

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for limited proceeding for recovery of incremental storm restoration costs related to Hurricane Sally, by Gulf Power Company.

DOCKET NO. 20200241-EI

In re: Petition for evaluation of Hurricane Isaias and Tropical Storm Eta storm costs, by Florida Power & Light Company.

DOCKET NO. 20210178-EI

In re: Petition for limited proceeding for recovery of incremental storm restoration costs and associated true-up process related to Hurricane Zeta, by Gulf Power Company.

DOCKET NO. 20210179-EI

DATED: June 14, 2022

COMMISSION STAFF'S PREHEARING STATEMENT

Pursuant to Order No. PSC-2022-0042-PCO-EI, filed January 26, 2022, 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 1:** Should the incremental cost and capitalization approach (ICCA) found in Rule 25-6.0143, F.A.C., be used to determine the reasonable and prudent amounts to be included in the restoration costs?

- a. Docket No. 20200241-EI for Gulf's Hurricane Sally.
- b. Docket No. 20210178-EI for FPL's Hurricane Isaias.
- c. Docket No. 20210178-EI for FPL's Tropical Storm Eta.

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- d. Docket No. 20210179-EI for Gulf's Hurricane Zeta.

**POSITION:** Staff has no position at this time.

**ISSUE 2:** What is the reasonable and prudent amount of regular payroll expense to be included in the restoration costs?

- a. Docket No. 20200241-EI for Gulf's Hurricane Sally.
- b. Docket No. 20210178-EI for FPL's Hurricane Isaias.
- c. Docket No. 20210178-EI for FPL's Tropical Storm Eta.
- d. Docket No. 20210179-EI for Gulf's Hurricane Zeta.

**POSITION:** Staff has no position at this time.

**ISSUE 3:** What is the reasonable and prudent amount of overtime payroll expense to be included in the restoration costs?

- a. Docket No. 20200241-EI for Gulf's Hurricane Sally.
- b. Docket No. 20210178-EI for FPL's Hurricane Isaias.
- c. Docket No. 20210178-EI for FPL's Tropical Storm Eta.
- d. Docket No. 20210179-EI for Gulf's Hurricane Zeta.

**POSITION:** Staff has no position at this time.

**ISSUE 4:** What is the reasonable and prudent amount of contractor costs to be included in the restoration costs?

- a. Docket No. 20200241-EI for Gulf's Hurricane Sally.
- b. Docket No. 20210178-EI for FPL's Hurricane Isaias.
- c. Docket No. 20210178-EI for FPL's Tropical Storm Eta.
- d. Docket No. 20210179-EI for Gulf's Hurricane Zeta.

**POSITION:** Staff has no position at this time.

**ISSUE 5:** What is the reasonable and prudent amount of vegetation and line clearing costs to be included in the restoration costs?

- a. Docket No. 20200241-EI for Gulf's Hurricane Sally.
- b. Docket No. 20210178-EI for FPL's Hurricane Isaias.
- c. Docket No. 20210178-EI for FPL's Tropical Storm Eta.
- d. Docket No. 20210179-EI for Gulf's Hurricane Zeta.

**POSITION:** Staff has no position at this time.

**ISSUE 6:** What is the reasonable and prudent amount of employee expenses to be included in restoration costs?

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- a. Docket No. 20200241-EI for Gulf's Hurricane Sally.
- b. Docket No. 20210178-EI for FPL's Hurricane Isaias.
- c. Docket No. 20210178-EI for FPL's Tropical Storm Eta.
- d. Docket No. 20210179-EI for Gulf's Hurricane Zeta.

**POSITION:** Staff has no position at this time.

**ISSUE 7:** What is the reasonable and prudent amount of materials and supplies expense to be included in the restoration costs?

- a. Docket No. 20200241-EI for Gulf's Hurricane Sally.
- b. Docket No. 20210178-EI for FPL's Hurricane Isaias.
- c. Docket No. 20210178-EI for FPL's Tropical Storm Eta.
- d. Docket No. 20210179-EI for Gulf's Hurricane Zeta.

**POSITION:** Staff has no position at this time.

**ISSUE 8:** What is the reasonable and prudent amount of logistics costs to be included in the restoration costs?

- a. Docket No. 20200241-EI for Gulf's Hurricane Sally.
- b. Docket No. 20210178-EI for FPL's Hurricane Isaias.
- c. Docket No. 20210178-EI for FPL's Tropical Storm Eta.
- d. Docket No. 20210179-EI for Gulf's Hurricane Zeta.

**POSITION:** Staff has no position at this time.

**ISSUE 9:** What is the reasonable and prudent total amount of costs to be included in the restoration costs?

- a. Docket No. 20200241-EI for Gulf's Hurricane Sally.
- b. Docket No. 20210178-EI for FPL's Hurricane Isaias.
- c. Docket No. 20210178-EI for FPL's Tropical Storm Eta.
- d. Docket No. 20210179-EI for Gulf's Hurricane Zeta.

**POSITION:** Staff has no position at this time.

**ISSUE 10:** What is the reasonable and prudent amount of storm-related costs that should be capitalized?

- a. Docket No. 20200241-EI for Gulf's Hurricane Sally.
- b. Docket No. 20210178-EI for FPL's Hurricane Isaias.
- c. Docket No. 20210178-EI for FPL's Tropical Storm Eta.
- d. Docket No. 20210179-EI for Gulf's Hurricane Zeta.

**POSITION:** Staff has no position at this time.

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**ISSUE 11:** What is the appropriate accounting treatment associated with any storm costs found to have been imprudently incurred?

- a. Docket No. 20210178-EI for FPL's Hurricane Isaias.
- b. Docket No. 20210178-EI for FPL's Tropical Storm Eta.

**POSITION:** Staff has no position at this time.

**ISSUE 12:** Should the Commission approve Gulf Power Company's proposed tariffs and associated charges?

- a. Docket No. 20200241-EI for Gulf's Hurricane Sally.
- b. Docket No. 20210179-EI for Gulf's Hurricane Zeta.

**POSITION:** Staff has no position at this time.

**ISSUE 13:** If applicable, how should any under-recovery or over-recovery be handled?

- a. Docket No. 20200241-EI for Gulf's Hurricane Sally.
- b. Docket No. 20210179-EI for Gulf's Hurricane Zeta.

**POSITION:** Staff has no position at this time.

**ISSUE 14:** Should this docket be closed?

- a. Docket No. 20200241-EI for Gulf's Hurricane Sally.
- b. Docket No. 20210178-EI for FPL's Hurricane Isaias.
- c. Docket No. 20210178-EI for FPL's Tropical Storm Eta.
- d. Docket No. 20210179-EI for Gulf's Hurricane Zeta.

**POSITION:** Staff has no position at this time.

5. Stipulated Issues

Staff has no stipulated issues at this time.

6. Pending Motions

Staff has no pending motions at this time.

7. Pending Confidentiality Claims or Requests

Staff has no pending confidentiality claims at this time.

8. Objections to Witness Qualifications as an Expert

Commission staff has no objections to witness qualifications at this time.

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9. Compliance with Order No. PSC-2022-0042-PCO-EI

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

Respectfully submitted this 14<sup>th</sup> day of June, 2022.

*/s/ Shaw Stiller*

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SHAW STILLER

STAFF COUNSEL

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DATED: June 14, 2022

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 14<sup>th</sup> day of June, 2022:

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*/s/ Shaw Stiller*

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