

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchased Power Cost Recovery
Clause with Generating Performance Incentive
Factor

Docket No. 20240001-EI

Filed: October 7, 2024

FLORIDA POWER & LIGHT COMPANY’S PREHEARING STATEMENT

Florida Power & Light Company (“FPL”), pursuant to Order No. PSC-2024-0027-PCO-EI, hereby submits its Prehearing Statement regarding the issues to be addressed at the hearing scheduled for November 5-7, 2024.

1. WITNESSES

WITNESS	SUBJECT MATTER	ISSUE Nos.
Direct		
Amin Mohomed	FPL Fuel Adjustment True-ups and Projections; FPL SolarTogether Subscription Credit; FPL Capacity Cost Recovery True-ups and Projections; Fuel Cost Recovery Factor Calculations; Capacity Cost Recovery Factor Calculations; FPL’s 2025 Project Revenue Requirements; Tariff Rates; Request for Tariff Approval; 2025 FCR and CCR Factors Effective Date	2E, 2H, 7-10, 16-20, 22A
Michael V. Cashman	2023 Asset Optimization Program Gains; Incremental Optimization Costs; 2025 Risk Management Plan;	2A-2D, 2F, 5-10
Daniel DeBoer	Projected Nuclear Fuel Costs; Projected Incremental Plant Security; Fukushima-Related Costs	10
Charles R. Rote	FPL 2023 Generation Performance Incentive Factor (“GPIF”) Reward/Penalty; FPL 2025 GPIF Target/Ranges	14, 15
Kelly Fagan	2025 Solar Project (“2025 Project”) costs	2G
Andrew W. Whitley	2025 Project Cost Effectiveness	2G
Edward J. Anderson	Calculation of 2025 Project Base Rate Adjustment (Percentage Increase); Tariff Rates; Request for Tariff Approval	2I, 2J

2. EXHIBITS

WITNESS	PROFFERED BY	EXHIBIT No.	DESCRIPTION	ISSUE No.
Direct				
Amin Mohomed	FPL	AM-1	2023 FCR Final True-Up	7
Amin Mohomed	FPL	AM-2	2023 CCR Final True-Up (Confidential)	24
Amin Mohomed	FPL	AM-3	2024 FCR Actual Estimated	8
Amin Mohomed	FPL	AM-4	2024 CCR Actual Estimated	25
Amin Mohomed	FPL	AM-5	2025 FCR Projections (January - December Not Including SoBRA Fuel Savings)	10, 16-20
Amin Mohomed	FPL	AM-6	2025 FCR Projections (February - December Including SoBRA Fuel Savings)	10, 16-20
Amin Mohomed	FPL	AM-7	2025 FCR Projections (January - December Including SoBRA Fuel Savings)	10, 16-20
Amin Mohomed	FPL	AM-8	2025 CCR Projections (Confidential)	26-30
Amin Mohomed	FPL	AM-6	Residential Bill Impacts	2I, 2J, 20, 30
Amin Mohomed	FPL	AM-9	2024 SoBRA Revenue Requirement Calculation	2H
Michael V. Cashman	FPL	GJY-1	2023 Asset Optimization Program Results (Confidential)	2A
Michael V. Cashman	FPL	MVC-1	2025 Projected Dispatch Costs and Availability	10
Charles R. Rote	FPL	CRR-1	2023 GPIF Results	14
Charles R. Rote	FPL	CRR-2	Generating Performance Incentive Factor	15
Charles R. Rote	FPL	CRR-3	2023 Revised GPIF Targets	14
Charles R. Rote	FPL	CRR-4	2024 Revised GPIF Targets	15
Kelly Fagan	FPL	KF-1	List of FPL Solar Energy Centers in Service	2G
Kelly Fagan	FPL	KF-2	FPL 2025 Solar Energy Center Maps	2G

WITNESS	PROFFERED BY	EXHIBIT No.	DESCRIPTION	ISSUE No.
Kelly Fagan	FPL	KF-3	Typical Solar Energy Center Block Diagram	2G
Kelly Fagan	FPL	KF-4	Specifications for 2025 Solar Energy Centers	2G
Kelly Fagan	FPL	KF-5	Construction Schedules for the 2025 Solar Energy Centers	2G
Kelly Fagan	FPL	KF-6	Capital Cost Table (errata filed Sept. 5)	2G
Kelly Fagan	FPL	KF-7	Cost Increase Waterfall	2G
Andrew W. Whitley	FPL	AWW-1	Load Forecast	2G
Andrew W. Whitley	FPL	AWW-2	FPL Fuel Price Forecast	2G
Andrew W. Whitley	FPL	AWW-3	FPL Resource Plans	2G
Andrew W. Whitley	FPL	AWW-4	CPVRR – Costs and (Benefits)	2G
Andrew W. Whitley	FPL	AWW-5	Yearly PTC Impact	2G
Andrew W. Whitley	FPL	AWW-6	Avoided Natural Gas	2G
Andrew W. Whitley	FPL	AWW-7	Avoided Air Emissions	2G
Edward J. Anderson	FPL	EJA-1	2025 SoBRA Factor Calculation	2I
Edward J. Anderson	FPL	EJA-2	Typical Bill Projections	2I, 2J, 20, 30

3. STATEMENT OF BASIC POSITION

FPL’s 2025 Fuel and Purchased Power Cost Recovery factors and Capacity Cost Recovery factors are appropriate and reasonable and should be approved. FPL’s proposed FCR factors for the period January 2025 through December 2025 reflect the recovery of projected total net fuel costs of \$3,431,589,874. This amount includes an estimated 2024 net true-up, the Generating Performance Incentive Factor (“GPIF”) reward, FPL’s 2025 projected fuel costs, FPL’s portion of the 2023 Jurisdictional Asset Optimization Gains, and the projected 2025 FPL SolarTogether Credit. FPL’s proposed CCR factors for the period January 2025 through December 2025 reflect the recovery of projected total net capacity costs of \$117,186,652. This amount includes the 2023 final true-up, the 2024 actual/estimated under-recovery, FPL’s 2025 projected fuel costs, and a revenue requirement reduction to reflect incremental tax savings (for 2025) stemming from the Inflation Reduction Act. In addition, FPL’s 2025 Risk Management Plan and GPIF targets and ranges are reasonable and should be approved.

FPL’s request for a Solar Base Rate Adjustment (“SoBRA”) to be effective 2025, satisfies the requirements set forth in Order No. PSC-2021-0446-S-EI (the “2021 Rate Settlement” or “Settlement”), and should therefore be approved. FPL will place 894 MW¹ of solar generation into service in 2025 (the “2025 Project”), which is projected to save FPL customers approximately \$911 million on a cumulative present value of revenue requirements (“CPVRR”) basis. In addition, FPL’s costs are reasonable, and it is limiting the amount of construction costs to be recovered through the SoBRA to \$1,159 per kW in accordance with the “Adjusted Cap” prescribed by the Settlement. Finally, the revenue requirement of \$61.087 million and SoBRA factor of 0.667% are calculated in accordance with the terms approved in the 2021 Rate Settlement. Accordingly, the Commission should approve the proposed tariff rates reflecting the requested base rate percentage increase for the 2025 SoBRA.

4. STATEMENT OF ISSUES AND POSITIONS

COMPANY-SPECIFIC FUEL ADJUSTMENT ISSUES

ISSUE 2A: What was the total gain under FPL’s Incentive Mechanism approved by Order No. PSC-2021-0446A-S-EI that FPL may recover for the period January 2023 through December 2023, and how should that gain to be shared between FPL and its customers?

FPL: FPL’s asset optimization activities in 2023 delivered total gains of \$123,207,265. Of the total gains, FPL is allowed to retain \$46,103,632 (system). (Cashman)

ISSUE 2B: What is the appropriate amount of Incremental Optimization Costs under FPL’s Incentive Mechanism approved by Order No. PSC-2021-0446A-S-EI that FPL should be allowed to recover through the fuel clause for Personnel, Software, and Hardware costs for the period January 2023 through December 2023?

FPL: The amount of Incremental Optimization Costs for Personnel, Software, and Hardware Costs that FPL should be allowed to recover through the fuel clause is \$517,530 for the period January 2023 through December 2023. (Cashman)

ISSUE 2C: What is the appropriate amount of Variable Power Plant O&M Attributable to Off-System Sales under FPL’s Incentive Mechanism approved by Order No. PSC-2021-0446A-S-EI that FPL should be allowed to recover through the fuel clause for the period January 2023 through December 2023?

FPL: The amount of Incremental Optimization Costs under the Asset Optimization Program that FPL should be allowed to recover through the fuel clause for variable power plant O&M attributable to off-system sales for the period January 2023 through December 2023 is \$1,603,947. (Cashman)

¹ All capacity references for the 2025 Project are measured in alternating current.

ISSUE 2D: What is the appropriate amount of Variable Power Plant O&M Avoided due to Economy Purchases under FPL’s Incentive Mechanism approved by Order No. PSC-2021-0446A-S-EI that FPL should be allowed to recover through the fuel clause for the period January 2023 through December 2023?

FPL: FPL has included a credit of \$76,763 as the amount of Incremental Optimization Costs under the Asset Optimization Program for variable power plant O&M avoided due to economy purchases for the period January 2023 through December 2023. The Commission should authorize FPL to flow this credit to customers through the Fuel Clause. (Cashman)

ISSUE 2E: What is the appropriate subscription credit associated with FPL’s SolarTogether Program approved by Order No. PSC-2020-0084-S-EI, to be included for recovery in 2025?

FPL: \$245,377,980. (Mohomed)

ISSUE 2F: Should the Commission approve FPL’s 2025 Risk Management Plan?

FPL: Yes. FPL’s 2025 Risk Management Plan complies with the Hedging Guidelines established by this Commission and should be approved. (Cashman)

ISSUE 2G: Are the 2025 SoBRA units proposed by FPL cost effective?

FPL: Yes. The 2025 SoBRA Project is projected to result in \$911 million (CPVRR) of customer savings. (Fagan, Whitley)

ISSUE 2H: What are the revenue requirements associated with the 2025 SoBRA Project?

FPL: \$61,087,293. (Mohomed)

ISSUE 2I: What is the appropriate base rate percentage increase for the 2025 SoBRA Project, to be effective when all 2025 units are in service?

FPL: 0.667%. (Anderson)

ISSUE 2J: Should the Commission approve revised tariffs for FPL reflecting the base rate percentage increases for the 2025 SoBRA project determined to be appropriate in this proceeding?

FPL: Yes. (Anderson)

ISSUE 2K: Were FPL’s actions related to the forced outage event(s) that occurred at St. Lucie Nuclear Unit No. 1 in July 2024 prudent? If not, what actions should the Commission take?

FPL: FPL and OPC agree that resolution of this issue should be deferred to a later hearing.

ISSUE 2L: How much replacement power cost did FPL incur due to the forced outage event(s) that occurred at St. Lucie Nuclear Unit No. 1 in July 2024?

FPL: FPL and OPC agree that resolution of this issue should be deferred to a later hearing.

ISSUE 2M: Were FPL's actions related to the forced outage event(s) that occurred at St. Lucie Nuclear Unit No. 2 in May/June 2024 prudent? If not, what actions should the Commission take?

FPL: FPL and OPC agree that resolution of this issue should be deferred to a later hearing.

ISSUE 2N: How much replacement power cost did FPL incur due to the forced outage event(s) that occurred at St. Lucie Nuclear Unit No. 2 in July 2024?

FPL: FPL and OPC agree that resolution of this issue should be deferred to a later hearing.

GENERIC FUEL ADJUSTMENT ISSUES

ISSUE 5: What are the appropriate actual benchmark levels for calendar year 2024 for gains on non-separated wholesale energy sales eligible for a shareholder incentive?

FPL: FPL's revised Asset Optimization Program approved by the Commission in Order No. PSC-2021-0046-S-EI does not rely upon the three-year average Shareholder Incentive Benchmark specified in Order No. PSC-00-1744-PAA-EI, so it is not applicable to FPL for calendar year 2024. (Cashman)

ISSUE 6: What are the appropriate estimated benchmark levels for calendar year 2025 for gains on non-separated wholesale energy sales eligible for a shareholder incentive?

FPL: The Asset Optimization Program approved in Order No. PSC-2021-0046-S-EI does not rely upon the three-year average Shareholder Incentive Benchmark specified in Order No. PSC-00-1744-PAA-EI, so it would not be applicable to FPL for calendar year 2025. (Cashman)

ISSUE 7: What are the appropriate final fuel adjustment true-up amounts for the period January 2023 through December 2023?

FPL: \$0. The amount of \$37,290,272 was flowed back to customer as part of the Mid-Course Correction filed on March 13, 2024. (Mohomed)

ISSUE 8: What are the appropriate fuel adjustment actual/estimated true-up amounts for the period January 2024 through December 2024?

FPL: \$19,030,441 under-recovery. (Mohomed)

ISSUE 9: What are the appropriate total fuel adjustment true-up amounts to be collected/refunded from January 2025 through December 2025?

FPL: \$19,030,441 under-recovery. (Mohomed)

ISSUE 10: What are the appropriate projected total fuel and purchased power cost recovery amounts for the period January 2025 through December 2025?

FPL: \$3,112,084,981 jurisdictionalized and adjusted for line losses, excluding prior period true-ups, FPL's portion of Asset Optimization Program gains, FPL's projected 2025 SolarTogether Credit amount and the GPIF reward. (Mohomed)

COMPANY-SPECIFIC GPIF ISSUES

FPL

No company-specific GPIF issues for FPL have been identified at this time. If such issues are identified, they shall be numbered 12A, 12B, 12C, and so forth, as appropriate.

GENERIC GPIF ISSUES

ISSUE 14: What is the appropriate GPIF reward or penalty for performance achieved during the period January 2023 through December 2023 for each investor-owned electric utility subject to the GPIF?

FPL: \$11,145,919 net reward. (Rote)

ISSUE 15: What should the GPIF targets/ranges be for the period January 2025 through December 2025 for each investor-owned electric utility subject to the GPIF?

FPL: FPL's GPIF targets and ranges for January 2025 through December 2025 are:

Plant/Unit	EAF			ANOHR		
	Target	Maximum		Target	Maximum	
	EAF (%)	EAF (%)	Savings (\$000's)	ANOHR BTU/KWH	ANOHR BTU/KWH	Saving (\$000's)
Cape Canaveral 3	92.3	94.8	858	6,750	6,837	1,473
Fort Myers 2	91.2	93.7	163	7,394	7,612	3,269
Manatee 3	90.3	92.8	670	6,899	7,057	3,503
Martin 8	91.4	94.4	539	6,954	7,176	5,098
Okeechobee 1	90.9	93.9	803	6,425	6,510	2,869
Port Everglades 5	76.3	78.8	1,357	6,677	6,834	3,028
Riviera 5	94.3	96.8	640	6,631	6,706	1,946
Sanford 4	93.3	95.8	116	7,312	7,414	1,454
Sanford 5	83.1	85.6	149	7,293	7,397	1,400
St. Lucie 1	82.6	85.6	4,404	10,387	10,486	368
St. Lucie 2	93.6	96.6	4,375	10,341	10,438	306
Turkey Point 3	93.6	96.6	4,184	10,524	10,679	561
Turkey Point 4	84.3	87.3	4,011	10,418	10,548	399
Turkey Point 5	83.6	86.1	809	7,157	7,257	1,051
West County 1	91.0	94.0	874	7,028	7,152	2,621
West County 2	93.5	96.0	935	6,893	7,001	2,780
West County 3	88.0	90.5	772	7,068	7,173	2,244

(Rote)

FUEL FACTOR CALCULATION ISSUES

ISSUE 16: What are the appropriate projected net fuel and purchased power cost recovery and Generating Performance Incentive amounts to be included in the recovery factor for the period January 2025 through December 2025?

FPL: \$3,431,589,874 including the estimated true-up, FPL's portion of Asset Optimization gains, FPL's 2025 SolarTogether Credit amount and the GPIF reward. (Mohomed)

ISSUE 17: What is the appropriate revenue tax factor to be applied in calculating each investor-owned electric utility's levelized fuel factor for the projection period January 2025 through December 2025?

FPL: 0%. FPL's 2021 Settlement Agreement removed the Regulatory Assessment Fee from base and clause rates and is presented on the bill as its own line item. (Mohomed)

ISSUE 18: What are the appropriate levelized fuel cost recovery factors for the period January 2025 through December 2025?

FPL: FPL proposed that the fuel factors be reduced as of the in-service date of the 2025 Project to reflect the projected jurisdictional fuel savings as of that date. FPL is proposing the following factors:

- (a) 2.748 cents/kWh for January 2025 through the day prior to the 2025 Project in-service date (Projected to be January 31, 2025);
- (b) 2.710 cents/kWh from the 2025 Project in-service date (Projected to be February 1, 2025) until the fuel factor is reset by the Commission. (Mohomed)

ISSUE 19: What are the appropriate fuel recovery line loss multipliers to be used in calculating the fuel cost recovery factors charged to each rate class/delivery voltage level class?

FPL: The appropriate fuel cost recovery line loss multipliers are provided in response to Issue No. 20. (Mohomed)

COMPANY-SPECIFIC CAPACITY COST RECOVERY FACTOR ISSUES

No company-specific capacity cost recovery factor issues for FPL have been identified at this time. If such issues are identified, they will be numbered 22A, 22B, 22C, and so forth, as appropriate.

GENERIC CAPACITY COST RECOVERY FACTOR ISSUES

ISSUE 24: What are the appropriate final capacity cost recovery true-up amounts for the period January 2023 through December 2023?

FPL: \$7,342,001 over-recovery. (Mohomed)

ISSUE 25: What are the appropriate capacity cost recovery actual/estimated true-up amounts for the period January 2024 through December 2024?

FPL: \$6,402,666 under-recovery. (Mohomed)

ISSUE 26: What are the appropriate total capacity cost recovery true-up amounts to be collected/refunded during the period January 2025 through December 2025?

FPL: \$939,336 over-recovery. (Mohomed)

ISSUE 27: What are the appropriate projected total capacity cost recovery amounts for the period January 2025 through December 2025?

FPL: \$121,736,404. (Mohomed)

ISSUE 28: What are the appropriate projected net purchased power capacity cost recovery amounts to be included in the recovery factor for the period January 2025 through December 2025?

FPL: \$116,885,784. (Mohomed)

ISSUE 29: What are the appropriate jurisdictional separation factors for capacity revenues and costs to be included in the recovery factor for the period January 2025 through December 2025?

FPL: ENERGY

Retail Energy Jurisdictional Factor - Base/Solar	95.7062%
Retail Energy Jurisdictional Factor - Intermediate	93.9405%
Retail Energy Jurisdictional Factor - Peaking	95.6020%

DEMAND

Retail Demand Jurisdictional Factor - Transmission	88.7807%
Retail Demand Jurisdictional Factor - Base/Solar	96.0110%

Retail Demand Jurisdictional Factor - Intermediate	95.4157%
Retail Demand Jurisdictional Factor - Peaking	94.9428%
Retail Demand Jurisdictional Factor - Distribution	100.0000%

GENERAL PLANT

Retail General Plant Jurisdictional Factor - Labor	96.9425%
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(Mohomed)

ISSUE 30: What are the appropriate capacity cost recovery factors for the period January 2025 through December 2025?

FPL:

2025 Factors with IRA			
Capacity Recovery Factor (\$/KW)	Capacity Recovery Factor (\$/kw h)	RDC (\$/KW)	SDD (\$/KW)
	0.00103		
	0.00092		
0.32			
	0.00041		
0.35			
0.35			
0.35			
		0.04	0.02
		0.05	0.02
0.36			
0.36			
0.30			
	0.00007		
	0.00065		

(Mohomed)

EFFECTIVE DATE

ISSUE 31: What should be the effective date of the fuel adjustment factors and capacity cost recovery factors for billing purposes?

FPL: The factors shall be effective commencing January 1, 2025. These charges should continue in effect until modified by subsequent order of this Commission.
(Mohomed)

ISSUE 32: Should the Commission approve revised tariffs reflecting the fuel adjustment factors and capacity cost recovery factors determined to be appropriate in this proceeding?

FPL: Yes. The Commission should approve revised tariffs reflecting the fuel adjustment factors and capacity cost recovery factors determined to be reasonable in this proceeding. The Commission should direct staff to verify that the revised tariffs are consistent with the Commission's decision. (Mohomed)

ISSUE 33: Should this docket be closed?

FPL: This is a continuing docket and should remain open. (Mohomed)

5. STIPULATED ISSUES

FPL: None at this time.

6. PENDING MOTIONS

FPL: None at this time.

7. PENDING REQUESTS FOR CONFIDENTIALITY

1. Florida Power & Light Company's Request for Extension of Confidential Classification of materials provided pursuant to Audit, dated July 11, 2024. [DN 07495-2024]
2. Florida Power & Light Company's Request for Extension of Confidential Classification of materials provided pursuant to Audit, dated August 30, 2024. [DN 08777-2024]
3. Florida Power & Light Company's Request for Extension of Confidential Classification of materials provided pursuant to Audit, dated August 30, 2024. [DN 08779-2024]
4. Florida Power & Light Company's Request for Confidential Classification of Capacity Payments to Non-Cogenerators Identified in Schedule E12 to AM-8, dated September 5, 2024. [DN 08862-2024]
5. Florida Power & Light Company's Request for Extension of Confidential Classification of materials provided pursuant to Audit, dated September 13, 2024. [DNs 09006-2024 and 04254-2019]

8. OBJECTIONS TO WITNESS QUALIFICATIONS AS AN EXPERT

FPL: None at this time.

9. REQUEST FOR SEQUESTRATION OF WITNESSES

FPL: None at this time.

10. STATEMENT OF COMPLIANCE WITH ORDER ESTABLISHING PROCEDURE

FPL: There are no requirements of the Order Establishing Procedure with which FPL cannot comply.

Respectfully submitted,

By: s/ Maria Jose Moncada

Maria Jose Moncada
Fla. Bar No. 0773301
David Lee
Fla. Bar No. 103152
Will P. Cox
Florida Bar No. 0093531
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, Florida 33408-0420
Telephone: (561) 304-5795
Facsimile: (561) 691-7135
maria.moncada@fpl.com
david.lee@fpl.com
will.p.cox@fpl.com

CERTIFICATE OF SERVICE

Docket No. 20240001-EI

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic service on this 7th day of October 2024 to the following:

Suzanne Brownless
Ryan Sandy
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850
sbrownle@psc.state.fl.us
rsandy@psc.state.fl.us
discovery-gcl@psc.state.fl.us

J. Jeffry Wahlen
Malcolm N. Means
Virginia Ponder
Ausley McMullen
Post Office Box 391
Tallahassee, Florida 32302
jwahlen@ausley.com
mmeans@ausley.com
vponder@ausley.com
Attorneys for Tampa Electric Company

Paula K. Brown
Manager, Regulatory Coordination
Tampa Electric Company
Post Office Box 111
Tampa, Florida 33601-0111
regdept@tecoenergy.com

Mike Cassel
Vice President/Governmental
and Regulatory Affairs
Florida Public Utilities Company
208 Wildlight Avenue
Yulee, Florida 32097
mcassel@fpuc.com

Walt Trierweiler
Charles J. Rehwinkel
Mary A. Wessling
Patricia A. Christensen
Octavio Ponce
Austin Watrous
Office of Public Counsel
The Florida Legislature
111 W. Madison Street, Room 812
Tallahassee, Florida 32399
trierweiler.walt@leg.state.fl.us
rehwinkel.charles@leg.state.fl.us
wessling.mary@leg.state.fl.us
christensen.patty@leg.state.fl.us
ponce.octavio@leg.state.fl.us
watrous.austin@leg.state.fl.us
**Attorneys for the Citizens of the State
of Florida**

Matthew R. Bernier
Robert L. Pickels
Stephanie A. Cuello
106 East College Avenue, Suite 800
Tallahassee, Florida 32301
matt.bernier@duke-energy.com
robert.pickels@duke-energy.com
stephanie.cuello@duke-energy.com
FLRegulatoryLegal@duke-energy.com
Attorneys for Duke Energy Florida

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

Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe Street, Suite 601
Tallahassee, Florida 32301-1804
bkeating@gunster.com
**Attorneys for Florida Public Utilities
Company**

Michelle D. Napier
Director, Regulatory Affairs
Florida Public Utilities Company
1635 Meathe Drive
West Palm Beach, Florida 33411
mnapier@fpuc.com

Robert Scheffel Wright
John Thomas LaVia, III
Gardner, Bist, Bowden, Dee, LaVia,
Wright, Perry & Harper, P.A.
1300 Thomaswood Drive
Tallahassee, Florida 32308
schef@gbwlegal.com
jlavia@gbwlegal.com
**Attorneys for the Florida Retail
Federation**

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

James W. Brew
Laura Wynn Baker
Sarah B. Newman
Stone Mattheis Xenopoulos & Brew, P.C.
1025 Thomas Jefferson Street, NW
Eighth Floor, West Tower
Washington, DC 20007
jbrew@smxblaw.com
lwb@smxblaw.com
sbn@smxblaw.com
**Attorneys for White Springs
Agricultural Chemicals, Inc. d/b/a PCS
Phosphate -White Springs**

Peter J. Mattheis
Michael K. Lavanga
Joseph R. Briscar
Stone Mattheis Xenopoulos & Brew, PC
1025 Thomas Jefferson Street, NW
Eighth Floor, West Tower
Washington, DC 20007
pjm@smxblaw.com
mkl@smxblaw.com
jrb@smxblaw.com
Attorneys for Nucor Steel Florida, Inc.

By: s/ Maria Jose Moncada
Maria Jose Moncada
Florida Bar No. 0773301