

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for a Limited Proceeding to
Approve Large Load Tariff by Duke Energy
Florida, LLC

DOCKET NO.: 20260064-EI
Filed: July 29, 2026

**PREHEARING STATEMENT OF
SEMINOLE ELECTRIC COOPERATIVE, INC.**

Seminole Electric Cooperative, Inc. (“Seminole”), pursuant to the Florida Public Service Commission’s (“FPSC” or “Commission”) Order No. PSC-2026-0120-PCO-EI in this docket (“Procedural Order”), hereby files its Prehearing Statement.

I. PREHEARING STATEMENT

- (1) The name of all known witnesses whose testimony has been prefiled or who may be called by Seminole, along with subject matter of each such witness’s testimony and the corresponding issue numbers:

All Known Witnesses:

Witness	Subject Matter	Issue #
None		

- (2) A description of all prefiled exhibits and other exhibits that may be used by Seminole in presenting its direct case (including individual components of a composite exhibit) and the witness sponsoring each in the following format:

All Known Exhibits:

Witness	Proffered By	Exhibit No.	Description	Issue #
None				

- (3) A statement of Seminole’s basic position in the proceeding;

Duke Energy Florida’s proposed Contribution in Aid of Construction (“CIAC”), Large Load Customer Policy (“LLCP”), and Large Load Customer Agreement (“LLCA”, and together with the CIAC and LLCP, “DEF’s Proposal”) may not comply with applicable Florida law because incremental transmission costs associated with large load customers may be cost shifted to the general body of ratepayers, including transmission customers like Seminole. Seminole’s position is preliminary, offered to assist the parties in preparation for hearing, and may change based on all evidence in the record.

- (4) A statement of each question of fact, question of law, and policy question that Seminole considers at issue, along with Seminole's position on each issue, and, where applicable, the names of the party's witness(es) who will address each issue.

ISSUE A: Does DEF's petition and associated tariffs comply with the requirements of Section 366.03, Florida Statutes?

POSITION: No.

ISSUE B: Does DEF's petition and associated tariffs comply with the requirements of Section 366.043, Florida Statutes?

POSITION: No.

ISSUE C: Does DEF's petition and associated tariffs comply with the requirements of Section 366.05, Florida Statutes?

POSITION: No.

ISSUE D: Whether the following persons have standing to intervene in this proceeding:

- a. PCS Phosphate – White Springs
- b. Florida Industrial Power Users Group
- c. Florida Rising, Inc.
- d. Nucor Steel Florida, Inc.
- e. Seminole Electric Cooperative, Inc.

POSITION: Seminole Electric Cooperative has standing to intervene. Based on prior Commission standing decisions, Seminole tentatively believes that the other parties listed above have standing to intervene.

ISSUE E: Is Commission approval, as-filed or with modifications, of the proposed Large Load Customer Agreement (Tariff Sheet Nos. 7.510-7.530), the Large Load Customer Policy (Tariff Sheet Nos. 4.130-4.132), and their associated terms and conditions consistent with provisions of the 2024 Settlement Agreement approved in Order No. PSC-2024-0472-AS-EI?

POSITION: No position at this time.

ISSUE 1: Should the Commission approve, deny, or deny with leave to refile with modifications the proposed Large Load Customer Policy (Tariff Sheet Nos. 4.130-4.132) and the associated terms and conditions (e.g., minimum term, minimum monthly bill, security requirements, early termination, and special terms provision)? If denied with leave to refile, what should the modifications be?
POSITION: The Commission should deny with leave to refile the modifications to the proposed LLCP and associated terms and conditions. No position at this time regarding modifications if DEF refiles.

ISSUE 2: Should the Commission approve, deny, or deny with leave to refile with modifications the proposed Large Load Customer Agreement (Tariff Sheet Nos. 7.510-7.530) and the associated terms and conditions (e.g., minimum demand, minimum term, minimum demand charge payments, security requirements, and early termination provision)? If denied with leave to refile, what should the modifications be?

POSITION: The Commission should deny with leave to refile the modifications to the proposed LLCA. No position at this time regarding modifications if DEF refiles.

ISSUE 3: Should the Commission approve, deny, or deny with leave to refile with modifications the proposed CIAC tariff modifications (Tariff Sheet No. 4.030 and 4.132, paragraph 13.07)? If denied with leave to refile, what should the modifications be?

POSITION: The Commission should deny with leave to refile the modifications to the proposed CIAC tariff modifications. No position at this time regarding modifications if DEF refiles.

ISSUE 4: What are the effective dates for the proposed Large Load Customer Policy, Large Load Customer Agreement, and CIAC tariff? **POSITION:** No position at this time.

ISSUE 5: Should this docket be closed? **POSITION:** No position at this time.

(5) A statement of issues to which the parties have stipulated;

No issues have been stipulated at this time.

(6) A statement of all pending motions or other matters Seminole seeks action upon;

Pursuant to F.A.C. 28-106.204(a), Seminole intends to intervene no less than 20 days prior to the final hearing – i.e. on or before August 5, 2026. Seminole has no other motions or matters pending.

(7) A statement identifying Seminole’s pending requests or claims for confidentiality;

At this time, Seminole has no pending requests or claims for confidentiality.

(8) Any objections to a witness’s qualifications as an expert.

At this time, Seminole does not object to any witness qualifications.

(9) A request for sequestration of witnesses, so any such request may be resolved by the Prehearing Officer prior to the hearing.

At this time, Seminole does not request any sequestration of witnesses.

(10) A statement as to any requirement set forth in the Procedural Order that cannot be complied with.

At this time, Seminole can comply with all requirements set forth in the Procedural Order.

Respectfully submitted this 29th day of July, 2026.

/s/ Robert Scheffel Wright

Robert Scheffel Wright

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Certificate of Service

I hereby certify that a true copy of the foregoing Prehearing Statement and Motion has been furnished by electronic mail and/or U.S. Mail this 29th day of July, 2026, to the following:

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