

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for limited proceeding for recovery of incremental storm restoration costs related to Hurricane Matthew by Florida Power & Light Company.

DOCKET NO. 20160251-EI

DATED: April 30, 2018

COMMISSION STAFF'S PREHEARING STATEMENT

Pursuant to Order No. PSC-2017-0471-PCO-EI, filed on December 15, 2017, the Staff of the Florida Public Service Commission files its Prehearing Statement.

1. All Known Witnesses

Witness	Subject Matter	Issues #
Direct		
Donna D. Brown	Staff audit reports	2-9

2. All Known Exhibits

Witness	Proffered By	Exhibit #	Description
Direct			
Staff	Donna D. Brown	DDB-1	Auditor's Report-Storm Recovery Cost Audit- Dec. 5, 2017
		DDB-2	Auditor's Report-Supplemental April 4, 2018

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

ISSUE 1: What is the appropriate baseline from which incremental costs are derived?

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

ISSUE 2: What is the appropriate amount of FPL regular payroll expense to be included in storm recovery?

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

ISSUE 3: What is the appropriate amount of FPL overtime payroll expense to be included in storm recovery?

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

ISSUE 4: What is the appropriate amount of contractor costs to be included in storm recovery?

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

ISSUE 5: What is the appropriate amount of logistic costs that should be included in storm recovery?

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

ISSUE 6: Are the standby and mobilization/demobilization costs that are included in FPL's storm recovery appropriate? If not, what adjustments, if any, should be made?

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

ISSUE 7: What is the appropriate amount to include in storm recovery to replenish the level of FPL's storm reserve?

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

ISSUE 8: What is the appropriate amount of storm-related costs and storm reserve replenishment FPL is entitled to recover for Hurricane Matthew?

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

ISSUE 9: What is the total amount of storm-related revenues that FPL collected for Hurricane Matthew through their approved interim storm restoration recovery charge?

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

ISSUE 10: If applicable, how should any under-recovery or over-recovery be handled?

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

ISSUE 11: Should this docket be closed?

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

CONTESTED ISSUES

ISSUE A: Should FPL be required to separately track and account for costs associated with standby time, mobilization and demobilization work?

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

Commission staff has no pending motions at this time.

7. Pending Confidentiality Claims or Requests

Commission staff has no pending confidentiality claims or requests at this time.

8. Objections to Witness Qualifications as an Expert

Commission staff has no objections to witness qualifications as an expert.

9. Compliance with Order No. PSC-2017-0471-PCO-EI

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

Respectfully submitted this 30th day of April, 2018.

/s/ Suzanne S. Brownless

SUZANNE S. BROWNLESS

SPECIAL COUNSEL

FLORIDA PUBLIC SERVICE COMMISSION

Gerald L. Gunter Building

2540 Shumard Oak Boulevard

Tallahassee, Florida 32399-0850

Telephone: (850) 413-6218

sbrownle@psc.state.fl.us

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for limited proceeding for recovery of incremental storm restoration costs related to Hurricane Matthew by Florida Power & Light Company.

DOCKET NO. 20160251-EI

DATED: April 30, 2018

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that STAFF'S PREHEARING STATEMENT has been filed with the Office of Commission Clerk and that a true copy has been furnished to the following by electronic mail this 30th day of April, 2018:

Ken Rubin
Kevin I.C. Donaldson
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, Florida 33408
ken.rubin@fpl.com
kevin.donaldson@fpl.com

J. R. Kelly
Patricia Christensen
Office of the Public Counsel
c/o The Florida Legislature
111 West Madison Street, Room 812
Tallahassee, Florida 32399-1400
Kelly.jr@leg.state.fl.us
Christensen.patty@leg.state.fl.us

Jon C. Moyle, Jr.
Karen A. Putnal
Moyle Law Firm, P.A.
118 North Gadsden Street
Tallahassee, Florida 32301
Telephone: (850) 681-3828
Facsimile: (850) 681-8788
jmoyle@moylelaw.com
kputnal@moylelaw.com

Schef Wright
John T. LaVia, III
Gardner, Bist, et al
1300 Thomaswood Drive
Tallahassee, Florida 32308
Schef@gbwlegal.com
jlavia@gbwlegal.com

/s/ Suzanne S. Brownless

SUZANNE S. BROWNLESS
SPECIAL COUNSEL
FLORIDA PUBLIC SERVICE COMMISSION
Gerald L. Gunter Building
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850
Telephone: (850) 413-6218
sbrownle@psc.state.fl.us