered for the EPU project?

AARP: Same as OPC.

Progress Energy Florida

ISSUE 9A: What amount should the Commission approve as PEF's 2008 actual and estimated preconstruction costs for the Levy Units 1 & 2 project?

AARP: Same as OPC.

ISSUE 9B: What amount should the Commission approve as PEF's 2008 actual and estimated construction costs for the Levy Units 1 & 2 project?

AARP: Same as OPC.

ISSUE 9C: What amount should the Commission approve as carrying charges on PEF's 2008 actual and estimated construction costs for the Levy Units 1 & 2 project?

AARP: Same as OPC.

ISSUE 9D: What amount should the Commission approve as PEF's 2008 actual and estimated costs to be recovered for the Levy Units 1 & 2 project?

AARP: Same as OPC.

ISSUE 9E: What amount should the Commission approve as PEF's 2008 actual and estimated construction costs for the Crystal River 3 Uprate project?

AARP: Same as OPC.

ISSUE 9F: What amount should the Commission approve as carrying charges on PEF's 2008 actual and estimated construction costs for the Crystal River 3 Uprate project?

AARP: Same as OPC.

ISSUE 9G: What amount should the Commission approve as PEF's 2008 actual and estimated costs to be recovered for the Crystal River 3 Uprate project?

AARP: Same as OPC.

**COMPANY SPECIFIC PROJECTED PRECONSTRUCTION AND
CONSTRUCTION COSTS (2009)**

ISSUE 10A: What amount should the Commission approve as FPL's 2009 projected preconstruction costs for the Turkey Point Units 6 & 7 project.

AARP: Same as OPC.

ISSUE 10B: What total amount should the Commission approve as FPL's 2009 projected costs to be recovered for the Turkey Point Units 6 & 7 project?

AARP: Same as OPC.

ISSUE 10C: What amount should the Commission approve as FPL's 2009 projected construction costs for the EPU project.

AARP: Same as OPC.

ISSUE 10D: What amount should the Commission approve as carrying charges on FPL's 2009 projected construction costs for the EPU project?

AARP: Same as OPC.

ISSUE 10E: What total amount should the Commission approve as FPL's 2009 projected costs to be recovered for the EPU project?

AARP: No position.

Progress Energy Florida

ISSUE 11A: What amount should the Commission approve as PEF's 2009 projected preconstruction costs for the Levy Units 1 & 2 project?

AARP: Same as OPC.

ISSUE 11B: What amount should the Commission approve as PEF's 2009 projected construction costs for the Levy Units 1 & 2 project?

AARP: Same as OPC.

ISSUE 11C: What amount should the Commission approve as carrying charges on PEF's 2009 projected constructions costs for the Levy Units 1 & 2 project?

AARP: Same as OPC.

ISSUE 11D: What total amount should the Commission approve as PEF's 2009 projected costs to be recovered for the Levy Units 1 & 2 project?

AARP: Same as OPC.

ISSUE 11E: What amount should the Commission approve as PEF's 2009 projected construction costs for the Crystal River 3 Uprate project?

AARP: Same as OPC.

ISSUE 11F: What amount should the Commission approve as carrying charges on PEF's 2009 projected construction costs for the Crystal River 3 Uprate project?

AARP: Same as OPC.

ISSUE 11G: What total amount should the Commission approve as PEF's 2009 projected costs to be recovered for the Crystal River 3 Uprate project?

AARP: Same as OPC.

SUMMARY ISSUES

Florida Power & Light

ISSUE 12: What total amount should the Commission approve for the Nuclear Cost Recovery Clause to be included in establishing FPL's 2009 Capacity Cost Recovery Clause factor?

AARP: No position.

Progress Energy Florida

ISSUE 13: What total amount should the Commission approve for the Nuclear Cost Recovery Clause to be included in establishing PEF's 2009 Capacity Cost

Recovery Clause factor?

AARP: No position.

5. **STIPULATED ISSUES:**

None.

6. **PENDING MOTIONS:**

None.

7. **STATEMENT OF PARTY'S PENDING REQUESTS OR CLAIMS FOR CONFIDENTIALITY:**

None.

8. **OBJECTIONS TO QUALIFICATION OF WITNESSES AS AN EXPERT:**

None at this time.

9. **STATEMENT OF COMPLIANCE WITH ORDER ESTABLISHING PROCEDURE:**

There are no requirements of the Order Establishing Procedure with which AARP cannot comply.

Dated this 22nd day of August, 2008.

Respectfully submitted,

/s/ Michael B. Twomey
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Attorney for AARP

DOCKET NO. 080009-EI
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing document has been furnished by electronic mail to the following parties on this 22nd day of August, 2008.

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