

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchased Power Cost Recovery
Clause and Generating Performance Incentive Factor

Docket No. 20200001-EI

Filed: October 6, 2020

FLORIDA POWER & LIGHT COMPANY’S PREHEARING STATEMENT

Florida Power & Light Company (“FPL”), pursuant to Order Nos. PSC-2020-0041-PCO-EI and PSC-2020-0123-PCO-PU, hereby submits its Prehearing Statement regarding the issues to be addressed at the hearing scheduled for November 3-5, 2020.

1) WITNESSES

WITNESS	SUBJECT MATTER	ISSUES
R. B. Deaton	Fuel Adjustment True-ups and Projections	6-11 and 18-22
R. B. Deaton	FPL SolarTogether Subscription Credit	2H
R. B. Deaton	Indiantown Non-Fuel Base Revenue Requirements	24B
R. B. Deaton	Capacity Cost Recovery True-ups and Projections	27-33
R. B. Deaton	2021 FCR/CCR Factors Effective Date	34
R. B. Deaton	Tariff Approval	35
R. B. Deaton	Docket Closure	36
G. J. Yupp	Incentive Mechanism Gains	2B
G. J. Yupp	Incremental Optimization Costs	2C-2E
G. J. Yupp	Fuel Adjustment True-Up and Projections	6-11 and 18
R. Coffey	April 2019 St. Lucie Unit 1 Replacement Power Cost Adjustments	2F
R. Coffey	March 2020 St. Lucie Unit 2 Replacement Power Cost Adjustments	2G
R. Coffey	Fuel Adjustment True-Up and Projections	6-11 and 18
C. R. Rote	2019 GPIF Reward	16
C. R. Rote	2021 GPIF Target/Ranges	17
E. J. Anderson	Revised 2018 SoBRA Factor	2A
E. J. Anderson	2018 SoBRA True-Up Adjustment Amount	24A

2) **EXHIBITS**

Witness	Proffered by	Exhibits	Description	Issues
R. B. Deaton	FPL	RBD-1	2019 FCR Final True-Up Calculation	8, 10
R. B. Deaton	FPL	RBD-2	2019 CCR Final True-Up Calculation (Confidential)	27, 29
R. B. Deaton	FPL	RBD-3	2020 FCR Actual/Estimated True-Up Calculation	9, 10
R. B. Deaton	FPL	RBD-4	2020 CCR Actual/Estimated True-Up Calculation	28, 29
R. B. Deaton	FPL	RBD-5	2019 FCR Final True-Up Calculation REVISED	8
R. B. Deaton	FPL	RBD-6	Appendix II 2021 FCR Projections	11, 18-22, 34-36
R. B. Deaton	FPL	RBD-7	Appendix III 2021 CCR Projections	24B, 30-36
G. J. Yupp	FPL	GJY-1	2019 Incentive Mechanism Results (Confidential)	2B-2E
G. J. Yupp	FPL	GJY-2	Appendix I Fuel Cost Recovery	6-11 and 18
C. R. Rote	FPL	CRR-1	Generating Performance Incentive Factor Performance Results for January 2019 through December 2019	16
C. R. Rote	FPL	CRR-2	Generating Performance Incentive Factor Performance Targets for January 2021 through December 2021	17
L. Fuentes	FPL	LF-1	2018 SoBRA Final Revenue Requirement Calculation	2A, 24A
E. J. Anderson	FPL	EJA-1	Revised 2018 SoBRA Factor/Refund Calculation	2A, 24A
E. J. Anderson	FPL	EJA-2	2018 SoBRA Prospective Adjustment for January 1, 2021	2A, 24A
E. J. Anderson	FPL	EJA-3	Projected Retail Base Revenues for January 1, 2021	2A, 24A
E. J. Anderson	FPL	EJA-4	Summary of Tariff Changes for January 1, 2021	2A, 24A
E. J. Anderson	FPL	EJA-5	Typical Bill Projections	2A, 24A

3) **STATEMENT OF BASIC POSITION**

FPL's 2021 Fuel and Purchased Power Cost Recovery factors and Capacity Cost Recovery factors, including its prior period true-ups, are appropriate and reasonable and should be approved. In addition, FPL's refund, including interest, of \$12.4 million and base rate decrease of 0.059% associated with the true-up of the 2018 SoBRA should be approved.

4) **STATEMENT OF ISSUES AND POSITIONS**

COMPANY-SPECIFIC FUEL ADJUSTMENT ISSUES

ISSUE 2A: 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?

FPL: The revised 2018 SoBRA factor is 0.856%. (Anderson)

ISSUE 2B: What is the total gain under FPL's Incentive Mechanism approved by Order No. PSC-2016-0560-AS-EI that FPL may recover for the period January 2019 through December 2019, and how should that gain be shared between FPL and customers?

FPL: FPL's asset optimization activities in 2019 delivered total benefits of \$55,249,313. Of the total gains, FPL is allowed to retain \$9,149,588. (Yupp)

ISSUE 2C: 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 2019 through December 2019?

FPL: The amount of Incremental Optimization Costs for Personnel, Software, and Hardware Costs that FPL should be allowed to recover through the fuel clause is \$533,064 for the period January 2019 through December 2019. (Yupp)

ISSUE 2D: 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 2019 through December 2019?

FPL: The 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 attributable to off-system sales for the period January 2019 through December 2019 is \$1,754,273. (Yupp)

ISSUE 2E: 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 2019 through December 2019?

FPL: FPL has included a credit of \$358,271 as the amount of Incremental Optimization Costs under the Incentive Mechanism for variable power plant O&M avoided due to economy purchases for the period January 2019 through December 2019. The Commission should authorize FPL to flow this credit to customers through the fuel clause. (Yupp)

ISSUE 2F: Has FPL made reasonable and prudent adjustments, if any are needed, to account for replacement power costs associated with the April 2019 forced outage at St. Lucie Nuclear Power Plant, Unit No. 1?

FPL: No adjustments are needed for the replacement power costs associated with the April 2019 outage at St. Lucie Nuclear Power Plant, Unit No. 1. The Commission has consistently based clause recovery of replacement fuel costs on whether a utility's actions were prudent in the circumstances that led to the need for replacement power. FPL acted prudently with respect to the circumstances that resulted in the April 2019 outage and the associated need for replacement power. Therefore, the replacement power costs should be recovered through the fuel cost recovery clause. (Coffey)

ISSUE 2G: Has FPL made reasonable and prudent adjustments, if any are needed, to account for replacement power costs associated with the March 2020 return-to-service delay at St. Lucie Nuclear Power Plant, Unit No. 2?

FPL: No adjustments are needed for the replacement power costs associated with the March 2020 return-to-service delay at St. Lucie Power Plant Unit No. 2. The Commission has consistently based clause recovery of replacement fuel costs on whether a utility's actions were prudent in the circumstances that led to the need for replacement power. FPL acted prudently with respect to the circumstances that resulted in the March 2020 return-to-service delay and the associated need for replacement power. Therefore, the replacement power costs should be recovered through the fuel cost recovery clause. (Coffey)

ISSUE 2H: What is the appropriate subscription credit associated with FPL's Solar Together Program, approved by Order No. PSC-2020-0084-S-EI, to be included for recovery in 2021?

FPL: \$98,939,400. (Deaton)

GENERIC FUEL ADJUSTMENT ISSUES

ISSUE 6: What are the appropriate actual benchmark levels for calendar year 2020 for gains on non-separated wholesale energy sales eligible for a shareholder incentive?

FPL: FPL's revised Incentive Mechanism approved by the Commission in Order No. PSC-16-0560-AS-EI does not rely upon the three-year average Shareholder Incentive Benchmark specified in Order No. PSC-00-1744-PAA-EI, so it is not applicable to FPL for calendar year 2020. (Yupp)

ISSUE 7: What are the appropriate estimated benchmark levels for calendar year 2021 for gains on non-separated wholesale energy sales eligible for a shareholder incentive?

FPL: FPL's revised Incentive Mechanism approved by the Commission in Order No. PSC-16-0560-AS-EI does not rely upon the three-year average Shareholder Incentive Benchmark specified in Order No. PSC-00-1744-PAA-EI, so it is not applicable to FPL for calendar year 2021. (Yupp)

ISSUE 8: What are the appropriate final fuel adjustment true-up amounts for the period January 2019 through December 2019?

FPL: \$51,621,690 under-recovery. (Deaton)

ISSUE 9: What are the appropriate fuel adjustment actual/estimated true-up amounts for the period January 2020 through December 2020?

FPL: \$30,951,780 over-recovery. (Deaton)

ISSUE 10: What are the appropriate total fuel adjustment true-up amounts to be collected/refunded from January 2021 through December 2021?

FPL: \$20,669,910 under-recovery. (Deaton)

ISSUE 11: What are the appropriate projected total fuel and purchased power cost recovery amounts for the period January 2021 through December 2021?

FPL: \$2,593,860,560 jurisdictionalized, excluding prior period true-ups, revenue taxes, FPL's portion of Incentive Mechanism gains, FPL's 2021 SolarTogether Credit amount and the GPIF reward. (Deaton)

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

Florida Power & Light Company

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.

GENERIC GENERATING PERFORMANCE INCENTIVE FACTOR ISSUES

ISSUE 16: What is the appropriate GPIF reward or penalty for performance achieved during the period January 2019 through December 2019 for each investor-owned electric utility subject to the GPIF?

FPL: \$8,125,681 reward. (Rote)

ISSUE 17: What should the GPIF targets/ranges be for the period January 2021 through December 2021 for each investor-owned electric utility subject to the GPIF?

FPL:

Plant/Unit	EAF			ANOHR		
	Target	Maximum		Target	Maximum	
	EAF (%)	EAF (%)	Savings (\$000's)	ANOHR BTU/KWH	ANOHR BTU/KWH	Savings (\$000's)
Cape Canaveral 3	90.1	92.6	430	6,640	6,724	1,581
Sanford 5	90.4	92.9	209	7,372	7,549	2,158
Ft. Myers 2	91.2	93.7	288	7,189	7,343	3,276
Port Everglades 5	84.0	87.0	949	6,566	6,671	2,558
Riviera 5	84.6	87.1	512	6,545	6,636	1,818
St. Lucie 1	80.6	84.1	3,807	10,422	10,522	363
St. Lucie 2	84.0	87.0	2,815	10,297	10,389	267
Turkey Point 3	85.7	88.7	2,769	11,234	11,492	828
Turkey Point 4	93.6	96.6	2,816	10,888	11,041	643
Turkey Point 5	80.6	83.6	194	7,350	7,468	1,186
West County 1	91.0	93.5	581	7,098	7,260	3,025
West County 2	89.7	92.2	643	6,882	7,053	3,572
West County 3	83.2	85.7	622	6,919	7,074	3,118

(Rote)

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 2021 through December 2021?

FPL: \$2,732,181,548 including prior period true-ups, revenue taxes, FPL's portion of Incentive Mechanism gains, FPL's 2021 SolarTogether Credit amount and the GPIF reward. (Deaton)

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 2021 through December 2021?

FPL: 1.00072. (Deaton)

ISSUE 20: What are the appropriate levelized fuel cost recovery factors for the period January 2021 through December 2021?

FPL: FPL is proposing a levelized factor of 2.444 cents/kWh. (Deaton)

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?

FPL: The appropriate fuel cost recovery line loss multipliers are provided in response to Issue No. 22. (Deaton)

ISSUE 22: What are the appropriate fuel cost recovery factors for each rate class/delivery voltage level class adjusted for line losses?

FPL:

GROUPS	RATE SCHEDULE	JANUARY - DECEMBER		
		Average Factor	Fuel Recovery Loss Multiplier	Fuel Recovery Factor
A	RS-1 first 1,000 kWh	2.444	1.00226	2.123
A	RS-1 all additional kWh	2.444	1.00226	3.123
A	GS-1, SL-2, GSCU-1, WIES-1	2.444	1.00226	2.449
A-1	SL-1, OL-1, PL-1 ⁽¹⁾	2.352	1.00226	2.357
B	GSD-1	2.444	1.00220	2.449
C	GSLD-1, CS-1	2.444	1.00164	2.448
D	GSLD-2, CS-2, OS-2, MET	2.444	0.99483	2.431
E	GSLD-3, CS-3	2.444	0.97357	2.379
A	GST-1 On-Peak	2.896	1.00226	2.903
A	GST-1 Off-Peak	2.248	1.00226	2.253
A	RTR-1 On-Peak			0.454
	RTR-1 Off-Peak			(0.196)
B	GSDT-1, CILC-1(G), HLFT-1 (21-499 kW) On-Peak	2.896	1.00220	2.902
B	GSDT-1, CILC-1(G), HLFT-1 (21-499 kW) Off-Peak	2.248	1.00220	2.253
C	GSLDT-1, CST-1, HLFT-2 (500-1,999 kW) On-Peak	2.896	1.00164	2.901
C	GSLDT-1, CST-1, HLFT-2 (500-1,999 kW) Off-Peak	2.248	1.00164	2.252
D	GSLDT-2, CST-2, HLFT-3 (2,000+ kW) On-Peak	2.896	0.99518	2.882
D	GSLDT-2, CST-2, HLFT-3 (2,000+ kW) Off-Peak	2.248	0.99518	2.237
E	GSLDT-3, CST-3, CILC-1(T), ISST-1(T) On-Peak	2.896	0.97357	2.819
E	GSLDT-3, CST-3, CILC-1(T), ISST-1(T) Off-Peak	2.248	0.97357	2.189
F	CILC-1(D), ISST-1(D) On-Peak	2.896	0.99485	2.881
	CILC-1(D), ISST-1(D) Off-Peak	2.248	0.99485	2.236

⁽¹⁾ WEIGHTED AVERAGE 16% ON-PEAK AND 84% OFF-PEAK

GROUPS	RATE SCHEDULE	JUNE - SEPTEMBER		
		Average Factor	Fuel Recovery Loss Multiplier	Fuel Recovery Factor
B	GSD(T)-1 On-Peak	3.685	1.00220	3.693
	GSD(T)-1 Off-Peak	2.280	1.00220	2.285
C	GSLD(T)-1 On-Peak	3.685	1.00164	3.691
	GSLD(T)-1 Off-Peak	2.280	1.00164	2.284
D	GSLD(T)-2 On-Peak	3.685	0.99518	3.667
	GSLD(T)-2 Off-Peak	2.280	0.99518	2.269

(Deaton)

CAPACITY ISSUES

COMPANY-SPECIFIC CAPACITY COST RECOVERY FACTOR ISSUES

ISSUE 24A: What is the appropriate true-up adjustment amount associated with the 2018 SOBRA projects approved by Order No. PSC-2018-0028-FOF-EI to be refunded through the capacity clause in 2021?

FPL: \$12,401,882. (Anderson)

ISSUE 24B: What are the appropriate Indiantown non-fuel base revenue requirements to be recovered through the Capacity Clause pursuant to the Commission's approval of the Indiantown transaction in Docket No. 160154-EI (Order No. PSC-16-0506-FOF-EI) for 2021?

FPL: \$1,356,055. (Deaton)

GENERIC CAPACITY COST RECOVERY FACTOR ISSUES

ISSUE 27: What are the appropriate final capacity cost recovery true-up amounts for the period January 2019 through December 2019?

FPL: \$5,141,967 over-recovery. (Deaton)

ISSUE 28: What are the appropriate capacity cost recovery actual/estimated true-up amounts for the period January 2020 through December 2020?

FPL: \$7,388,454 over-recovery. (Deaton)

ISSUE 29: What are the appropriate total capacity cost recovery true-up amounts to be collected/refunded during the period January 2021 through December 2021?

FPL: \$12,530,421 over-recovery. (Deaton)

ISSUE 30: What are the appropriate projected total capacity cost recovery amounts for the period January 2021 through December 2021?

FPL: \$237,781,299 for the period January 2021 through December 2021, excluding prior period true-ups, revenue taxes, the 2018 SoBRA true-up credit and the Indiantown non-fuel base revenue requirement. (Deaton)

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 2021 through December 2021?

FPL: The projected net purchased power capacity cost recovery amount to be recovered over the period January 2021 through December 2021 is \$214,358,302, including prior period true-ups, revenue taxes, the Indiantown non-fuel base revenue requirement, and the 2018 SoBRA true-up credit. (Deaton)

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 2021 through December 2021?

FPL:

<u>Energy</u>	
Retail Energy Jurisdictional Factor - Base/Solar	95.6788%
Retail Energy Jurisdictional Factor - Intermediate	94.9979%
Retail Energy Jurisdictional Factor – Peaking	95.2675%
<u>Demand</u>	
Retail Demand Jurisdictional Factor - Transmission	90.2300%
Retail Demand Jurisdictional Factor - Base/Solar	95.6891%
Retail Demand Jurisdictional Factor - Intermediate	95.0081%
Retail Demand Jurisdictional Factor - Peaking	95.2778%
Retail Demand Jurisdictional Factor - Distribution	100.0000%
<u>General Plant</u>	
Retail General Plant Jurisdictional Factor - Labor	96.9888%

(Deaton)

ISSUE 33: What are the appropriate capacity cost recovery factors for the period January 2021 through December 2021?

FPL: The January 2021 through December 2021 capacity cost recovery factors including Indiantown factors are as follows:

Rate Schedule	Total Jan - Dec Capacity Recovery Factor			
	Capacity Recovery Factor (\$/KW)	Capacity Recovery Factor (\$/kwh)	RDC (\$/KW)	SDD (\$/KW)
RS1/RTR1	-	0.00204	-	-
GS1/GST1	-	0.00206	-	-
GSD1/GSDT1/HLFT1/GSD1-EV	0.68	-	-	-
OS2	-	0.00089	-	-
GSLD1/GSLDT1/CS1/CST1/HLFT2/GSLD1-EV	0.76	-	-	-
GSLD2/GSLDT2/CS2/CST2/HLFT3	0.73	-	-	-
GSLD3/GSLDT3/CS3/CST3	0.74	-	-	-
SST1T	-	-	0.09	0.04
SST1D1/SST1D2/SST1D3	-	-	0.09	0.04
CILC D/CILC G	0.78	-	-	-
CILC T	0.75	-	-	-
MET	0.67	-	-	-
OL1/SL1/SL1M/PL1	-	0.00016	-	-
SL2/SL2M/GSCU1	-	0.00136	-	-

(Deaton)

EFFECTIVE DATE

ISSUE 34: What should be the effective date of the fuel adjustment factors and capacity cost recovery factors for billing purposes?

FPL: The factors shall be effective for meter readings commencing January 1, 2021. These charges should continue in effect until modified by subsequent order of this Commission. (Deaton)

ISSUE 35: Should the Commission approve revised tariffs reflecting the fuel adjustment factors and capacity cost recovery factors determined to be appropriate in this proceeding?

FPL: Yes. The Commission should approve revised tariffs reflecting the fuel adjustment factors and capacity cost recovery factors determined to be reasonable in this proceeding. The Commission should direct staff to verify that the revised tariffs are consistent with the Commission's decision. (Deaton)

ISSUE 36: Should this docket be closed?

FPL: No. While a separate docket number is assigned each year for administrative convenience, this is a continuing docket and should remain open. (Deaton)

MISCELLANEOUS ISSUES

5) STIPULATED ISSUES

FPL: Yet to be determined. FPL is willing to stipulate that the testimony of all witnesses whom no one wishes to cross examine be inserted into the record as though read, cross examination be waived, and the witness's attendance at the hearing be excused.

6) PENDING MOTIONS

FPL: None at this time.

7) PENDING REQUESTS FOR CONFIDENTIALITY

1. Florida Power & Light Company's request for confidential classification of information 423 Forms for the fourth quarter of 2019, dated January 31, 2020. [DN 00717-2020]
2. Florida Power & Light Company's request for confidential classification of certain information provided in exhs to the prepared direct testimony of FPL witnesses Renae B. Deaton (Exh RBD-2) and Gerald J. Yupp (GJY-1), dated March 2, 2020. [DN 01196-2020]
3. Florida Power & Light Company's request for confidential classification of certain information 423 Forms for the first quarter of 2020, dated April 30, 2020. [DN 02322-2020]
4. Florida Power & Light Company's request for confidential classification of certain material provided to staff pursuant to Audit Control No. 2020-007-4-2, dated May 26, 2020. [DN 02745-2020]
5. Florida Power & Light Company's request for confidential classification of certain material provided to staff pursuant to Audit Control No. 2020-007-4-1, dated May 26, 2020. [DN 02748-2020]
6. First request for extension of confidential classification of [DN 03411-2020] materials provided pursuant to Audit [Control] No. 17-023-4-2, dated June 29, 2020. [DN 03410-2020]

7. First request for extension of confidential classification of [DN 03413-2020] materials provided pursuant to Audit [Control] No. 17-023-4-1, dated June 29, 2020. [DN 03412-2020]
8. Florida Power & Light Company's request for confidential classification of certain information 423 Forms for the second quarter of 2020, dated July 31, 2020. [DN 04153-2020]

8) OBJECTIONS TO WITNESS QUALIFICATIONS AS AN EXPERT

FPL: None at this time.

9) STATEMENT OF COMPLIANCE WITH ORDER ESTABLISHING PROCEDURE

FPL: There are no requirements of the Order Establishing Procedure with which FPL cannot comply.

Respectfully submitted this 6th day of October 2020.

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CERTIFICATE OF SERVICE
Docket No. 20200001-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished

by electronic service on this 6th day of October 2020 to the following:

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