

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Cost Recovery Clause

Docket No. 150009-EI

Submitted for filing: July 8, 2015

DUKE ENERGY FLORIDA, INC.'S PREHEARING STATEMENT

Pursuant to the Order Establishing Procedure, Order No. PSC-15-0082-PCO-EI, issued January 30, 2015 (the "Order"), Duke Energy Florida, Inc. ("DEF" or the "Company") submits its Prehearing Statement and states as follows:

A. APPEARANCES:

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B. WITNESSES AND EXHIBITS:

In identifying witnesses and exhibits herein, DEF reserves the right to call such other witnesses and to use such other exhibits as may be identified in the course of discovery and preparation for the final hearing in this matter.

1. WITNESSES.

Direct Testimony.

<u>Witness</u> ¹	<u>Subject Matter</u>	<u>Issues</u>
Thomas G. Foster	March 2, 2015 testimony: Presents for Commission review and approval, the actual costs associated with DEF’s Levy Nuclear Project (“LNP”) and Crystal River Unit 3 (“CR3”) Extended Power Uprate (“EPU”) project activities for the period January 2014 through December 2014. Also presents the LNP and EPU project 2014 accounting and cost oversight policies and procedures. May 1, 2015 testimony: Presents for Commission review, DEF’s expected 2015 and 2016 costs associated with the LNP and EPU project consistent with Rule 25-6.0423(7), F.A.C., in support of setting 2016 rates in the Capacity Cost Recovery Clause (“CCRC”).	8, 9, 10, 11, 12, 13, 14, 15, 16
Mark R. Teague	March 2, 2015 testimony: Supports DEF’s request for a prudence determination for the actual costs it incurred in 2014 for the EPU project close-out, offset by the proceeds received from the sale or salvage of EPU-related assets. Also supports the Company’s 2014 EPU project management, contracting, and cost controls and provides an update on the EPU project close-out and asset	12, 13, 14, 15, 16

¹ Indicates proposed order for witness testimony presentation at the final hearing.

disposition investment recovery project.

May 1, 2015 testimony: Describes the status of the CR3 EPU project wind-down and investment recovery activities in 2015 to date and projected activities for 2016. Also supports the reasonableness and prudence of DEF's 2015 actual/estimated and 2016 projected costs associated with the cancellation and wind-down of the EPU project.

Christopher M.
Fallon

March 2, 2015 testimony: Supports DEF's request for cost recovery for the LNP actual exit costs incurred from January 2014 through December 2014, and DEF's 2014 LNP project management, contracting, and cost controls. Also describes how DEF implemented a prudent LNP long lead equipment ("LLE") disposition plan and project wind-down subsequent to Commission approval of the 2013 Revised and Restated Stipulation and Settlement Agreement.

8, 9, 10, 11, 16

May 1, 2015 testimony: Describes DEF's wind-down activities for the LNP, including activities related to the termination of the Engineering, Procurement, and Construction ("EPC") Agreement and disposition of LLE with Westinghouse Electric Company LLC ("WEC") and its sub-suppliers. Also presents DEF's 2015 actual/estimated and 2016 projected costs for the wind-down of the LNP.

DEF has not identified the need for any rebuttal witnesses at this time. To the extent the need to call rebuttal witnesses becomes apparent due to the nature of discovery in this proceeding, DEF expressly reserves the right to call such rebuttal witnesses or to provide supplemental testimony as necessary.

2. DIRECT TESTIMONY EXHIBITS.

<u>Exhibit Number</u>	<u>Witness</u>	<u>Description</u>
TGF-1	Thomas G. Foster	CONFIDENTIAL - reflects the actual costs associated with the LNP and consists of: 2014 True-Up Summary, 2014 Detail Schedule and Appendices A through E, which show DEF's retail revenue requirements for the LNP from January 2014 through December 2014. Mr. Fallon will be co-sponsoring portions of the 2014 Detail Schedule and sponsoring Appendices D and E.
TGF-2	Thomas G. Foster	CONFIDENTIAL - reflects the actual costs associated with the EPU project and consists of: 2014 True-Up Summary, 2014 Detail Schedule and Appendices A through E, which show DEF's retail revenue requirements for the EPU project from January 2014 through December 2014. Mr. Teague will be co-sponsoring portions of the 2014 Detail Schedule and sponsoring Appendices D and E.
TGF-3	Thomas G. Foster	CONFIDENTIAL - reflects the actual and estimated costs associated with the LNP and consists of: 2016 Revenue Requirement Summary, 2015 Revenue Requirement Detail Schedule, 2016 Revenue Requirement Detail Schedule, 2015 LLE Deferred Balance Detail Schedule, 2016 LLE Deferred Balance Detail Schedule, 2016 Estimated Rate Impact Schedule, and Appendices A through E. Mr. Fallon will be co-sponsoring portions of the 2015 Actual/Estimate Revenue Requirement Detail Schedule and 2016 Projection Revenue Requirement Detail Schedule, and sponsoring Appendices D and E.
TGF-4	Thomas G. Foster	CONFIDENTIAL - reflects the actual costs associated with the EPU project and consists of: 2016 Revenue Requirement Summary, 2015 Revenue Requirement Detail Schedule, 2016 Revenue Requirement Detail Schedule, 2016

Estimated Rate Impact Schedule, and Appendixes A through F. Mr. Teague will be co-sponsoring portions of 2015 Actual/Estimated Revenue Requirement Detail Schedule and 2016 Project Revenue Requirement Detail Schedule, and sponsoring Appendices D and E.

MT-1	Mark R. Teague	The CR3 Administrative Procedure, AI-9010, Conduct of CR3 Investment Recovery, Rev. 1.
MT-2	Mark R. Teague	The CR3 Investment Recovery Project, Project Execution Plan, Rev. 0.
MT-3	Mark R. Teague	The Investment Recovery Guidance Document IRGD-001, Sales Track Guidance and Documentation Package Development.
MT-4	Mark R. Teague	CONFIDENTIAL – Chart of EPU-related assets disposed of through sales to third parties or affiliate transfers in 2014.
MT-5	Mark R. Teague	CONFIDENTIAL – Integrated Change Form for the retention of an auction company used to sell CR3 plant assets, including EPU-related assets.
MT-6	Mark R. Teague	DEF Abandon In-place Justification for (1) New Stator Core and Rewound Generator Rotor; (2) Feedwater Heat Exchangers CDHE-3A/3B; (3) Belly Drain Heat Exchangers CDHE-7A/7B; (4) Isolated Phase Bus Duct Coolers; and (5) Moisture Separator Reheaters.
MT-7	Mark R. Teague	CR3 Investment Recovery Project (IRP) Closeout and Long-Term SAFSTOR Asset Recovery Plan, Rev. 0.
CMF-1	Christopher M. Fallon	CONFIDENTIAL – DEF’s January 2014 letter to the Consortium terminating the EPC Agreement.
CMF-2	Christopher M. Fallon	CONFIDENTIAL – LNP LLE Disposition Plan.
CMF-3	Christopher M. Fallon	CONFIDENTIAL – Final resolution with Stone & Webster, Inc. (“S&W”) for costs under the EPC Agreement.

CMF-4	Christopher M. Fallon	CONFIDENTIAL – Tioga LNP LLE final disposition settlement memorandum.
CMF-5	Christopher M. Fallon	CONFIDENTIAL – DEF letter to the Consortium accepting the Tioga LNP LLE final disposition settlement offer.
CMF-6	Christopher M. Fallon	CONFIDENTIAL – January 12, 2015 Status Update for LNP LLE Disposition Memorandum.
CMF-7	Christopher M. Fallon	CONFIDENTIAL – Chart of the Company’s LNP LLE disposition actions and status.
CMF-8	Christopher M. Fallon	Chart of the expected LNP Combined Operating License Application (“COLA”) schedule.

In addition, DEF reserves the right to utilize any exhibits introduced by another party and to introduce additional exhibits necessary for rebuttal or cross examination at the final hearing of this matter.

C. DEF’S STATEMENT OF BASIC POSITION:

1. Levy Nuclear Project

With the execution of the 2013 Revised and Restated Stipulation and Settlement Agreement (“2013 Settlement Agreement”) approved by the Commission, DEF elected not to complete construction of the LNP and DEF subsequently terminated the EPC Agreement with WEC and S&W (collectively, the “Consortium”) in early 2014. DEF and WEC have since initiated litigation against the other for claims under the EPC Agreement. DEF is vigorously prosecuting its claims against WEC and defending the WEC claims against DEF under the EPC Agreement in the litigation pending in federal court in North Carolina.

Following cancellation, DEF prudently implemented a wind-down plan for in-progress LNP LLE and made disposition decisions on all LLE except the Variable Frequency Drives (“VFDs”). DEF is currently in the process of evaluating its options and DEF intends to make a disposition decision regarding the VFDs this year. DEF expects to conclude its LLE disposition efforts in 2015 and, consequently, DEF is only projecting minimal other wind-down/exit and project management costs beyond 2015. This projection does not take into account any costs or credits that DEF simply is not able to reasonably quantify at this time, including costs or credits resulting from the WEC litigation. Any proceeds from the sale or salvage of LNP assets will be credited against the remaining unrecovered balance.

On March 2, 2015, DEF requested that the Commission order an end to the fixed portion of the LNP NCRC charge as provided for in the 2013 Settlement Agreement. The Petition was granted and the recovery of LNP costs using the fixed factor ended effective the first billing cycle of May, 2015. As a result, to set the 2016 CCRC factor DEF is presenting its known LNP costs in accordance with Section 366.93, Florida Statute, and Rule 25-6.0423(7), F.A.C. DEF's request for cost recovery includes (1) actual and estimated exit and wind-down costs, (2) the amortization of the true-up of prior period costs, (3) associated carrying costs on the unrecovered balance including the LLE deferred balance, and (4) the continued amortization of the deferred balance.

DEF currently plans to continue its COLA work in order to obtain the Combined Operating License ("COL") for the LNP site from the Nuclear Regulatory Commission ("NRC"). At this time, DEF anticipates COL receipt for the LNP site in May 2016. Additionally, pursuant to the 2013 Settlement Agreement, DEF is not including COLA, environmental permitting, wetlands mitigation, conditions of certification, and other costs related to the COL for the LNP site in its request for cost recovery.

DEF has taken reasonable and prudent efforts to minimize costs, curtail avoidable future costs, and sell or otherwise salvage LNP assets. Based on the testimony and exhibits filed in this docket, DEF is entitled to a determination that all of DEF's prior period LNP costs are prudent, and that all of DEF's actual/estimated 2015 and projected 2016 costs presented for the LNP are reasonable, consistent with Section 366.93(6), Florida Statutes, and Rule 25-6.0423(7), F.A.C.

2. EPU Project

As a result of the decision to retire CR3, the EPU project was not needed and was accordingly cancelled. In 2014 and 2015, DEF continued work to disposition EPU assets and materials in accordance with the CR3 investment recovery project policies and procedures -- CR3 Administrative Procedure, AI-9010, *Conduct of CR3 Investment Recovery*, and the Investment Recovery Project, Project Execution Plan -- as described in the testimony of Mr. Teague. The investment recovery project team was able to disposition many of the EPU assets, through internal transfers, bid events, and a world-wide auction.

DEF anticipates closing out the EPU portion of the investment recovery project in the summer of 2015 once all EPU-related assets are finally disposed of and removed from the plant or abandoned in-place. Value received from sale or salvage of EPU-related assets has been and will continue to be credited back to DEF's customers to reduce the remaining unrecovered investment. There are no 2016 EPU closeout costs projected for 2016 and only minimal other wind-down/exit costs are projected for 2016 as discussed in the testimony of Mr. Foster.

DEF has taken reasonable and prudent efforts to minimize costs and curtail avoidable future costs and sell or otherwise salvage EPU assets. DEF's 2014 actual, 2015 actual/estimated and 2016 projected costs are reasonable and prudent and DEF is entitled to recover its EPU project wind-down and exit costs pursuant to the nuclear cost recovery statute and rule.

D. DEF'S STATEMENT OF ISSUES AND POSITIONS:

DEF takes "no position" on Florida Power & Light Company Issues 1 through 7.

ISSUE 8: Should the Commission find that during 2014, DEF's project management, contracting, accounting and cost oversight controls were reasonable and prudent for the Levy Units 1 & 2 project?

DEF Position:

Yes, for the year 2014, DEF's project management, contracting, accounting and cost oversight controls were reasonable and prudent for the Levy Units 1 & 2 project (LNP) as discussed in Mr. Fallon's March 2, 2015 direct testimony and in Mr. Foster's March 2, 2015 direct testimony. The Company's 2014 LNP management and cost oversight controls, policies, and procedures are substantially the same as the policies and procedures reviewed and previously determined to be prudent by the Commission. These project management and cost oversight controls include regular risk assessment, evaluation, cost oversight, and management. Duke Energy did not change its nuclear development project management, contracting and cost control oversight policies and procedures because of the Company's decisions not to complete construction of the LNP and to terminate the EPC Agreement. Some of these policies and procedures are no longer applicable to the LNP going forward as a result of these decisions. Some new processes, like the LLE Disposition Plan, were developed and implemented as a result of these decisions. These policies and procedures are revised as necessary to reflect industry leading best project management and cost oversight policies, practices, and procedures. The Company also has reasonable and prudent project accounting controls, project monitoring procedures, disbursement services controls, and regulatory accounting controls. (Fallon, Foster)

ISSUE 9: What jurisdictional amounts should the Commission approve as DEF's actual 2014 prudently incurred costs for the Levy Units 1 & 2 project?

DEF Position:

As presented in and supported by the testimony of Mr. Fallon and Mr. Foster in DEF's March 2, 2015 Actual 2014 filing, the Commission should approve the following amounts as DEF's actual 2014 prudently incurred costs for the LNP:

Wind-Down / Exit Costs (Jurisdictional) -- \$10,197,887

Carrying Costs -- \$13,310,606

The over-recovery of \$6,833,655 should be included in setting the allowed 2016 NCRC recovery.

The 2014 variance is the sum of over-projection exit/wind-down costs of \$2,390,900 plus an over-projection of carrying costs of \$4,442,755. (Foster, Fallon)

ISSUE 10: What jurisdictional amounts should the Commission approve as reasonably estimated 2015 exit and wind down costs and carrying costs for the Levy Units 1 & 2 project?

DEF Position:

As presented in and supported by the testimony of Mr. Fallon and Mr. Foster in DEF's May 1, 2015 Actual/Estimated 2015 filing, the Commission should approve the following amounts as DEF's reasonably estimated 2015 exit and wind down costs and carrying costs for the LNP consistent with Section 366.93(6) and Rule 25-6.0423(7):

Wind-Down / Exit Costs (Jurisdictional) -- \$173,071

Carrying Costs (including 2014 WACC adjustment) -- \$5,904,767

The estimated under-recovery of \$3,574,308 should be included in setting the allowed 2016 NCRC recovery.

The 2015 variance is the sum of under-projection exit/wind-down costs of \$54,712 plus an under-projection of carrying costs of \$3,519,596. (Foster, Fallon)

ISSUE 11: What jurisdictional amounts should the Commission approve as reasonably projected 2016 exit and wind down costs and carrying costs for the Levy Units 1 & 2 project?

DEF Position:

As presented in and supported by the testimony of Mr. Fallon and Mr. Foster in DEF's May 1, 2015 Projection 2016 filing, the Commission should approve the following amounts as DEF's reasonably estimated 2016 exit and wind down costs and carrying costs for the LNP consistent with Section 366.93(6) and Rule 25-6.0423(7):

Wind-Down / Exit Costs (Jurisdictional) -- \$205,706

Carrying Costs -- \$5,302,187

Current Period Amortization of Unrecovered Balance -- \$12,084,506.
(Foster, Fallon)

ISSUE 12: Should the Commission find that during 2014, DEF's project management, contracting, accounting and cost oversight controls were reasonable and prudent for the Crystal River Unit 3 Uprate project?

DEF Position:

Yes, for 2014, DEF's project management, contracting, accounting and cost oversight controls were reasonable and prudent for the Crystal River Unit 3 Uprate project (EPU) and close out of the EPU project as discussed in Mr. Teague's March 2, 2015 direct testimony and in Mr. Foster's March 2, 2015 direct testimony. These project management and cost oversight controls include regular risk assessment, evaluation, and management. These policies, procedures, and controls are continually reviewed, and where necessary, revised and updated, in line with industry best practices. To this end, DEF developed and employed its close out and investment recovery processes and procedures, including CR3 Administrative Procedure, AI-9010, *Conduct of CR3 Investment Recovery*, and the Investment Recovery Project, Project Execution Plan, utilizing industry best practices and the project management policies and procedures that have been reviewed and approved as prudent by this Commission in prior year's dockets. The Company also has reasonable and prudent project accounting controls, project monitoring procedures, disbursement services controls, and regulatory accounting controls. (Teague, Foster)

ISSUE 13: What jurisdictional amounts should the Commission approve as DEF's actual 2014 prudently incurred costs for the Crystal River Unit 3 Uprate project?

DEF Position:

As presented in and supported by the testimony of Mr. Teague and Mr. Foster in DEF's March 2, 2015 Actual 2014 filing, the Commission should approve the following amounts as DEF's actual 2014 prudently incurred costs for the Crystal River Unit 3 Uprate project:

Wind-Down / Exit Costs (Jurisdictional, net of joint owners) -- (\$292,076)

Carrying Costs -- \$23,793,581

The over-recovery of \$1,070,629 should be included in setting the allowed 2016 NCRC recovery.

The 2014 variance is the sum of over-projection of period-recoverable exit/wind-down costs of \$688,977 plus an over-projection of carrying costs of \$381,652. (Foster, Teague)

ISSUE 14: What jurisdictional amounts should the Commission approve as reasonably estimated 2015 exit and wind down costs and carrying costs for the Crystal River Unit 3 Uprate Project?

DEF Position:

As presented in and supported by the testimony of Mr. Teague and Mr. Foster in DEF's May 1, 2015 Actual/Estimated 2015 filing, the Commission should approve the following amounts as DEF's reasonably estimated 2015 exit and wind down costs and carrying costs for the Crystal River Unit 3 Uprate project consistent with Section 366.93(6) and Rule 25-6.0423(7):

Wind-Down / Exit Costs (Jurisdictional, net of joint owners) -- \$266,260.

Carrying Costs (including 2014 WACC adjustment) -- \$18,768,771

The over-recovery of \$857,612 should be included in setting the allowed 2016 NCRC recovery.

The 2015 variance is the sum of over-projection exit/wind-down costs of \$77,191 plus an over-projection of carrying costs of \$780,421. (Foster, Teague)

ISSUE 15: What jurisdictional amounts should the Commission approve as reasonably projected 2016 exit and wind down costs and carrying costs for the Crystal River Unit 3 Uprate Project?

DEF Position:

As presented in and supported by the testimony of Mr. Teague and Mr. Foster in DEF's May 1, 2015 Projection 2016 filing, the Commission should approve the following amounts as DEF's reasonably estimated 2016 exit and wind down costs and carrying costs for the Crystal River Unit 3 Uprate project consistent with Section 366.93(6) and Rule 25-6.0423(7):

Wind-Down / Exit Costs (Jurisdictional, net of joint owners) -- \$73,763

Carrying Costs -- \$14,790,552

Amortization of 2013 Regulatory Asset -- \$43,681,007
(Foster, Teague)

ISSUE 16: What is the total jurisdictional amount to be included in establishing DEF's 2016 Capacity Cost Recovery Clause Factor?

DEF Position:

The total jurisdictional amount to be included in establishing DEF's 2016 Capacity Cost Recovery Clause factor should be \$69,929,287 (before revenue tax multiplier). This consists of \$13,459,542 for the LNP and \$56,469,745 for the Crystal River Unit 3 Uprate project. (Foster, Teague, Fallon)

E. STIPULATED ISSUES:

None at this time.

F. PENDING MOTIONS OR OTHER MATTERS:

None at this time.

G. DEF'S REQUESTS FOR CONFIDENTIAL CLASSIFICATION PENDING RULING:

Document No.	Request	Date Filed
01506-15	Duke Energy Florida, Inc.'s Second Request for Confidential Classification regarding portions of Direct Testimony and Exhibits of Thomas G. Foster, Mark R. Teague and Christopher M. Fallon filed March 2, 2015	3/18/15
03039-15	Duke Energy Florida, Inc.'s Third Request for Confidential Classification regarding portions of Direct Testimony and Exhibits of Thomas G. Foster, Mark R. Teague and Christopher M. Fallon filed May 1, 2015	5/21/15
03976-15	Duke Energy Florida, Inc.'s Fourth Request for Confidential Classification regarding portions of responses to Staff's First Set of Interrogatories (Nos. 1-11)	6/29/15
03767-15	Duke Energy Florida, Inc.'s Fifth Request for Confidential Classification regarding portions of the Review of Duke Energy Florida, Inc.'s Project Management Internal Controls for Nuclear Plant Uprate and Construction Projects	6/19/15
03880-15	Duke Energy Florida, Inc.'s Sixth Request for Confidential Classification regarding portions of Auditor's Workpapers for Year Ended 12/31/2014 APA Nos. 15-005-2-1 and 15-005-2-2.	6/24/15

H. REQUIREMENTS OF PREHEARING ORDER THAT CANNOT BE MET:

There are no requirements of the prehearing order that cannot be met at this time. Because discovery is continuing in this matter, DEF reserves the right to use witnesses and exhibits other than or different from those identified hereinabove, in order to respond to ongoing developments in the case. DEF further reserves the right to amend any of its positions to the issues to respond to any such ongoing developments in the case or to respond to the Prehearing Officer's or Commission's rulings on any disputed issues or motions.

I. OBJECTIONS TO WITNESSES' QUALIFICATIONS:

None.

Respectfully submitted on the 8th day of July, 2015,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY a true and correct copy of the foregoing has been furnished to counsel and parties of record as indicated below via electronic and U.S. Mail this 8th day of July, 2015.

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