

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for limited proceeding for recovery of incremental storm restoration costs related to Hurricanes Ian and Nicole, by Florida Power & Light Company.

DOCKET NO. 20230017-EI

DATED: June 4, 2024

COMMISSION STAFF’S PREHEARING STATEMENT

Pursuant to Order No. PSC-2023-0372-PCO-EI, filed December 14, 2023, the Staff of the Florida Public Service Commission files its Prehearing Statement.

1. All Known Witnesses

Witness	Subject Matter	Issues #
Direct		
Yen Ngo	Commission Staff Audit Report	As needed

2. All Known Exhibits

Witness	Proffered By	Exhibit #	Description
Direct			
Yen Ngo	Commission Staff	YN-1	Audit Report of Florida Power & Light

3. Staff’s Statement of Basic Position

Staff’s positions are preliminary and based on materials filed by the parties and on discovery. The preliminary positions are 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. Staff’s Position on the Issues

ISSUE 1: Should the incremental cost and capitalization approach (ICCA) found in Rule 25-6.0143, F.A.C., be used to determine the reasonable and prudent amounts to be included in the restoration costs?

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POSITION: Staff has no position at this time.

ISSUE 2: Has FPL complied with the terms of the 2019 Stipulation and Settlement, approved by Order No. PSC-2019-0319-S-EI, issued August 1, 2019? If not, why not?

POSITION: Staff has no position at this time.

ISSUE 3: What is the reasonable and prudent amount of regular payroll expense to be included in the restoration costs?

POSITION: Staff has no position at this time.

ISSUE 4: What is the reasonable and prudent amount of overtime payroll expense to be included in the restoration costs?

POSITION: Staff has no position at this time.

ISSUE 5: What is the reasonable and prudent amount of contractor costs to be included in the restoration costs?

POSITION: Staff has no position at this time.

ISSUE 6: What is the reasonable and prudent amount of vegetation and line clearing costs to be included in the restoration costs?

POSITION: Staff has no position at this time.

ISSUE 7: What is the reasonable and prudent amount of employee expenses to be included in the restoration costs?

POSITION: Staff has no position at this time.

ISSUE 8: What is the reasonable and prudent amount of materials and supplies expense to be included in the restoration costs?

POSITION: Staff has no position at this time.

ISSUE 9: What is the reasonable and prudent amount of logistics costs to be included in the restoration costs?

POSITION: Staff has no position at this time.

ISSUE 10: What is the reasonable and prudent total amount of costs to be included in the restoration costs?

POSITION: Staff has no position at this time.

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ISSUE 11: What is the reasonable and prudent amount of storm-related costs that should be capitalized?

POSITION: Staff has no position at this time.

ISSUE 12: What is the appropriate accounting treatment associated with any storm costs found to have been imprudently incurred?

POSITION: Staff has no position at this time.

ISSUE 13: Should the Commission approve FPL's proposed tariffs and associated charges?

POSITION: Staff has no position at this time.

ISSUE 14: If applicable, how should any under-recovery or over-recovery be handled?

POSITION: Staff has no position at this time.

ISSUE 15: Should this docket be closed?

POSITION: Staff has no position at this time.

5. Stipulated Issues

There are no stipulated issues at this time.

6. Pending Motions

Commission staff has no pending motions.

7. Pending Confidentiality Claims or Requests

Commission staff has no pending confidentiality claims or requests.

8. Objections to Witness Qualifications as an Expert

Commission staff has no objections to witness qualifications as an expert.

9. Compliance with Order No. PSC-2023-0372-PCO-EI

Staff has complied with all requirements of the Order Establishing Procedure entered in this docket.

Respectfully submitted this 4th day of June, 2024.

/s/ Shaw Stiller

SHAW STILLER

Special Counsel

DANIEL DOSE

Attorney

Office of the General Counsel

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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 4th day of June, 2024:

<p>Christopher T. Wright Joel T. Baker Florida Power & Light Company 700 Universe Blvd. Juno Beach, Florida 33408 Christopher.wright@fpl.com Joel.baker@fpl.com</p> <p>Kenneth A. Hoffman Vice President, Regulatory Affairs Florida Power & Light Company 134 W. Jefferson Street Tallahassee, Florida 32301 Ken.hoffman@fpl.com</p> <p>Walt Trierweiler Charles Rehwinkel Patricia A. Christensen Mary Wessling c/o The Florida Legislature 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</p>	<p>Stephanie U. Eaton Spilman Thomas & Battle, PLLC 110 Oakwood Drive, Suite 500 Winston-Salem, North Carolina 27103 seaton@spilmanlaw.com</p> <p>Derrick Price Williamson Steven W. Lee Spilman Thomas & Battle, PLLC 1100 Bent Creek Blvd., Suite 101 Mechanicsburg, Pennsylvania 17050 dwilliamson@spilmanlaw.com slee@spilmanlaw.com</p> <p>Jordan Luebke Earthjustice Florida 111 S. Martin Luther King, Jr. Blvd. Tallahassee, Florida 32301 jluebke@earthjustice.org</p>
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/s/ Shaw Stiller

SHAW STILLER

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