

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Storm protection plan cost recovery clause.

DOCKET NO. 20240010-EI

DATED: July 31, 2024

COMMISSION STAFF’S PREHEARING STATEMENT

Pursuant to Order No. PSC-2024-0032-PCO-EI, filed February 6, 2024, modified by Order No. PSC-2024-0110-PCO-EI on April 19, 2024 and by Order No. PSC-2024-0216-PCO-EI on June 20, 2024, the Staff of the Florida Public Service Commission files its Prehearing Statement.

1. All Known Witnesses

Witness	Subject Matter	Issues #
Direct		
Tomer Kopelovich	Staff’s audit report of FPL: Storm Protection Plan Cost Recovery Clause	1A
Ron Mavrides	Staff’s audit report of TECO: Storm Protection Plan Cost Recovery Clause	1B
Donna D. Brown	Staff’s audit report of DEF and FPUC: Storm Protection Plan Cost Recovery Clause	1C and 1D

2. All Known Exhibits

Witness	Proffered By	Exhibit #	Description
Direct			
Tomer Kopelovich	Commission Staff	TK-1	Auditor’s Report - FPL
Ron Mavrides	Commission Staff	RM-1	Auditor’s Report – TECO
Donna D. Brown	Commission Staff	DDB-1	Auditor’s Report - DEF
Donna D. Brown	Commission Staff	DDB-2	Auditor’s Report – FPUC

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 1A: What jurisdictional amounts should the Commission approve as FPL's final 2023 prudently incurred costs and final true-up revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

POSITION: Staff has no position at this time.

ISSUE 1B: What jurisdictional amounts should the Commission approve as TECO's final 2023 prudently incurred costs and final true-up revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

POSITION: Staff has no position at this time.

ISSUE 1C: What jurisdictional amounts should the Commission approve as the FPUC's final 2023 prudently incurred costs and final true-up revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

POSITION: Staff has no position at this time.

ISSUE 1D: What jurisdictional amounts should the Commission approve as the DEF's final 2023 prudently incurred costs and final true-up revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

POSITION: Staff has no position at this time.

ISSUE 2A: What jurisdictional amounts should the Commission approve as the FPL's reasonably estimated 2024 costs and estimated true-up revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

POSITION: Staff has no position at this time.

ISSUE 2B: What jurisdictional amounts should the Commission approve as TECO's reasonably estimated 2024 costs and estimated true-up revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

POSITION: Staff has no position at this time.

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ISSUE 2C: What jurisdictional amounts should the Commission approve as FPUC's reasonably estimated 2024 costs and estimated true-up revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

POSITION: Staff has no position at this time.

ISSUE 2D: What jurisdictional amounts should the Commission approve as DEF's reasonably estimated 2024 costs and estimated true-up revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

POSITION: Staff has no position at this time.

ISSUE 3A: What jurisdictional amounts should the Commission approve as FPL's reasonably projected 2025 costs and projected revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

POSITION: Staff has no position at this time.

ISSUE 3B: What jurisdictional amounts should the Commission approve as TECO's reasonably projected 2025 costs and projected revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

POSITION: Staff has no position at this time.

ISSUE 3C: What jurisdictional amounts should the Commission approve as FPUC's reasonably projected 2025 costs and projected revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

POSITION: Staff has no position at this time.

ISSUE 3D: What jurisdictional amounts should the Commission approve as DEF's reasonably projected 2025 costs and projected revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

POSITION: Staff has no position at this time.

ISSUE 4A: What are the Storm Protection Plan Cost Recovery Clause total jurisdictional cost recovery amounts, including true-ups, to be included in establishing 2025 Storm Protection Plan Cost Recovery factors for FPL?

POSITION: Staff has no position at this time.

ISSUE 4B: What are the Storm Protection Plan Cost Recovery Clause total jurisdictional cost recovery amounts, including true-ups, to be included in establishing 2025 Storm Protection Plan Cost Recovery factors for TECO?

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POSITION: Staff has no position at this time.

ISSUE 4C: What are the Storm Protection Plan Cost Recovery Clause total jurisdictional cost recovery amounts, including true-ups, to be included in establishing 2025 Storm Protection Plan Cost Recovery factors for FPUC?

POSITION: Staff has no position at this time.

ISSUE 4D: What are the Storm Protection Plan Cost Recovery Clause total jurisdictional cost recovery amounts, including true-ups, to be included in establishing 2025 Storm Protection Plan Cost Recovery factors for DEF?

POSITION: Staff has no position at this time.

ISSUE 5A: What depreciation rates should be used to develop the depreciation expense included in the total 2025 Storm Protection Plan Cost Recovery Clause amounts for FPL?

POSITION: Staff has no position at this time.

ISSUE 5B: What depreciation rates should be used to develop the depreciation expense included in the total 2025 Storm Protection Plan Cost Recovery Clause amounts for TECO?

POSITION: Staff has no position at this time.

ISSUE 5C: What depreciation rates should be used to develop the depreciation expense included in the total 2025 Storm Protection Plan Cost Recovery Clause amounts for FPUC?

POSITION: Staff has no position at this time.

ISSUE 5D: What depreciation rates should be used to develop the depreciation expense included in the total 2025 Storm Protection Plan Cost Recovery Clause amounts for DEF?

POSITION: Staff has no position at this time.

ISSUE 6A: What are the appropriate 2025 jurisdictional separation factors for FPL?

POSITION: Staff has no position at this time.

ISSUE 6B: What are the appropriate 2025 jurisdictional separation factors for TECO?

POSITION: Staff has no position at this time.

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ISSUE 6C: What are the appropriate 2025 jurisdictional separation factors for FPUC?

POSITION: Staff has no position at this time.

ISSUE 6D: What are the appropriate 2025 jurisdictional separation factors for DEF?

POSITION: Staff has no position at this time.

ISSUE 7A: What are the appropriate 2025 Storm Protection Plan Cost Recovery Clause factors for each rate class for FPL?

POSITION: Staff has no position at this time.

ISSUE 7B: What are the appropriate 2025 Storm Protection Plan Cost Recovery Clause factors for each rate class for TECO?

POSITION: Staff has no position at this time.

ISSUE 7C: What are the appropriate 2025 Storm Protection Plan Cost Recovery Clause factors for each rate class for FPUC?

POSITION: Staff has no position at this time.

ISSUE 7D: What are the appropriate 2025 Storm Protection Plan Cost Recovery Clause factors for each rate class for DEF?

POSITION: Staff has no position at this time.

ISSUE 8A: What should be the effective date of the 2025 Storm Protection Plan Cost Recovery Clause factors for billing purposes for FPL?

POSITION: Staff has no position at this time.

ISSUE 8B: What should be the effective date of the 2025 Storm Protection Plan Cost Recovery Clause factors for billing purposes for TECO?

POSITION: Staff has no position at this time.

ISSUE 8C: What should be the effective date of the 2025 Storm Protection Plan Cost Recovery Clause factors for billing purposes for FPUC?

POSITION: Staff has no position at this time.

ISSUE 8D: What should be the effective date of the 2025 Storm Protection Plan Cost Recovery Clause factors for billing purposes for DEF?

POSITION: Staff has no position at this time.

ISSUE 9A: Should the Commission approve revised tariffs reflecting the 2025 Storm Protection Plan Cost Recovery Clause factors determined to be appropriate in this proceeding for FPL?

POSITION: Staff has no position at this time.

ISSUE 9B: Should the Commission approve revised tariffs reflecting the 2025 Storm Protection Plan Cost Recovery Clause factors determined to be appropriate in this proceeding for TECO?

POSITION: Staff has no position at this time.

ISSUE 9C: Should the Commission approve revised tariffs reflecting the 2025 Storm Protection Plan Cost Recovery Clause factors determined to be appropriate in this proceeding for FPUC?

POSITION: Staff has no position at this time.

ISSUE 9D: Should the Commission approve revised tariffs reflecting the 2025 Storm Protection Plan Cost Recovery Clause factors determined to be appropriate in this proceeding for DEF?

POSITION: Staff has no position at this time.

ISSUE 10: Should this docket be closed?

POSITION: Staff has no position at this time.

5. Stipulated Issues

Staff has no stipulated issues 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 motions at this time.

8. Objections to Witness Qualifications as an Expert

Staff has no objections to witness qualifications at this time.

9. Compliance with Order No. PSC-2024-0032-PCO-EI

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

Respectfully submitted this 31st day of July, 2024.

/s/ Shaw Stiller

SHAW STILLER

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DATED: July 31, 2024

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 31st day of July, 2024:

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