

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for limited proceeding for recovery of incremental storm restoration costs related to Hurricanes Debby, Helene, and Milton by Duke Energy Florida, LLC

DOCKET NO.: 20240173-EI
FILED: January 15, 2025

**PETITION TO INTERVENE OF
NUCOR STEEL FLORIDA, INC.**

Pursuant to Sections 120.569 and 120.57, Florida Statutes and Rule 28-106.205, Florida Administrative Code, Nucor Steel Florida, Inc. ("Nucor"), through its undersigned attorneys, files its Petition to Intervene in the above captioned proceeding. In support thereof, Nucor states as follows:

1. The name and address of the affected agency is:

Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

2. The name and address of the petitioner is:

Nucor Steel Florida, Inc.
22 Nucor Drive
Frostproof, FL 33843

3. All pleadings, motions, orders, and other documents directed to the petitioner

should be served on:

Peter J. Mattheis
Michael K. Lavanga
Joseph R. Briscar
Stone Mattheis Xenopoulos & Brew, PC
1025 Thomas Jefferson Street, NW
Suite 800 West
Washington, DC 20007-5201

Phone: (202) 342-0800
Fax: (202) 342-0807
pjm@smxblaw.com
mkl@smxblaw.com
jrb@smxblaw.com

4. Statement of Affected Interests. Nucor owns and operates a steel production facility located within Duke Energy Florida's ("DEF") electric service territory. Nucor purchases large amounts of electric energy from DEF to power its steel making operations.

5. On December 27, 2024, DEF filed a Petition to conduct a limited proceeding to authorize commencement of recovery of incremental storm restoration costs and interest related to Hurricanes Debby, Helene, and Milton, and replenishment of DEF's authorized storm reserve ("Petition"). DEF seeks to recover approximately \$1,089.6 million beginning March 2025, subject to final true-up. The proposed surcharge recovery factors will have a significant impact on DEF's customers, including Nucor. Given that charges proposed in the Petition will affect the rates charged and paid by DEF customers, and because Nucor purchases substantial amounts of electric energy from DEF, the outcome of this proceeding may adversely affect Nucor's interests.

6. Disputed Issues of Material Fact. Nucor is not aware of any disputed issues of material fact at this early stage of the proceeding. However, Nucor anticipates that disputed issues of material fact may be identified over the course of the proceeding, and Nucor reserves the right to identify such issues.

7. Disputed Legal Issues. Nucor is not aware of any disputed legal issues at this early stage of the proceeding. However, Nucor anticipates that disputed legal issues

may be identified over the course of the proceeding, and Nucor reserves the right to identify such issues.

8. Statement of Ultimate Facts Alleged. Alleged ultimate facts include, but are not limited to, whether the proposed rate and relief request by DEF are just and reasonable. Nucor anticipates additional alleged ultimate facts may be identified over the course of the proceeding.

9. Laws Entitling Petitioner to Relief and Relation to Alleged Facts. The rules and statutes entitling Nucor to relief include but are not necessarily limited to the following: Sections 120.569 and 120.57(1), Florida Statutes, Sections 366.04 through 366.07, Florida Statutes, and Rule 28-106.205, Florida Administrative Code.

10. Statement of Conferral. In accordance with Rule 28-106.204(3), Florida Administrative Code, Nucor has conferred with all parties to this proceeding regarding Nucor's intervention. DEF takes no position on Nucor's intervention; the Office of Public Counsel does not object to Nucor's intervention. As such, no party indicated an objection to Nucor's intervention.

11. Relief. Nucor requests that it be permitted to intervene as a full party in this docket.

WHEREFORE, Nucor respectfully requests that the Commission enter an order allowing it to intervene as a full party in this docket.

Respectfully Submitted,

/s/ Michael K. Lavanga

Peter J. Mattheis

Michael K. Lavanga

Joseph R. Briscar

Stone Mattheis Xenopoulos & Brew, PC

1025 Thomas Jefferson Street, NW

Suite 800 West

Washington, DC 20007-5201

Phone: (202) 342-0800

Fax: (202) 342-0807

pjm@smxblaw.com

mkl@smxblaw.com

jrb@smxblaw.com

Attorneys for Nucor Steel Florida, Inc.

Certificate of Service

I hereby certify that a true copy of the foregoing Petition to Intervene has been furnished by electronic mail and/or U.S. Mail this 15th day of January, 2025, to the following:

Duke Energy
Matthew R. Bernier
Stephanie Cuello
106 East College Avenue, Suite 800
Tallahassee, FL 32301
Matt.Bernier@Duke-Energy.com
Stephanie.Cuello@Duke-Energy.com
FLRegulatoryLegal@duke-energy.com

Walt Trierweiler
Charles J. Rehwinkel
The Florida Legislature
111 W. Madison St., Rm 812
Tallahassee, FL 32399
Trierweiler.walt@leg.state.fl.us
rehwinkel.charles@leg.state.fl.us

Duke Energy
Dianne M. Triplett
229 First Avenue North
St. Petersburg, FL 33701
Dianne.Triplett@Duke-Energy.com

Daniel Dose
Office of General Counsel
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850
ddose@psc.state.fl.us

/s/ Michael K. Lavanga
Michael K. Lavanga