

**BEFORE THE PUBLIC SERVICE COMMISSION**

In re: Fuel and purchased power cost recovery clause with generating performance incentive factor. | DOCKET NO. 20190001-EI  
DATED: October 1, 2019

**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 2020 through December 2020:

1. **Known Witnesses** - DEF intends to offer the testimony of:

<b>Witness</b>	<b>Direct Subject Matter</b>	<b>Issues#</b>
Christopher A. Menendez	Fuel Cost Recovery True-Up (2018); Capacity Cost Recovery True-Up (2018); Actual / Estimated and Projection Schedules; Other Matters	1B, 1C, 6-11, 18-23, 27-37
Jeffrey Swartz	Bartow Plant Outage <sup>1</sup>	1B, 1C
Arnold Garcia	Existence of Insurance to cover replacement power costs from the Bartow outage	1B
James McClay	Generic Hedging Issues; 2019 April/August Hedging Information	1A

**Rebuttal**

<sup>1</sup> DEF may use Richard A. Polich’s, Exhibit No. (RAP-3), filed on September 19, 2019, as a demonstrative exhibit regarding the Bartow Plant Outage.

2. **Known Exhibits** - DEF intends to offer the following exhibits:

<b>Witness</b>	<b>Proffered By</b>	<b>Exhibit #</b>	<b>Description</b>
	<b>Direct</b>		
Christopher Menendez	DEF	(CAM-1T)	Fuel Cost Recovery True-Up (Jan – Dec. 2018)
Christopher Menendez	DEF	(CAM-2T)	Capacity Cost Recovery True-Up (Jan – Dec. 2018) <b>CONFIDENTIAL</b>
Christopher Menendez	DEF	(CAM-3T)	Schedule A12 for Jan-Dec 2018
Christopher Menendez	DEF	(CAM-4T)	2018 Capital Structure and Cost Rates Applied to Capital Projects
Christopher Menendez	DEF	(CAM-2)	Actual/Estimated True-up Schedules for period January – December 2019
Christopher Menendez	DEF	(CAM-3)	Projection Factors for January - December 2020
Jeffrey Swartz	DEF	(JS-1) <sup>2</sup>	Bartow Plant Root Cause Analysis <b>CONFIDENTIAL</b>
Arnold Garcia	DEF	AG-1	Bartow CC Insurance Policy in effect on February 9, 2017. <b>CONFIDENTIAL</b>
James McClay	DEF	(JM-1T)	Hedging True-Up August - December 2018- <b>CONFIDENTIAL</b>

---

<sup>2</sup> Filed in Docket No. 20180001-EI, incorporated by reference in Mr. Jeffrey Swartz’s Direct Testimony filed in this docket on March 2, 2019.

James McClay	DEF	(JM-1P)	Hedging Report (January – July 2019) – <b>CONFIDENTIAL</b>
James Bradley Daniel	DEF	(JBD-1T)	Calculation of GPIF Reward for January - December 2018
James Bradley Daniel	DEF	(JBD-1P)	GPIF Targets/Ranges Schedules for January – December 2020)

**Rebuttal**

Jeffrey Swartz	DEF	(JS-2)	Bartow Plant Root Cause Analysis (revised as to confidentiality) <b>CONFIDENTIAL</b>
Jeffrey Swartz	DEF	(JS-3)	Bartow ST 40” Blade Test <b>CONFIDENTIAL</b>
Jeffrey Swartz	DEF	(JS-4)	Bartow RCA Summary <b>CONFIDENTIAL</b>

DEF reserves the right to identify additional exhibits for the purpose of cross-examination or rebuttal.

- 3. **Statement of Basic Position** - Not applicable. DEF’s positions on specific issues are listed below.
- 4. **Statement of Facts**

**FUEL ISSUES**

**COMPANY SPECIFIC FUEL ADJUSTMENT ISSUES**

**Duke Energy Florida, LLC**

**ISSUE 1A:** 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 2019 and August 2019 hedging reports?

**DEF:** Yes. The Commission should approve as prudent DEF's actions to mitigate the volatility of natural gas, residential oil and purchased power prices as reported in DEF's April 2019 and August 2019 hedging reports. (McClay)

**ISSUE 1B:** Was DEF prudent in its actions and decisions leading up to and in restoring the unit to service after the February 2017 forced outage at the Bartow plant and, if not, what action should the Commission take with respect to replacement power costs?

**DEF:** Yes. DEF's actions leading up to, and in restoring the unit to service after, the Bartow outage were prudent. DEF operated the Bartow unit within the known operating parameters set by the Original Equipment Manufacturer, as further explained in the confidential testimony and exhibits of Mr. Jeff Swartz. DEF included the replacement power costs from the Bartow outage in the 2017 final true-up balance, filed on March 2, 2018 and consistent with the stipulation in Order No. PSC-2018-0610-FOF-EI, the 2019 fuel factors; no further Commission action is needed with respect to replacement power costs.(Swartz, Menendez, Garcia)

**ISSUE 1C:** Has DEF made prudent adjustments, if any are needed, to account for replacement power costs associated with any impacts related to the de-rating of the Bartow Plant? If appropriate adjustments are needed and have not been made, what adjustment(s) should be made?

**DEF:** No adjustments are needed. DEF's actions leading up to, and in restoring the unit to service after, the Bartow outage were prudent, therefore DEF should be permitted to recover its prudently incurred fuel and purchased power costs. Specifically, DEF does not agree that the Bartow Plant was "de-rated" as a result of the installation of the pressure plate. To the contrary, the pressure plate has ensured reliable operation of the plant until the long-term solution can be implemented. (Swartz, Menendez)

### **Florida Power & Light, Co.**

**ISSUE 2A:** What is the appropriate revised SoBRA factor for the 2017 projects to reflect actual construction costs that are less than the projected costs used to develop the initial SoBRA factor?

**DEF:** No position.

**ISSUE 2B:** What is the appropriate revised SoBRA factor for the 2018 projects to reflect actual construction costs that are less than the projected costs used to develop the initial SoBRA factor? (Deferred)

**DEF:** No position.

**ISSUE 2C:** What is the appropriate total gain under FPL's Incentive Mechanism approved by Order No. PSC-2016-0560-AS-EI that FPL may recover for the period January 2018 through December 2018, and how should that gain to be shared between FPL and customers?

**DEF:** No position.

**ISSUE 2D:** What is the appropriate amount of Incremental Optimization Costs under FPL's Incentive Mechanism approved by Order No. PSC-2016-0560-AS-EI that FPL should be allowed to recover through the fuel clause for Personnel, Software, and Hardware costs for the period January 2018 through December 2018?

**DEF:** No position.

**ISSUE 2E:** What is the appropriate amount of Variable Power Plant O&M Attributable to Off-System Sales under FPL's Incentive Mechanism approved by Order No. PSC-2016-0560-AS-EI that FPL should be allowed to recover through the fuel clause for the period January 2018 through December 2018?

**DEF:** No position.

**ISSUE 2F:** What is the appropriate amount of Variable Power Plant O&M Avoided due to Economy Purchases under FPL's Incentive Mechanism approved by Order No. PSC-2016-0560-AS-EI that FPL should be allowed to recover through the fuel clause for the period January 2018 through December 2018?

**DEF:** No position.

**ISSUE 2G:** If the Commission approves the FPL Solar Together Program and Tariff, what is the appropriate total FPL SolarTogether Credit amount should the Commission approve to be recovered through the fuel cost recovery clause for the period January 2020 through December 2020?

**DEF:** No position.

**ISSUE 2H:** Are the 2020 SoBRA projects (Hibiscus, Okeechobee, Southfork, and Echo River) proposed by FPL cost effective?

**DEF:** No position.

**ISSUE 2I:** What are the revenue requirements associated with the 2020 SoBRA projects?

**DEF:** No position.

**ISSUE 2J:** What is the appropriate base rate percentage increase to be effective when all of the 2020 SoBRA projects are in service, currently projected to be May 1, 2020?

**DEF:** No position.

**ISSUE 2K:** Should the Commission approve revised tariffs for FPL reflecting the base rate percentage increase for the 2020 SoBRA projects determined to be reasonably and prudently incurred in this proceeding?

**DEF:** No position.

**ISSUE 2L:** Has FPL made reasonable and prudent adjustments, if any are needed, to account for replacement costs associated with the April 2019 forced outage at Saint Lucie Unit 1 generating station? If adjustments are needed and have not been made, what adjustment(s) should be made? (Deferred)

**DEF:** No position.

**ISSUE 2M:** What is the appropriate base rate percentage decrease associated with the true-up of the 2017 SoBRA projects approved by Order No. PSC-2018-0028-FOF-EI to be effective January 1, 2020?

**DEF:** No position.

**ISSUE 2N:** Should the Commission approve revised tariffs for FPL to be effective January 1, 2020, reflecting the base rate percentage decrease for the true-up of the 2017 SoBRA projects determined to be reasonable in this proceeding?

**DEF:** No position.

### **Florida Public Utilities Company**

No company-specific fuel issues for Florida Public Utilities Company have been identified at this time. If such issues are identified, they shall be numbered 3A, 3B, 3C, and so forth, as appropriate.

### **Gulf Power Company**

**ISSUE 4A:** 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 2019 and August 2019 hedging reports?

**DEF:** No position.

### **Tampa Electric Company**

**ISSUE 5A:** 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 2019 hedging report?

**DEF:** No position.

**ISSUE 5B:** What was the total gain under TECO's Optimization Mechanism approved by Order No. PSC-2017-0456-S-EI that TECO may recover for the period January 2018 through December 2018, and how should that gain be shared between TECO and customers?

**DEF:** No position.

### **GENERIC FUEL ADJUSTMENT ISSUES**

**ISSUE 6:** What are the appropriate actual benchmark levels for calendar year 2019 for gains on non-separated wholesale energy sales eligible for a shareholder incentive?

**DEF:** \$1,333,709. (Menendez)

**ISSUE 7:** What are the appropriate estimated benchmark levels for calendar year 2020 for gains on non-separated wholesale energy sales eligible for a shareholder incentive?

**DEF:** \$1,604,573. (Menendez)

**ISSUE 8:** What are the appropriate final fuel adjustment true-up amounts for the period January 2018 through December 2018?

**DEF:** \$54,428,676 under-recovery. (Menendez)

**ISSUE 9:** What are the appropriate fuel adjustment actual/estimated true-up amounts for the period January 2019 through December 2019?

**DEF:** \$39,965,991 over-recovery. (Menendez)

**ISSUE 10:** What are the appropriate total fuel adjustment true-up amounts to be collected/refunded from January 2020 through December 2020?

**DEF:** \$14,462,684 under-recovery. (Menendez)

**ISSUE 11:** What are the appropriate projected total fuel and purchased power cost recovery amounts for the period January 2020 through December 2020?

**DEF:** \$1,303,329,632, which is adjusted for line losses and excludes prior period true-up amounts, revenue taxes and GPIF amounts. (Menendez)

**COMPANY-SPECIFIC GENERATING PERFORMANCE  
INCENTIVE FACTOR ISSUES**

**Duke Energy Florida, LLC**

No company-specific GPIF issues for Duke Energy Florida, LLC have been identified at this time. If such issues are identified, they shall be numbered 12A, 12B, 12C, and so forth, as appropriate.

**Florida Power & Light, Co.**

No company-specific GPIF issues for Florida Power and Light Company have been identified at this time. If such issues are identified, they shall be numbered 13A, 13B, 13C, and so forth, as appropriate.

**Gulf Power Company**

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

**Tampa Electric Company**

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

**GENERIC GENERATING PERFORMANCE INCENTIVE FACTOR ISSUES**

**ISSUE 16:** What is the appropriate generation performance incentive factor (GPIF) reward or penalty for performance achieved during the period January 2018 through December 2018 for each investor-owned electric utility subject to the GPIF?

**DEF:** For DEF, a \$2,591,697 reward. (Daniel)

**ISSUE 17:** What should the GPIF targets/ranges be for the period January 2020 through December 2020 for each investor-owned electric utility subject to the GPIF??

**DEF:** For DEF, the appropriate targets and ranges are shown on Page 4 of Exhibit JBD-1P filed on August 30, 2019 with the Direct Testimony of James Bradley Daniel. (Daniel)



## FUEL FACTOR CALCULATION ISSUES

**ISSUE 18:** 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 2020 through December 2020?

**DEF:** \$1,321,332,823 (Menendez)

**ISSUE 19:** 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 2020 through December 2020?

**DEF:** 1.00072 (Menendez)

**ISSUE 20:** What are the appropriate levelized fuel cost recovery factors for the period January 2020 through December 2020?

**DEF:** 3.345 cents/kWh (adjusted for jurisdictional losses) (Menendez)

**ISSUE 21:** 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

**ISSUE 22:** 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	--	--	3.283	4.222	2.863
B	Distribution Primary	--	--	3.317	4.266	2.892
C	Distribution Secondary	3.067	4.067	3.350	4.308	2.921
D	Lighting Secondary	--	--	3.181	--	--

## COMPANY-SPECIFIC CAPACITY COST RECOVERY FACTOR ISSUES

### Duke Energy Florida, LLC

**ISSUE 23A:** What amount has DEF included in the capacity cost recovery clause for nuclear cost recovery?

**DEF:** \$0. (Menendez)

**ISSUE 23B:** What adjustment amount for the Hamilton SoBRA project approved in Order No. PSC-2019-0159-FOF-EI should the Commission approve to be refunded through the capacity clause in 2020?

**DEF:** \$478,334 (Menendez)

### Florida Power & Light Company

**ISSUE 24A:** What amount has FPL included in the capacity cost recovery clause for nuclear cost recovery?

**DEF:** No position.

**ISSUE 24B:** What is the appropriate true-up adjustment amount associated with the 2017 SOBRA projects approved by Order No. PSC-2018-0028-FOF-EI to be refunded through the capacity clause in 2020?

**DEF:** No position.

**ISSUE 24C:** What is the appropriate true-up amount associated with the 2018 SOBRA projects approved by Order No. PSC-2018-0028-FOF-EI to be refunded through the capacity clause in 2020? (DEFERRED)

**DEF:** No position.

**ISSUE 24D:** What are the appropriate Indiantown non-fuel based revenue requirements to be recovered through the Capacity Clause pursuant to the Commission's approval of the Indiantown transaction in Docket No. 20160154-EI for 2020?

**DEF:** No position.

## **Gulf Power Company**

No company-specific capacity cost recovery factor issues for Gulf Power Company have been identified at this time. If such issues are identified, they shall be numbered 25A, 25B, 25C, and so forth, as appropriate.

## **Tampa Electric Company**

No company-specific capacity cost recovery factor issues for Tampa Electric Company have been identified at this time. If such issues are identified, they shall be numbered 26A, 26B, 26C, and so forth, as appropriate.

### **GENERIC CAPACITY COST RECOVERY FACTOR ISSUES**

**ISSUE 27:** What are the appropriate final capacity cost recovery true-up amounts for the period January 2018 through December 2018?

**DEF:** \$845,393 under-recovery (Menendez)

**ISSUE 28:** What are the appropriate capacity cost recovery actual/estimated true-up amounts for the period January 2019 through December 2019?

**DEF:** \$2,693,901 over-recovery (Menendez)

**ISSUE 29:** What are the appropriate total capacity cost recovery true-up amounts to be collected/refunded during the period January 2020 through December 2020?

**DEF:** \$1,848,509 over-recovery (Menendez)

**ISSUE 30:** What are the appropriate projected total capacity cost recovery amounts for the period January 2020 through December 2020?

**DEF:** \$409,624,753 (Menendez)

**ISSUE 31:** What are the appropriate projected net purchased power capacity cost recovery amounts to be included in the recovery factor for the period January 2020 through December 2020?

**DEF:** \$414,954,634 (Menendez)

**ISSUE 32:** What are the appropriate jurisdictional separation factors for capacity revenues and costs to be included in the recovery factor for the period January 2020 through December 2020?

**DEF:** Base – 92.885%, Intermediate – 72.703%, Peaking – 95.924%, consistent with the 2017 Settlement approved in Order No. PSC-2017-0451-AS-EI. (Menendez)

**ISSUE 33:** What are the appropriate capacity cost recovery factors for the period January 2020 through December 2020?

<b>DEF:</b>	<u>Rate Class</u>	<u>CCR Factor</u>
	Residential	1.200 cents/kWh
	General Service Non-Demand	1.147 cents/kWh
	@ Primary Voltage	1.136 cents/kWh
	@ Transmission Voltage	1.124 cents/kWh
	General Service 100% Load Factor	0.690 cents/kWh
	General Service Demand	3.60 \$/kW-month
	@ Primary Voltage	3.56 \$/kW-month
	@ Transmission Voltage	3.53 \$/kW-month
	Curtaillable	1.38 \$/kW-month
	@ Primary Voltage	1.37 \$/kW-month
	@ Transmission Voltage	1.35 \$/kW-month
	Interruptible	3.00 \$/kW-month
	@ Primary Voltage	2.97 \$/kW-month
	@ Transmission Voltage	2.94 \$/kW-month
	Standby Monthly	0.349 \$/kW-month
	@ Primary Voltage	0.346 \$/kW-month
	@ Transmission Voltage	0.342 \$/kW-month
	Standby Daily	0.166 \$/kW-month
	@ Primary Voltage	0.164 \$/kW-month
	@ Transmission Voltage	0.163 \$/kW-month
	Lighting	0.147 cents/kWh

(Menendez)

#### **EFFECTIVE DATE**

**ISSUE 34:** 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 2020 through the last billing cycle for December 2020. The first billing cycle may start before January 1, 2020, and the last billing cycle may end after December 31, 2020, so long as each customer is billed for twelve months regardless of when the factors became effective. (Menendez)

**ISSUE 35:** Should the Commission approve revised tariffs reflecting the fuel adjustment factors and capacity cost recovery factors determined 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)

### **MISCELLANEOUS ISSUES**

**ISSUE 36:** Should the Joint Motion to Modify Order No. PSC-2012-0425-PAA-EU Regarding Weighted Average Cost of Capital Methodology be approved?

**DEF:** Yes (Menendez)

**ISSUE 37:** Should this docket be closed?

**DEF:** Yes (Menendez)

### **CONTESTED ISSUES**

#### **Office of the Public Counsel**

**ISSUE 1E:** Should the Commission hold a separate “spin-off” hearing to determine the cause of the Bartow outage and the prudence of DEF’s decisions on all factors related to the cause(s) and duration of any outages and the de-rating of the Bartow plant?

**DEF:** DEF objects to inclusion of this issue. The issues related to the 2017 Bartow outage and resulting operation of the unit are ripe for determination in this docket. The 2017 Bartow outage was first deferred, by agreement of DEF and OPC, from the 2017 fuel clause to the 2018 proceeding. Then again, per the Stipulation approved by the Commission in Order No. PSC-2018-0610-FOF-EI, Issue 1B (which has been reworded from the 2018 proceeding but related to this same 2017 Bartow outage) was deferred for consideration until a “subsequent fuel docket.” Spinning off Issues 1B and 1C is not only contrary to the specific terms of the stipulation, but also unnecessary. As noted, a decision on this issue has already been deferred twice, meaning the parties have had more than adequate time to conduct discovery and prepare for hearing. Indeed, OPC has sponsored testimony challenging DEF’s actions leading up to the 2017 Bartow outage. While DEF disagrees with the substance of the testimony (as explained in its rebuttal testimony), it remains clear that the issue is ripe for determination in this docket and further delay will do little more than delay adjudication to a later date with no discernible benefit. If the Prehearing Officer determines this is a proper issue for inclusion in this docket, DEF reserves the right to provide a substantive position after that determination is made.

5. **Stipulated Issues** - None at this time.

6. **Pending Motions**

DEF has the following pending Motions:

- September 20, 2019-Motion for Temporary Protective Order: Late Filed Exhibits 2, 4, 5 & 6 (DN 08956-2019).
- September 13, 2019-Motion for Temporary Protective Order: DEF's Response to OPC's Sixth Set of Interrogatories (No. 36) and Sixth Request for Production of Documents (Nos. 47-48)(DN 08770-2019).
- September 10, 2019- Motion for Temporary Protective Order: DEF's Response to OPC's Fifth Set of Interrogatories (Nos. 32-35) and Fifth Request for Production of Documents (Nos. 40-46) (DN 08704-2019).
- September 3, 2019-Motion for Temporary Protective Order: DEF's Response to OPC's Fourth Set of Interrogatories (Nos. 18-31) and Fourth Request for Production of Documents (Nos. 34-39)(DN 08594-2019).
- May 6, 2019-Motion for Temporary Protective Order-DEF's Response to OPC's First Set of Interrogatories (Nos. 1-11) and First Request for Production of Documents (Nos. 1-25)(DN 04163-2019).

7. **Requests for Confidentiality**

DEF has the following pending requests for confidential classification:

- September 26, 2019-DEF's Request for Extension of Confidential Classification concerning Rebuttal Testimony of Jeffrey Swartz and Exhibit No. \_\_\_\_ (JS-2), Exhibit No. \_\_\_\_ (JS-3) and Exhibit No. \_\_\_\_ (JS-4), filed on September 26, 2019 (DN 09058-2019).
- September 24, 2019-DEF's Request for Confidential Classification concerning portions of DEF's Response to OPC's Fourth Set of Interrogatories (Nos. 18-31), specifically questions 23 and 27 (DN 09003-2019).
- September 20, 2019- DEF's Request for Extension of Confidential Classification concerning portions Hedging Audit Workpapers-ACN 2019-070-2-1 (DN 08955-2019).

8. **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.

9. **Sequestration of Witnesses** - DEF has not identified any witnesses for sequestration at this time.

10. **Requirements of Order** - At this time, DEF is unaware of any requirements of the Order Establishing Procedure of which it will be unable to comply.  
RESPECTFULLY SUBMITTED this 1<sup>st</sup> day of October, 2019.

*s/Matthew R. Bernier*

**DIANNE M. TRIPLETT**

Deputy General Counsel  
Duke Energy Florida, LLC

299 First Avenue North  
St. Petersburg, FL 33701

T: 727.820.4692

F: 727.820.5041

E: [Dianne.Triplett@duke-energy.com](mailto:Dianne.Triplett@duke-energy.com)

**MATTHEW R. BERNIER**

Associate General Counsel  
Duke Energy Florida, LLC

106 East College Avenue  
Suite 800

Tallahassee, Florida 32301

T: 850.521.1428

F: 727.820.5041

E: [Matthew.Bernier@duke-energy.com](mailto:Matthew.Bernier@duke-energy.com)

**CERTIFICATE OF SERVICE**

Docket No. 20190001-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via email this 1<sup>st</sup> day of October, 2019 to all parties of record as indicated below.

*s/Matthew R. Bernier*

Attorney

<p>Suzanne Brownless Office of General Counsel FL Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 <a href="mailto:sbrownle@psc.state.fl.us">sbrownle@psc.state.fl.us</a></p> <p>J. Beasley / J. Wahlen / M. Means Ausley McMullen P.O. Box 391 Tallahassee, FL 32302 <a href="mailto:jbeasley@ausley.com">jbeasley@ausley.com</a> <a href="mailto:jwahlen@ausley.com">jwahlen@ausley.com</a> <a href="mailto:mmeans@ausley.com">mmeans@ausley.com</a></p> <p>Steven Griffin Beggs &amp; Lane P.O. Box 12950 Pensacola, FL 32591 <a href="mailto:srg@beggslane.com">srg@beggslane.com</a></p> <p>Russell A. Badders Gulf Power Company One Energy Place Pensacola, FL 32520 <a href="mailto:russell.badders@nexteraenergy.com">russell.badders@nexteraenergy.com</a></p> <p>Holly Henderson Gulf Power Company 215 S. Monroe St., Ste. 618 Tallahassee, FL 32301 <a href="mailto:holly.henderson@nexteraenergy.com">holly.henderson@nexteraenergy.com</a></p> <p>Kenneth A. Hoffman Florida Power &amp; Light Company 134 W. Jefferson Street Tallahassee, FL 32301-1713 <a href="mailto:ken.hoffman@fpl.com">ken.hoffman@fpl.com</a></p> <p>Jon C. Moyle, Jr. Moyle Law Firm, P.A. 118 North Gadsden Street Tallahassee, FL 32301 <a href="mailto:jmoyle@moylelaw.com">jmoyle@moylelaw.com</a> <a href="mailto:mqualls@moylelaw.com">mqualls@moylelaw.com</a></p>	<p>J.R. Kelly / P. Christensen / T. David / S. Morse Office of Public Counsel 111 W. Madison St., Room 812 Tallahassee, FL 32399-1400 <a href="mailto:kelly.jr@leg.state.fl.us">kelly.jr@leg.state.fl.us</a> <a href="mailto:christensen.patty@leg.state.fl.us">christensen.patty@leg.state.fl.us</a> <a href="mailto:david.tad@leg.state.fl.us">david.tad@leg.state.fl.us</a> <a href="mailto:morse.stephanie@leg.state.fl.us">morse.stephanie@leg.state.fl.us</a></p> <p>Ms. Paula K. Brown Regulatory Affairs Tampa Electric Company P.O. Box 111 Tampa, FL 33601-0111 <a href="mailto:regdept@tecoenergy.com">regdept@tecoenergy.com</a></p> <p>Maria Moncada / Joel Baker Florida Power &amp; Light Company 700 Universe Blvd. (LAW/JB) Juno Beach, FL 33408-0420 <a href="mailto:maria.moncada@fpl.com">maria.moncada@fpl.com</a> <a href="mailto:joel.baker@fpl.com">joel.baker@fpl.com</a></p> <p>James Brew / Laura Wynn Stone Law Firm 1025 Thomas Jefferson St., N.W. Suite 800 West Washington, DC 20007 <a href="mailto:jbrew@smxblaw.com">jbrew@smxblaw.com</a> <a href="mailto:law@smxblaw.com">law@smxblaw.com</a></p> <p><a href="#">Mike Cassel</a> Florida Public Utilities Company 1750 S. 14<sup>th</sup> Street, Suite 200 Fernandina Beach, FL 32034 <a href="mailto:mcassel@fpuc.com">mcassel@fpuc.com</a></p> <p>Beth Keating Gunster, Yoakley &amp; Stewart, P.A. 215 South Monroe Street, Suite 601 Tallahassee, FL 32301 <a href="mailto:bkeating@gunster.com">bkeating@gunster.com</a></p>
---	---