

BEFORE THE PUBLIC SERVICE COMMISSION

In re: Fuel and purchased power cost recovery clause with generating performance incentive factor.	DOCKET NO. 160001-EI
	DATED: October 4, 2016

**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 2017 through December 2017:

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 (2015)	9
	Capacity Cost Recovery True-Up (2015)	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	35-37
Joseph McCallister	Generic Hedging Issues	1A, 1B
	2016 April/August Hedging Information	2A
	2017 Risk Management Plan	2B
Matthew J. Jones	GPIF: Reward/Penalty Schedules	17
Marcia Olivier	GPIF: Targets/Ranges Schedules	18
	Dry Cask Storage Facility Capacity Costs	24B, 32

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. 2015)
_____ (CAM-2T)	Menendez	Capacity Cost Recovery True-Up (Jan – Dec. 2015) Confidential
_____ (CAM-3T)	Menendez	Schedules A1 through A3, A6 and A12 for Dec 2015 Confidential
_____ (CAM-4T)	Menendez	2015 Capital Structure and Cost Rates Applied to Capital Projects
_____ (CAM-2)	Menendez	Actual/Estimated true-up Schedules for period January – December 2016
_____ (CAM-3)	Menendez	Projection factors for January to December 2017- Confidential
_____ (MO-1)	Olivier	Projection factors for January to December 2017-ISFSI
_____ (MO-2)	Olivier	Projection factors for January to December 2017-Batch 19 Fuel Sale- Confidential
_____ (MO-3)	Olivier	Projection factors for January to December 2017- RRSSA Second Amendment-Confidential
_____ (CAM-3)	Olivier	Co-sponsoring Schedule E12-A, Page 1 of 2: Lines 26, 27, and 38-Confidential
_____ (JM-1T)	McCallister	Hedging True-Up August through December 2015- Confidential
_____ (JM-2T)	McCallister	Hedging Monthly Projected light oil burns - Confidential
_____ (JM-1P)	McCallister	2017 Risk Management Plan - Confidential
_____ (JM-2P)	McCallister	Hedging Report (January – July 2016) - Confidential

(MJJ-1T)

Jones

GPIF Reward/Penalty Schedules for 2015

(MJJ-1P)

Jones

GPIF Targets/Ranges Schedules (for Jan – Dec. 2017)

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: 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 and DEF will comply with the Commission's direction. (McCallister)

ISSUE 1B: 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 and DEF will comply with the Commission's direction. If the Commission determines changes are appropriate, DEF believes more information and workshops are needed to ensure a full understanding of any new concepts and requirements, to ensure updated program parameters and reporting are consistent with amended or new policies, and to provide time for implementation. Further, the form and content of Commission reviews of new or amended program parameters need to be fully developed and understood. (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, and purchased power prices, as reported in DEF's April 2016 and August 2016 hedging reports?

DEF: Yes, the Commission should find that DEF's actions were reasonable and prudent. (McCallister)

ISSUE 2B: What action should the Commission take regarding DEF's 2017 Risk Management?

DEF: The Commission should approve DEF's 2017 Risk Management Plan. If the Commission adopts Staff's position and modifies its hedging protocol on a prospective basis, the Commission should nonetheless approve DEF's 2017 Risk Management Plan to allow time for the new hedging protocol to be incorporated into a forthcoming Risk Management Plan in a subsequent fuel docket. (McCallister)

ISSUE 2C: Has DEF made appropriate adjustments, if any are needed, to account for replacement costs associated with the May 2016 forced outage at the Hines plant? If appropriate adjustments are needed and have not been made, what adjustment(s) should be made?

DEF: At the time of filing DEF's petitions and testimony in this docket, the root cause analyses into the Hines Unit 4 outage had not been completed, thus a decision on recoverability of replacement power costs would have been premature. DEF has not included any replacement power costs in the 2016 Actual/Estimated or 2017 Projection Filings. Any necessary adjustments will be addressed in DEF's 2016 Final True-up filing. (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, and purchased power prices, as reported in FPL's April 2016 and August 2016 hedging reports?

DEF: No position.

ISSUE 3B: What action should the Commission take regarding FPL’s 2017 Risk Management Plan?

DEF: No position.

ISSUE 3C: What is the total gain in 2015 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 2015 through December 2015?

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 2015 through December 2015?

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 2016 through December 2016?

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 2016 through December 2016?

DEF: No position.

ISSUE 3H: If the Commission approves FPL’s petition to continue the Incentive Mechanism with modifications in Docket No. 160088-EI, 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 2017 through December 2017?

DEF: No position.

ISSUE 3I: If the Commission approves FPL's petition to continue the Incentive Mechanism with modifications in Docket No. 160088-EI, 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 associated with wholesale economy sales and purchases for the period January 2017 through December 2017?

DEF: No position.

ISSUE 3J: Is \$1,890,528 the appropriate refund amount associated with the Cape Canaveral Energy Center (CCEC) GBRA true-up?

DEF: No position.

ISSUE 3K: What amount should be refunded to customers in the Fuel Clause as a result of the Florida Supreme Court's decision on the Woodford gas reserves project?

DEF: No position.

Florida Public Utilities Company

No company-specific issues for Florida Public Utilities Company have been identified at this time. If such issues are identified, they shall be numbered 4A, 4B, 4C, and so forth, as appropriate.

Gulf Power Company

ISSUE 5A: Should the Commission approve as prudent Gulf's actions to mitigate the volatility of natural gas, residual oil, and purchased power prices, as reported in Gulf's April 2016 and August 2016 hedging reports?

DEF: No position.

ISSUE 5B: What action should the Commission take regarding Gulf's 2017 Risk Management Plan?

DEF: No position.

ISSUE 5C: What fuel costs, if any, related to Scherer Unit 3 should be recovered through the fuel clause?

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, and purchased power prices, as reported in TECO's April 2016 and August 2016 hedging reports?

DEF: No position.

ISSUE 6B: What action should the Commission take regarding TECO's 2017 Risk Management Plan?

DEF: No position.

GENERIC FUEL ADJUSTMENT ISSUES

ISSUE 7: What are the appropriate actual benchmark levels for calendar year 2016 for gains on non-separated wholesale energy sales eligible for a shareholder incentive?

DEF: \$2,880,457. (Menendez)

ISSUE 8: What are the appropriate estimated benchmark levels for calendar year 2017 for gains on non-separated wholesale energy sales eligible for a shareholder incentive?

DEF: \$2,933,170. (Menendez)

ISSUE 9: What are the appropriate final fuel adjustment true-up amounts for the period January 2015 through December 2015?

DEF: \$25,816 under-recovery, which is comprised of the 2015 over-recovery of \$116,563,080 net of DEF's Midcourse Correction true-up of \$116,588,896 approved in Order No. PSC-16-0120-PCO-EI. (Menendez)

ISSUE 10: What are the appropriate fuel adjustment actual/estimated true-up amounts for the period January 2016 through December 2016?

DEF: \$26,191,847 under-recovery. (Menendez)

ISSUE 11: What are the appropriate total fuel adjustment true-up amounts to be collected/refunded from January 2017 to December 2017?

DEF: \$26,217,663 under-recovery. (Menendez)

ISSUE 12: What are the appropriate projected total fuel and purchased power cost recovery amounts for the period January 2017 through December 2017?

DEF: \$1,406,748,451. (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.

No company-specific issues for Florida Power & Light Company have been identified at this time. If such issues are identified, they shall be numbered 14A, 14B, 14C, and so forth, as appropriate.

Gulf Power Company

No company-specific issues for Gulf Power Company have been identified at this time. If such issues are identified, they shall be numbered 15A, 15B, 15C, and so forth, as appropriate.

Tampa Electric Company

No company-specific issues for Tampa Electric Company have been identified at this time. If such issues are identified, they shall be numbered 16A, 16B, 16C, and so forth, as appropriate.

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 2015 through December 2015 for each investor-owned electric utility subject to the GPIF?

DEF: \$2,255,421 reward. (Jones)

ISSUE 18: What should the GPIF targets/ranges be for the period January 2017 through December 2017 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, 2016 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 2017 through December 2017?

DEF: \$1,436,253,271. (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 2017 through December 2017?

DEF: 1.00072 (Menendez)

ISSUE 21: What are the appropriate levelized fuel cost recovery factors for the period January 2017 through December 2017?

DEF: 3.663 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)						
Group	Delivery Voltage Level	First Tier Factor	Second Tier Factors	Levelized Factors	Time of Use	
					On-Peak	Off-Peak
A	Transmission	--	--	3.594	4.482	3.181
B	Distribution Primary	--	--	3.630	4.527	3.213
C	Distribution Secondary	3.377	4.377	3.667	4.573	3.245
D	Lighting Secondary	--	--	3.494	--	--

(Menendez)

COMPANY-SPECIFIC CAPACITY COST RECOVERY FACTOR ISSUES

Duke Energy Florida, LLC

ISSUE 24A: Has DEF included in the capacity cost recovery clause the nuclear cost recovery amount ordered by the Commission in Docket No. 160009-EI?

DEF: Yes, DEF included \$51,737,557 for the Crystal River 3 Uprate project, which was approved by the Commission by a bench vote on August 9, 2016. Per the stipulation approved in Docket No. 150009-EI, the Levy portion of the NCRC charge has been set at \$0 for 2017. (Menendez)

ISSUE 24B: What is the appropriate amount of costs for the Dry Cask Storage Facility that DEF should be allowed to recover through the capacity cost recovery clause pursuant to the 3rd Amendment to the RRSSA?

DEF: \$5,287,371. (Olivier)

Florida Power & Light Company

ISSUE 25: If the Commission does not approve recovery of the WCEC-3 revenue requirement through base rates in Docket No. 160021-EI, What are the appropriate 2017 projected non-fuel revenue requirements for West County Energy Center Unit 3 (WCEC-3) to be recovered through the Capacity Clause?

DEF: No position.

Gulf Power Company

No company-specific issues for Gulf Power Company have been identified at this time. If such issues are identified, they shall be numbered 26A, 26B, 26C, and so forth, as appropriate.

Tampa Electric Company

No company-specific issues for Tampa Electric Company have been identified at this time. If such issues are identified, they shall be numbered 27A, 27B, 27C, and so forth, as appropriate.

GENERIC CAPACITY COST RECOVERY FACTOR ISSUES

ISSUE 28: What are the appropriate final capacity cost recovery true-up amounts for the period January 2015 through December 2015?

DEF: \$35,762,070 under-recovery, which is being recovered from customers as part of the Midcourse Correction approved by Order No. PSC-16-0120-PCO-EI. (Menendez)

ISSUE 29: What are the appropriate capacity cost recovery actual/estimated true-up amounts for the period January 2016 through December 2016?

DEF: \$14,665,234 over-recovery. (Menendez)

ISSUE 30: What are the appropriate total capacity cost recovery true-up amounts to be collected/refunded during the period January 2017 through December 2017?

DEF: \$14,665,234 over-recovery. (Menendez)

ISSUE 31: What are the appropriate projected total capacity cost recovery amounts for the period January 2017 through December 2017?

DEF: \$386,010,796. (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 2017 through December 2017?

DEF: The appropriate projected net purchased power capacity cost recovery amount, excluding nuclear cost recovery, is \$376,900,301. The appropriate nuclear cost recovery amount is that which is approved in Issue 24A. (Menendez, Olivier)

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 2017 through December 2017?

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 2017 through December 2017?

DEF:

<u>Rate Class</u>	<u>CCR Factor</u>
Residential	1.294 cents/kWh
General Service Non-Demand	1.006 cents/kWh
@ Primary Voltage	0.996 cents/kWh
@ Transmission Voltage	0.986 cents/kWh
General Service 100% Load Factor	0.708 cents/kWh
General Service Demand	3.67 \$/kW-month
@ Primary Voltage	3.63 \$/kW-month
@ Transmission Voltage	3.60 \$/kW-month
Curtaillable	2.89 \$/kW-month
@ Primary Voltage	2.86 \$/kW-month
@ Transmission Voltage	2.83 \$/kW-month
Interruptible	2.83 \$/kW-month
@ Primary Voltage	2.80 \$/kW-month
@ Transmission Voltage	2.77 \$/kW-month
Standby Monthly	0.356 \$/kW-month
@ Primary Voltage	0.352 \$/kW-month
@ Transmission Voltage	0.349 \$/kW-month
Standby Daily	0.170 \$/kW-month
@ Primary Voltage	0.168 \$/kW-month
@ Transmission Voltage	0.167 \$/kW-month
Lighting	0.203 cents/kWh

(Menendez)

EFFECTIVE DATE

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

DEF: The new factors should be effective beginning with the first billing cycle for January 2017 through the last billing cycle for December 2017. The first billing cycle may start before January 1, 2017, and the last billing cycle may end after December 31, 2017, 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. The Commission should approve revised tariffs reflecting the fuel adjustment factors and capacity cost recovery factors determined to be appropriate in this proceeding. The Commission should direct staff to verify that the revised tariffs are consistent with the Commission decision. (Menendez)

ISSUE 37: Should this docket be closed?

DEF: Yes. (Menendez)

CONTESTED ISSUES

FIPUG

ISSUE 1C: What were the financial results for each IOUs natural gas hedging activities for 2015?

DEF: DEF does not believe it is necessary or appropriate to include this issue. DEF will provide a position shortly following the prehearing conference if the Prehearing Officer concludes that these issues should be included.

ISSUE 1D: What were the financial results for each IOUs natural gas hedging activities for 2016 as of July 31, 2016?

DEF: DEF does not believe it is necessary or appropriate to include this issue. DEF will provide a position shortly following the prehearing conference if the Prehearing Officer concludes that these issues should be included.

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:

- April 6, 2016 – Portions of the direct testimony of Joseph McCallister and Exhibit Nos. JM-1T AND JM-2T (DN 01837-16).
- August 4, 2016-Exhibit No. CAM-2 to the direct testimony of Christopher Menendez (DN 05863-16).
- August 4, 2016-DEF's 2017 Risk Management Plan (DN 05867-16).
- August 18, 2016-Information contained in the direct testimony of Joseph McCallister and Exhibit JM-2P (DN 06830-16).
- August 22, 2016-Information provided in response to Citizens' Second Set of Interrogatories (11-18), specifically 12b, 13b, and 16 (DN 06926-16).
- August 29, 2016- Information provided in response to Staff's Fourth Set of Interrogatories (15) (DN 07080-16).
- September 1, 2016-Information contained in the direct testimony of Christopher Menendez and Exhibit No. CAM-3, direct testimony of Marcia Oliver and Exhibit Nos. MO-1, MO-2 and MO-3 (DN 07222-16).
- September 29, 2016-Information provided in response to Staff's Sixth Set of Interrogatories (24-30), specifically 24, 25 & 27 (DN 07860-16).
- October 6, 2016-Hedging Audit Workpapers-16-068-2-1 (DN TBD).

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 4th day of October, 2016.

s/ Matthew R. Bernier

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Duke Energy Florida
CERTIFICATE OF SERVICE
Docket No. 160001-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via email this 4th day of October, 2016 to all parties of record as indicated below.

s/ Matthew R. Bernier
Attorney

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