FILED OCT 14, 2015 DOCUMENT NO. 06533-15 FPSC - COMMISSION CLERK

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchase Power Cost Recovery Clause and Generating Performance Incentive

Factor

Docket No. 150001-EI

Filed: October 14, 2015

## FLORIDA POWER & LIGHT COMPANY'S NOTICE OF WITNESSES' SUBJECT MATTER EXPERTISE

Florida Power & Light Company ("FPL") hereby files this Notice of Expert Subject Matter Designations in response the objection set forth in Section H of the Florida Industrial Power Users Group's ("FIPUG") prehearing statement filed October 9, 2015. FIPUG lodges an objection "to a witness being considered an expert witness unless the witness affirmatively states the subject matter area(s) in which he or she claims expertise...." FPL believes that its prehearing statement and the prefiled testimony of each FPL witness provides adequate notice of each witness's area of expertise. Nonetheless, as further clarification, FPL proffers this notice as an affirmative statement of the subject matter of its witnesses' expertise for the purpose of this proceeding. FPL's witnesses are prepared to confirm the statements of expertise in this notice when they take the stand.

- 1. Terry J. Keith is qualified as an expert through his knowledge, skill, education, training and experience. Mr. Keith will testify as an expert on the subject matters of Issue Nos. 3P, 7-12, 19-23 and 25A -25C, 28-36: regulatory treatment for the historical and projected costs of fuel and purchased power; implementation of, and calculations associated with, the Commission's fuel adjustment cost recovery factors; calculations associated with the Commission's capacity cost recovery factors; the appropriate effective date of fuel adjustment and capacity cost recovery factors for 2016; and the tariff approval process.
- 2. Gerard J. Yupp is qualified as an expert through his knowledge, skill, education, training and experience. Mr. Yupp will testify as an expert on the subject matters of Issue Nos.

1

- 1D, 1E, 3A-3I, 3K, 9-12, 13: natural gas financial hedging; projections and calculations associated with gains and losses for asset optimization activities; projection and calculation of costs associated with asset optimization activities; projection of fuel costs; and projection of physical hedging costs.
- 3. Charles R. Rote is qualified as an expert through his knowledge, skill, education, training and experience. Mr. Rote will testify as an expert on the subject matters of Issue Nos. 14A, 17 and 18: the setting of targets and the calculation of rewards and penalties under the generation performance incentive factor.
- 4. Don Grissette is qualified as an expert through his knowledge, skill, education, training and experience. Mr. Grissette will testify as an expert on the subject matters of Issue Nos. 3J, 3O, 9-12 and 19: the prudence of FPL actions in connection with the refueling outage extension in 2014 at St. Lucie 2 and the unplanned outages at St. Lucie Unit 2 in February and April 2015; projection of nuclear fuel costs; and the projection of power plant security and Fukushima-related costs.
- 5. Terry O. Jones is qualified as an expert through his knowledge, skill, education, training and experience. Mr. Jones will testify as an expert on the subject matter of Issue No. 3J: the prudence of FPL's actions in connection with the refueling outage extension in 2014 at St. Lucie Unit 2.
- 6. John J. Reed is qualified as an expert through his knowledge, skill, education, training and experience. Mr. Reed will testify as an expert on the subject matter of Issue No. 3J: the standard of review for FPL's actions in connection with the refueling outage extension in

2014 at St. Lucie Unit 2; and the application of that standard to the 2014 St. Lucie Unit 2 outage extension.

Respectfully submitted this 14th day of October 2015.

R. Wade Litchfield, Esq.
Vice President and General Counsel
John T. Butler, Esq.
Assistant General Counsel – Regulatory
Maria J. Moncada
Principal Attorney
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408
Telephone: (561) 304-5639

Facsimile: (561) 691-7135

By: <u>s/ Maria J. Moncada</u>

Maria J. Moncada

Fla. Bar No. 0773301

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished

by electronic delivery on the <u>14th</u> day of October 2015 to the following:

Suzanne Brownless, Esq. Division of Legal Services Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850 sbrownle@psc.state.fl.us

Beth Keating, Esq.
Gunster Law Firm
Attorneys for Florida Public Utilities Corp.
215 South Monroe St., Suite 601
Tallahassee, Florida 32301-1804
bkeating@gunster.com

James D. Beasley, Esq.
J. Jeffrey Wahlen, Esq.
Ashley M. Daniels, Esq.
Ausley & McMullen
Attorneys for Tampa Electric Company
P.O. Box 391
Tallahassee, Florida 32302
jbeasley@ausley.com
jwahlen@ausley.com
adaniels@ausley.com

Robert Scheffel Wright, Esq.
John T. LaVia, III, Esq.
Gardner, Bist, Wiener, et al
Attorneys for Florida Retail Federation
1300 Thomaswood Drive
Tallahassee, Florida 32308
schef@gbwlegal.com
jlavia@gbwlegal.com

Andrew Maurey
Michael Barrett
Division of Accounting and Finance
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850
mbarrett@psc.state.fl.us
amaurey@psc.state.fl.us

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

Jeffrey A. Stone, Esq.
Russell A. Badders, Esq.
Steven R. Griffin, Esq.
Beggs & Lane
Attorneys for Gulf Power Company
P.O. Box 12950
Pensacola, Florida 32591-2950
jas@beggslane.com
rab@beggslane.com
srg@beggslane.com

James W. Brew, Esq.
Owen J. Kopon, Esq.
Laura A. Wynn, Esq.
Attorneys for PCS Phosphate - White Springs
Stone Mattheis Xenopoulos & Brew, PC
1025 Thomas Jefferson Street, NW
Eighth Floor, West Tower
Washington, DC 20007-5201
jbrew@smxblaw.com
ojk@smxblaw.com
laura.wynn@smxblaw.com

Robert L. McGee, Jr. Gulf Power Company One Energy Place Pensacola, Florida 32520 rlmcgee@southernco.com

Matthew R. Bernier, Esq. Duke Energy Florida 106 East College Avenue, Suite 800 Tallahassee, Florida 32301 matthew.bernier@duke-energy.com

Erik L. Sayler, Esq.
John J. Truitt, Esq.
J. R. Kelly, Esq.
Patricia Christensen, Esq.
Charles Rehwinkel, Esq.
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street, Room 812
Tallahassee, Florida 32399
kelly.jr@leg.state.fl.us
christensen.patty@leg.state.fl.us
rehwinkel.charles@leg.state.fl.us
sayler.erik@leg.state.fl.us
truitt.john@leg.state.fl.us

Mike Cassel, Director/Regulatory and Governmental Affairs Florida Public Utilities Company 911 South 8th Street Fernandina Beach, Florida 32034 mcassel@fpuc.com

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

Jon C. Moyle, Esq.
Moyle Law Firm, P.A.
Attorneys for Florida Industrial Power
Users Group
118 N. Gadsden St.
Tallahassee, Florida 32301
jmoyle@moylelaw.com

By: s/Maria J. Moncada

Maria J. Moncada Fla. Bar No. 0773301