

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Environmental cost recovery clause

DOCKET NO.: 20220007-EI

FILED: October 7, 2022

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

Pursuant to the Florida Public Service Commission's *Order Establishing Procedure*, Order No. PSC-2022-0055-PCO-EI, issued February 7, 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

Nucor’s basic position is that Duke Energy Florida, LLC (“DEF”) bears the burden of proof to justify the costs it seeks to recover through the ECRC and any other relief DEF requests in this proceeding.

E. STATEMENT ON SPECIFIC ISSUES

GENERIC ENVIRONMENTAL COST RECOVERY ISSUES

ISSUE 1: What are the final jurisdictional environmental cost recovery true-up amounts for the period January 2021 through December 2021?

- **Nucor:** Regarding DEF, agree with OPC. For all other utilities, Nucor takes no position.

ISSUE 2: What are the actual/estimated jurisdictional environmental cost recovery true-up amounts for the period January 2022 through December 2022?

- **Nucor:** Regarding DEF, agree with OPC. For all other utilities, Nucor takes no position.

ISSUE 3: What are the projected jurisdictional environmental cost recovery amounts for the period January 2023 through December 2023?

- **Nucor:** Regarding DEF, agree with OPC. For all other utilities, Nucor takes no position.

ISSUE 4: What are the jurisdictional environmental cost recovery amounts, including true-up amounts, for the period January 2023 through December 2023?

- **Nucor:** Regarding DEF, agree with OPC. For all other utilities, Nucor takes no position.

ISSUE 5: What depreciation rates should be used to develop the depreciation expense included in the total environmental cost recovery amounts for the period January 2023 through December 2023?

- **Nucor:** Regarding DEF, agree with OPC. For all other utilities, Nucor takes no position.

ISSUE 6: What are the appropriate jurisdictional separation factors for the projected period January 2023 through December 2023?

- **Nucor:** Regarding DEF, agree with OPC. For all other utilities, Nucor takes no position.

ISSUE 7: What are the appropriate environmental cost recovery factors for the period January 2023 through December 2023 for each rate group?

- **Nucor:** Regarding DEF, agree with OPC. For all other utilities, Nucor takes no position.

ISSUE 8: What should be the effective date of the new environmental cost recovery factors for billing purposes?

- **Nucor:** Regarding DEF, agree with OPC. For all other utilities, Nucor takes no position.

ISSUE 9: Should the Commission approve revised tariffs reflecting the environmental cost recovery amounts and environmental cost recovery factors determined to be appropriate in this proceeding?

- **Nucor:** Regarding DEF, agree with OPC. For all other utilities, Nucor takes no position.

ISSUE 10: Should this docket be closed?

- **Nucor:** No position.

COMPANY-SPECIFIC ENVIRONMENTAL COST RECOVERY ISSUES

Florida Power & Light Company (FPL):

ISSUE 11: Should the Commission approve FPL's Combustion Turbine National Emission Standards for Hazardous Air Pollutants Project for cost recovery through the Environmental Cost Recovery Clause?

- **Nucor:** No position.

ISSUE 12: How should any approved Environmental Cost Recovery Clause costs associated with FPL's Combustion Turbine National Emission Standards for Hazardous Air Pollutants Project be allocated to the rate classes?

- **Nucor:** No position.

ISSUE 13: Should FPL be allowed to recover, through the Environmental Cost Recovery Clause, prudently incurred costs associated with its proposed modification to its National Pollutant Discharge Elimination System Permit Requirements Project?

- **Nucor:** No position.

ISSUE 14: Should the Commission approve FPL’s proposed treatment for the Environmental Cost Recovery Clause assets associated with the retirement of Martin Thermal Solar, as proposed in FPL’s 2022 Actual/Estimated Filing?

- **Nucor:** No position.

ISSUE 15: How should the costs related to the regulatory asset for the unrecovered early retired investment associated with the Martin Thermal Solar facility be allocated to the rate classes?

- **Nucor:** No position.

Duke Energy Florida, LLC (DEF):

ISSUE 15: Should the Commission approve DEF’s National Emission Standards for Hazardous Air Pollutants Project for cost recovery through the Environmental Cost Recovery Clause?

- **Nucor:** Agree with OPC.

ISSUE 16: How should any approved Environmental Cost Recovery Clause costs associated with DEF’s National Emission Standards for Hazardous Air Pollutants Project be allocated to the rate classes?

- **Nucor:** Agree with OPC.

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: October 7, 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 7th of October 2022, to the following:

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