

**BEFORE THE PUBLIC SERVICE COMMISSION**

In re: Fuel and purchased power cost recovery clause with generating performance incentive factor.	DOCKET NO. 150001-EI
	DATED: October 9, 2015

**DUKE ENERGY FLORIDA, LLC'S  
PREHEARING STATEMENT**

Duke Energy Florida, LLC (“DEF”) hereby submits its Prehearing Statement with respect to its levelized fuel and capacity cost recovery factors and its Generating Performance Incentive Factor (GPIF) for the period of January 2016 through December 2016:

A. Known Witnesses - DEF intends to offer the testimony of:

<u>Witness - Direct</u>	<u>Subject Matter</u>	<u>Issues</u>
Christopher A. Menendez	Fuel Cost Recovery True-Up (2014)	9
	Capacity Cost Recovery True-Up (2014)	28
	Projection and Actual/Estimated True-up	2C, 7, 8, 10, 11, 29-30
	Fuel and Capacity Cost Projections	12, 19-23, 24A, 31-34
	Other Matters	35
Joseph McCallister	2015 April/August Hedging Information	2A
	2016 Risk Management Plan	1D, 1E, 2B
Matthew J. Jones	GPIF: Reward/Penalty Schedules	17
	GPIF: Targets/Ranges Schedules	18
Jeffrey Swartz	Hines 2 Outage	2C

B. Known Exhibits - DEF intends to offer the following exhibits:

<u>Exhibit No.</u>	<u>Witness</u>	<u>Description</u>
_____ (CAM-1T)	Menendez	Fuel Cost Recovery True-Up (Jan – Dec. 2014)
_____ (CAM-2T)	Menendez	Capacity Cost Recovery True-Up (Jan – Dec. 2014) Confidential
_____ (CAM-3T)	Menendez	Schedules A1 through A3, A6 and A12 for Dec 2014 Confidential
_____ (CAM-4T)	Menendez	2014 Capital Structure and Cost Rates Applied to Capital Projects
_____ (CAM-2)	Menendez	Actual/Estimated true-up Schedules for period January – December 2015
_____ (CAM-3)	Menendez	Projection factors for January to December 2016- Confidential
_____ (JM-1T)	McCallister	Hedging True-Up January through December 2014- Confidential
_____ (JM-1P)	McCallister	2016 Risk Management Plan - Confidential
_____ (JM-2P)	McCallister	Hedging Report (January – July 2015) - Confidential
_____ (MJJ-1T)	Jones	GPIF Reward/Penalty Schedules for 2014
_____ (MJJ-1P)	Jones	GPIF Targets/Ranges Schedules (for Jan – Dec. 2016)
_____ (JS-1)	Swartz	DEF Root Cause Analysis (“RCA”) Report- Confidential
_____ (JS-2)	Swartz	DEF’s Major Project Restoration Milestones and Photographs

C. Statement of Basic Position - Not applicable. DEF's positions to specific issues are listed below.

D.-F. Issues and Positions

DEF's positions on the issues identified in this proceeding are as follows:

**FUEL ISSUES**

**ISSUE 1A:** Deleted per Order PSC-15-0354-PCO-EI, issued on September 3, 2015.

**ISSUE 1B:** Deleted per Order PSC-15-0354-PCO-EI, issued on September 3, 2015.

**ISSUE 1C:** Deleted per Order PSC-15-0354-PCO-EI, issued on September 3, 2015.

**ISSUE 1D:** Is it in the consumers' best interest for the utilities to continue natural gas financial hedging activities?

**DEF:** As part of effective fuel cost management, DEF believes managing fuel price volatility risk over time for a portion of its projected fuel costs is a prudent risk management practice. However, this is a policy decision for the Commission to determine. (McCallister)

**ISSUE 1E:** What changes, if any, should be made to the manner in which electric utilities conduct their natural gas financial hedging activities?

**DEF:** This is a policy decision for the Commission. If the Commission determines that hedging should be wound down and eliminated, reduced in scope, suspended, or replaced with something new, DEF will comply with the Commission's policy. (McCallister)

**COMPANY SPECIFIC FUEL ADJUSTMENT ISSUES**

**Duke Energy Florida, LLC**

**ISSUE 2A:** Should the Commission approve as prudent DEF's actions to mitigate the volatility of natural gas, residual oil, fuel oil, and purchased power prices, as reported in DEF's April 2015 and August 2015 hedging reports?

**DEF:** Yes. DEF's actions are reasonable and prudent. (McCallister)

**ISSUE 2B:** Should the Commission approve DEF's 2016 Risk Management Plan?

**DEF:** Yes, unless the Commission concludes that it is in the best interests of customers for the hedging program to be wound down and eliminated, reduced in scope, suspended, or replaced with something new. If the Commission amends or modifies the parameters of the hedging program, DEF will amend its Risk Management Plan accordingly, and will not execute any hedges beyond those previously executed per approved risk management plans to comply with the Commission's direction. (McCallister)

**ISSUE 2C:** Has DEF made appropriate adjustments, if any are needed, to account for replacement costs associated with the July 2014 forced outage at the Hines plant? If appropriate adjustments are needed and have not been made, what adjustment(s) should be made?

**DEF:** No adjustments were needed. (Swartz, Menendez)

**Florida Power & Light, Co.**

**ISSUE 3A:** Should the Commission approve as prudent FPL's actions to mitigate the volatility of natural gas, residual oil, fuel oil, and purchased power prices, as reported in FPL's April 2015 and August 2015 hedging reports?

**DEF:** No position.

**ISSUE 3B:** Should the Commission approve FPL's 2016 Risk Management Plan?

**DEF:** No position.

**ISSUE 3C:** What is the total gain in 2014 under the Incentive Mechanism approved in Order No. PSC-13-0023-S-EI, and how is that gain to be shared between FPL and customers?

**DEF:** No position.

**ISSUE 3D:** What is the appropriate amount of Incremental Optimization Costs under the Incentive Mechanism that FPL should be allowed to recover through the fuel clause for Personnel, Software, and Hardware costs for the period January 2014 through December 2014?

**DEF:** No position.

**ISSUE 3E:** What is the appropriate amount of Incremental Optimization Costs under the Incentive Mechanism that FPL should be allowed to recover through the fuel clause for variable power plant O&M costs incurred to generate output for wholesale sales in excess of 514,000 megawatt-hours for the period January 2014 through December 2014?

**DEF:** No position.

**ISSUE 3F:** What is the appropriate amount of Incremental Optimization Costs under the Incentive Mechanism that FPL should be allowed to recover through the fuel clause for Personnel, Software, and Hardware costs for the period January 2015 through December 2015?

**DEF:** No position.

**ISSUE 3G:** What is the appropriate amount of Incremental Optimization Costs under the Incentive Mechanism that FPL should be allowed to recover through the fuel clause for variable power plant O&M costs incurred to generate output for wholesale sales in excess of 514,000 megawatt-hours for the period January 2015 through December 2015?

**DEF:** No position.

**ISSUE 3H:** What is the appropriate amount of Incremental Optimization Costs under the Incentive Mechanism that FPL should be allowed to recover through the fuel clause for Personnel, Software, and Hardware costs for the period January 2016 through December 2016?

**DEF:** No position.

**ISSUE 3I:** What is the appropriate amount of Incremental Optimization Costs under the Incentive Mechanism that FPL should be allowed to recover through the fuel clause for variable power plant O&M costs incurred to generate output for wholesale sales in excess of 514,000 megawatt-hours for the period January 2016 through December 2016?

**DEF:** No position.

**ISSUE 3J:** Has FPL made appropriate adjustments, if any are needed, to account for replacement power costs associated with the extended refueling outage in 2014 at Saint Lucie Unit 2? If appropriate adjustments are needed and have not been made, what adjustment(s) should be made?

**DEF:** No position.

**ISSUE 3K:** What costs are appropriate for FPL’s Woodford natural gas exploration and production project for recovery through the Fuel Clause?

**DEF:** No position.

**ISSUE 3L:** Deleted per Order PSC-15-0418-PCO-EI, issued on October 1, 2015.

**ISSUE 3M:** Deleted per Order PSC-15-0418-PCO-EI, issued on October 1, 2015.

**ISSUE 3N:** Should the Commission approve FPL’s proposed generation base rate adjustment (GBRA) factor of 3.899 percent for the Port Everglades Energy Center (PEEC) expected to go in-service on June 1, 2016?

**DEF:** No position.

**ISSUE 3O:** Should the replacement power costs related to the unplanned outages at St. Lucie Unit 2 in February and April 2015 be recovered through the fuel recovery clause?

**DEF:** No position.

**ISSUE 3P:** Has FPL properly reflected in the fuel and purchased power cost recovery clause the effects of acquiring the Cedar Bay facility and terminating the existing Cedar Bay power purchase agreement consistent with the terms of the settlement agreement between FPL and OPC approved in Docket No. 150075-EI?

**DEF:** No position.

### **Florida Public Utilities Company**

**ISSUE 4A:** Should FPUC be permitted to recover the cost (depreciation expense, taxes, and return on investment) of building an interconnection between FPL’s substation and FPUC’s Northeast Division through the fuel recovery clause?

**DEF:** No position.

**ISSUE 4B:** Should FPUC’s request to recover consulting and legal fees through the fuel clause be approved?

**DEF:** No position.

### **Gulf Power Company**

**ISSUE 5A:** Should the Commission approve as prudent Gulf’s actions to mitigate the volatility of natural gas, residual oil, fuel oil, and purchased power prices, as reported in Gulf’s April 2015 and August 2015 hedging reports?

**DEF:** No position.

**ISSUE 5B:** Should the Commission approve Gulf's 2016 Risk Management Plan?

**DEF:** No position.

**Tampa Electric Company**

**ISSUE 6A:** Should the Commission approve as prudent TECO's actions to mitigate the volatility of natural gas, residual oil, fuel oil, and purchased power prices, as reported in TECO's April 2015 and August 2015 hedging reports?

**DEF:** No position.

**ISSUE 6B:** Should the Commission approve TECO's 2016 Risk Management Plan?

**DEF:** No position.

**ISSUE 6C:** What is the appropriate amount of capital costs for the Big Bend fuel conversion project that TECO should be allowed to recover through the Fuel Clause for the period January 2015 through December 2015?

**DEF:** No position.

**ISSUE 6D:** What is the appropriate amount of capital costs for the Big Bend fuel conversion project that TECO should be allowed to recover through the Fuel Clause for the period January 2016 through December 2016?

**DEF:** No position.

**ISSUE 6E:** Are adjustments needed to account for replacement costs associated with the June 2015 forced outage at Big Bend Unit 2? If adjustments are needed, what adjustments should be made?

**DEF:** No position.

**ISSUE 6F:** Should TECO be allowed to recover through the fuel clause the costs associated with testing natural gas as a co-fired fuel at the Big Bend station?

**DEF:** No position.

**GENERIC FUEL ADJUSTMENT ISSUES**

**ISSUE 7:** What are the appropriate actual benchmark levels for calendar year 2015 for gains on non-separated wholesale energy sales eligible for a shareholder incentive?

**DEF:** \$1,739,843. (Menendez)

**ISSUE 8:** What are the appropriate estimated benchmark levels for calendar year 2016 for gains on non-separated wholesale energy sales eligible for a shareholder incentive?

**DEF:** \$2,704,668. (Menendez)

**ISSUE 9:** What are the appropriate fuel adjustment true-up amounts for the period January 2014 through December 2014?

**DEF:** \$11,604,966 over-recovery. (Menendez)

**ISSUE 10:** What are the appropriate fuel adjustment actual/estimated true-up amounts for the period January 2015 through December 2015?

**DEF:** \$67,126,064 over-recovery. (Menendez)

**ISSUE 11:** What are the appropriate total fuel adjustment true-up amounts to be collected/refunded from January 2016 to December 2016?

**DEF:** \$78,731,032 over-recovery. (Menendez)

**ISSUE 12:** What are the appropriate projected total fuel and purchased power cost recovery amounts for the period January 2016 through December 2016?

**DEF:** \$1,480,800,063. (Menendez)

## **COMPANY-SPECIFIC GENERATING PERFORMANCE INCENTIVE FACTOR ISSUES**

### **Duke Energy Florida, LLC**

No company-specific issues for Duke Energy Florida, LLC have been identified at this time. If such issues are identified, they shall be numbered 13A, 13B, 13C, and so forth, as appropriate.

**Florida Power & Light, Co.**

**ISSUE 14A:** Has FPL properly reflected in its 2016 GPIF targets/ranges the effects of acquiring the Cedar Bay facility and terminating the existing Cedar Bay power purchase agreement consistent with the terms of the settlement agreement between FPL and OPC that was approved in Docket No. 150075-EI?

**DEF:** No position.

**GENERIC GENERATING PERFORMANCE INCENTIVE FACTOR ISSUES**

**ISSUE 17:** What is the appropriate generation performance incentive factor (GPIF) reward or penalty for performance achieved during the period January 2014 through December 2014 for each investor-owned electric utility subject to the GPIF?

**DEF:** \$8,613,797 penalty. (Jones)

**ISSUE 18:** What should the GPIF targets/ranges be for the period January 2016 through December 2016 for each investor-owned electric utility subject to the GPIF?

**DEF:** The appropriate targets and ranges are shown on Page 4 of Exhibit MJJ-1P filed on September 1, 2015 with the Direct Testimony of Matthew J. Jones. (Jones)

**FUEL FACTOR CALCULATION ISSUES**

**ISSUE 19:** 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 2016 through December 2016?

**DEF:** \$1,394,464,724. (Menendez)

**ISSUE 20:** 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 2016 through December 2016?

**DEF:** 1.00072 (Menendez)

**ISSUE 21:** What are the appropriate levelized fuel cost recovery factors for the period January 2016 through December 2016?

**DEF:** 3.677 cents per kWh (adjusted for jurisdictional losses). (Menendez)

**ISSUE 22:** 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?

**DEF:**

<u>Group</u>	<u>Delivery Voltage Level</u>	<u>Line Loss Multiplier</u>
A.	Transmission	0.9800
B.	Distribution Primary	0.9900
C.	Distribution Secondary	1.0000
D.	Lighting Service	1.0000

(Menendez)

**ISSUE 23:** What are the appropriate fuel cost recovery factors for each rate class/delivery voltage level class adjusted for line losses?

**DEF:**

Fuel Cost Factors (cents/kWh) GSD-1, GSDT-1, SS-1, CS-1, CST-1, CS-2, CST-2, CS-3, CST-3, SS-3, IS-1, IST-1, IS-2, IST-2, SS-2, LS-1						
Group	Delivery Voltage Level	First Tier Factor	Second Tier Factors	Levelized Factors	Time of Use	
					On-Peak	Off-Peak
A	Transmission	--	--	3.608	4.860	3.034
B	Distribution Primary	--	--	3.645	4.910	3.065
C	Distribution Secondary	--	--	3.682	4.960	3.097
D	Lighting Secondary	--	--	3.445	--	--

(Menendez)

Fuel Cost Factors (cents/kWh) RS-1, RST-1, RSL-1, RSL-2, RSS-1						
Group	Delivery Voltage Level	First Tier Factor	Second Tier Factors	Levelized Factors	Time of Use	
					On-Peak	Off-Peak
C	Distribution Secondary	3.353	4.353	3.634	4.895	3.056

(Menendez)

Fuel Cost Factors (cents/kWh) GS-1, GST-1, GS-2						
					Time of Use	
Group	Delivery Voltage Level	First Tier Factor	Second Tier Factors	Levelized Factors	On-Peak	Off-Peak
A	Transmission	--	--	3.574	4.814	3.006
B	Distribution Primary	--	--	3.611	4.864	3.037
C	Distribution Secondary	--	--	3.647	4.913	3.067

(Menendez)

### COMPANY-SPECIFIC CAPACITY COST RECOVERY FACTOR ISSUES

**ISSUE 24A:** Has DEF included in the capacity cost recovery clause, the nuclear cost recovery amount ordered by the Commission in Docket No. 150009-EI?

**DEF:** For the Crystal River 3 Uprate project, the amount to be included is \$56,510,403, which was approved by the Commission in a bench vote at Hearing on August 18, 2015. At Hearing, on August 18, 2015, the FPSC approved DEF's stipulation with the parties to leave the Levy portion of the NCRC charge at \$0 for 2016 and 2017. (Menendez)

**ISSUE 25A:** Has FPL included in the capacity cost recovery clause the nuclear cost recovery amount ordered by the Commission in Docket No. 150009-EI?

**DEF:** No position.

**ISSUE 25B:** What are the appropriate 2016 projected non-fuel revenue requirements for West County Energy Center Unit 3 (WCEC-3) to be recovered through the Capacity Clause?

**DEF:** No position.

**ISSUE 25C:** Has FPL properly reflected in the capacity cost recovery clause the effects of acquiring the Cedar Bay facility and terminating the existing Cedar Bay power purchase agreement consistent with the terms of the settlement agreement between FPL and OPC that was approved in Docket No. 150075-EI?

**DEF:** No position.

## **GENERIC CAPACITY COST RECOVERY FACTOR ISSUES**

**ISSUE 28:** What are the appropriate capacity cost recovery true-up amounts for the period January 2014 through December 2014?

**DEF:** \$13,962,445 under-recovery. (Menendez)

**ISSUE 29:** What are the appropriate capacity cost recovery actual/estimated true-up amounts for the period January 2015 through December 2015?

**DEF:** \$24,680,810 under-recovery. (Menendez)

**ISSUE 30:** What are the appropriate total capacity cost recovery true-up amounts to be collected/refunded during the period January 2016 through December 2016?

**DEF:** \$38,643,256 under-recovery. (Menendez)

**ISSUE 31:** What are the appropriate projected total capacity cost recovery amounts for the period January 2016 through December 2016?

**DEF:** \$358,842,970. (Menendez)

**ISSUE 32:** What are the appropriate projected net purchased power capacity cost recovery amounts to be included in the recovery factor for the period January 2016 through December 2016?

**DEF:** The appropriate projected net purchased power capacity cost recovery amount, excluding nuclear cost recovery, is \$397,772,416. The appropriate nuclear cost recovery amount is that which is approved in Issue 24A. (Menendez)

**ISSUE 33:** What are the appropriate jurisdictional separation factors for capacity revenues and costs to be included in the recovery factor for the period January 2016 through December 2016?

**DEF:** Base – 92.885%, Intermediate – 72.703%, Peaking – 95.924%, consistent with the Revised and Restated Stipulation and Settlement Agreement approved in Order No. PSC-13-0598-FOF-EI. (Menendez)

**ISSUE 34:** What are the appropriate capacity cost recovery factors for the period January 2016 through December 2016?

**DEF:**

<u>Rate Class</u>	<u>CCR Factor</u>
Residential	1.418 cents/kWh
General Service Non-Demand	1.100 cents/kWh
@ Primary Voltage	1.089 cents/kWh
@ Transmission Voltage	1.078 cents/kWh
General Service 100% Load Factor	0.779 cents/kWh
General Service Demand	3.94 \$/kW-month
@ Primary Voltage	3.90 \$/kW-month
@ Transmission Voltage	3.86 \$/kW-month
Curtable	2.32 \$/kW-month
@ Primary Voltage	2.30 \$/kW-month
@ Transmission Voltage	2.27 \$/kW-month
Interruptible	3.14 \$/kW-month
@ Primary Voltage	3.11 \$/kW-month
@ Transmission Voltage	3.08 \$/kW-month
Standby Monthly	0.383 \$/kW-month
@ Primary Voltage	0.379 \$/kW-month
@ Transmission Voltage	0.375 \$/kW-month
Standby Daily	0.182 \$/kW-month
@ Primary Voltage	0.180 \$/kW-month
@ Transmission Voltage	0.178 \$/kW-month
Lighting	0.217 cents/kWh (Menendez)

#### **EFFECTIVE DATE**

**ISSUE 35:** What should be the effective date of the fuel adjustment charge and capacity cost recovery charge for billing purposes?

**DEF:** The new factors should be effective beginning with the first billing cycle for January 2016 through the last billing cycle for December 2016. The first billing cycle may start before January 1, 2016, and the last billing cycle may end after December 31, 2016, so long as each customer is billed for twelve months regardless of when the factors became effective. (Menendez)

## TARIFF APPROVAL

**ISSUE 36:** Should the Commission approve revised tariffs reflecting the fuel adjustment factors and capacity cost recovery factors determined to be appropriate in this proceeding?

**DEF:** Yes. (Menendez)

**ISSUE 37:** Should this docket be closed?

**DEF:** Yes.

G. Stipulated Issues

DEF has no stipulated issues at this time.

H. Pending Motions

DEF does not have any pending motions at this time.

I. Requests for Confidentiality

DEF has the following pending requests for confidential classification:

- July 23, 2015 - Information provided in response to OPC's 2<sup>nd</sup> Set of Interrogatories (14-36) (DN 04599-15).
- July 30, 2015-423 forms for April, May, & June 2015 (DN 04775-15).
- August 4, 2015-Exhibit JS-1 and information provided in the direct testimony of Jeffrey Swartz (DN 04917-15).
- August 4, 2015-DEF's 2016 Risk Management Plan (DN 04921-15).
- August 4, 2015-Information provided in DEF's Fuel Hedging Report from January 2015 through July 2015 (DN 05112-15).
- September 1, 2015-Exhibit CAM-3 to the direct testimony of Christopher Menendez (DN 05446-15).
- September 14, 2015- Information provided in response to Staff's 6<sup>th</sup> Set of Interrogatories (21-36) (DN 05694-15).
- September 1, 2015-Information contained in the direct testimony of Joseph McCallister (DN 05455-15).
- October 7, 2015-Hedging Audit Workpapers-15-051-2-1 (DN 06298-15 ).
- October 8, 2015 –Information provided in response to Staff's 7<sup>th</sup> Set of Interrogatories (37) (DN 06323-15).

J. Requirements of Order

DEF believes that this prehearing statement complies with all the requirements of the Order Establishing Procedure.

K. Objections to Qualifications

DEF has no objection to the qualifications of any expert witnesses in this proceeding at this time, subject to further discovery in this matter.

RESPECTFULLY SUBMITTED this 9<sup>th</sup> day of October, 2015.

*s/Matthew R. Bernier*

**DIANNE M. TRIPLETT**

Associate General Counsel

299 First Avenue North

St. Petersburg, FL 33701

T: (727)820-4692

F: (727)820-5041

Email: [Dianne.Triplett@duke-energy.com](mailto:Dianne.Triplett@duke-energy.com)

**MATTHEW R. BERNIER**

Senior Counsel

106 East College Avenue, Suite 800

Tallahassee, Florida 32301

T: (850)521-1428

F: (727)820-5041

Email: [Matthew.Bernier@duke-energy.com](mailto:Matthew.Bernier@duke-energy.com)

Attorneys for Duke Energy Florida, LLC

Duke Energy Florida  
**CERTIFICATE OF SERVICE**  
Docket No. 150001-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via email this 9<sup>th</sup> day of October, 2015 to all parties of record as indicated below.

*s/Matthew R. Bernier*  
Attorney

<p>Suzanne Brownless, Esq  Danijela Janjic, Esq.  John Villafrate, Esq.  Office of General Counsel  Florida Public Service Commission  2540 Shumard Oak Blvd.  Tallahassee, FL 32399-0850  <a href="mailto:sbrownle@psc.state.fl.us">sbrownle@psc.state.fl.us</a>  <a href="mailto:djanjic@psc.state.fl.us">djanjic@psc.state.fl.us</a>  <a href="mailto:jvillafr@psc.state.fl.us">jvillafr@psc.state.fl.us</a></p> <p>James D. Beasley, Esq.  J. Jeffrey Wahlen, Esq.  Ashley M. Daniels, Esq.  Ausley McMullen Law Firm  P.O. Box 391  Tallahassee, FL 32302  <a href="mailto:jbeasley@ausley.com">jbeasley@ausley.com</a>  <a href="mailto:jwahlen@ausley.com">jwahlen@ausley.com</a>  <a href="mailto:adaniels@ausley.com">adaniels@ausley.com</a></p> <p>Jeffrey A. Stone, Esq.  Russell A. Badders, Esq.  Steven R. Griffin, Esq.  Beggs &amp; Lane  P.O. Box 12950  Pensacola, FL 32591  <a href="mailto:jas@beggslane.com">jas@beggslane.com</a>  <a href="mailto:rab@beggslane.com">rab@beggslane.com</a>  <a href="mailto:srg@beggslane.com">srg@beggslane.com</a></p> <p>Jon C. Moyle, Jr., Esq.  Moyle Law Firm, P.A.  118 North Gadsden Street  Tallahassee, FL 32301  <a href="mailto:jmoyle@moylelaw.com">jmoyle@moylelaw.com</a></p> <p>Kenneth Hoffman  Florida Power &amp; Light Company  215 S. Monroe Street, Suite 810  Tallahassee, FL 32301-1858  <a href="mailto:ken.hoffman@fpl.com">ken.hoffman@fpl.com</a></p>	<p>Mike Cassel  Aleida Socarras  Florida Public Utilities  Company/Florida Division of  Chesapeake Utilities Corporation  1750 SW 14<sup>th</sup> Street, Suite 200  Fernandina Beach, FL 32034  <a href="mailto:mcassel@fpuc.com">mcassel@fpuc.com</a>  <a href="mailto:asocarras@chpk.com">asocarras@chpk.com</a></p> <p>Robert Scheffel Wright, Esq.  John T. LaVia, III, Esq.  c/o Gardner Law Firm  1300 Thomaswood Drive  Tallahassee, FL 32308  <a href="mailto:schef@gbwlegal.com">schef@gbwlegal.com</a>  <a href="mailto:jlavia@gbwlegal.com">jlavia@gbwlegal.com</a></p> <p>Robert L. McGee, Jr.  Gulf Power Company  One Energy Place  Pensacola, FL 32520-0780  <a href="mailto:rlmcgee@southernco.com">rlmcgee@southernco.com</a></p> <p>Charles J. Rehwinkel  Erik Sayler / John Truitt  Patty Christensen / J.R. Kelly  Office of Public Counsel  c/o The Florida Legislature  111 West Madison Street, Room 812  Tallahassee, FL 32399-1400  <a href="mailto:rehwinkel.charles@leg.state.fl.us">rehwinkel.charles@leg.state.fl.us</a>  <a href="mailto:sayler.erik@leg.state.fl.us">sayler.erik@leg.state.fl.us</a>  <a href="mailto:kelly.jr@leg.state.fl.us">kelly.jr@leg.state.fl.us</a>  <a href="mailto:Christensen.patty@leg.state.fl.us">Christensen.patty@leg.state.fl.us</a>  <a href="mailto:Truitt.john@leg.state.fl.us">Truitt.john@leg.state.fl.us</a></p>	<p>Ms. Paula K. Brown  Manager, Regulatory Coordination  Tampa Electric Company  P.O. Box 111  Tampa, FL 33601  <a href="mailto:regdept@tecoenergy.com">regdept@tecoenergy.com</a></p> <p>Raoul G. Cantero, III, Esq.  White &amp; Case, LLP  Southeast Financial Center, Suite 4900  200 South Biscayne Boulevard  Miami, FL 33131-2352  <a href="mailto:rcantero@whitecase.com">rcantero@whitecase.com</a></p> <p>James W. Brew, Esq.  Owen J. Kopon, Esq.  Laura A. Wynn, Esq.  Stone Matheis Xenopoulos &amp; Brew, PC  1025 Thomas Jefferson Street NW  8<sup>th</sup> Floor, West Tower  Washington, DC 20007  <a href="mailto:jbrew@smxblaw.com">jbrew@smxblaw.com</a>  <a href="mailto:ojk@smxblaw.com">ojk@smxblaw.com</a>  <a href="mailto:laura.wynn@smxblaw.com">laura.wynn@smxblaw.com</a></p> <p>John T. Butler, Esq.  Maria Moncada, Esq.  Florida Power &amp; Light Company  700 Universe Boulevard (LAW/JB)  Juno Beach, FL 33408-0420  <a href="mailto:john.butler@fpl.com">john.butler@fpl.com</a>  <a href="mailto:maria.moncada@fpl.com">maria.moncada@fpl.com</a></p> <p>Beth Keating, Esq.  Gunster, Yoakley &amp; Stewart, P.A.  215 South Monroe Street, Suite 601  Tallahassee, FL 32301  <a href="mailto:bkeating@gunster.com">bkeating@gunster.com</a></p>
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