

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Storm Protection Plan Cost Recovery)
Clause) Docket No. 20210010-EI
) Filed: July 12, 2021
_____)

**PREHEARING STATEMENT OF
NUCOR STEEL FLORIDA, INC.**

Pursuant to the Florida Public Service Commission’s *Order Establishing Procedure*, Order No. PSC-2021-0083-PCO-EI, issued February 17, 2021, Nucor Steel Florida, Inc. (“Nucor”) hereby files its Prehearing Statement in this case.

A. APPEARANCES

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B. WITNESSES

Nucor does not plan to call any witnesses at this time.

C. EXHIBITS

Nucor does not plan to offer any exhibits at this time.

D. STATEMENT OF BASIC POSITION

This case addresses the Storm Protection Plan Cost Recovery Clauses (“SPPCRC”) of several utilities. Since Nucor is a customer of Duke Energy Florida, LLC (“DEF”), Nucor’s interest

in this case is limited to DEF's SPPCRC. Nucor's basic position is that DEF bears the burden of proof to justify the costs it seeks to recover through the SPPCRC and any other relief DEF requests in this proceeding.

E. STATEMENT ON SPECIFIC ISSUES

GENERIC STORM PROTECTION PLAN COST RECOVERY ISSUES

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?

1A: TECO

Nucor: No position.

1B: DEF

Nucor: No position at this time.

1C: Gulf

Nucor: No position.

1D: FPL

Nucor: No position.

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?

1A: TECO

Nucor: No position.

1B: DEF

Nucor: No position at this time.

1C: Gulf

Nucor: No position.

1D: FPL

Nucor: No position.

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

1A: TECO

Nucor: No position.

1B: DEF

Nucor: No position at this time.

1C: Gulf

Nucor: No position.

1D: FPL

Nucor: No position.

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?

1A: TECO

Nucor: No position.

1B: DEF

Nucor: No position at this time.

1C: Gulf

Nucor: No position.

1D: FPL

Nucor: No position.

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?

Nucor: No position.

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

Nucor: No position.

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?

Nucor: No position at this time.

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

Nucor: No position.

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?

Nucor: No position at this time.

ISSUE 10: Should this docket be closed?

Nucor: No position.

COMPANY SPECIFIC STORM PROTECTION PLAN COST RECOVERY ISSUES

FPL SPECIFIC ISSUES

ISSUE A: 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?

Nucor: No position.

ISSUE B: 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?

Nucor: No position.

F. PENDING MOTIONS

None.

G. PENDING REQUESTS OR CLAIMS FOR CONFIDENTIALITY

None.

H. OBJECTIONS TO QUALIFICATIONS OF WITNESS AS EXPERT

None at this time.

I. REQUIREMENTS OF ORDER ESTABLISHING PROCEDURE

There are no requirements of the Procedural Orders with which Nucor cannot comply.

Respectfully submitted,

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Dated: July 12, 2021

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Prehearing Statement of Nucor Steel Florida, Inc. has been furnished by electronic mail this 12th of July 2021, to the following:

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