

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

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

DOCKET NO.: 20220050-EI
FILED: July 13, 2022

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

Pursuant to the Florida Public Service Commission's *Order Establishing Procedure and Consolidating Docket Nos. 20220048-EI, 2022049-EI, 20220050-EI, and 20220051-EI for Hearing*, Order No. PSC-2022-0119-PCO-EI, issued March 17, 2022, as modified by the *First Order Modifying Order Establishing Procedure and Granting Duke Energy Florida's Motion to Modify Rebuttal Testimony Filing Date*, Order No. PSC- 2022-0226-PCO-EI, issued on June 24, 2022, 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

Duke Energy Florida, LLC (“DEF”) bears the burden of proof to justify the proposed programs for which it seeks approval in its Storm Protection Plan and any other relief DEF requests in this proceeding. As such, DEF must show that its proposed Storm Protection Plan only includes proposed programs that are necessary to increase electric system reliability and resilience against extreme weather, as required by the Storm Protection Plan Recovery statute, 366.96, F.S. The Commission should carefully review DEF’s proposed Storm Protection Plan to ensure that it complies with the statute and only includes programs that “effectively reduce restoration costs and outage times to customers and improve overall service reliability for customers.” § 366.96 (1)(d), F.S.

E. STATEMENT ON SPECIFIC 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.
Nucor: No position.
- b. Docket No. 20220049-EI for FPUC’s Storm Protection Plan.
Nucor: No position.
- c. Docket No. 20220050-EI for DEF’s Storm Protection Plan.
Nucor: Agree with OPC.
- d. Docket No. 20220051-EI for FPL’s Storm Protection Plan.
Nucor: No position.

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.
Nucor: No position.

- b. Docket No. 20220049-EI for FPUC's Storm Protection Plan.
Nucor: No position.
- c. Docket No. 20220050-EI for DEF's Storm Protection Plan.
Nucor: Agree with OPC.
- d. Docket No. 20220051-EI for FPL's Storm Protection Plan.
Nucor: No position.

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.
Nucor: No position.
- b. Docket No. 20220049-EI for FPUC's Storm Protection Plan.
Nucor: No position.
- c. Docket No. 20220050-EI for DEF's Storm Protection Plan.
Nucor: Agree with OPC.
- d. Docket No. 20220051-EI for FPL's Storm Protection Plan.
Nucor: No position.

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.
Nucor: No position.
- b. Docket No. 20220049-EI for FPUC's Storm Protection Plan.
Nucor: No position.
- c. Docket No. 20220050-EI for DEF's Storm Protection Plan.
Nucor: Agree with OPC.
- d. Docket No. 20220051-EI for FPL's Storm Protection Plan.
Nucor: No position.

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?

- a. Docket No. 20220048-EI for TECO's Storm Protection Plan.
Nucor: No position.

- b. Docket No. 20220049-EI for FPUC's Storm Protection Plan.
Nucor: No position
- c. Docket No. 20220050-EI for DEF's Storm Protection Plan.
Nucor: Agree with OPC.
- d. Docket No. 20220051-EI for FPL's Storm Protection Plan.
Nucor: No position.

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.
Nucor: No position.
- b. Docket No. 20220049-EI for FPUC's Storm Protection Plan.
Nucor: No position.
- c. Docket No. 20220050-EI for DEF's Storm Protection Plan.
Nucor: Agree with OPC.
- d. Docket No. 20220051-EI for FPL's Storm Protection Plan.
Nucor: No position.

ISSUE 7: Should the Commission approve, approve with modification, or deny FPL's new Distribution Winterization Program?

Nucor: No position.

ISSUE 8: Should the Commission approve, approve with modification, or deny FPL's new Transmission Winterization Program?

Nucor: No position.

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

Nucor: No position.

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.
Nucor: No position.
- b. Docket No. 20220049-EI for FPUC's Storm Protection Plan.
Nucor: No position.

- c. Docket No. 20220050-EI for DEF's Storm Protection Plan.
Nucor: Agree with OPC.
- d. Docket No. 20220051-EI for FPL's Storm Protection Plan.
Nucor: No position.

ISSUE 11: Should this docket be closed?

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

OPC PROPOSED ISSUES

OPC Proposed Issue A: Are the Company's Storm Protection Plan programs and projects new or expansions of existing activities that are incremental, and are the programs designed specifically for the purpose of reducing restoration costs and outage times?

- a. Docket No. 20220048-EI for TECO's Storm Protection Plan.
Nucor: No position.
- b. Docket No. 20220049-EI for FPUC's Storm Protection Plan.
Nucor: No position.
- c. Docket No. 20220050-EI for DEF's Storm Protection Plan.
Nucor: Agree with OPC.
- d. Docket No. 20220051-EI for FPL's Storm Protection Plan.
Nucor: No position.

OPC Proposed Issue B: What decision criteria, including economic, did the Company use to qualify, rank (select), and determine the magnitude (optimal and/or maximum levels and timing of capital expenditures and expenses) of the Company's Storm Protection Plan programs and projects, and are these criteria reasonable and properly applied for the purposes of mitigating outage times and restoration costs of extreme storms?

- a. Docket No. 20220048-EI for TECO's Storm Protection Plan.
Nucor: No position.
- b. Docket No. 20220049-EI for FPUC's Storm Protection Plan.
Nucor: No position.
- c. Docket No. 20220050-EI for DEF's Storm Protection Plan.
Nucor: Agree with OPC.
- d. Docket No. 20220051-EI for FPL's Storm Protection Plan.
Nucor: No position.

OPC Proposed Issue C: Are the Company's Storm Protection Plan programs and projects prudent and reasonable and are the costs reasonable?

- a. Docket No. 20220048-EI for TECO's Storm Protection Plan.
Nucor: No position.
- b. Docket No. 20220049-EI for FPUC's Storm Protection Plan.
Nucor: No position.
- c. Docket No. 20220050-EI for DEF's Storm Protection Plan.
Nucor: Agree with OPC.
- d. Docket No. 20220051-EI for FPL's Storm Protection Plan.
Nucor: No position.

OPC Proposed Issue D: Should a return on CWIP be included in the Company's annual rate impacts or deferred and included in the rate impacts only after a project is completed and determined to be prudent?

- a. Docket No. 20220048-EI for TECO's Storm Protection Plan.
Nucor: No position.
- b. Docket No. 20220049-EI for FPUC's Storm Protection Plan.
Nucor: No position.
- c. Docket No. 20220050-EI for DEF's Storm Protection Plan.
Nucor: Agree with OPC.
- d. Docket No. 20220051-EI for FPL's Storm Protection Plan.
Nucor: No position.

OPC Proposed Issue E: Should credits be reflected in the Company’s annual rate impacts for savings in depreciation on base rate assets that are retired when replaced with SPP project assets and savings in base rate operation and maintenance and other operating expenses that are avoided due to SPP programs and projects?

- a. Docket No. 20220048-EI for TECO’s Storm Protection Plan.
Nucor: No position.
- b. Docket No. 20220049-EI for FPUC’s Storm Protection Plan.
Nucor: No position.
- c. Docket No. 20220050-EI for DEF’s Storm Protection Plan.
Nucor: Agree with OPC.
- d. Docket No. 20220051-EI for FPL’s Storm Protection Plan.
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 13, 2022

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 13th of July 2022, to the following:

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