

Docket No. 160009-EI: Nuclear Cost Recovery Clause.

Florida Power & Light Company

Turkey Point Units 6 & 7

Witness: **Direct Testimony of ILIANA H. PIEDRA,**

Appearing on behalf of the staff of the Florida Public Service Commission

Date Filed: June 16, 2016

1 **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

2 **COMMISSION STAFF**

3 **DIRECT TESTIMONY OF ILIANA H. PIEDRA**

4 **DOCKET NO. 160009-EI**

5 **June 16, 2016**

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

7 **A.** My name is Iliana H. Piedra. My business address is 3625 N.W. 82nd Ave., Suite
8 400, Miami, Florida, 33166.

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

10 **A.** I am employed by the Florida Public Service Commission (FPSC or Commission)
11 as a Professional Accountant Specialist in the Office of Auditing and Performance
12 Analysis.

13 **Q. Briefly review your educational and professional background.**

14 **A.** I received a Bachelor of Business Administration degree with a major in
15 accounting from Florida International University in 1983. I am also a Certified Public
16 Accountant licensed in the State of Florida. I have been employed by the FPSC since
17 January 1985.

18 **Q. Please describe your current responsibilities.**

19 **A.** My responsibilities consist of planning and conducting utility audits of manual
20 and automated accounting systems for historical and forecasted data.

21 **Q. Have you presented testimony before this Commission or any other
22 regulatory agency?**

23 **A.** Yes. I filed testimony in the City Gas Company of Florida's rate case, Docket No.
24 940276-GU, the General Development Utilities, Inc. for the Silver Springs Shores
25 Division in Marion County and the Port Labelle Division in Glades and Hendry Counties

1 rate cases in Docket Nos. 920733-WS and 920734-WS, the Florida Power & Light
2 Company's storm cost recovery case in Docket No. 041291-EI, the Embarq's storm cost
3 recovery case in Docket No. 060644-TL, the K W Resort Utilities Corp. rate case in
4 Docket No. 070293-SU, the Fuel and Purchased Power Cost Recovery Clause in Docket
5 Nos. 120001-EI, 130001-EI and 140001-EI, and the Nuclear Cost Recovery Clause in
6 Docket Nos. 130009-EI and 150009-EI.

7 **Q. What is the purpose of your testimony today?**

8 **A.** The purpose of my testimony is to sponsor the staff audit report of Florida Power
9 & Light Company (FPL or Utility) which addresses the Utility's filing in Docket No.
10 160009-EI, Nuclear Cost Recovery Clause (NCRC) for costs associated with its Nuclear
11 Units - Turkey Point Units 6 & 7 (Turkey Point 6 & 7). We issued an audit report in this
12 docket for these units on June 10, 2016. This audit report is filed with my testimony and
13 is identified as Exhibit IHP-1.

14 **Q. Was this audit prepared by you or under your direction?**

15 **A.** Yes, it was prepared under my direction.

16 **Q. Please describe the work you performed in this audit.**

17 **A.** Our overall objective was to verify that the Utility's 2015 NCRC filings for Turkey
18 Point 6 & 7 in Docket No. 160009-EI are consistent with and in compliance with Section
19 366.93, Florida Statutes, and Rule 25-6.0423, Florida Administrative Code. We
20 performed the following procedures to satisfy the overall objective.

21 Construction Work in Progress (CWIP)

22 We sampled and verified the monthly pre-construction expenditures and traced to
23 invoices and other supporting documentation including contracts. We verified various
24 sample items to purchase orders for contracts over \$250,000. We verified a sample of
25 salary expenses and traced to time sheets. We verified a sample of legal fees and traced

1 to invoices. We recalculated Schedule T-6.

2 Recovery

3 We traced the amount collected on Schedules T-1 to the NCRC jurisdictional amount
4 approved in Order No. PSC-14-0617-PAA-EI, and to the Capacity Cost Recovery Clause
5 in Docket No. 160001-EI.

6 Carrying Cost on Deferred Tax Adjustment

7 We recalculated Schedule T-3A. We traced the projected and estimated True-Up amount
8 to prior NCRC Orders. We reconciled the monthly recovered costs to the supporting
9 schedules in the filing. We traced the Allowance for Funds Used During Construction
10 (AFUDC) rate applied to the current rate approved in Order No. PSC-14-0193-PAA-EI,
11 issued April 25, 2014.

12 Other Issues

13 We recalculated Schedule T-2. We traced the projected and estimated true-up amounts to
14 prior NCRC Orders. We traced the beginning balances included in the schedule to the
15 prior docket. We reconciled the monthly costs to the supporting schedules in the filing.

16 True-up

17 We traced the December 31, 2014, Site Selection and Pre-Construction True-Up
18 Provisions to the Commission Order No. 14-0617-FOF-EI. We recalculated the True-Up
19 and Interest Provision amounts as of December 31, 2015 using the Commission approved
20 beginning balances as of December 31, 2014, the approved AFUDC rate, and the 2015
21 costs.

22 **Q. Please review the audit findings in this audit report, Exhibit IHP-1.**

23 **A.** There were no findings in this audit.

24 **Q. Does that conclude your testimony?**

25 **A.** Yes.

State of Florida



Public Service Commission

Office of Auditing and Performance Analysis
Bureau of Auditing
Miami District Office

Auditor's Report

Florida Power & Light Company
Nuclear Cost Recovery Clause
Turkey Point Units 6 & 7

Twelve Months Ended December 31, 2015

Docket No. 160009-EI
Audit Control No. 16-005-4-1
May 31, 2015

Handwritten signature of Iliana H. Piedra in black ink.

Iliana H. Piedra
Audit Manager

Handwritten signature of Gabriela Leon in black ink.

Gabriela Leon
Audit Staff

Handwritten signature of Marisa Glover in blue ink.

Marisa Glover
Reviewer

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Purpose

To: Florida Public Service Commission

We have performed the procedures described later in this report to meet the objectives set forth by the Office of Industry Development and Market Analysis in its audit service request dated January 5, 2016. We have applied these procedures to the attached schedules prepared by Florida Power & Light Company, and to several of its related schedules in support of its 2015 filing for the Nuclear Cost Recovery Clause (Turkey Point Units 6 & 7 Project) in Docket No. 160009-EI.

This audit was performed following General Standards and Fieldwork Standards found in the AICPA Statements on Standards for Attestation Engagements. The report is intended only for internal Commission use.

Objectives and Procedures

General

Definitions

Site selection costs, are costs that are expended prior to the selection of a site.

Pre-construction costs, are costs that are expended after a site has been selected in preparation for the construction of a nuclear power plant, incurred up to and including the date the utility completes site clearing work.

FPL/Utility refers to Florida Power & Light Company.

CCRC refers to Capacity Cost Recovery Clause.

NCRC refers to Nuclear Cost Recovery Clause.

Objectives: The objective was to determine whether the Utility's 2015 NCRC filings in Docket No. 160009-EI are consistent and in compliance with Section 366.93, Florida Statutes (F.S.), and Rule 25-6.0423, Florida Administrative Code (F.A.C.)

Procedures: We performed the following specific objectives and procedures to satisfy the overall objective identified above.

Construction Work in Progress (CWIP)

Objectives: The objectives were to verify that pre-construction costs listed on the Utility's Schedule T-6 filing were supported by adequate documentation and that the capital additions were appropriately recoverable through the NCRC and in compliance with Section 366.93, F.S. and Rule 25-6.043, F.A.C.

Procedures: We sampled and verified the monthly pre-construction expenditures and traced to invoices and other supporting documentation including contracts. We verified various sample items to purchase orders for contracts over \$250,000. We verified a sample of salary expenses and traced to time sheets. We verified a sample of legal fees and traced to invoices. We recalculated Schedule T-6. No exceptions were noted.

Recovery

Objectives: The objectives were to determine whether the Utility used the Commission approved CCRC factors to bill customers for the period January 1, 2015 through December 31, 2015 and whether Schedules T-2 and T-3 reflect the amounts in Order No. PSC-14-0617-FOF-EI, issued October 27, 2014.

Procedures: We verified the amount collected on the Schedule T-1 to the NCRC jurisdictional amount approved in Order No. PSC-14-0617-FOF-EI, and to the CCRC in Docket No. 160001-EI and verified that the approved factor was used to bill the customers. No exceptions were noted.

Carrying Cost on Deferred Tax Adjustment

Objectives: The objectives were to determine whether Schedule T-3A - Carrying Cost on Deferred Tax Assets (DTA) included the correct balances from the supporting schedules and the deferred tax adjustment is accurately calculated.

Procedures: We traced the projected and estimated True-Up amount to prior NCRC Orders. We traced the beginning balances included in the schedule to the prior audit. We reconciled the monthly recovered costs to the supporting schedules in the filing. We traced the Allowance for Funds Used During Construction (AFUDC) rate applied to the rates approved in Order No. PSC-14-0193-PAA-EI, issued April 25, 2014. We recalculated Schedule T-3A and verified the Final True-Up amount. No exceptions were noted.

Other Issues

Objectives: The objectives were to determine whether the carrying cost for site selection and pre-construction costs listed on the Utility's Schedule T-2 include the correct balances from the supporting schedules of the filing and were appropriately calculated.

Procedures: We traced the projected and estimated true-up amounts to prior NCRC Orders. We traced the beginning balances included in the schedule to the prior docket. We reconciled the monthly costs to the supporting schedules in the filing. We traced the AFUDC rate applied by the Utility to the rate approved in Order No. PSC-14-0193-PAA-EI. We recalculated Schedule T-2 and verified the Final True-Up. No exceptions were noted.

True-Up

Objectives: The objective was to determine whether the final True-Up filed on Schedule T-1 was properly calculated.

Procedures: We traced the December 31, 2014, Site Selection and Pre-Construction True-Up Provisions to the Commission Order. We recalculated the True-Up and Interest Provision amounts as of December 31, 2015 using the Commission approved beginning balances as of December 31, 2014, the approved AFUDC interest rate, and the 2015 costs. No exceptions were noted.

Audit Findings

None

Exhibits

Exhibit 1: Schedule T-1 True-Up of Site Selection Cost

Schedule T-1 (True-up)		Turkey Point Units 6&7 Site Selection Carrying Costs on Cost Balance True-up Filing: Retail Revenue Requirements Summary					[Section (6)(c)1.a.]	
FLORIDA PUBLIC SERVICE COMMISSION		EXPLANATION: Provide the calculation of the true-up of total retail revenue requirements based on actual carrying costs for the prior year and the previously filed costs.					For the Year Ended 12/31/2015	
COMPANY: FLORIDA POWER & LIGHT COMPANY							Witness: Jennifer Grant-Keene	
DOCKET NO.: 160009-EI								
Line No.		(A) Actual January	(B) Actual February	(C) Actual March	(D) Actual April	(E) Actual May	(F) Actual June	(G) 6 Month Total
Jurisdictional Dollars								
1	Site Selection Revenue Requirements (Schedule T-2, Line 7)	(\$188)	(\$184)	(\$176)	(\$169)	(\$160)	(\$152)	(\$1,027)
2	Construction Carrying Cost Revenue Requirements	\$0	\$0	\$0	\$0	\$0	\$0	\$0
3	Recoverable O&M Revenue Requirements	\$0	\$0	\$0	\$0	\$0	\$0	\$0
4	DTA/(DTL) Carrying Cost (Schedule T-3A, Line 8)	\$13,325	\$13,326	\$13,326	\$13,326	\$13,327	\$13,327	\$78,957
5	Other Adjustments	\$0	\$0	\$0	\$0	\$0	\$0	\$0
6	Total Period Revenue Requirements (Lines 1 through 5)	<u>\$13,137</u>	<u>\$13,142</u>	<u>\$13,150</u>	<u>\$13,159</u>	<u>\$13,167</u>	<u>\$13,176</u>	<u>\$78,930</u>
7	Projected Cost and Carrying Cost on DTA/(DTL) for the Period (Order No. PSC 14-0617-FOF-EI)	<u>\$12,209</u>	<u>\$12,212</u>	<u>\$12,212</u>	<u>\$12,212</u>	<u>\$12,212</u>	<u>\$12,212</u>	<u>\$73,270</u>
8	True-up to Projections (Over)/Under Recovery for the Period (Line 6 - Line 7)	<u>\$828</u>	<u>\$930</u>	<u>\$938</u>	<u>\$946</u>	<u>\$955</u>	<u>\$963</u>	<u>\$5,659</u>
9	Actual / Estimated Revenue Requirements for the period (Order No. PSC 15-0521-FOF-EI)	<u>\$13,108</u>	<u>\$13,113</u>	<u>\$13,121</u>	<u>\$13,130</u>	<u>\$13,138</u>	<u>\$13,146</u>	<u>\$78,756</u>
10	Final True-up Amount for the Period (Line 6 - Line 9)	<u>\$28</u>	<u>\$29</u>	<u>\$29</u>	<u>\$29</u>	<u>\$29</u>	<u>\$30</u>	<u>\$174</u>

* Totals may not add due to rounding

Turkey Point Units 6&7
Site Selection Carrying Costs on Cost Balance
True-up Filing: Retail Revenue Requirements Summary

Schedule T-1 (True-up) [Section (6)(c)1.a.]

FLORIDA PUBLIC SERVICE COMMISSION
 COMPANY: FLORIDA POWER & LIGHT COMPANY
 DOCKET NO.: 160009-EI

EXPLANATION: Provide the calculation of the true-up of total retail revenue requirements based on actual carrying costs for the prior year and the previously filed costs.

For the Year Ended 12/31/2015
 Witness: Jennifer Grant-Keena

Line No.	(H) Actual July	(I) Actual August	(J) Actual September	(K) Actual October	(L) Actual November	(M) Actual December	(N) 12 Month Total
Jurisdictional Dollars							
1	Site Selection Revenue Requirements (Schedule T-2, Line 7)	(\$143)	(\$142)	(\$146)	(\$161)	(\$156)	(\$1,926)
2	Construction Carrying Cost Revenue Requirements	\$0	\$0	\$0	\$0	\$0	\$0
3	Recoverable O&M Revenue Requirements	\$0	\$0	\$0	\$0	\$0	\$0
4	DTA/DTL Carrying Cost (Schedule T-3A, Line 8)	\$13,328	\$13,328	\$13,329	\$13,329	\$13,329	\$155,930
5	Other Adjustments	\$0	\$0	\$0	\$0	\$0	\$0
6	Total Period Revenue Requirements (Lines 1 through 5)	<u>\$13,184</u>	<u>\$13,186</u>	<u>\$13,182</u>	<u>\$13,178</u>	<u>\$13,168</u>	<u>\$158,002</u>
7	Projected Cost and Carrying Cost on DTA/DTL for the Period (Order No. PSC 14-0617-FOF-EI)	\$13,905	\$13,924	\$13,950	\$13,977	\$14,008	\$157,080
8	True-up to Projections (Over)/Under Recovery for the Period (Line 6 - Line 7)	<u>(\$720)</u>	<u>(\$738)</u>	<u>(\$768)</u>	<u>(\$799)</u>	<u>(\$830)</u>	<u>\$942</u>
9	Actual / Estimated Revenue Requirements for the period (Order No. PSC 15-0521-FOF-EI)	\$13,166	\$13,158	\$13,154	\$13,149	\$13,139	\$157,658
10	Final True-up Amount for the Period (Line 6 - Line 9)	<u>\$28</u>	<u>\$28</u>	<u>\$28</u>	<u>\$29</u>	<u>\$29</u>	<u>\$345</u>

* Totals may not add due to rounding

Exhibit 2: Schedule T-1 True-Up of Pre-Construction Cost

		Turkey Point Units 6&7 Pre-Construction Costs and Carrying Costs on Construction Cost Balance True-up Filing: Retail Revenue Requirements Summary						(Section 8)(c)1.a.)
Schedule T-1 (True-up)								
FLORIDA PUBLIC SERVICE COMMISSION		EXPLANATION: Provide the calculation of the true-up of total retail revenue requirements based on actual expenditures for the prior year and previously filed expenditures.						For the Year Ended 12/31/2015
COMPANY: FLORIDA POWER & LIGHT COMPANY								Witness: Jennifer Grant-Keene
DOCKET NO.: 160009-EI								
Line No.		(A) Actual January	(B) Actual February	(C) Actual March	(D) Actual April	(E) Actual May	(F) Actual June	(G) 6 Month Total
Jurisdictional Dollars								
1	Pre-Construction Revenue Requirements (Schedule T-2, Line 7)	\$1,082,527	\$2,420,678	\$1,311,551	\$1,487,404	\$1,835,826	\$1,242,581	\$9,380,636
2	Construction Carrying Costs Revenue Requirements	\$0	\$0	\$0	\$0	\$0	\$0	\$0
3	Recoverable O&M Revenue Requirements	\$0	\$0	\$0	\$0	\$0	\$0	\$0
4	DTA/DTL Carrying Costs (Schedule T-3A, Line 8)	\$538,018	\$542,511	\$547,356	\$550,878	\$555,180	\$559,132	\$3,283,085
5	Other Adjustments	\$0	\$0	\$0	\$0	\$0	\$0	\$0
6	Total Period Revenue Requirements (Lines 1 through 5)	<u>\$1,620,545</u>	<u>\$2,963,187</u>	<u>\$1,858,908</u>	<u>\$2,048,372</u>	<u>\$2,391,016</u>	<u>\$1,801,694</u>	<u>\$12,663,721</u>
7	Projected Costs and Carrying Costs for the Period (Order No. PSC 14-0817-FOF-EI) (e)	\$1,270,611	\$3,366,449	\$3,627,540	\$405,086	\$2,401,325	\$4,091,639	\$15,362,951
8	True-up to Projections (Over/Under Recovery for the Period (Line 6 - Line 7)	<u>\$349,933</u>	<u>(\$403,262)</u>	<u>(\$1,988,632)</u>	<u>\$1,643,286</u>	<u>(\$10,308)</u>	<u>(\$2,290,246)</u>	<u>(\$2,679,230)</u>
9	Actual / Estimated Revenue Requirements for the period (Order No. PSC-15-0521-FOF-EI)	\$1,619,401	\$2,982,023	\$2,130,186	\$2,136,483	\$2,241,286	\$1,888,665	\$12,978,045
10	Final True-up Amount for the Period (Line 6 - Line 9)	<u>\$1,143</u>	<u>\$1,164</u>	<u>(\$271,278)</u>	<u>(\$88,111)</u>	<u>\$146,731</u>	<u>(\$85,772)</u>	<u>(\$284,324)</u>
11	(a) Total being recovered in 2015 as approved in Order No. PSC-14-0817-FOF-EI in Docket No. 140008-EI							6 Month Total
12	2013 Final True-Up (2013 Schedule T-1, Line 10)	(\$0)	(\$0)	\$216,800	(\$637,117)	(\$438,136)	\$1,491,428	\$632,975
13	2014 (Over/Under Recovery (Schedule AE-1, Line 8)	\$10,386	\$2,038,917	\$1,891,752	(\$377,746)	\$1,162,282	\$1,016,667	\$5,848,558
14	2015 Projected Costs / Carrying Costs (Schedule P-2, Line 7)	\$718,182	\$789,292	\$1,079,022	\$876,130	\$1,130,431	\$1,033,631	\$6,625,889
15	2015 Projected DTA/DTL Carrying Costs (Schedule P-3A, Line 8)	\$538,043	\$538,240	\$540,888	\$543,819	\$548,750	\$548,612	\$3,265,730
16	2016 Total (Over/Under Recovery	<u>\$1,270,611</u>	<u>\$3,366,449</u>	<u>\$3,627,540</u>	<u>\$405,086</u>	<u>\$2,401,325</u>	<u>\$4,091,639</u>	<u>\$15,362,951</u>

* Totals may not add due to rounding

See notes on Page 2

Turkey Point Units 6&7
Pre-Construction Costs and Carrying Costs on Construction Cost Balance
True-up Filing: Retail Revenue Requirements Summary

[Section (6)(c)1.a.]

Schedule T-1 (True-up)

FLORIDA PUBLIC SERVICE COMMISSION
 COMPANY: FLORIDA POWER & LIGHT COMPANY
 DOCKET NO.: 160009-EI

EXPLANATION: Provide the calculation of the true-up of total retail revenue requirements based on actual expenditures for the prior year and previously filed expenditures.

For the Year Ended 12/31/2015

Witness: Jennifer Grant-Keene

Line No.	(H) Actual July	(I) Annual August	(J) Actual September	(K) Actual October	(L) Actual November	(M) Actual December	(N) 12 Month Total
Jurisdictional Dollars							
1	\$1,445,651	\$1,427,791	\$2,233,568	\$723,815	\$1,553,715	\$973,897	\$17,749,073
2	\$0	\$0	\$0	\$0	\$0	\$0	\$0
3	\$0	\$0	\$0	\$0	\$0	\$0	\$0
4	\$561,314	\$504,974	\$569,781	\$573,533	\$576,284	\$579,413	\$9,718,383
5	\$0	\$0	\$0	\$0	\$0	\$0	\$0
6	<u>\$2,006,965</u>	<u>\$1,932,765</u>	<u>\$2,803,349</u>	<u>\$1,297,348</u>	<u>\$2,129,999</u>	<u>\$1,553,309</u>	<u>\$24,467,457</u>
7	\$659,031	(\$710,602)	\$2,252,935	\$2,411,124	\$1,706,501	(\$2,001,503)	\$19,680,436
8	<u>\$1,347,935</u>	<u>\$2,703,367</u>	<u>\$550,414</u>	<u>(\$1,113,776)</u>	<u>\$423,498</u>	<u>\$3,554,812</u>	<u>\$4,787,020</u>
9	\$1,657,149	\$1,704,333	\$1,842,668	\$1,632,525	\$1,797,534	\$3,739,222	\$25,781,487
10	<u>\$149,816</u>	<u>\$228,432</u>	<u>\$98,691</u>	<u>(\$535,177)</u>	<u>\$382,455</u>	<u>(\$2,185,913)</u>	<u>(\$1,314,010)</u>
11	<u>(a) Total recovered in 2015 as approved in Order No. PSC-14-0617-FOF-EI in Docket No. 140009-EI:</u>						
	July	August	September	October	November	December	12 Month Total
12	\$556,215	(\$187,119)	\$569,101	\$846,185	(\$151,998)	(\$2,729,012)	(\$463,648)
13	(\$1,279,278)	(\$1,879,653)	\$37,860	\$245,950	\$525,006	(\$2,538,164)	\$950,338
14	\$829,459	\$801,148	\$1,088,193	\$759,507	\$770,773	\$2,697,815	\$12,571,584
15	\$552,635	\$555,018	\$557,781	\$660,482	\$582,720	\$587,796	\$5,612,164
16	<u>\$659,031</u>	<u>(\$710,602)</u>	<u>\$2,252,935</u>	<u>\$2,411,124</u>	<u>\$1,706,501</u>	<u>(\$2,001,503)</u>	<u>\$19,680,436</u>

* Totals may not add due to rounding

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear cost recovery clause.

DOCKET NO. 160009-EI

DATED: JUNE 16, 2016

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the direct testimony of Iliana H. Piedra on behalf of the staff of the Florida Public Service Commission was electronically filed with the Office of Commission Clerk, Florida Public Service Commission, and copies were furnished to the following, by electronic mail, on this 16th day of June, 2016.

Matthew R. Bernier
Duke Energy Florida, LLC
106 East College Avenue, Suite 800
Tallahassee, Florida 32301
Matthew.Bernier@duke-energy.com

Dianne M. Triplett
Duke Energy Florida, LLC
299 First Avenue North
St. Petersburg, Florida 33701
Dianne.Triplett@duke-energy.com

J.R. Kelly/Charles J. Rehwinkel/
Erik L. Saylor/Patricia A. Christensen
Office of Public Counsel
111 W. Madison Street, Room 812
Tallahassee, Florida 32399
Kelly.JR@leg.state.fl.us
Rehwinkel.Charles@leg.state.fl.us
Saylor.Erik@leg.state.fl.us
Christensen.Patty@leg.state.fl.us

Jon C. Moyle, Jr.
Florida Industrial Power Users Group
Moyle Law Firm, P.A.
118 North Gadsden Street
Tallahassee, Florida 32301
jmoyle@moylelaw.com

Kenneth Hoffman
Florida Power & Light Company
215 S. Monroe Street, Suite 810
Tallahassee, Florida 32301-1858
Ken.Hoffman@fpl.com

Jessica Cano/Kevin I.C. Donaldson
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, Florida 33408-0420
Jessica.Cano@fpl.com
Kevin.Donaldson@fpl.com

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CERTIFICATE OF SERVICE
PAGE 2

Victoria Mendez/Christopher A. Green
Xavier Albán/ Kerri L. McNulty
The City of Miami
444 SW 2nd Avenue
Miami, Florida 33130
vmendez@miamigov.com
cagreen@miami.gov
xealban@miamigov.com
klmcnulty@miamigov.com

George Cavros
Southern Alliance for Clean Energy
120 E. Oakland Park Boulevard, Suite 105
Fort Lauderdale, Florida 33334
george@cavros-law.com

James W. Brew/Laura A. Wynn
White Springs Agricultural Chemicals Inc.
d/b/a PCS Phosphate – White Springs
Stone Mattheis Xenopoulos & Brew, P.C.
1025 Thomas Jefferson Street, NW
Eighth Floor, West Tower
Washington, D.C. 20007
jbrew@smxblaw.com
law@smxblaw.com

Robert Scheffel Wright/John T. LaVia, III
Gardner, Bist, Bowden, Bush, Dee, LaVia &
Wright, P.A.
1300 Thomaswood Drive
Tallahassee, Florida 32308
Schef@gbwlegal.com
Jlavia@gbwlegal.com

/s/ Kyesha R. Mapp
KYESHA R. MAPP
SENIOR ATTORNEY

FLORIDA PUBLIC SERVICE COMMISSION
Gerald L. Gunter Building
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850
Telephone: (850) 413-6199
kmapp@psc.state.fl.us