

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Storm protection plan cost recovery clause.

DOCKET NO. 20230010-EI

DATED: August 7, 2023

COMMISSION STAFF'S PREHEARING STATEMENT

Pursuant to Order No. PSC-2023-0090-PCO-EI, filed February 15, 2023, revised by Order No. PSC-2023-0105-PCO-EI, filed March 20, 2023 and modified by Order No. PSC-2023-0178-PCO-EI, filed June 12, 2023, the Staff of the Florida Public Service Commission files its Prehearing Statement.

1. All Known Witnesses

Witness	Subject Matter	Issues #
Direct		
Hymavathi Vedula	Staff's audit report of DEF and FPUC: Storm Protection Plan Cost Recovery Clause	1
Donna D. Brown	Staff's audit report of FPL and TECO: Storm Protection Plan Cost Recovery Clause	1

2. All Known Exhibits

Witness	Proffered By	Exhibit #	Description
Direct			
Hymavathi Vedula	Commission Staff	HV-1	Auditor's Report - DEF
Hymavathi Vedula	Commission Staff	HV-2	Auditor's Report - FPUC
Donna D. Brown	Commission Staff	DDB-1	Auditor's Report - FPL
Donna D. Brown	Commission Staff	DDB-2	Auditor's Report - TECO

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: What amounts should the Commission approve as the Utilities' final 2022 prudently incurred costs and final jurisdictional revenue requirement true-up amount for the Storm Protection Plan Cost Recovery Clause?

POSITION: Staff has no position at this time.

ISSUE 2: What amounts should the Commission approve as the Utilities' reasonably estimated 2023 costs and estimated jurisdictional revenue requirement true-up amount for the Storm Protection Plan Cost Recovery Clause?

POSITION: Staff has no position at this time.

ISSUE 3: What amounts should the Commission approve as the Utilities' reasonably projected 2024 costs and projected jurisdictional revenue requirement amount for the Storm Protection Plan Cost Recovery Clause?

POSITION: Staff has no position at this time.

ISSUE 4: What are the Storm Protection Plan Cost Recovery Clause total jurisdictional revenue requirements, including true-ups, to be included in the Storm Protection Plan Cost Recovery factors for 2024?

POSITION: Staff has no position at this time.

ISSUE 5: What depreciation rates should be used to develop the depreciation expense included in the total Storm Protection Plan Cost Recovery Clause amounts for 2024?

POSITION: Staff has no position at this time.

ISSUE 6: What are the appropriate jurisdictional separation factors for 2024?

POSITION: Staff has no position at this time.

ISSUE 7: What are the appropriate Storm Protection Plan Cost Recovery Clause factors for 2024 for each rate class?

POSITION: Staff has no position at this time.

ISSUE 8: What should be the effective date of the new Storm Protection Plan Cost Recovery Clause factors for billing purposes?

POSITION: Staff has no position at this time.

ISSUE 9: Should the Commission approve revised tariffs reflecting the new Storm Protection Plan Cost Recovery Clause factors determined to be appropriate in this proceeding?

POSITION: Staff has no position at this time.

ISSUE 10: Should this docket be closed?

POSITION: Staff has no position at this time.

CONTESTED ISSUES

OPC ISSUE 1A: Has FPL demonstrated that the programs and projects contained in its current SPP plan and on which it is basing cost recovery, are prudent to undertake and prudent in amount?

POSITION: Staff has no position at this time.

OPC ISSUE 1B: Has the Commission properly determined, pursuant to Section 366.06(1), Fla. Stat., that the projected expenditures proposed for cost recovery by FPL are prudent?

POSITION: Staff has no position at this time.

OPC ISSUE 2A: Has DEF demonstrated that the programs and projects contained in its current SPP plan and on which it is basing cost recovery, are prudent to undertake and prudent in amount?

POSITION: Staff has no position at this time.

OPC ISSUE 2B: Has the Commission properly determined, pursuant to Section 366.06(1), Fla. Stat., that the projected expenditures proposed for cost recovery by DEF are prudent?

POSITION: Staff has no position at this time.

OPC ISSUE 3A: Has Tampa Electric demonstrated that the programs and projects contained in its current SPP plan and on which it is basing cost recovery, are prudent to undertake and prudent in amount?

POSITION: Staff has no position at this time.

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OPC ISSUE 3B: Has the Commission properly determined, pursuant to Section 366.06(1), Fla. Stat., that the projected expenditures proposed for cost recovery by Tampa Electric are prudent?

POSITION: Staff has no position at this time.

OPC ISSUE 4A: Has FPUC demonstrated that the programs and projects contained in its current SPP plan and on which it is basing cost recovery, are prudent to undertake and prudent in amount?

POSITION: Staff has no position at this time.

OPC ISSUE 4B: Has the Commission properly determined, pursuant to Section 366.06(1), Fla. Stat., that the projected expenditures proposed for cost recovery by FPUC are prudent?

POSITION: Staff has no position at this time.

OPC ISSUE 4C: Due to the proposed change in the cost allocation, did the Commission have adequate notice of the rate impacts caused by the capital expenditures under FPUC's current SPP so that the Commission could determine whether FPUC's projects and programs were prudent?

POSITION: Staff has no position at this time.

5. Stipulated Issues

Staff has no stipulated issues at this time.

6. Pending Motions

Staff has no pending motions at this time.

7. Pending Confidentiality Claims or Requests

Staff has no pending confidentiality motions at this time.

8. Objections to Witness Qualifications as an Expert

Staff has no objections to witness qualifications at this time.

9. Compliance with Order No. PSC-2023-0090-PCO-EI

Staff has complied with all requirements of the Order Establishing Procedure entered in this docket.

Respectfully submitted this 7th day of August, 2023.

/s/ Shaw Stiller

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that STAFF'S PREHEARING STATEMENT has been filed with the Office of Commission Clerk and that a true copy has been furnished to the following by electronic mail this Respectfully submitted this 7th day of August, 2023:

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