

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for approval to include in base rates the revenue requirement for the CR3 regulatory asset, by Duke Energy Florida, Inc.

DOCKET NO. 150148-EI

In re: Petition for issuance of nuclear asset-recovery financing order, by Duke Energy Florida, Inc. d/b/a Duke Energy.

DOCKET NO. 150171-EI

DATED: September 21, 2015

COMMISSION STAFF’S PREHEARING STATEMENT

Pursuant to Order Nos. PSC-15-0238-PCO-EI and PSC-15-0340-PCO-EI, issued June 5, 2015 and August 21, 2015, respectively, the Staff of the Florida Public Service Commission (Commission) files its Prehearing Statement.

1. All Known Witnesses

<u>Witness</u>	<u>Subject</u>	<u>Issues</u>
Ronald A. Mavrides	Commission Staff’s Auditor Report dated August 4, 2015 addressing costs associated with the Crystal River Unit 3 (CR3) Regulatory Asset from December 31, 2012 through April 30, 2015.	1, 14
William Coston & Jerry Hallenstein	Commission Staff’s Audit Report entitled “Review of Duke Energy Florida, Inc.’s Project Management Internal Controls for Crystal River Unit 3 Asset Recovery” dated August 2015.	1, 14
Brian A. Maher ¹	Lowest overall cost standard; post-financing order regulatory oversight.	16, 28, 33, 35, 39
Rebecca Klein	Lowest overall cost standard; post-financing order regulatory oversight.	16, 28, 33, 35, 39

¹ Witness Maher is only available to testify on October 14, 2015.

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<u>Witness</u>	<u>Subject</u>	<u>Issues</u>
Hyman Schoenblum ²	Lowest overall cost standard; post-financing order regulatory oversight.	16, 28, 33, 35, 39
Paul Sutherland	Lowest overall cost standard; indemnification; amount of servicing and administration fee to credit back to customers; frequency of remittances to SPE; DEF's proposed process for determining the upfront bond issuance costs; additional conditions that should be made in the financing order to include "Best Practices;" DEF's proposed pre-issuance review and Issuance Advice Letter processes; approval of Financing Documents; degree of flexibility afforded to DEF; post-financing order regulatory oversight.	16, 19, 21, 23, 25, 26, 28, 31, 32, 33, 35, 36, 39

2. All Known Exhibits

<u>Exhibit</u>	<u>Title</u>
RAM-1	Auditor's Report – Review of CR3 Regulatory Asset
CH-1	Review of Project Management Internal Controls
BAM-1	Speech by SEC Staff: Fiduciary Duty: Return to First Principles
BAM-2	SIFMA Definition of Fiduciary Relationship
BAM-3	Form of Underwriting Agreement
BAM-4	Saber Partners Survey
BAM-5	Excerpts from Registration Statements

² Witness Shoenblum is not available to testify on October 14, 2015.

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<u>Exhibit</u>	<u>Title</u>
BAM-6	Credit risk disclosure transmittal from Hunton & Williams and Thelen Reid and Priest, counsel to Oncor, to Saber Partners, LLC
RK-1	Texas Issuance Advice Letters
HS-1	Citigroup Study 2003
HS-2	Wisconsin Study of Saber
PS-1	Glossary
PS-1a	Securitized Utility Property Not A Financial Asset
PS-1b	Accountants Handbook
PS-1c	FASB ASC
PS-2	Organization Chart
PS-3	New Issue Pricing Spreads, 4-6 Year Average Life
PS-4	New Issue Pricing Spreads, 9-10 Year Average Life
PS-5	Excerpt from Independent Advisor Report
PS-5a	Merrill Lynch E-Mail
PS-6	AAA Utility Securitization Spreads to AAA Credit Cards
PS-6a	Wells Fargo Research Report
PS-7	Centerpoint 1/11/2012 Securitization
PS-9	CEHE Securitization
PS-10	AAA Rated Comparable Pricing
PS-11	Saber Partners Report – Analysis of Ohio Power Pricing
PS-12	Servicer Set-Up Costs

<u>Exhibit</u>	<u>Title</u>
PS-13	Utility Securitization Spreads to Credit Cards
PS-14	Investment Dealers Digest Article
PS-15	Orders Crediting Costs Above Incremental Costs to Ratepayer
PS-15a	Article Re: LA Public Facilities Authority
PS-16	Ordering Paragraphs
PS-17	Investor Participation Profile
PS-17a	S+P Ratings Digest of July 8, 2009
PS-18	Principal Amount of Utility Securitization Financing Issued by Year
PS-19	10-Year AAA Stranded Assets Spreads – Citigroup vs. J.P. Morgan
PS-19a	AEP Sidley MS Email
PS-20	Utility Securitization Transactions

3. Staff's Statement of Basic Position

Staff's positions are preliminary and based on materials filed by the parties and on discovery. The preliminary positions are offered to assist the parties in preparing for the hearing. Staff's final positions will be based upon all the evidence in the record and may differ from the preliminary positions stated herein.

4. Staff's Position on the Issues

CR3 Regulatory Asset Issues

ISSUE 1: Has DEF provided adequate internal controls and management oversight of its CR3 investment recovery procedure and plan?

POSITION: Type 2 stipulation approved at the 9/15/15 agenda conference: Yes, DEF has provided adequate internal controls and management oversight of its CR3 investment recovery procedure and plan. Please note that DEF and Staff are in agreement for Issue 1. The Intervenor take "No Position" on this issue. DEF stipulates to the entry of Staff's witnesses' testimony (regarding the CR3 Regulatory Asset) and exhibits and further agrees to Staff's CR3 Regulatory

Asset witnesses' excusal from the October hearing. (Mavrides, Coston, Hallenstein)

ISSUE 2: Did DEF minimize the current and future costs of the CR3 Regulatory Asset and use reasonable and prudent efforts to curtail avoidable costs or to sell or otherwise salvage assets that would otherwise be included in the CR3 Regulatory Asset, as required by the Revised and Restated Stipulation and Settlement Agreement (RRSSA)?

POSITION: Stipulation approved at the 9/15/15 agenda conference: Yes, DEF fully complied with its obligations under the RRSSA.

ISSUE 3: Should DEF be required to collect the 2016 CR3 Regulatory Asset carrying cost of \$1.50/mWh through the fuel clause as provided in the RRSSA and to reduce the CR3 Regulatory Asset by the projected amount to be recovered?

POSITION: Stipulation approved at the 9/15/15 agenda conference: No, recovery of the carrying cost through the fuel clause pursuant to Paragraph 7.a. of the RRSSA should terminate with the last billing cycle for December 2015. DEF will not implement the \$1.50 per megawatt hour rate increase for 2016.

ISSUE 4: Has DEF properly categorized and recorded costs associated with the CR3 Regulatory Asset as contemplated by the RRSSA?

POSITION: Stipulation approved at the 9/15/15 agenda conference: Yes, DEF has properly categorized and recorded costs consistent with the RRSSA.

ISSUE 5: Did DEF appropriately apply the accelerated recovery of the carrying charge collected through the Fuel Adjustment Clause to the CR3 Regulatory Asset?

POSITION: Stipulation approved at the 9/15/15 agenda conference: Yes.

ISSUE 6: What is the appropriate projected amount of the CR3 Regulatory Asset at December 31, 2015?

POSITION: Stipulation approved at the 9/15/15 agenda conference: The appropriate projected amount of the CR3 Regulatory Asset at December 31, 2015 is \$1,283,012,000. This amount reflects the original amount projected in DEF's petition of \$1,298,012,000 reduced by the adjustment of \$15 million referenced in the parties' stipulation.

ISSUE 7: Has DEF calculated the annual revenue requirement for the CR3 Regulatory Asset consistent with the requirements of the RRSSA?

POSITION: Stipulation approved at the 9/15/15 agenda conference: Yes.

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ISSUE 8: What is the appropriate amortization period and annual revenue requirement to amortize the CR3 Regulatory Asset?

POSITION: Stipulation approved at the 9/15/15 agenda conference: The appropriate amortization period is 240 months consistent with the RRSSA. The appropriate annual revenue requirement is \$168,331,000 calculated on Exhibit __ (MO-2) as revised on 8/31/15 and attached to the approved stipulation.

ISSUE 9: Should the Commission approve DEF's proposed treatment to account for nuclear fuel proceeds, that will not be received until the future, through the capacity cost recovery clause?

POSITION: Stipulation approved at the 9/15/15 agenda conference: Yes, DEF should be allowed to recover through the capacity cost recovery clause the return on the future nuclear fuel proceeds until they are received and recover the difference between the actual amounts received and the amount credited to the CR3 Regulatory Asset in the December 31, 2015 balance. The pretax rate of return should be 8.12% consistent with the RRSSA Exhibit 10, line 20.

ISSUE 10: Has DEF calculated the base rate increase consistent with the requirements of the RRSSA?

POSITION: Stipulation approved at the 9/15/15 agenda conference: Yes, the base rate increase including the \$15 million stipulated reduction is calculated to be .496 cents/kWh as shown in Exhibit __ (MO-4) as revised on 8/31/15 and attached to the approved stipulation.

ISSUE 11: If the Commission does not issue a financing order pursuant to DEF's Petition, should the projected amounts included in the CR3 Regulatory Asset be true-up? If so, how should the true-up be accomplished?

POSITION: Stipulation approved at the 9/15/15 agenda conference: Yes, DEF will do the true-up consistent with the RRSSA.

ISSUE 12: If the Commission does not issue a financing order pursuant to DEF's Petition, what is the proposed uniform percentage rate increase to the demand and energy charges by customer rate schedule?

POSITION: Stipulation approved at the 9/15/15 agenda conference: The proposed uniform percentage rate increase to the demand and energy charges by customer rate schedule is that provided in Exhibit __ (MO-4) as revised on 8/31/15 and attached to the approved stipulation.

ISSUE 13: If the Commission does not issue a financing order pursuant to DEF's Petition, what should be the effective date of the requested base rate increase for billing purposes?

POSITION: Stipulation approved at the 9/15/15 agenda conference: If the Commission does not issue a financing order pursuant to DEF's Petition, the effective date of the requested base rate increase should be six months after the Commission's vote rejecting the financing order.

Financing Order Issues

ISSUE 14: Do the cost amounts contained in DEF's CR3 Regulatory Asset meet the definition of "nuclear asset-recovery costs" pursuant to Section 366.95(1)(k), Florida Statutes?

POSITION: Yes. The cost amounts contained in DEF's CR3 Regulatory Asset meet the definition of "nuclear asset-recovery costs" pursuant to Section 366.95(1)(k), Florida Statutes. (Mavrides, Coston, Hallenstein)

ISSUE 15: Do the ongoing financing costs identified in DEF's Petition qualify as "financing costs" pursuant to Section 366.95(1)(e), Florida Statutes?

POSITION: No position pending further development of the record.

ISSUE 16: Has DEF demonstrated that securitization has a significant likelihood of resulting in lower overall costs or would avoid or significantly mitigate rate impacts compared to the traditional method of cost recovery pursuant to Section 366.95(2)(a)6., Florida Statutes?

POSITION: Yes. DEF has demonstrated that securitization has a significant likelihood of resulting in lower overall costs or would avoid or significantly mitigate rate impacts compared to the traditional method of cost recovery pursuant to Section 366.95(2)(a)6., Florida Statutes. However, the Commission should institute a lowest cost standard in the financing order to ensure that the securitization achieves the lowest overall cost of funds at the time of pricing under prevailing market conditions. (Sutherland, Schoenblum, Maher, Klein)

ISSUE 17: What amount, if any, should the Commission authorize DEF to recover through securitization?

POSITION: No position pending further development of the record.

ISSUE 18: What is the appropriate treatment of the deferred tax liability consistent with paragraph 5(j) of the RRSSA?

POSITION: No position pending further development of the record.

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ISSUE 19: Should DEF indemnify customers to the extent customers incur losses associated with higher servicing fees payable to a substitute servicer, or with higher administration fees payable to a substitute administrator, as a result of DEF's termination for cause?

POSITION: Yes. DEF should be required to indemnify customers to the extent customers incur losses associated with higher servicing fees payable to a substitute servicer, or with higher administration fees payable to a substitute administrator, as a result of DEF's termination for cause. (Sutherland)

ISSUE 20: What should be the up-front and ongoing fee for the role of servicer throughout the term of the nuclear asset-recovery bonds?

POSITION: No position pending further development of the record.

ISSUE 21: What amount, if any, of DEF's periodic servicing fee in this transaction should DEF be required to credit back to customers through an adjustment to other rates and charges?

POSITION: DEF should be required to credit back to customers all periodic servicing fees in excess of DEF's incremental cost of providing periodic services. The amount will be determined pending further development of the record. (Sutherland)

ISSUE 22: What should be the ongoing fee for the role of the administrator throughout the term of the nuclear asset-recovery bonds?

POSITION: No position pending further development of the record.

ISSUE 23: What amount, if any, of DEF's periodic administration fee in this transaction should DEF be required to credit back to customers through an adjustment to other rates and charges?

POSITION: The amount, if any, of DEF's periodic administration fee in this transaction that DEF should be required to credit back to customers through an adjustment to other rates and charges is the amount of periodic administrative fees in excess of DEF's incremental cost of providing periodic administrative services. The amount will be determined pending further development of the record. (Sutherland)

ISSUE 24: How frequently should DEF in its role as servicer be required to remit funds collected from customers to the SPE?

POSITION: No position pending further development of the record.

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ISSUE 25: If remittances are not daily, should DEF be required periodically to remit actual earnings on collections pending remittance?

POSITION: Yes. If remittances are not daily, DEF should be required periodically to remit actual earnings on collections pending remittance. (Sutherland)

ISSUE 26: Is DEF's proposed process for determining whether the upfront bond issuance costs satisfy the statutory standard of Section 366.95(2)(c)5., Florida Statutes, reasonable and should it be approved?

POSITION: No. The Commission should not predetermine that upfront bond issuance costs within a range of estimates meets the statutory standard of Section 366.95(2)(c)5, Florida Statutes. Accordingly, DEF's proposed process should not be approved. (Sutherland)

ISSUE 27: Issue dropped.

ISSUE 28: What additional conditions, if any, should be made in the financing order that are authorized by Section 366.95(2)(c)2.i.?

POSITION: The Commission should institute a lowest cost standard in the financing order to ensure that the securitization achieves the lowest overall cost of funds at the time of pricing under prevailing market conditions. Also, the Commission should implement the Best Practices enunciated by staff witness Sutherland in his direct testimony. Finally, the Commission should specify that it does not consider the Nuclear Asset-Recovery Bonds to be standard Asset-Backed Securities (ABS) but rather considers them to be utility securitization bonds that are superior to and less risky than standard ABS. (Sutherland, Schoenblum, Maher, Klein)

ISSUE 29: Should all legal opinions be subject to review by the Bond Team?

POSITION: No position pending further development of the record.

ISSUE 30: Should all transaction documents and subsequent amendments be filed with the Commission before becoming operative?

POSITION: No position pending further development of the record.

ISSUE 31: Is DEF's proposed pre-issuance review process reasonable and should it be approved?

POSITION: No. DEF's proposed pre-issuance review process is not reasonable and should not be approved. (Sutherland)

ISSUE 32: Should the Financing Documents be approved in substantially the form proposed by DEF, subject to modifications as addressed in the draft form of the financing order?

POSITION: No. Although it is reasonable to approve the general concept that the Financing Documents will be necessary elements of the proposed transaction, the specific terms, conditions, covenants, warranties, representations, and specific language contained in the Documents will be impacted by the Commission's decisions on other issues and must be reviewed in consideration of the financing order approved by the Commission. (Sutherland)

ISSUE 33: Is DEF's proposed Issuance Advice Letter process reasonable and consistent with the statutory financing cost objective contained in Section 366.95(2)(c)2.b., Florida Statutes?

POSITION: Yes. DEF's proposed Issuance Advice Letter process is reasonable and consistent with the statutory financing cost objective contained in Section 366.95(2)(c)2.b., Florida Statutes. However, the Commission should institute a lowest cost standard in the financing order to ensure that the securitization achieves the lowest overall cost of funds at the time of pricing under prevailing market conditions. Also, the Commission should implement the Best Practices enunciated by staff witness Sutherland in his direct testimony. Finally, the Commission should specify that it does not consider the Nuclear Asset-Recovery Bonds to be standard Asset-Backed Securities (ABS) but rather considers them to be utility securitization bonds that are superior to and less risky than standard ABS. (Sutherland, Schoenblum, Maher, Klein)

ISSUE 34: Should the Standard True-up Letter be approved in substantially the form proposed by DEF?

POSITION: No position pending further development of the record.

ISSUE 35: Is DEF's proposed process for determining whether the structure, plan of marketing, expected pricing and financing costs of the nuclear asset-recovery bonds have a significant likelihood of resulting in lower overall costs or would avoid or significantly mitigate rate impacts to customers as compared with the traditional method of financing and recovering nuclear asset-recovery costs reasonable and should it be approved?

POSITION: Yes. DEF's proposed process for determining whether the structure, plan of marketing, expected pricing and financing costs of the nuclear asset-recovery bonds have a significant likelihood of resulting in lower overall costs or would avoid or significantly mitigate rate impacts to customers as compared with the traditional method of financing and recovering nuclear asset-recovery costs. However, the Commission should institute a lowest cost standard in the financing order to ensure that the securitization achieves the lowest overall cost of funds at

the time of pricing under prevailing market conditions. Also, the Commission should implement the Best Practices enunciated by staff witness Sutherland in his direct testimony. Finally, the Commission should specify that it does not consider the Nuclear Asset-Recovery Bonds to be standard Asset-Backed Securities (ABS) but rather considers them to be utility securitization bonds that are superior to and less risky than standard ABS. (Sutherland, Schoenblum, Maher, Klein)

ISSUE 36: Is the degree of flexibility afforded to DEF in establishing the terms and conditions of the nuclear asset-recovery bonds as described in the proposed form of financing order, reasonable and consistent with Section 366.95(2)(c)2.f., Florida Statutes?

POSITION: Yes. The degree of flexibility afforded to DEF in establishing the terms and conditions of the nuclear asset-recovery bonds as described in the proposed form of financing order is reasonable and consistent with Section 366.95(2)(c)2.f., Florida Statutes. However, DEF and the Commission should work together in a collaborative process to allow for flexibility for the Bond Team to ensure that the lowest overall costs consistent with prevailing market conditions and the terms of the financing order are achieved. (Sutherland)

ISSUE 37: What persons or entities should be represented on the Bond Team?

POSITION: No position pending further development of the record.

ISSUE 38: Based on resolution of the preceding issues, should a financing order in substantially the form proposed by DEF be approved, including the findings of fact and conclusions of law as proposed?

POSITION: No position pending further development of the record.

ISSUE 39: If the Commission votes to issue a financing order, what post-financing order regulatory oversight is appropriate and how should that oversight be implemented?

POSITION: The Commission, its staff, its outside counsel, and its financial advisor, along with DEF, its financial advisor, and its outside counsel should work in a collaborative effort to ensure the structuring, marketing, and pricing of the nuclear asset-recovery bonds will result in the lowest cost consistent with prevailing market conditions and the terms of the financing order. (Sutherland, Schoenblum, Maher, Klein)

ISSUE 40: Are the energy sales forecasts used to develop the bond amortization schedules and the recovery mechanism appropriate?

POSITION: No position pending further development of the record.

ISSUE 41: If the Commission approves recovery of any nuclear asset-recovery related costs through securitization, how should the recovery of these costs be allocated to the rate classes consistent with Section 366.95(2)(c)2.g., Florida Statutes?

POSITION: No position pending further development of the record.

ISSUE 42: If the Commission approves recovery of any nuclear asset-recovery related costs through securitization, what is the appropriate recovery period for the Nuclear Asset-Recovery Charge?

POSITION: No position pending further development of the record.

ISSUE 43: Issue dropped.

ISSUE 44: What should be the scheduled final maturity and the legal final maturity of the nuclear asset-recovery bonds?

POSITION: No position pending further development of the record.

ISSUE 45: Is DEF's proposed Nuclear Asset-Recovery Charge True-Up Mechanism appropriate and consistent with Section 366.95, Florida Statutes, and should it be approved?

POSITION: No position pending further development of the record.

ISSUE 46: How frequently should the Nuclear Asset-Recovery Charge True-up Mechanism be conducted?

POSITION: No position pending further development of the record.

ISSUE 47: If the Commission approves an amount to be securitized, on what date should the Nuclear Asset-Recovery Charge become effective?

POSITION: No position pending further development of the record.

ISSUE 48: Issue dropped.

ISSUE 49: If the Commission denies DEF's request for a financing order, or if the nuclear asset-recovery bonds are not issued for any reason after the Commission issues a financing order, should the Commission approve DEF's alternative request for a base rate increase pursuant to the RRSSA, to be implemented beginning six months after the final order rejecting DEF's request (in the event the financing order is not issued) or the date upon which DEF notifies the Commission that the bonds will not be issued (in the event the financing order is issued), with carrying costs on the nuclear asset-recovery costs collected from January 1, 2016, through the Capacity Cost Recovery Clause, until such time as the base rate increase goes into effect?

POSITION: No position pending further development of the record.

ISSUE 50: Should the form of tariff sheets to be filed under DEF's tariff, as provided in Exhibit __ (MO-6A) of Witness Olivier's testimony, be approved?

POSITION: No position pending further development of the record.

ISSUE 51: In accordance with Section 366.95(2)(c)2.h., Florida Statutes, if the Commission does not issue a stop order by 5:00 p.m. on the third business day after pricing, should the nuclear asset-recovery charges become final and effective without further action from the Commission?

POSITION: No position pending further development of the record.

ISSUE 52: Should this docket be closed?

POSITION: No. This docket should remain open throughout the bond issuance process and through completion of the Commission's post-issuance review of the actual costs.

5. Stipulated Issues

Stipulations on Issues 1-13 were approved by the Commission at the September 15, 2015 Agenda Conference.

6. Pending Motions

Staff has no pending motions.

7. Pending Confidentiality Claims or Requests

Staff has no pending confidentiality claims or requests.

8. Objections to Witness Qualifications as an Expert

Staff has no objections to witness qualifications as an expert.

9. Compliance with Order No. PSC-15-0238-PCO-EI

Staff has complied with all requirements of the Order Establishing Procedure entered in this docket, as well as with Order No. PSC-15-0340-PCO-EI, revising it.

Respectfully submitted this 21st day of September, 2015.

/s/ Rosanne Gervasi

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DOCKET NO. 150171-EI

DATED: September 21, 2015

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that STAFF'S PREHEARING STATEMENT has been filed with Office of Commission Clerk and one copy has been furnished to the following by electronic mail, on this 21st day of September, 2015:

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