

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Storm Protection Plan Cost Recovery
Clause

Docket No. 20210010-EI

Dated: July 12, 2021

**DUKE ENERGY FLORIDA, LLC'S
PREHEARING STATEMENT**

Pursuant to the Order Establishing Procedure, Order No. PSC-2021-0083-PCO-EI, Duke Energy Florida, LLC (“DEF”) hereby submits its Prehearing Statement for the Storm Protection Plan Cost Recovery Clause docket.

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

Witness	Direct Subject Matter	Issues#
Christopher A. Menendez	Actual/estimated true-up costs associated with the SPPCRC activities for the period January 2021 through December 2021. Calculation of revenue requirements and SPPCRC factors for customer billings for the period January 2022 through December 2022 as permitted by Rule 25-6.031, F.A.C.	1-9
Sharon Bauer	Transmission-related costs associated with DEF’s Storm Protection Plan (“SPP”) proposed for recovery through the Storm Protection Plan Cost Recovery Clause (“SPPCRC”)	2-3
Ron Adams	Transmission Vegetation Management costs associated with DEF’s Storm Protection Plan (“SPP”) proposed for recovery through the Storm Protection Plan Cost Recovery Clause (“SPPCRC”)	2-3
David Doss	Policies and procedures and accounting guidance consistent with Section 366.96, F.S., and Rule 25-6.031, F.A.C.	2-3
Brian Lloyd	Distribution-related costs associated with DEF’s Storm Protection Plan (“SPP”) proposed for recovery through the Storm	2-3

Protection Plan Cost Recovery Clause
 (“SPPCRC”)

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

Witness	Proffered By	Exhibit #	Description
Christopher Menendez	DEF	(CAM-1)	Actual/estimated true-up costs associated with the SPPCRC activities for the period January 2021 through December 2021.
Christopher Menendez	DEF	(CAM-2)	Projected Capital & O&M revenue requirements for the period of January 2022 through December 2022.
Sharon Bauer	DEF	(CAM-1)	Transmission related costs associated with DEF’s Storm Protection Plan (“SPP”) proposed for recovery through the Storm Protection Plan Cost Recovery Clause (“SPPCRC”) 2020 through 2021.
Sharon Bauer	DEF	(CAM-2)	Transmission related costs associated with DEF’s Storm Protection Plan (“SPP”) proposed for recovery through the Storm Protection Plan Cost Recovery Clause (“SPPCRC”) for 2022.
Ron Adams	DEF	(CAM-2)	Transmission related Vegetation Management projected costs for 2022.
Brian Lloyd	DEF	(CAM-1)	Distribution-related costs associated with DEF’s Storm Protection Plan (“SPP”) proposed for recovery through the Storm Protection Plan Cost Recovery Clause (“SPPCRC”) 2020 through 2021.
Brian Lloyd	DEF	(CAM-2)	Distribution-related costs associated with DEF’s Storm Protection Plan (“SPP”) proposed for recovery through the Storm Protection Plan Cost Recovery Clause (“SPPCRC”) for 2022.

DEF reserves the right to identify additional exhibits for the purposes 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**

ISSUE 1: What are the final Storm Protection Plan Cost Recovery Clause jurisdictional cost recovery true-up amounts for the period January 2020 through December 2020?

DEF: None. DEF did not seek any revenue requirements in 2020. (Menendez)

ISSUE 2: What are the actual/estimated Storm Protection Plan Cost Recovery Clause jurisdictional cost recovery true-up amounts for the period January 2021 through December 2021?

DEF: Over-recovery of \$966,652. (Menendez)

ISSUE 3: What are the projected Storm Protection Plan Cost Recovery Clause jurisdictional cost recovery amounts for the period January 2022 through December 2022?

DEF: \$105,270,501. (Menendez)

ISSUE 4: What are the Storm Protection Plan Cost Recovery Clause total jurisdictional cost recovery amounts, including true-ups, to be included in establishing Storm Protection Plan Cost Recovery factors for the period January 2022 through December 2022?

DEF: \$104,303,849. (Menendez)

ISSUE 5: What depreciation rates should be used to develop the depreciation expense included in the total Storm Protection Plan Cost Recovery Clause amounts for the period January 2022 through December 2022?

DEF: DEF should use the depreciation rates that were approved in Final Order PSC-2021-0202A-AS-EI.¹ (Menendez)

¹ Amendatory Order PSC-2021-0202A-AS-EI corrected two scrivener's errors in Order PSC-2021-0202-AS-EI, but otherwise affirmed the original order in all respects.

ISSUE 6: What are the appropriate jurisdictional separation factors for the projected period January 2022 through December 2022?

DEF: DEF should apply the appropriate jurisdictional separation factors that were approved in Final Order PSC-2021-0202A-AS-EI, shown in the MFRs for 2022 in Exhibit 1:

Distribution: 1.0000000
Transmission: 0.7199434
Labor: 0.9541460 (Menendez)

ISSUE 7: What are the appropriate Storm Protection Plan Cost Recovery Clause factors for the period January 2022 through December 2022 for each rate group?

<u>DEF:</u>	<u>Customer Class</u>	<u>SPPCRC Factor</u>
	Residential	0.329 cents/kWh
	General Service Non-Demand	0.277 cents/kWh
	@ Primary Voltage	0.274 cents/kWh
	@ Transmission Voltage	0.271 cents/kWh
	General Service 100% Load Factor	0.132 cents/kWh
	General Service Demand	0.69 \$/kW
	@ Primary Voltage	0.67 \$/kW
	@ Transmission Voltage	0.14 \$/kW
	Curtaillable	0.65 \$/kW
	@ Primary Voltage	0.64 \$/kW
	@ Transmission Voltage	0.64 \$/kW
	Interruptible	0.58 \$/kW
	@ Primary Voltage	0.44 \$/kW
	@ Transmission Voltage	0.11 \$/kW
	Standby Monthly	0.063 \$/kW
	@ Primary Voltage	0.062 \$/kW
	@ Transmission Voltage	0.062 \$/kW
	Standby Daily	0.030 \$/kW
	@ Primary Voltage	0.030 \$/kW
	@ Transmission Voltage	0.029 \$/kW
	Lighting	0.212 cents/kWh
		(Menendez)

ISSUE 8 What should be the effective date of the new Storm Protection Plan Cost Recovery Clause factors for billing purposes?

DEF The factors shall be effective beginning with the specified Storm Protection Plan Cost Recovery Clause cycle and thereafter for the period January 2022 through December 2022. Billing cycles may start before January 1, 2022 and the last cycle may be read after December 31, 2022, so that each customer is billed for twelve months, regardless of when the adjustment factor became effective. These charges shall continue in effect until modified by subsequent order of this Commission. (Menendez)

ISSUE 9: Should the Commission approve revised tariffs reflecting the new Storm Protection Plan Cost Recovery Clause factors determined to be appropriate in this proceeding?

DEF: Yes. The Commission should approve DEF's revised tariffs reflecting the Storm Protection Plan Cost Recovery Clause factors determined to be appropriate in this proceeding. The Commission should direct staff to verify that the revised tariffs are consistent with the Commission's decision. Commission should grant Staff Administrative authority to approve revised tariffs reflecting the new Storm Protection Plan Cost Recovery Clause factors determined to be appropriate in this proceeding. (Menendez)

COMPANY SPECIFIC STORM PROTECTION PLAN COST RECOVERY ISSUES

FLORIDA POWER & LIGHT COMPANY

ISSUE 10: In the event that the Commission declines to approve FPL's pending request for unified rates in Docket No. 20210015-EI, what are the appropriate Storm Protection Plan Cost Recovery Clause factors for the period January 2022 through December 2022?

DEF No position.

ISSUE 11: How should the assumptions used to develop FPL's 2022 Storm Protection Plan Cost Recovery Clause factors approved in this proceeding be revised to reflect any changes or modifications adopted by the Commission in the 2021 Rate Case pending in Docket No. 20210015-EI?

DEF No position.

CLOSE THE DOCKET ISSUE

ISSUE 12: Should this docket be closed?

DEF Yes.

5. **Stipulated Issues** - None at this time.
6. **Pending Motions** - None at this time.
7. **Requests for Confidentiality** - None at this time.
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 with which it will be unable to comply.

Respectfully submitted this 12th day of July, 2021.

s/ Matthew R. Bernier

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CERTIFICATE OF SERVICE

Docket No. 20200010-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via email this 12th day of July, 2021 to all parties of record as indicated below.

s/Matthew R. Bernier

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