

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

DOCKET NO. 20220048-EI

In re: Review of Storm Protection Plan,  
pursuant to Rule 25-6.030, F.A.C., Florida  
Public Utilities Company.

DOCKET NO. 20220049-EI

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

DOCKET NO. 20220050-EI

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

DOCKET NO. 20220051-EI

DATED: July 13, 2022

COMMISSION STAFF'S PREHEARING STATEMENT

Pursuant to Order No. PSC-2022-0119-PCO-EI, issued March 17, 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:** Does the Company's Storm Protection Plan contain all of the elements required by Rule 25-6.030, Florida Administrative Code?

- a. Docket No. 20220048-EI for TECO's Storm Protection Plan.
- b. Docket No. 20220049-EI for FPUC's Storm Protection Plan.

- c. Docket No. 20220050-EI for DEF's Storm Protection Plan.
- d. Docket No. 20220051-EI for FPL's Storm Protection Plan.

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

**ISSUE 2:** To what extent is the Company's Storm Protection Plan expected to reduce restoration costs and outage times associated with extreme weather events and enhance reliability?

- a. Docket No. 20220048-EI for TECO's Storm Protection Plan.
- b. Docket No. 20220049-EI for FPUC's Storm Protection Plan.
- c. Docket No. 20220050-EI for DEF's Storm Protection Plan.
- d. Docket No. 20220051-EI for FPL's Storm Protection Plan.

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

**ISSUE 3:** To what extent does the Company's Storm Protection Plan prioritize areas of lower reliability performance?

- a. Docket No. 20220048-EI for TECO's Storm Protection Plan.
- b. Docket No. 20220049-EI for FPUC's Storm Protection Plan.
- c. Docket No. 20220050-EI for DEF's Storm Protection Plan.
- d. Docket No. 20220051-EI for FPL's Storm Protection Plan.

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

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

- a. Docket No. 20220048-EI for TECO's Storm Protection Plan.
- b. Docket No. 20220049-EI for FPUC's Storm Protection Plan.
- c. Docket No. 20220050-EI for DEF's Storm Protection Plan.
- d. Docket No. 20220051-EI for FPL's Storm Protection Plan.

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

**ISSUE 5:** What are the estimated costs and benefits to the Company and its customers of making the improvements proposed in the Storm Protection Plan?

- e. Docket No. 20220048-EI for TECO's Storm Protection Plan.
- f. Docket No. 20220049-EI for FPUC's Storm Protection Plan.
- g. Docket No. 20220050-EI for DEF's Storm Protection Plan.
- h. Docket No. 20220051-EI for FPL's Storm Protection Plan.

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

**ISSUE 6:** What is the estimated annual rate impact resulting from implementation of the Company's Storm Protection Plan during the first 3 years addressed in the plan?

- a. Docket No. 20220048-EI for TECO's Storm Protection Plan.
- b. Docket No. 20220049-EI for FPUC's Storm Protection Plan.
- c. Docket No. 20220050-EI for DEF's Storm Protection Plan.
- d. Docket No. 20220051-EI for FPL's Storm Protection Plan.

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

**ISSUE 7:** Withdrawn.

**ISSUE 8:** Withdrawn

**ISSUE 9:** Should the Commission approve, approve with modification, or deny FPL's new Transmission Access Enhancement Program?

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

**ISSUE 10:** Is it in the public interest to approve, approve with modification, or deny the Company's Storm Protection Plan?

- a. Docket No. 20220048-EI for TECO's Storm Protection Plan.
- b. Docket No. 20220049-EI for FPUC's Storm Protection Plan.
- c. Docket No. 20220050-EI for DEF's Storm Protection Plan.
- d. Docket No. 20220051-EI for FPL's Storm Protection Plan.

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

**ISSUE 11:** Should this docket be closed?

- a. Docket No. 20220048-EI for TECO's Storm Protection Plan.
- b. Docket No. 20220049-EI for FPUC's Storm Protection Plan.
- c. Docket No. 20220050-EI for DEF's Storm Protection Plan.
- d. Docket No. 20220051-EI for FPL's Storm Protection Plan.

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

5. Stipulated Issues

Commission staff has 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-2022-0119-PCO-EI

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

Respectfully submitted this 13th day of July, 2022.

*/s/ Walt Trierweiler*

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*/s/ Jacob Imig*

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DOCKET NO. 20220051-EI

DATED: July 13, 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 13th day of July, 2022:

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CERTIFICATE OF SERVICE

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