BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Storm protection plan cost recovery clause

DOCKET NO.: 20230010-EI FILED: October 13, 2023

POST-HEARING STATEMENT OF ISSUES AND POSITIONS OF NUCOR STEEL FLORIDA, INC.

Pursuant to the Florida Public Service Commission's Prehearing Order, Order No. PSC-2023-0281-PHO-EI, issued in this proceeding on September 8, 2023, and Rule 28-106.215, F.A.C, Nucor Steel Florida, Inc. ("Nucor") hereby files its Post-Hearing Statement in this case.

I. 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.

II. POST-HEARING STATEMENT OF ISSUES AND POSITIONS

Nucor supports Type 2 partial stipulations on Issues 1-4 and 7 in this proceeding. Consistent with the discussion at the Prehearing Conference and the Hearing held August 24, 2023, and September 12, 2023, Nucor files this Post-Hearing Statement of Issues and Positions to address the remaining issues.

<u>ISSUE 5</u>: 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.**

1

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 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.**

<u>ISSUE 9</u>: 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.**

III. CONCLUSION

Nucor respectfully requests the Commission issue an order consistent with Nucor's positions as set forth above.

Respectfully submitted,

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Dated: October 13, 2023

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Post-Hearing Statement of Nucor Steel

Florida, Inc. has been furnished by electronic mail this 13th of October 2023, to the following:

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