

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for determination of need for
Citrus County combined cycle power plant, by
Duke Energy Florida, Inc.

DOCKET NO. 140110-EI

DATED: August 1, 2014

COMMISSION STAFF'S PREHEARING STATEMENT

Pursuant to Order No. PSC-14-0341-PCO-EI, filed July 3, 2014, the Staff of the Florida Public Service Commission files its Prehearing Statement.

1. All Known Witnesses

There are no known witnesses at this time.

2. All Known Exhibits

There are no known exhibits at this time.

3. Staff's Statement of Basic Position

Staff's positions are preliminary and based on materials filed by the parties and on discovery. The preliminary positions are offered to assist the parties in preparing for the hearing. Staff's final positions will be based upon all the evidence in the record and may differ from the preliminary positions stated herein.

4. Staff's Position on the Issues

ISSUE 1: Is the proposed Citrus County combined cycle plant needed, taking into account the need for electric system reliability and integrity?

POSITION: No position at this time.

ISSUE 2: Is the proposed Citrus County combined cycle plant needed, taking into account the need for adequate electricity at a reasonable cost?

POSITION: No position at this time.

ISSUE 3: Is the proposed Citrus County combined cycle plant needed, taking into account the need for fuel diversity and supply reliability?

RECEIVED-FPSC
14 AUG - 1 PM 3: 27
COMMISSION
CLERK

COMMISSION STAFF'S PREHEARING STATEMENT

DOCKET NO. 140110-EI

PAGE 2

POSITION: No position at this time.

ISSUE 4: Are there any renewable energy sources and technologies or conservation measures taken by or reasonably available to Duke Energy Florida that might mitigate the need for the proposed Citrus County combined cycle plant?

POSITION: No position at this time.

ISSUE 5: Is the proposed Citrus County combined cycle plant the most cost-effective alternative available to meet the needs of Duke Energy Florida and its customers?

POSITION: No position at this time.

ISSUE 6: Did Duke Energy Florida reasonably evaluate all alternative scenarios for cost effectively meeting the needs of its customers over the relevant planning horizon?

POSITION: No position at this time.

ISSUE 7: Based on the resolution of the foregoing issues, should the Commission grant the requested determination of need for the proposed Citrus County combined cycle plant?

POSITION: No position at this time.

ISSUE 8: Should this docket be closed?

POSITION: No position at this time.

5. Stipulated Issues

None at this time.

6. Pending Motions

None at this time.

7. Pending Confidentiality Claims or Requests

None at this time.

8. Objections to Witness Qualifications as an Expert

None at this time.

9. Compliance with Order Nos. PSC-14-0341-PCO-EI, PSC-14-0307-PCO-EI and PSC-14-0341-PCO-EI

Staff has complied with all requirements of the Procedural Orders entered in this docket.

Respectfully submitted this 1st day of August, 2014.

/s/ Michael T. Lawson

MICHAEL T. LAWSON
STAFF COUNSEL
FLORIDA PUBLIC SERVICE
COMMISSION
Gerald L. Gunter Building
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-
0850
Telephone: (850) 413-6076
Email: Mlawson@psc.state.fl.us

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for determination of need for
Citrus County combined cycle power plant, by
Duke Energy Florida, Inc.

DOCKET NO. 140110-EI

DATED: August 1, 2014

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original of STAFF'S PREHEARING STATEMENT has been filed with Office of Commission Clerk and one copy has been furnished to the following by electronic mail, on this 1st day of August, 2014:

J. R. Kelly
Charles J. Rehwinkel
Office of the Public Counsel
c/o The Florida Legislature
111 West Madison Street, Room 812
Tallahassee, FL 32399-1400
kelly.jr@leg.state.fl.us
rehwinkel.charles@leg.state.fl.us

James W. Brew
Brickfield, Burchette, Ritts & Stone, P.C.
1025 Thomas Jefferson Street, NW, Eighth
Floor, West Tower
Washington, DC 20007-5201
jbrew@bbrslaw.com

Jon C. Moyle, Jr.
Karen A. Putnal
Moyle Law Firm, P.A.
118 North Gadsden Street
Tallahassee, Florida 32301
jmoyle@moylelaw.com
kputnal@moylelaw.com

Robert Scheffel Wright
John T. LaVia, III
Gardner, Bist, Wiener, Wadsworth, Bowden,
Bush, Dee, LaVia and Wright, P.A.
1300 Thomaswood Drive
Tallahassee, Florida 32308
schef@gbwlegal.com
jlavia@gbwlegal.com

Gordon D. Polozola, Esq.
General Counsel – South Central Region
NRG Energy, Inc.
112 Telly Street
New Roads, LA 70760
Gordon.Polozola@nrgenergy.com

Marsha E. Rule, Esq.
Rutledge Ecenia, P.A.
119 South Monroe Street, Suite 202
Tallahassee, Florida 32301
marsha@rutledge-ecenia.com

CERTIFICATE OF SERVICE
DOCKET NO. 140110-EI
PAGE 2

Richard A. Zambo, Esq.
Richard A. Zambo, P.A.
2336 S.E. Ocean Boulevard, #309
Stuart, Florida 34966
richzambo@aol.com

Matthew R. Bernier
Paul Lewis, Jr.
106 E. College Ave., Ste. 800
Tallahassee, FL 32301
Matthew.bernier@duke-energy.com
Paul.lewisjr@duke-energy.com

John T. Burnett
P.O. Box 14042
St. Petersburg, Florida 33733
John.burnett@duke-energy.com
Dianne.triplett@duke-energy.com

James Michael Walls
Blaise N. Gamba
Carlton Fields Jordan Burt, P.A.
4221 W. Boy Scout Boulevard, Ste. 1000
Tampa, FL 33607-5780
mwalls@cfjbLaw.com
bgamba@CFJBLaw.com

/s/ Michael T. Lawson

MICHAEL T. LAWSON
STAFF COUNSEL
FLORIDA PUBLIC SERVICE
COMMISSION
Gerald L. Gunter Building
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850
Telephone: (850) 413-6076
Email: Mlawson@psc.state.fl.us