

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Storm protection plan cost recovery
clause

DOCKET NO.: 20220010-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-2022-0044-PCO-EI, issued January 28, 2022, and the *First Order Revising Order Establishing Procedure*, Order No. PSC-2022-0111-PCO-EI, issued March 14, 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 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 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 Storm Protection Plan Cost Recovery Clause jurisdictional 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 Storm Protection Plan Cost Recovery Clause jurisdictional 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 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 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 Storm Protection Plan Cost Recovery Clause 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 Storm Protection Plan Cost Recovery Clause 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 Storm Protection Plan Cost Recovery Clause 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 new Storm Protection Plan Cost Recovery Clause 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.

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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