

C. EXHIBITS

PCS Phosphate may offer exhibits based on responses to discovery requests as well as the testimony offered by Duke Energy Florida (“Duke” or “DEF”) and other party witnesses at the hearing.

D. STATEMENT OF BASIC POSITION

In the *First Order Modifying Procedure*, the Prehearing Officer approved the *Motion of the Office of Public Counsel and White Springs Agricultural Chemicals, Inc., d/b/a PCS Phosphate – White Springs to Temporarily Hold in Abeyance and Reschedule the 2017 Hearing for Duke Energy Florida, LLC*, filed in this docket on June 16, 2017. That order temporarily held in abeyance the Levy Nuclear Project portion of this proceeding, to be addressed at a later time. As a result of that order, only DEF issues regarding the Crystal River Unit 3 power uprate project remain in this portion of the proceeding. PCS Phosphate agrees that these issues for Duke Energy Florida, Inc. can be addressed as a “Type 2” stipulation.

E. STATEMENT ON SPECIFIC ISSUES

With respect to the various issues presented in this proceeding, PCS Phosphate takes the following positions on the specific issues presented below.

Florida Power & Light Company Issues

Issue 1: Should the Commission find that FPL’s 2015 and 2016 project management, contracting, accounting and cost oversight controls were reasonable and prudent for the Turkey Point Units 6 & 7 project?

PCS Phosphate: No position.

Issue 2: What jurisdictional amounts should the Commission approve as FPL’s actual 2015 and 2016 prudently incurred costs and final true-up amounts for the Turkey Point Units 6 & 7 Project?

PCS Phosphate: No position.

Issue 3: Should the Commission approve FPL’s request to defer recovery of costs for the Turkey Point Units 6 & 7 Project incurred after December 31, 2016, pursuant to Section 366.93 F.S. and Rule 25-6.0423 F.A.C.? If so, what type of information should FPL report on an annual basis in the Nuclear Cost Recovery docket?

PCS Phosphate: No position.

Issue 4: If FPL continues to seek its combined operating license and defers the associated costs, are these costs eligible for cost recovery in a future time period pursuant to Section 366.93 F.S. and Rule 25-6.0423 F.A.C.?

PCS Phosphate: No position.

Issue 5: A) Is FPL’s decision to continue pursuing a combined operating license from the Nuclear Regulatory Commission for Turkey Point Units 6 & 7 reasonable? (STAFF)

B) Is FPL’s decision to continue pursuing a combined operating license from the Nuclear Regulatory Commission for Turkey Point Units 6 & 7 reasonable pursuant to Section 366.93 F.S. and Rule 25-6.0423 F.A.C.? (OPC)

PCS Phosphate: No position as to both (A) and (B).

Issue 6A: Should the Commission approve what FPL has submitted as its 2017 annual detailed analysis of the long term feasibility of completing the Turkey Point 6 & 7 project as provided for in Rule 25-6.0423 F.A.C.? (SACE)

PCS Phosphate: No position.

Issue 6B: Was FPL required to file an annual detailed analysis of the long term feasibility of completing the Turkey Point Unit 6 & 7 project, pursuant to Rule 25-6.0423(6)(c)5 F.A.C.? If so, has FPL complied with that requirement?

PCS Phosphate: No position.

Issue 7: Has FPL complied with Order No. PSC-16-0266-PCO-EI? If not, what action should the Commission take, if any?

PCS Phosphate: No position.

Issue 8: What is the total jurisdictional amount to be included in establishing FPL’s 2018 Capacity Cost Recovery Clause factor?

PCS Phosphate: No position.

Issue 9: What is the current total estimated all-inclusive cost (including AFUDC and sunk costs) of the proposed Turkey Point Units 6 & 7 nuclear project?

PCS Phosphate: No position.

Issue 10: What is the current estimated planned commercial operation date of the planned Turkey Point Units 6 & 7 nuclear facility?

PCS Phosphate: No position.

Duke Energy Florida, Inc., Issues

Issue 11: Should the Commission find that during 2016 DEF's accounting and cost oversight controls were reasonable and prudent for the Crystal River Unit 3 Uprate project?

PCS Phosphate: No position.

Issue 12: What jurisdictional amounts should the Commission approve as DEF's actual 2016 prudently incurred costs for the Crystal River Unit 3 Uprate project?

PCS Phosphate: No position.

Issue 13: What jurisdictional amounts should the Commission approve as reasonably estimated 2017 exit and wind down costs and carrying costs for the Crystal River Unit 3 Uprate Project?

PCS Phosphate: No position.

Issue 14: What jurisdictional amounts should the Commission approve as reasonably projected 2018 exit and wind down costs and carrying costs for the Crystal River Unit 3 Uprate Project?

PCS Phosphate: No position.

Issue 15: What is the total jurisdictional amount for the Crystal River Unit 3 Uprate Project to be included in establishing DEF's 2018 Capacity Cost Recovery Clause Factor?

PCS Phosphate: No position.

F. STIPULATED ISSUES

As stated above, PCS Phosphate is in agreement that the Duke Energy Florida, Inc., issues may be disposed of as a Type 2 stipulation if all parties are in agreement. There are no other issues that have been stipulated at this time.

G. PENDING MOTIONS

None.

H. PENDING REQUESTS OR CLAIMS FOR CONFIDENTIALITY

None.

I. OBJECTIONS TO QUALIFICATIONS OF WITNESS AS EXPERT

None at this time.

J. REQUIREMENTS OF ORDER ESTABLISHING PROCEDURE

There are no requirements of the *Procedural Order* with which PCS Phosphate cannot comply.

Respectfully submitted the 20th day of July, 2017.

STONE MATTHEIS XENOPOULOS & BREW, PC

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CERTIFICATE OF SERVICE

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