

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear cost recovery clause.

DOCKET NO. 160009-EI

DATED: June 30, 2016

COMMISSION STAFF'S PREHEARING STATEMENT

Pursuant to Order No. PSC-16-0105-PCO-EI, filed April 6, 2016, the Staff of the Florida Public Service Commission files its Prehearing Statement.

1. All Known Witnesses

<u>Witness</u>	<u>Subject</u>
Ronald A. Mavrides	Commission Staff's Audit Report of Duke Energy Florida, Inc. (DEF) Crystal River Unit 3 Power Uprate and Levy Units 1 & 2
Jerry Hallenstein and Lynn Fisher	Commission Staff's Review of DEF's Project Management Internal Controls for Nuclear Plant Uprate and Construction Projects
Iliana H. Piedra	Commission Staff's Audit Report of Florida Power & Light Company (FPL) Nuclear Plant Additions Turkey Point Units 6 & 7
David Rich and Sofia Lehmann	Commission Staff's Review of FPL's Project Management Internal Controls for Turkey Point 6 & 7 Construction

2. All Known Exhibits

<u>Exhibit</u>	<u>Title</u>
RAM-1	Auditor's Report - Crystal River Unit 3 Uprate
RAM-2	Auditor's Report - Levy Nuclear Plant Units 1 & 2

<u>Exhibit</u>	<u>Title</u>
HF-1	Review of Project Management Internal Controls
IHP-1	Auditor's Report - Turkey Point Units 6 & 7
RL-1	Review of Project Management Internal Controls

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

**Duke Energy Florida, LLC**

**ISSUE 1:** Should the Commission find that during 2015, DEF's project management, contracting, accounting and cost oversight controls were reasonable and prudent for the Levy Units 1 & 2 project?

**POSITION:** Staff has no position pending evidence adduced at the hearing.

**ISSUE 2:** Should the Commission find that during 2015, DEF's project management, contracting, accounting and cost oversight controls were reasonable and prudent for the Crystal River Unit 3 Uprate project?

**POSITION:** Staff has no position pending evidence adduced at the hearing.

**ISSUE 3:** What jurisdictional amounts should the Commission approve as DEF's actual 2015 prudently incurred costs for the Crystal River Unit 3 Uprate project?

**POSITION:** Staff has no position pending evidence adduced at the hearing.

**ISSUE 4:** What jurisdictional amounts should the Commission approve as reasonably estimated 2016 exit and wind down costs and carrying costs for the Crystal River Unit 3 Uprate Project?

**POSITION:** Staff has no position pending evidence adduced at the hearing.

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**ISSUE 5:** What jurisdictional amounts should the Commission approve as reasonably projected 2017 exit and wind down costs and carrying costs for the Crystal River Unit 3 Uprate Project?

**POSITION:** Staff has no position pending evidence adduced at the hearing.

**ISSUE 6:** What is the total jurisdictional amount to be included in establishing DEF's 2017 Capacity Cost Recovery Clause Factor?

**POSITION:** Staff has no position pending evidence adduced at the hearing.

**Florida Power & Light Company**

**ISSUE 7:** Should the Commission approve as reasonable what FPL has submitted as its 2016 annual detailed analysis of the long-term feasibility of completing the Turkey Point Units 6 & 7 project, as provided for in Rule 25-6.0423, F.A.C?

**POSITION:** Staff has no position pending evidence adduced at the hearing.

**ISSUE 7A:** What is the current total estimated all-inclusive cost (including AFUDC and sunk costs) of the proposed Turkey Point Units 6 & 7 nuclear project?

**POSITION:** Staff has no position pending evidence adduced at the hearing.

**ISSUE 7B:** What is the current estimated planned commercial operation date of the planned Turkey Point Units 6 & 7 nuclear facility?

**POSITION:** Staff has no position pending evidence adduced at the hearing.

**ISSUE 8:** Should the Commission find that FPL's 2015 project management, contracting, accounting and cost oversight controls were reasonable and prudent for the Turkey Point Units 6 & 7 project?

**POSITION:** Staff has no position pending evidence adduced at the hearing.

**ISSUE 9:** What jurisdictional amounts should the Commission approve as FPL's actual 2015 prudently incurred costs and final true-up amounts for the Turkey Point Units 6 & 7 project?

**POSITION:** Staff has no position pending evidence adduced at the hearing.

**ISSUE 10:** What jurisdictional amounts should the Commission approve as reasonably estimated 2016 costs and estimated true-up amounts for FPL's Turkey Point Units 6 & 7 project?

**POSITION:** Staff has no position pending evidence adduced at the hearing.

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**ISSUE 11:** What jurisdictional amounts should the Commission approve as reasonably projected 2017 costs for FPL's Turkey Point Units 6 & 7 project?

**POSITION:** Staff has no position pending evidence adduced at the hearing.

**ISSUE 12:** What is the total jurisdictional amount to be included in establishing FPL's 2017 Capacity Cost Recovery Clause factor?

**POSITION:** Staff has no position pending evidence adduced at the hearing.

5. Stipulated Issues

There are no stipulated issues at this time.

6. Pending Motions

Staff has no pending motions at this time.

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 any witness's qualifications as an expert.

9. Compliance with Order No. PSC-16-0105-PCO-EI

Staff has complied with all requirements of the Order Establishing Procedure entered in this docket.

Respectfully submitted this 30th day of June, 2016.

*/s/ Kyeshia Mapp*

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KYESHA MAPP

Senior Attorney

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that STAFF'S PREHEARING STATEMENT has been filed with Office of Commission Clerk and has been furnished to the following by electronic mail, on this 30th day of June, 2016:

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*/s/ Kyessa Mapp*

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