

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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In re: Storm Protection Plan Cost Recovery  
Clause

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Docket No. 20250010-EI

Dated: October 10, 2025

**DUKE ENERGY FLORIDA, LLC'S  
PREHEARING STATEMENT**

Pursuant to the Order Establishing Procedure, Order No. PSC-2025-0048-PCO-EI (the "OEP"), Duke Energy Florida, LLC ("DEF") hereby submits its Prehearing Statement for the Storm Protection Plan Cost Recovery Clause docket.

1. **Known Witnesses** - DEF intends to offer the testimony of:

**Direct**

<b>Witness</b>	<b>Subject Matter</b>	<b>Issues#</b>
Christopher A. Menendez	True-up costs associated with the SPPCRC activities for the period January 2024 through December 2024. Actual/Estimated true-up for the period January 2025 through December 2025, Updated projected costs for the SPPCRC for the period January 2026 through December 2026, and DEF's Storm Protection Plan cost recovery factors for the period January 2026 through December 2026.	1D-9D
Robert E. McCabe	Distribution-related costs associated with DEF's Storm Protection Plan ("SPP") proposed for recovery through the Storm Protection Plan Cost Recovery Clause ("SPPCRC").	1D-3D
Robert E. Brong	Transmission-related costs associated with DEF's Storm Protection Plan ("SPP") proposed for recovery through the Storm Protection Plan Cost Recovery Clause ("SPPCRC").	1D-3D

2. **Known Exhibits** - DEF intends to offer the following exhibits:

<b>Witness</b>	<b>Proffered By</b>	<b>Exhibit #</b>	<b>Description</b>	<b>Issue(s)</b>
Christopher A. Menendez	DEF	(CAM-1)	True-up costs associated with the SPPCRC activities for the period January 2024 through December 2024.	1D, 4D, 7D
Christopher A. Menendez	DEF	(CAM-2)	Actual/estimated true-up for the period January 2025 through December 2025.	2D, 4D, 7D
Christopher A. Menendez	DEF	(CAM-3) Amended	Projected costs for the SPPCRC for the period January 2026 through December 2026, and DEF's Storm Protection Plan cost recovery factors for the period January 2026 through December 2026.	3D, 4D, 5D, 6D, 7D, 8D, 9D
Robert E. McCabe	DEF	(CAM-1)	Distribution-related costs associated with DEF's Storm Protection Plan ("SPP") proposed for recovery through the Storm Protection Plan Cost Recovery Clause ("SPPCRC") for 2024.	1D
Robert E. McCabe	DEF	(CAM-2)	Distribution-related costs associated with DEF's Storm Protection Plan ("SPP") proposed for recovery through the Storm Protection Plan Cost Recovery Clause ("SPPCRC") for 2025.	2D
Robert E. McCabe	DEF	(CAM-3) Amended	Distribution-related costs associated with DEF's Storm Protection Plan ("SPP") proposed for recovery through the Storm Protection Plan Cost Recovery Clause ("SPPCRC") for 2026.	3D
Robert E. Brong	DEF	(CAM-1)	Transmission-related costs associated with DEF's Storm Protection Plan ("SPP") proposed for recovery through the Storm Protection Plan Cost Recovery Clause ("SPPCRC") for 2024.	1D
Robert E. Brong	DEF	(CAM-2)	Transmission-related costs associated with DEF's Storm Protection Plan ("SPP") proposed for recovery through the Storm Protection Plan Cost Recovery Clause ("SPPCRC") for 2025.	2D
Robert E. Brong	DEF	(CAM-3) Amended	Transmission-related costs associated with DEF's Storm Protection Plan ("SPP") proposed for recovery through the Storm Protection Plan Cost Recovery Clause ("SPPCRC") for 2026.	3D

DEF reserves the right to identify additional exhibits for the purpose of cross-examination or rebuttal.

3. **Statement of Basic Position** - DEF's position on specific issues are listed below.

4. **Statement of Facts**

#### **GENERIC STORM PROTECTION PLAN COST RECOVERY ISSUES**

**ISSUE 1A:** What jurisdictional amounts should the Commission approve as FPL's final 2024 prudently incurred costs and final true-up revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

**DEF:** No position.

**ISSUE 1B:** What jurisdictional amounts should the Commission approve as TECO's final 2024 prudently incurred costs and final true-up revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

**DEF:** No position.

**ISSUE 1C:** What jurisdictional amounts should the Commission approve as the FPUC's final 2024 prudently incurred costs and final true-up revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

**DEF:** No position.

**ISSUE 1D:** What jurisdictional amounts should the Commission approve as the DEF's final 2024 prudently incurred costs and final true-up revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

**DEF:** Investments of \$699,899,439 (System). Over-recovery of \$9,479,063. (Menendez, McCabe, Brong)

**ISSUE 2A:** What jurisdictional amounts should the Commission approve as the FPL's reasonably estimated 2025 costs and estimated true-up revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

**DEF:** No position.

**ISSUE 2B:** What jurisdictional amounts should the Commission approve as TECO's reasonably estimated 2025 costs and estimated true-up revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

**DEF:** No position.

**ISSUE 2C:** What jurisdictional amounts should the Commission approve as FPUC's reasonably estimated 2025 costs and estimated true-up revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

**DEF:** No position.

**ISSUE 2D:** What jurisdictional amounts should the Commission approve as DEF's reasonably estimated 2025 costs and estimated true-up revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

**DEF:** Investments of \$850,521,926 (System). Over-recovery of \$21,779,919. (Menendez, McCabe, Brong)

**ISSUE 3A:** What jurisdictional amounts should the Commission approve as FPL's reasonably projected 2026 costs and projected revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

**DEF:** No position.

**ISSUE 3B:** What jurisdictional amounts should the Commission approve as TECO's reasonably projected 2026 costs and projected revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

**DEF:** No position.

**ISSUE 3C:** What jurisdictional amounts should the Commission approve as FPUC's reasonably projected 2026 costs and projected revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

**DEF:** No position.

**ISSUE 3D:** What jurisdictional amounts should the Commission approve as DEF's reasonably projected 2026 costs and projected revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

**DEF:** Investments of \$763,445,416 (System). Revenue requirement \$347,807,804. (Menendez, McCabe, Brong)

**ISSUE 4A:** What are the Storm Protection Plan Cost Recovery Clause total jurisdictional cost recovery amounts, including true-ups, to be included in establishing 2026 Storm Protection Plan Cost Recovery factors for FPL?

**DEF:** No position.

**ISSUE 4B:** What are the Storm Protection Plan Cost Recovery Clause total jurisdictional cost recovery amounts, including true-ups, to be included in establishing 2026 Storm Protection Plan Cost Recovery factors for TECO?

**DEF:** No position

**ISSUE 4C:** What are the Storm Protection Plan Cost Recovery Clause total jurisdictional cost recovery amounts, including true-ups, to be included in establishing 2026 Storm Protection Plan Cost Recovery factors for FPUC?

**DEF:** No position

**ISSUE 4D:** What are the Storm Protection Plan Cost Recovery Clause total jurisdictional cost recovery amounts, including true-ups, to be included in establishing 2026 Storm Protection Plan Cost Recovery factors for DEF?

**DEF:** Revenue requirement \$316,548,823. (Menendez)

**ISSUE 5A:** What depreciation rates should be used to develop the depreciation expense included in the total 2026 Storm Protection Plan Cost Recovery Clause amounts for FPL?

**DEF:** No position.

**ISSUE 5B:** What depreciation rates should be used to develop the depreciation expense included in the total 2026 Storm Protection Plan Cost Recovery Clause amounts for TECO?

**DEF:** No position.

**ISSUE 5C:** What depreciation rates should be used to develop the depreciation expense included in the total 2026 Storm Protection Plan Cost Recovery Clause amounts for FPUC?

**DEF:** No position.

**ISSUE 5D:** What depreciation rates should be used to develop the depreciation expense included in the total 2026 Storm Protection Plan Cost Recovery Clause amounts for DEF?

**DEF:** DEF should use the depreciation rates that were approved in Final Order No. PSC-2024-0472-AS-EI. (Menendez)

**ISSUE 6A:** What are the appropriate 2026 jurisdictional separation factors for FPL?

**DEF:** No position.

**ISSUE 6B:** What are the appropriate 2026 jurisdictional separation factors for TECO?

**DEF:** No position.

**ISSUE 6C:** What are the appropriate 2026 jurisdictional separation factors for FPUC?

**DEF:** No position.

**ISSUE 6D:** What are the appropriate 2026 jurisdictional separation factors for DEF?

**DEF:** DEF should apply the appropriate jurisdictional separation factors that were approved in Final Order No. PSC-2024-0472-AS-EI.

Distribution: 1.000000  
Transmission: 0.703690  
(Menendez)

**ISSUE 7A:** What are the appropriate 2026 Storm Protection Plan Cost Recovery Clause factors for each rate class for FPL?

**DEF:** No position.

**ISSUE 7B:** What are the appropriate 2026 Storm Protection Plan Cost Recovery Clause factors for each rate class for TECO?

**DEF:** No position.

**ISSUE 7C:** What are the appropriate 2026 Storm Protection Plan Cost Recovery Clause factors for each rate class for FPUC?

**DEF:** No position.

**ISSUE 7D:** What are the appropriate 2026 Storm Protection Plan Cost Recovery Clause factors for each rate class for DEF?

**DEF:**

<b>Customer Class</b>	<b>SPPCRC Factor</b>
Residential	0.936 cents/kWh
General Service Non-Demand	0.811 cents/kWh
@ Primary Voltage	0.786 cents/kWh
@ Transmission Voltage	0.138 cents/kWh
General Service 100% Load Factor	0.416 cents/kWh
General Service Demand	2.23 \$/kW
@ Primary Voltage	2.19 \$/kW
@ Transmission Voltage	0.41 \$/kW
Curtable	1.44 \$/kW
@ Primary Voltage	1.43 \$/kW
@ Transmission Voltage	1.41 \$/kW
Interruptible	1.97 \$/kW
@ Primary Voltage	1.61 \$/kW
@ Transmission Voltage	0.33 \$/kW
Standby Monthly	0.199 \$/kW
@ Primary Voltage	0.197 \$/kW
@ Transmission Voltage	0.195 \$/kW
Standby Daily	0.095 \$/kW
@ Primary Voltage	0.094 \$/kW
@ Transmission Voltage	0.0093 \$/kW
Lighting	0.773 cents/kWh
	(Menendez)

**ISSUE 8A:** What should be the effective date of the 2026 Storm Protection Plan Cost Recovery Clause factors for billing purposes for FPL?

**DEF:** No position.

**ISSUE 8B:** What should be the effective date of the 2026 Storm Protection Plan Cost Recovery Clause factors for billing purposes for TECO?

**DEF:** No position.

**ISSUE 8C:** What should be the effective date of the 2026 Storm Protection Plan Cost Recovery Clause factors for billing purposes for FPUC?

**DEF:** No position.

**ISSUE 8D:** What should be the effective date of the 2026 Storm Protection Plan Cost Recovery Clause factors for billing purposes for DEF?

**DEF:** The factors shall be effective beginning with the specified Storm Protection Plan Cost Recovery Clause cycle and thereafter for the period January 2026 through December 2026. Billing cycles may start before January 1, 2026, and the last cycle may be read after December 31, 2026, so that each customer is billed for twelve months, regardless of when the adjustment factor became effective. These charges shall continue in effect until modified by subsequent order of this Commission. (Menendez)

**ISSUE 9A:** Should the Commission approve revised tariffs reflecting the 2026 Storm Protection Plan Cost Recovery Clause factors determined to be appropriate in this proceeding for FPL?

**DEF:** No position.

**ISSUE 9B:** Should the Commission approve revised tariffs reflecting the 2026 Storm Protection Plan Cost Recovery Clause factors determined to be appropriate in this proceeding for TECO?

**DEF:** No position.

**ISSUE 9C:** Should the Commission approve revised tariffs reflecting the 2026 Storm Protection Plan Cost Recovery Clause factors determined to be appropriate in this proceeding for FPUC?

**DEF:** No. position.

**ISSUE 9D:** Should the Commission approve revised tariffs reflecting the 2026 Storm Protection Plan Cost Recovery Clause factors determined to be appropriate in this proceeding for DEF?

**DEF:** Yes. The Commission should approve DEF's revised tariffs reflecting the Storm Protection Plan Cost Recovery Clause factors determined to be appropriate in this proceeding. The Commission should direct Staff to verify that the revised tariffs are consistent with the Commission's decision. The Commission should grant Staff Administrative authority to approve revised tariffs reflecting the new Storm Protection Plan Cost Recovery Clause factors determined to be appropriate in this proceeding. (Menendez)

**ISSUE 10:** Should this docket be closed?

**DEF:** No, this is an on-going docket and should remain open until a subsequent year's docket is established.

## **COMPANY SPECIFIC STORM PROTECTION PLAN COST RECOVERY ISSUES**

### **Duke Energy Florida, LLC**

No company-specific issues for Duke Energy Florida, LLC have been identified at this time.

### **Florida Power & Light, Co.**

No company-specific issues for Florida Power and Light Company have been identified at this time.

### **Tampa Electric Company**

No company-specific issues for Tampa Electric Company have been identified at this time.

## **CONTESTED ISSUES**

None at this time.

5. **Stipulated Issues** - None at this time.
6. **Pending Motions** - None at this time.
7. **Requests for Confidentiality** -  
DEF does not have any pending requests for confidential classification at this time.
8. **Objections to Qualifications** - DEF does not object to the qualifications of Staff's witness.
9. **Sequestration of Witnesses** - DEF has not identified any witnesses for sequestration at this time.
10. **Requirements of Order** - At this time, DEF is unaware of any requirements of the Order Establishing Procedure of which it will be unable to comply.

RESPECTFULLY SUBMITTED this 10<sup>th</sup> day of October, 2025.

/s/ Matthew R. Bernier  
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Attorneys for Duke Energy Florida, LLC

## **CERTIFICATE OF SERVICE**

*Docket No. 20250010-EI*

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic mail to the following this 10<sup>th</sup> day of October, 2025.

/s/ Matthew R. Bernier

Attorney

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