

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and purchased power cost recovery clause with generating performance incentive factor.

DOCKET NO. 20240001-EI
ORDER NO.
ISSUED:

COMMISSION STAFF'S PREHEARING STATEMENT

Pursuant to Order No. PSC-2023-0207-PCO-EI, filed July 24, 2023, and Order No. PSC-2024-0027-PCO-EI, issued February 6, 2024, the Staff of the Florida Public Service Commission files its Prehearing Statement.

1. WITNESSES

| WITNESS | SUBJECT MATTER | ISSUE NOS. |
|---------------|--|------------|
| Carl Vinson | Review of FPL Nuclear Operations 2017-2022 | 2-4 |
| Tom Ballinger | Review of FPL nuclear outages 2020-2022 | 1-4 |

2. EXHIBITS

| WITNESS | PROFFERED BY | EXHIBIT NO. | DESCRIPTION | ISSUE NOS. |
|---------------|--------------|-------------|---|------------|
| Carl Vinson | Staff | (CV-1) | Review of FPL Nuclear Operations January 2024 | 2-4 |
| Tom Ballinger | Staff | (TEB-1) | Summary of outages | 2-4 |

3. STATEMENT OF BASIC POSITION

Staff's positions are preliminary positions 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. STATEMENT OF ISSUES AND POSITIONS

ISSUE 1: What adjustment should be made with respect to replacement power costs associated with any unplanned outages that occurred at Turkey Point or St. Lucie during the calendar years 2020, 2021, and 2022?

POSITION: No position at this time.

ISSUE 2: **Should FPL be subject to a follow up nuclear operations and management audit covering the 2024 to 2029 time period?**

POSITION: No position at this time.

5. STIPULATED ISSUES

There are no stipulations 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 or Requests at this time.

8. OBJECTIONS TO WITNESS QUALIFICATIONS AS AN EXPERT

Staff has no objections to the qualifications of any witness as an expert at this time.

9. COMPLIANCE WITH ORDER NOS. PSC-2023-0207-PCO-EI and PSC-2024-0027-PCO-EI

Staff has complied with all requirements of Order Nos. PSC-2023-0207-PCO-EI and PSC-2024-0027-PCO-EI entered in this docket.

Respectfully submitted this 12th day of March 2024.

/s/ Suzanne S. Brownless

SUZANNE S. BROWNLESS

SPECIAL COUNSEL

FLORIDA PUBLIC SERVICE COMMISSION

Gerald L. Gunter Building

2540 Shumard Oak Boulevard

Tallahassee, Florida 32399-0850

Telephone: (850) 850-413-6218

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 12th day of :

J. Jeffry Wahlen/M. Means/
Virginia Ponder
Ausley Law Firm
Post Office Box 391
Tallahassee, Florida 32302
jwahlen@ausley.com
mmeans@ausley.com
vponder@ausley.com

Kenneth A. Hoffman
Florida Power & Light Company
134 W. Jefferson Street
Tallahassee, Florida 32301
ken.hoffman@fpl.com

Michelle D. Napier
Florida Public Utilities Company
1635 Meathe Drive
West Palm Beach, FL. 33411
mnapier@fpuc.com

Mike Cassel
Florida Public Utilities Company
208 Wildlight Ave.
Yulee, FL 32097
mcassel@fpuc.com

Matthew R. Bernier/ Robert Pickels/
Stephanie A. Cuello
Duke Energy Florida
106 East College Avenue, Suite 800
Tallahassee, Florida 32301
matt.bernier@duke-energy.com
robert.pickels@duke-energy.com
stephanie.cuello@duke-energy.com
FLRegulatoryLegal@duke-energy.com

Dianne M. Triplett
Duke Energy Florida
299 First Avenue North
St. Petersburg, Florida 33701
Dianne.triplett@duke-energy.com

Maria Jose Moncada/ David M. Lee
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408-0420
Maria.moncada@fpl.com
david.lee@fpl.com

Beth Keating
Gunster Law Firm
215 South Monroe Street, Suite 601
Tallahassee, Florida 32301
bkeating@gunster.com

CERTIFICATE OF SERVICE
DOCKET
PAGE 2

Ms. Paula K. Brown
Tampa Electric Company
Post Office Box 111
Tampa, Florida 33601
regdept@tecoenergy.com

Walt Trierweiler/ Charles Rehwinkel/
Patricia A. Christensen/ Mary Wessling/
Octavio Ponce/ Austin Watrous
Office of Public Counsel
111 W. Madison Street, Room 812
Tallahassee, Florida 32399
Trierweiler.walt@leg.state.fl.us
Rehwinkel.charles@leg.state.fl.us
Christensen.patty@leg.state.fl.us
Wessling.mary@leg.state.fl.us
Ponce.octavio@leg.state.fl.us
Watrous.austin@leg.state.fl.us

Jon C. Moyle, Jr.
Moyle Law Firm, P.A.
118 North Gadsden Street
Tallahassee, FL 32301
jmoyle@moylelaw.com
mqualls@moylelaw.com

Corey Allain
Nucor Steel Florida, Inc.
22 Nucor Drive
Frostproof, FL. 33843
Corey.allain@nucor.com

Peter J. Mattheis/Michael K. Lavanga/
Joseph R. Briscar
Stone Law Firm
1025 Thomas Jefferson Street
NW Suite 800 West
Washington, DC 20007
mkl@smxblaw.com
pjm@smxblaw.com
jrb@smxblaw.com

James W. Brew/Laura W. Baker/
Sarah B. Newman
Stone Law Firm
1025 Thomas Jefferson Street
NW Suite 800 West
Washington, DC 20007
jbrew@smxblaw.com
lwb@smxblaw.com
sbn@smxblaw.com

Robert Scheffel Wright
John T. LaVia, III
Gardner, Bist, Bowden, Dee, LaVia,
Wright, Perry & Harper, P.A.
1300 Thomaswood Drive
Tallahassee, FL 32308
schef@gbwlegal.com
jlavia@gbwlegal.com

William C. Garner, Esq.
Law Office of William C. Garner, PLLC
3425 Bannerman Road
Unit 105, No. 414
Tallahassee, FL. 32312
bgarner@wcglawoffice.com

CERTIFICATE OF SERVICE
DOCKET
PAGE 3

Suzanne Brownless
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399
sbrownle@psc.state.fl.us
discovery-gcl@psc.state.fl.us

/s/ Suzanne S. Brownless

SUZANNE S. BROWNLESS
SPECIAL COUNSEL
FLORIDA PUBLIC SERVICE COMMISSION
Gerald L. Gunter Building
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850
Telephone: (850) 850-413-6218