

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchased Power Cost Recovery
Clause with Generating Performance Incentive
Factor

Docket No. 20240001-EI

Filed: March 12, 2024

FLORIDA POWER & LIGHT COMPANY’S PREHEARING STATEMENT

Florida Power & Light Company (“FPL”), pursuant to Order No. PSC-2024-0027-PCO-EI, hereby submits its Prehearing Statement regarding the issues to be addressed at the hearing scheduled for March 26, 2024.

1. WITNESSES

WITNESS	SUBJECT MATTER	ISSUE Nos.
Daniel DeBoer	Prudence of FPL’s actions associated with unplanned outages and down power events during 2020, 2021 and 2022.	1, 2
Joel Gebbie	Prudence of FPL’s actions associated with unplanned outages and down power events during 2020, 2021 and 2022.	1

2. EXHIBITS

WITNESS	PROFFERED BY	EXHIBIT No.	DESCRIPTION	ISSUE No.
DeBoer	FPL	DD-1	Excerpt from: FPL’s Procedure 0-PME-049.0, Reactor Trip and Trip Bypass Breaker Inspection Maintenance	1

3. STATEMENT OF BASIC POSITION

The Commission should approve the stipulated positions reached by FPL and the Office of Public Counsel (“OPC”) as a reasonable resolution of the issues involved in this matter.

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?

FPL: See Stipulated Issues (Section 5)

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

FPL: See Stipulated Issues (Section 5)

5. STIPULATED ISSUES

FPL and OPC have stipulated as follows:

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?**

Stipulation: FPL shall credit customers \$5 million, inclusive of interest, through the fuel clause. The credit shall be included in the calculation of FPL's fuel factors the next time the fuel factors are reset. The prudence of, and replacement power cost calculations associated with, all forced or unplanned outages or down power events at the Turkey Point and St. Lucie nuclear facilities which occurred during the calendar years 2020, 2021 and 2022 are hereby fully resolved and shall not be subject to further challenge or litigation in the future.

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

Stipulation: Yes, a follow up audit may be conducted no earlier than 2030.

If the above stipulations are not approved, FPL reserves the right to revise its positions.

6. PENDING MOTIONS

FPL: None at this time.

7. PENDING REQUESTS FOR CONFIDENTIALITY

FPL: None at this time.

8. OBJECTIONS TO WITNESS QUALIFICATIONS AS AN EXPERT

FPL: None at this time.

9. REQUEST FOR SEQUESTRATION OF WITNESSES

FPL: None at this time.

10. STATEMENT OF COMPLIANCE WITH ORDER ESTABLISHING PROCEDURE

FPL: There are no requirements with which FPL cannot comply.

Respectfully submitted,

By: s/Maria Jose Moncada

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CERTIFICATE OF SERVICE
Docket No. 20240001-EI

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished
by electronic service on this 12th day of March 2024 to the following:

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