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FPSC - COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Fuel and Purchased Power Cost Recovery Clause with Generating Performance Incentive Factor	Docket No: 140001-EI Filed: October 27, 2014

FLORIDA POWER & LIGHT COMPANY'S PREHEARING STATEMENT

Florida Power & Light Company ("FPL" or the "Company"), pursuant to Section 366.93, Florida Statutes, Rule 25-6.0423, Florida Administrative Code, and Order No. PSC-14-0439-PCO-EI hereby files with the Florida Public Service Commission ("FPSC" or "Commission") its Prehearing Statement in connection with its Petition for approval of gas reserves project, filed June 25, 2014, and states:

I. FPL WITNESSES

Witness	Subject Matter	Issues
Sam Forrest Direct	The need for the Woodford project. Summary of FPL's request. FPL's use of natural gas. Opportunities for FPL in gas reserves. Overview of the Woodford Project. Economic evaluation of the Woodford project. Proposed Transactional Guidelines ("Gas Reserves Guidelines" or "Guidelines") for future gas reserve agreements.	1,2,3,4,5,6,7
Kim Ousdahl Direct	Overview of the Woodford project. Accounting for transfer of interests to FPL. Description of specialized accounting applicable to the Woodford Project and other gas reserves investments. Regulatory reporting, ratemaking and recovery of gas reserves through the Fuel Clause.	1,2,3,8
Dr. Tim Taylor Direct	Overview of the gas production industry. Estimate volumes of recoverable gas in the Woodford Project. Production rate for recovery of Woodford Project gas. Estimate of total recoverable gas from the Woodford project. Comparison of estimates of gas volume, production	1

Witness	Subject Matter	Issues
	rate and total recoverable gas from the Woodford Project with an independent, third party study. Detailed monthly forecast of recoverable natural gas from the Woodford Project	
Sam Forrest Rebuttal	Customer Benefits from the Woodford project. FPL's natural gas price forecast. Risk associated with gas reserves projects. Benefits of the Guidelines.	1,2,3,4,5,6,7
Kim Ousdahl Rebuttal	Application of the Uniform System of Accounts. Accounting controls and auditing joint venture arrangements. Benefits of outsourcing financial accounting for gas reserves	1,2,3
Dr. Tim Taylor Rebuttal	Woodford project production risks are low. Arkoma-Woodford area meets FPL's needs. PetroQuest is an appropriate partner for FPL.	1
J. Terry Deason Rebuttal	Fuel Clause mechanism. Regulatory policy considerations. Public interest regulation.	1,3,4,5,6,7

II. EXHIBITS

Exhibits	Witness	Sponsor	Description
SF-1	Sam Forrest	FPL	Map of FPL's Existing Natural Gas Transportation
SF-2	Sam Forrest	FPL	Map of U.S. Natural Gas Transportation Pipelines
SF-3	Sam Forrest	FPL	Map of U.S. Shale Gas and Oil Production Locations
SF-4	Sam Forrest	FPL	Drilling and Development Agreement (CONFIDENTIAL)
SF-5	Sam Forrest	FPL	Tax Partnership Agreement (CONFIDENTIAL)
SF-6	Sam Forrest	FPL	Petro Quest Agreement term Sheet (CONFIDENTIAL)
SF-7	Sam Forrest	FPL	PetroQuest Transaction Production Profile
SF-8	Sam Forrest	FPL	Results of FPL's Economic Evaluation (CONFIDENTIAL)
SF-9	Sam Forrest	FPL	Proposed Transactional Guidelines (CONFIDENTIAL)

Exhibits	Witness	Sponsor	Description
SF-10	Sam Forrest	FPL	Customer Savings under FPL and Intervenor Gas Price Forecasts
SF-11	Sam Forrest	FPL	Total Volume Traded on NYMEX in 2014
KO-1	Kim Ousdahl	FPL	Memorandum of Understanding
KO-2	Kim Ousdahl	FPL	Estimated Transfer price Calculation
KO-3	Kim Ousdahl	FPL	Purchase Accounting Entry (Estimated)
KO-4	Kim Ousdahl	FPL	Example Joint Interest Billing Statement ("JIB")
KO-5	Kim Ousdahl	FPL	Year One Proforma Financial Statements
KO-6	Kim Ousdahl	FPL	Sample of Supplemental Schedule Fuel Projection Filing
KO-7	Kim Ousdahl	FPL	Condensed Chart of Accounts
KO-8	Kim Ousdahl	FPL	Environmental Clause Sample Form 42-4P
TT-1	Tim Taylor	FPL	Resume of Dr. Timothy D. Taylor
TT-2	Tim Taylor	FPL	Difference Between Conventional and Unconventional Natural Gas Deposits
TT-3	Tim Taylor	FPL	Historic and Projected Growth of Shale Gas Volumes
TT-4	Tim Taylor	FPL	"Behind-Pipe" Zones
TT-5	Tim Taylor	FPL	Map of the Woodford Shale
TT-6	Tim Taylor	FPL	Location Map of the PetroQuest Acreage
TT-7	Tim Taylor	FPL	EUR Type Curve Map
TT-8	Tim Taylor	FPL	Projected Drill Schedule Map
TT-9	Tim Taylor	FPL	Volume Forecast for FPL (CONFIDENTIAL)
TT-10	Tim Taylor	FPL	Forrest A. Garb & Associates Report (CONFIDENTIAL)
TT-11	Tim Taylor	FPL	Type Curve 1: 5.3 Bcf Estimated Ultimate Recovery ("EUR")

Exhibits	Witness	Sponsor	Description
TT-12	Tim Taylor	FPL	Type Curve 2: 7.4 Bcf EUR
JTD-1	Terry Deason	FPL	Curriculum vita

In addition to the above pre-filed exhibits, FPL reserves the right to utilize any exhibit introduced by any other party. FPL additionally reserves the right to introduce any additional exhibit necessary for rebuttal, cross-examination, or impeachment at the final hearing.

III. STATEMENT OF BASIC POSITION

In recent years, FPL has made significant investments in clean, fuel-efficient natural gas generation and transportation. FPL currently supplies 62% of the electricity consumed in Florida, with approximately 65% of this coming from natural gas fired generation. FPL's investments in natural gas have saved customers more than $6.5 billion in fuel costs since 2001, and these investments will continue to provide customer savings for decades. With such a large demand for natural gas, establishing a predictable, reliable, and low cost fuel supply is imperative for FPL and its customers. FPL now looks to continue its efforts to ensure a reliable and stable source of delivery of clean electricity for its customers by making targeted investments in natural gas production.

As a means to achieve this goal, FPL is seeking a Commission determination that the Woodford Gas Reserves Project, a joint venture with PetroQuest Energy, Inc. ("PetroQuest") to invest in gas production in the Woodford Shale region is prudent and that the revenue requirements associated with this investment may be recovered through the fuel cost recovery clause ("Fuel Clause"). The project provides significant benefits to customers as both a hedge against volatile natural gas prices and through expected cost savings. It will be referred to herein as the "Woodford Project" or the "PetroQuest joint venture."

Furthermore, in order to ensure that the benefits of potential future gas reserves projects can be secured for customers, FPL is requesting that the Commission approve Guidelines for acquiring future gas reserves such that the revenue requirements associated with investments meeting these requirements would be eligible for cost recovery through the Fuel Clause, subject to the usual review of the prudence of fuel-related transactions that the Commission conducts in Fuel Clause proceedings. Without such Guidelines FPL will not be in a position to take advantage of the substantial opportunities to provide for customer savings through gas production. Gas production in today's shale gas markets is a fast moving business. Counterparties are generally unwilling to wait for standard regulatory approval timing in order to execute an agreement. FPL cannot depend on having USG or any other entity stand in until the regulatory review is completed. Additionally, because of the volatile nature of the gas markets, the start date of a transaction can have significant impacts on the value as viewed by the counterparty, as well as the benefit to FPL's customers. A several month delay in executing an agreement in today's gas markets could result in millions of dollars of savings lost for FPL's customers. By allowing FPL to move forward on future projects without the need for prior approval, the Commission would facilitate FPL's ability to take advantage of additional opportunities to achieve lower and more gas prices for customers, while maintaining the Commission's ability to review those projects in the same manner that it reviews other fuel related transactions.

The Woodford Project offers FPL and its customers an excellent opportunity to obtain a portion of FPL's gas requirements at a stable, lower cost. By disassociating a portion of FPL's natural gas purchases from market prices that historically have been volatile and instead obtaining that gas at a stable cost of production, the Woodford Project will help mitigate volatility in market prices and ensure more stable prices for the gas FPL burns in its power plants. Ownership of interests in gas reserves such as the Woodford Project thus would operate as a long-term physical hedge against market volatility.

The Woodford Project also is expected to produce significant volumes of gas over multiple decades, all of which would be provided *at the cost of production* rather than market prices. FPL's revenue requirements for the Woodford Project are projected to be lower than the market price of natural gas on a dollars per MMBtu basis even in the early years, and then far lower over the remaining 30 plus year life of the project as market prices for natural gas increase (as expected) while FPL's cost of production remains steady and low. FPL customers are projected to save approximately $107 million on a net present value ("NPV") basis over the life of the project, based on FPL's forecast of natural gas prices. If, for any reason, market prices were to fall lower than the cost of production, of course, FPL's customers would benefit enormously in the aggregate through such lower prices, far offsetting the cost of this physical hedge.

There are at least two bases for recovery of the Woodford Project costs through the Fuel Clause. First, the Commission has a long-standing practice of including capital projects in the Fuel Clause when they are undertaken in order to reduce the delivered cost of fossil fuels that customers must pay. This practice was initially established in Order No. 14546. As noted in Order No. PSC-11-0080-PAA-EI, Attachment A, Fuel Clause recovery for this sort of capital project has been permitted in a number of subsequent Commission decisions. The Woodford Project meets the requirements of these orders, because it is projected to result in $107 million in NPV savings on the cost of natural gas that customers pay. Second, the Commission also has authorized the recovery of natural gas hedging costs through the Fuel Clause. Order No. PSC-

02-1484-FOF-EI, issued on October 30, 2002 in Docket No. 011605-EI; Order No. PSC-08-0667-PAA-EI, issued on October 8, 2008 in Docket No. 080001-EI. The Woodford Project and other gas reserves projects that FPL may undertake pursuant to the proposed Guidelines are longer-term physical hedges of natural gas that would be an effective complement to FPL's existing program of short-term hedges in mitigating the volatility of natural gas prices. Therefore, gas reserves projects are properly recoverable under the Fuel Clause as a hedging cost.

The Office of Public Counsel ("OPC") and Florida Industrial Power Users Group ("FIPUG") oppose FPL's requests. Their opposition is both ill-founded and puzzling. They argue that the gas reserves projects would be beneficial for shareholders but too risky for customers, that FPL has not properly projected costs, and, astonishingly, that the Commission wouldn't have the tools to effectively regulate FPL's investment. On every one of these arguments, OPC and FIPUG are simply wrong. The arguments are premised upon erroneous facts and calculations as well as a fundamental lack of understanding of the oil and gas industry. But, interestingly, even the intervenors' flawed calculations show projected savings for customers that would make their recommended rejection of FPL's proposal nonsensical and at odds with the interests of the very customers they ostensibly seek to protect.

In contrast, FPL has supported its gas reserves petition with detailed analyses and actual industry expertise. The facts are clear: FPL's projections show substantial benefits for customers over a wide range of assumptions. And if the intervenors are correct that there is a high degree of uncertainty about future natural gas prices, then the price stability that gas reserves projects provide will be especially valuable to FPL and its customers. FPL's investment in the Woodford Project is prudent, and recovery through the fuel clause is appropriate. Furthermore, FPL's proposed Guidelines will provide the framework necessary for substantial future savings in fuel costs for customers. For these reasons, the Commission should approve FPL's requests.

IV. ISSUES AND POSITIONS

ISSUE 1: **Should the Commission approve FPL's request to recover the amounts it would pay to its subsidiary for gas obtained from the PetroQuest joint venture through the fuel cost recovery clause on the basis and in the manner proposed by FPL in the June 25 Petition?**

FPL: Yes. FPL's investment in the PetroQuest joint venture is prudent. FPL's investment in the PetroQuest joint venture is projected to provide for $107 million in customer fuel savings over the life of the project. In addition, the PetroQuest joint venture will provide for fuel price stability, effectively acting as a long-term hedge. Because it is designed to reduce the delivered price of fossil fuel (natural gas) and the costs for the PetroQuest joint venture were not recognized or anticipated in the cost levels used to determine FPL's current base rates, the costs associated with the PetroQuest joint venture are appropriate for recovery through the Fuel Clause. Moreover, the PetroQuest joint venture provides a longer-term physical hedge to complement FPL's existing program of short-term financial hedges and it is properly recoverable through the Fuel Clause as a hedging cost. (FORREST, OUSDAHL, TAYLOR, DEASON)

ISSUE 2: **If the Commission answers Issue 1 in the negative, what standard should the Commission apply to a request by FPL to recover the price that FPL pays to its subsidiary/affiliate for gas obtained through the joint venture with PetroQuest?**

FPL: Although FPL has agreed to the inclusion of this issue in the Prehearing Statement, it is effectively moot. If the Commission rejects FPL's Petition, FPL will not pursue the PetroQuest joint venture. Instead, FPL's unregulated affiliate, USG Properties Woodford I, LLC will retain all of the rights, benefits and responsibilities of the PetroQuest joint venture. Therefore, the question of what Commission standards would apply to recovery for the PetroQuest joint venture in the event of Commission rejection is purely hypothetical and need not be addressed. (FORREST, OUSDAHL)

ISSUE 3: **What amount, if any, associated with the transactions proposed in FPL's June 25 Petition should be included for recovery through FPL's 2015 fuel cost recovery factor?**

FPL: For 2015, the amount to be recovered is projected to be $45,473,295, which is based on FPL's share of the costs to be incurred in 2015 for the PetroQuest joint venture. The recovery amount will be adjusted through the normal Fuel Clause true-up mechanism as actual 2015 costs are known. (FORREST, OUSDAHL, DEASON)

__ISSUE 4:__ **Do FPL's proposed Guidelines for future capital investments in natural gas exploration and drilling joint ventures satisfy the Commission's criteria for consideration in the fuel cost recovery clause proceeding?**

__FPL:__ Yes. FPL's proposed Guidelines would govern investments in gas reserve projects. Because the Guidelines require that such investments are projected to produce savings in the cost of fossil fuel (natural gas) for FPL's customers and the investments also would provide a longer-term physical hedge against natural gas price volatility, they are appropriate criteria to determine eligibility for the Fuel Clause. (FORREST, DEASON)

__ISSUE 5:__ **If the Commission answers Issue 4 in the affirmative, should the Commission approve FPL's proposed criteria?**

__FPL:__ Yes. FPL's proposed Guidelines provide an effective and appropriate framework to allow FPL to consummate a transaction when an agreement has been reached that meets the Guidelines, without having to wait on the normal several month-long Commission approval process that likely would foreclose FPL from participating in many potentially valuable gas reserves projects. The Guidelines are effectively structured to limit the total dollar amount of FPL's gas reserves investments and to ensure both that the investments are projected to produce fuel savings for customers and that they are for the types of reserves that are most useful to FPL and its customers. Specifically, the Guidelines cover the scope of FPL's project participation as a percentage of average daily burn, as well as on an annual capital expenditure basis. They also describe how the deals will be evaluated against FPL's then-current forecast of natural gas prices. Finally, the Guidelines discuss the composition of gas reserves that FPL can pursue. The adoption of the Guidelines would be consistent with how the Commission has administered the short-term hedging program. These parameters will provide the framework FPL needs to secure the benefits of investment in natural gas production for customers, while maintaining the Commission's ability to review those projects in the same manner that it reviews other fuel-related transactions. (FORREST, DEASON)

__Issue 6:__ **Is FPL contractually precluded by paragraph 6 of the Stipulation and Settlement Agreement dated December 12, 2012 and approved by the Commission in Order No. PSC-13-0023-S-EI from seeking to increase rates as it proposes?**

__FPL:__ It is FPL's position that Issue 6 is subsumed by Issue 1. Moreover, the premise of this issue is that the PetroQuest joint venture would increase rates, whereas FPL's testimony demonstrates that there is a high probability that it would reduce rates because of the fuel savings that it would make possible. Regardless of where

Issue 6 is addressed, FPL's position on this issue is "no." The first sentence of paragraph 6 in the Stipulation and Settlement Agreement provides expressly that "[n]othing shall preclude the Company from requesting the Commission to approve the recovery of costs (a) that are of a type which traditionally and historically would be, have been, or are presently recovered through cost recovery clauses or surcharges …." FPL's request to recover costs associated with the PetroQuest joint venture through the Fuel Clause is fully consistent with the Commission's traditional and historical practices under Order No. 14546 (fuel-saving measures) and Order Nos. PSC-02-1484-FOF-EI and PSC-08-0667-PAA-EI (hedging), because it is projected to provide net savings for customers and would serve as a valuable longer term physical hedge. (FORREST, OUSDAHL, DEASON)

<u>Issue 7:</u> **If the Commission concludes that FPL's petition has merit, should the Commission engage in rulemaking pursuant to section 120.54, Florida Statutes, and adopt rules addressing gas reserve guidelines and operations rather than adopting the Gas Reserves Guidelines as proposed by FPL?**

<u>FPL:</u> No. The Commission should not engage in rulemaking rather than adopting the Gas Reserves Guidelines as proposed by FPL. Florida Statutes defines a "rule" as an "agency statement of general applicability that implements, interprets, or prescribes law or policy or describes the procedure or practice requirements of an agency.…" (s. 120.52(16), F.S.). If approved by the Commission, FPL's proposed Gas Reserves Guidelines would not be a statement of general applicability. Only FPL has requested approval of an investment in gas reserves. No other electric utility in Florida has made a similar request and there is no evidence presented to indicate that gas reserve guidelines would be generally applicable to other public utilities. To adopt a rule for one electric utility would be improper. Furthermore, FPL needs the Gas Reserves Guidelines in place in time to act on them to save customers money as soon as possible. Rulemaking can take six months to a year or more. Such a delay would come at the cost of customers and would serve no legitimate purpose. Finally, the Commission has the ability to thoroughly review the proposed Gas Reserves Guidelines in this proceeding and does not need a separate proceeding to do so. (FORREST, DEASON)

<u>ISSUE 8:</u> **What effect, if any, does Commission's decision on Issue 3 have on the fuel cost recovery factor and GPIF targets/ranges for the period January 2015 through December 2015?**

<u>FPL:</u> If the Commission approves recovery of costs associated with the PetroQuest joint venture through the Fuel Clause, FPL does not propose to revise the fuel cost recovery factors for the period January 2015 through December 2015. Rather, FPL would reflect both the costs and fuel savings associated with the PetroQuest joint venture in the actual/estimated and final true-ups for 2015. The GPIF targets/ranges table that was approved by stipulation at the October 22, 2014 hearing in this docket would change slightly as a consequence of approving cost recovery for the PetroQuest joint venture. As revised, the proper values for FPL in the table would be as follows:

GPIF TARGET AND RANGE SUMMARY
JANUARY THROUGH DECEMBER, 2015

Company (Exhibit)	*Plant/Unit*	*EAF*			*ANOHR*			*Total Projected Max Fuel Savings ($000's)*
		Target	*Maximum*		*Target*	*Maximum*		
		EAF (%)	*EAF (%)*	*Savings ($000's)*	*ANOHR BTU/KWH*	*ANOHR BTU/KWH*	*Savings ($000's)*	
FPL (JCB-2)	*Ft. Myers 2*	*84.1*	*86.6*	4,621	*7,197*	*7,064*	3,193	7,814
	Martin 8	*84.7*	*87.2*	5,003	*6,922*	*6,789*	3,875	8,878
	Manatee 3	*90.3*	*92.8*	4,322	*6,921*	*6,804*	2,802	7,124
	St. Lucie 1	*83.5*	*86.5*	10,302	*10,405*	*10,277*	4,324	14,626
	St. Lucie 2	*84.8*	*87.8*	8,486	*10,288*	*10,142*	4,019	12,505
	Turkey Point 3	*83.2*	*86.2*	8,459	*11,143*	*10,972*	4,506	12,965
	Turkey Point 4	*93.6*	*96.6*	9,317	*11,002*	*10,821*	5,305	14,622
	Turkey Point 5	*91.1*	*93.6*	5,530	*7,011*	*6,861*	2,862	8,392
	West County 1	*89.8*	*92.3*	5,343	*6,794*	*6,648*	5,234	10,577
	West County 2	*78.8*	*81.8*	5,692	*6,866*	*6,726*	4,367	10,059
	West County 3	*90.0*	*92.0*	3,955	*6,703*	*6,568*	4,388	8,343
	Total			71,030			44,875	115,905

(OUSDAHL)

<u>ISSUE 9:</u> **Should this Docket be closed?**

<u>FPL:</u> This docket should be closed after issuance of the final order approving the proposed PetroQuest joint venture for recovery through the Fuel Clause and approving FPL's proposed Guidelines.

V. STIPULATED ISSUES

There are no stipulated issues at this time.

VI. PENDING MOTIONS

Motion Document No.	**Date**	**Description**
04702-14	August 22, 2014	OPC's Motion to Dismiss FPL's 6/25/14 Petition for Lack of Subject Matter Jurisdiction
04713-14	August 22, 2014	OPC's request for Oral Argument on Motion to Dismiss FPL's 6/25/14 Petition for Lack of Subject Matter Jurisdiction

VII. PENDING REQUESTS FOR CONFIDENTIAL CLASSIFICATION

At this time, there are no pending requests for confidential classification.

VIII. OBJECTIONS TO WITNESSES' QUALIFICATIONS

At this time, FPL has no objections to any witness's qualifications.

IX. REQUIREMENTS OF THE PREHEARING ORDER THAT CANNOT BE MET

At this time, FPL is not aware of any requirements in the Order Establishing Procedure with which it cannot comply.

Respectfully submitted this 27th day of October, 2014.

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By *s/ Scott A. Goorland*
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CERTIFICATE OF SERVICE
Docket No. 140001-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic service on this 27th day of October, 2014 to the following:

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