

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of 2020-2029 Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Tampa Electric Company.	DOCKET NO. 20200067-EI
In re: Review of 2020-2029 Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Duke Energy Florida, LLC	DOCKET NO. 20200069-EI
In re: Review of 2020-2029 Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Gulf Power Company.	DOCKET NO. 20200070-EI
In re: Review of 2020-2029 Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Florida Power & Light Company.	DOCKET NO. 20200071-EI
	DATED: July 20, 2020

COMMISSION STAFF'S PREHEARING STATEMENT

Pursuant to Order No. PSC-2020-0073-PCO-EI, filed March 11, 2020, the Staff of the Florida Public Service Commission files its Prehearing Statement.

1. All Known Witnesses

There are no known witnesses at this time.

2. All Known Exhibits

There are no known exhibits at this time.

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 1A: Does TECO's 2020-2029 Storm Protection Plan contain all of the elements required by Rule 25-6.030, Florida Administrative Code?

POSITION: Staff has no position at this time.

ISSUE 1B: Does DEF's 2020-2029 Storm Protection Plan contain all of the elements required by Rule 25-6.030, Florida Administrative Code?

POSITION: Staff has no position at this time.

ISSUE 1C: Does Gulf's 2020-2029 Storm Protection Plan contain all of the elements required by Rule 25-6.030, Florida Administrative Code?

POSITION: Staff has no position at this time.

ISSUE 1D: Does FPL's 2020-2029 Storm Protection Plan contain all of the elements required by Rule 25-6.030, Florida Administrative Code?

POSITION: Staff has no position at this time.

ISSUE 2A: To what extent is TECO's 2020-2029 Storm Protection Plan expected to reduce restoration costs and outage times associated with extreme weather events and enhance reliability?

POSITION: Staff has no position at this time.

ISSUE 2B: To what extent is DEF's 2020-2029 Storm Protection Plan expected to reduce restoration costs and outage times associated with extreme weather events and enhance reliability?[Click here to enter Issue]

POSITION: Staff has no position at this time.

ISSUE 2C: To what extent is Gulf's 2020-2029 Storm Protection Plan expected to reduce restoration costs and outage times associated with extreme weather events and enhance reliability?[Click here to enter Issue]

POSITION: Staff has no position at this time.

ISSUE 2D: To what extent is FPL's 2020-2029 Storm Protection Plan expected to reduce restoration costs and outage times associated with extreme weather events and enhance reliability?

POSITION: Staff has no position at this time.

ISSUE 3A: To what extent does TECO's 2020-2029 Storm Protection Plan prioritize areas of lower reliability performance?

POSITION: Staff has no position at this time.

ISSUE 3B: To what extent does DEF's 2020-2029 Storm Protection Plan prioritize areas of lower reliability performance?

POSITION: Staff has no position at this time.

ISSUE 3C: To what extent does Gulf's 2020-2029 Storm Protection Plan prioritize areas of lower reliability performance?

POSITION: Staff has no position at this time.

ISSUE 3D: To what extent does FPL's 2020-2029 Storm Protection Plan prioritize areas of lower reliability performance?

POSITION: Staff has no position at this time.

ISSUE 4A: To what extent is TECO's 2020-2029 Storm Protection Plan regarding transmission and distribution infrastructure feasible, reasonable, or practical in certain areas of TECO's service territory, including, but not limited to, flood zones and rural areas?

POSITION: Staff has no position at this time.

ISSUE 4B: To what extent is DEF's 2020-2029 Storm Protection Plan regarding transmission and distribution infrastructure feasible, reasonable, or practical in certain areas of DEF's service territory, including, but not limited to, flood zones and rural areas?

POSITION: Staff has no position at this time.

ISSUE 4C: To what extent is Gulf's 2020-2029 Storm Protection Plan regarding transmission and distribution infrastructure feasible, reasonable, or practical in certain areas of Gulf's service territory, including, but not limited to, flood zones and rural areas?

POSITION: Staff has no position at this time.

ISSUE 4D: To what extent is FPL's 2020-2029 Storm Protection Plan regarding transmission and distribution infrastructure feasible, reasonable, or practical in certain areas of FPL's service territory, including, but not limited to, flood zones and rural areas?

POSITION: Staff has no position at this time.

ISSUE 5A: What are the estimated costs and benefits to TECO and its customers of making the improvements proposed in the 2020-2029 Storm Protection Plan?

POSITION: Staff has no position at this time.

ISSUE 5B: What are the estimated costs and benefits to DEF and its customers of making the improvements proposed in the 2020-2029 Storm Protection Plan?

POSITION: Staff has no position at this time.

ISSUE 5C: What are the estimated costs and benefits to Gulf and its customers of making the improvements proposed in the 2020-2029 Storm Protection Plan?

POSITION: Staff has no position at this time.

ISSUE 5D: What are the estimated costs and benefits to FPL and its customers of making the improvements proposed in the 2020-2029 Storm Protection Plan?

POSITION: Staff has no position at this time.

ISSUE 6A: What is the estimated annual rate impact resulting from implementation of TECO's 2020-2029 Storm Protection Plan during the first 3 years addressed in the plan?

POSITION: Staff has no position at this time.

ISSUE 6B: What is the estimated annual rate impact resulting from implementation of DEF's 2020-2029 Storm Protection Plan during the first 3 years addressed in the plan?

POSITION: Staff has no position at this time.

ISSUE 6C: What is the estimated annual rate impact resulting from implementation of Gulf's 2020-2029 Storm Protection Plan during the first 3 years addressed in the plan?

POSITION: Staff has no position at this time.

ISSUE 6D: What is the estimated annual rate impact resulting from implementation of FPL's 2020-2029 Storm Protection Plan during the first 3 years addressed in the plan?

POSITION: Staff has no position at this time.

ISSUE 7A: Is it in the public interest to approve, approve with modification, or deny TECO's 2020-2029 Storm Protection Plan?

POSITION: Staff has no position at this time.

ISSUE 7B: Is it in the public interest to approve, approve with modification, or deny DEF's 2020-2029 Storm Protection Plan?

POSITION: Staff has no position at this time.

ISSUE 7C: Is it in the public interest to approve, approve with modification, or deny Gulf's 2020-2029 Storm Protection Plan?

POSITION: Staff has no position at this time.

ISSUE 7D: Is it in the public interest to approve, approve with modification, or deny FPL's 2020-2029 Storm Protection Plan?

POSITION: Staff has no position at this time.

ISSUE 8A: Should Docket No. 20200067-EI be closed?

POSITION: Staff has no position at this time.

ISSUE 8B: Should Docket No. 20200069-EI be closed?

POSITION: Staff has no position at this time.

ISSUE 8C: Should Docket No. 20200070-EI be closed?

POSITION: Staff has no position at this time.

ISSUE 8D: Should Docket No. 20200071-EI be closed?

POSITION: Staff has no position at this time.

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 at this time.

9. Compliance with Order No. PSC-2020-0073-PCO-EI

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

Respectfully submitted this 20th day of July, 2020.

/s/ Rachael Dziechciarz

RACHAEL DZIECHCIARZ
STAFF COUNSEL
FLORIDA PUBLIC SERVICE COMMISSION
Gerald L. Gunter Building
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850
Telephone: (850) 413-6212

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of 2020-2029 Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Tampa Electric Company.

DOCKET NO. 20200067-EI

In re: Review of 2020-2029 Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Duke Energy Florida, LLC

DOCKET NO. 20200069-EI

In re: Review of 2020-2029 Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Gulf Power Company.

DOCKET NO. 20200070-EI

In re: Review of 2020-2029 Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Florida Power & Light Company.

DOCKET NO. 20200071-EI

DATED: July 20, 2020

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 20th day of July, 2020:

J. R. Kelly, Public Counsel
Charles Rehwinkel, Deputy Public Counsel
A. Mireille Fall-Fry, Associate Public Counsel
Patricia Christensen, Associate Public Counsel
Stephanie Morse, Associate Public Counsel
Thomas A. (Tad) David, Associate Public Counsel
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street, Room 812
Tallahassee, Florida 32399-1400
Kelly.jr@leg.state.fl.us
Rehwinkel.charles@leg.state.fl.us
Fall-Fry.Mireille@leg.state.fl.us
Christensen.patty@leg.state.fl.us
morse.stephanie@leg.state.fl.us
David.tad@leg.state.fl.us

James D. Beasley
J. Jeffrey Wahlen
Malcolm N. Means
Ausley McMullen
P.O. Box 391
Tallahassee, FL 32302
jbeasley@ausley.com
jwahlen@ausley.com
mmeans@ausley.com

CERTIFICATE OF SERVICE

DOCKET NOS. 20200067-EI, 20200069-EI, 20200070-EI, 20200071-EI

PAGE 2

Paula K. Brown
Manager, Regulatory Coordination
Tampa Electric Company
P.O. Box 111
Tampa, FL 33601
regdept@tecoenergy.com

Russell A. Badders
Vice President & Associate General Counsel
Gulf Power Company
One Energy Place
Pensacola, FL 32520
russell.badders@nexteraenergy.com

John T. Burnett
Vice President & Deputy General Counsel
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, Florida 33408-0420
john.t.burnett@fpl.com

Kenneth A. Hoffman
Vice President, Regulatory Affairs
Florida Power & Light Company
134 W. Jefferson Street
Tallahassee, FL 32301
ken.hoffman@fpl.com

James W. Brew
Laura Wynn Baker
Stone Mattheis Xenopoulos & Brew, PC
1025 Thomas Jefferson Street, NW
Suite 800 West
Washington, DC 20007-5201
jbrew@smxblaw.com
lwb@smxblaw.com

Dianne M. Triplett
Duke Energy
299 First Avenue North
St. Petersburg, FL 33701
dianne.triplett@duke-energy.com
FLRegulatoryLegal@duke-energy.com

Matthew R. Bernier
Duke Energy
106 East College Avenue, Ste. 800
Tallahassee, FL 32301
Matthew.bernier@duke-energy.com

Jason A. Higginbotham
Senior Attorney
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, Florida 33408-0420
jason.higginbotham@fpl.com

Christopher T. Wright
Senior Attorney
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408-0420
christopher.wright@fpl.com

Stephanie U. Eaton
Spilman Thomas & Battle, PLLC
110 Oakwood Drive, Suite 500
Winston-Salem, NC 27103
seaton@spilmanlaw.com

CERTIFICATE OF SERVICE

DOCKET NOS. 20200067-EI, 20200069-EI, 20200070-EI, 20200071-EI

PAGE 3

Derrick Price Williamson
Barry A. Naum
Spilman Thomas & Battle, PLLC
1100 Bent Creek Blvd., Suite 101
Mechanicsburg, PA 17050
dwilliamson@spilmanlaw.com
bnaum@spilmanlaw.com

Jon C. Moyle, Jr.
Karen A. Putnal
Moyle Law Firm, P.A.
118 North Gadsden Street
Tallahassee, Florida 32301
jmoyle@moylelaw.com
kputnal@moylelaw.com
mqualls@moylelaw.com

/s/ Rachael Dziechciarz

RACHAEL DZIECHCIARZ
STAFF COUNSEL
FLORIDA PUBLIC SERVICE COMMISSION
Gerald L. Gunter Building
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850
Telephone: (850) 413-6212