

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Storm protection plan cost recovery
clause

DOCKET NO.: 20230010-EI
FILED: August 7, 2023

**PREHEARING STATEMENT OF
NUCOR STEEL FLORIDA, INC.**

Pursuant to the Florida Public Service Commission's *Order Establishing Procedure*, Order No. PSC-2023-0090-PCO-EI, issued February 15, 2023, the *First Order Revising Order Establishing Procedure*, Order No. PSC-2023-0105-PCO-EI, issued March 20, 2023, and the *Order Granting Staff's Motion to Modify Order Establishing Procedure*, Order No. PSC-2023-0178-PCO-EI, issued June 12, 2023, Nucor Steel Florida, Inc. ("Nucor") hereby files its Prehearing Statement in this case.

A. APPEARANCES

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B. WITNESSES

Nucor does not plan to call any witnesses at this time.

C. EXHIBITS

Nucor does not plan to offer any exhibits at this time.

D. STATEMENT OF BASIC POSITION

Nucor's basic position is that Duke Energy Florida, LLC ("DEF") bears the burden of proof to justify the costs it seeks to recover through the SPPCRC and any other relief DEF requests in this proceeding.

E. STATEMENT ON SPECIFIC ISSUES

GENERIC STORM PROTECTION PLAN COST RECOVERY 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?

- **Nucor:** Regarding DEF, agree with OPC. For all other utilities, Nucor takes no position.

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?

- **Nucor:** Regarding DEF, agree with OPC. For all other utilities, Nucor takes no position.

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?

- **Nucor:** Regarding DEF, agree with OPC. For all other utilities, Nucor takes no position.

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?

- **Nucor:** Regarding DEF, agree with OPC. For all other utilities, Nucor takes no position.

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?

- **Nucor:** Regarding DEF, agree with OPC. For all other utilities, Nucor takes no position.

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

- **Nucor:** Regarding DEF, agree with OPC. For all other utilities, Nucor takes no position.

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

- **Nucor:** Regarding DEF, agree with OPC. For all other utilities, Nucor takes no position.

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

- **Nucor:** Regarding DEF, agree with OPC. For all other utilities, Nucor takes no position.

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?

- **Nucor:** Regarding DEF, agree with OPC. For all other utilities, Nucor takes no position.

ISSUE 10: Should this docket be closed?

- **Nucor:** No position.

OPC Proposed Issues

FPL

OPC Proposed 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?

- **Nucor:** No position.

OPC Proposed 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?

- **Nucor:** No position.

DEF

OPC Proposed 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?

- **Nucor:** Agree with OPC.

OPC Proposed 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?

- **Nucor:** Agree with OPC.

TECO

OPC Proposed 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?

- **Nucor:** No position.

OPC Proposed 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?

- **Nucor:** No position.

FPUC

OPC Proposed 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?

- **Nucor:** No position.

OPC Proposed 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?

- **Nucor:** No position.

OPC Proposed 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?

- **Nucor:** No position.

F. PENDING MOTIONS

None.

G. PENDING REQUESTS OR CLAIMS FOR CONFIDENTIALITY

None.

H. OBJECTIONS TO QUALIFICATIONS OF WITNESS AS EXPERT

None at this time.

I. REQUIREMENTS OF ORDER ESTABLISHING PROCEDURE

There are no requirements of the Procedural Orders with which Nucor cannot comply.

Respectfully submitted,

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Dated: August 7, 2023

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Prehearing Statement of Nucor Steel

Florida, Inc. has been furnished by electronic mail this 7th of August 2023, to the following:

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