

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Storm Protection Plan Cost Recovery
Clause

Docket No. 20250010-EI

Filed: October 10, 2025

**FLORIDA POWER & LIGHT COMPANY'S
PREHEARING STATEMENT**

Florida Power & Light Company ("FPL"), by and through its undersigned counsel, hereby submits this Prehearing Statement pursuant to Order No. PSC-2025-0048-PCO-EI, and states:

1. FPL WITNESSES

A. Direct Testimony

<u>Witness</u>	<u>Subject Matter - Direct</u>	<u>Issue #</u>
Michael Jarro	<ul style="list-style-type: none"> • Presents and supports FPL's 2024 actual Storm Protection Plan ("SPP") activities and associated costs, and explains the variances from the actual/estimated 2024 SPP costs approved in Docket No. 20240010-EI. (<i>Direct Testimony Filed April 1, 2025</i>) • Presents and supports FPL's 2025 actual/estimated SPP activities and associated costs, and explains the variances from the projected 2025 SPP costs approved in Docket No. 20240010-EI. (<i>Direct Testimony Filed May 1, 2025</i>) • Describes FPL's 2026 SPP programs and explains how those activities and costs are consistent with the programs and projects included in the 2026-2035 SPP ("2026 SPP"). (<i>Supplemental Testimony Filed July 11, 2025</i>) 	1A-4A
Richard L. Hume	<ul style="list-style-type: none"> • Presents and supports FPL's 2024 final SPPCRC true-up amounts. (<i>Direct Testimony Filed April 1, 2025</i>) • Presents and supports FPL's 2025 actual/estimated SPPCRC true-up amount. (<i>Direct Testimony Filed May 1, 2025</i>) • Presents and supports the 2026 projected amounts and 2026 SPPCRC Factors that should be approved in the event the Commission does not approve the proposed 2025 Stipulation and Settlement Agreement currently pending in FPL's 2025 rate case in Docket No. 20250011-EI (the "2025 Rate Case Settlement Agreement"). (<i>Supplemental Testimony Filed July 11, 2025</i>) • Presents and supports alternative 2026 SPPCRC Factors that should be approved in the event the Commission approves the 2025 Rate Case Settlement pending in Docket No. 20250011-EI. (<i>Second Supplemental Testimony Filed September 24, 2025</i>) 	1A-9A, 10

B. Rebuttal Testimony

None.¹

2. EXHIBITS

<u>Witness</u>	<u>Proffered By</u>	<u>Exhibit #</u>	<u>Description</u>	<u>Issue #</u>
Direct Testimony				
Michael Jarro	FPL	MJ-1	FPL Actual Storm Protection Plan Work Completed in 2024 (Project Level Detail)	1A
Michael Jarro	FPL	MJ-2	List of Explanations of Drivers for Variances in Storm Protection Plan Programs and Projects	1A, 2A
Michael Jarro	FPL	MJ-3	Form 6P – Program Description and Progress Report	N/A ²
Michael Jarro	FPL	Amended MJ-3	Amended Form 6P – Program Description and Progress Report	2A-4A
Michael Jarro	FPL	MJ-4	FPL Actual/Estimated Storm Protection Plan Work to be Completed in 2025 (Project Level Detail)	2A
Michael Jarro	FPL	MJ-5	FPL Storm Protection Plan Work Projected to be Completed in 2026 (Project Level Detail)	N/A ³
Michael Jarro	FPL	Amended MJ-5	Amended FPL Storm Protection Plan Work Projected to be Completed in 2026 (Project Level Detail)	3A, 4A
Michael Jarro	FPL	MJ-6	Comparison of the Targeted Number of Annual SPP Projects in the Originally Filed 2026 SPP with the Targeted Number of Annual Projects in the Approved 2026 SPP	3A, 4A
Richard L. Hume	FPL	RLH-1	Forms 1A through 8A for the FPL 2024 SPPCRC Final True-Up	1A
Richard L. Hume	FPL	RLH-2	Forms 1E through 8E for the FPL 2025 SPPCRC Actual/Estimated True-Up	2A
Richard L. Hume	FPL	RLH-3	Forms 1P through 5P and 7P for FPL's Proposed 2026 SPPCRC Factors	N/A ⁴
Richard L. Hume	FPL	Amended RLH-3	Amended Forms 1P through 5P and 7P for FPL's Proposed 2026 SPPCRC	3A-7A

¹ No other parties served any discovery, testimony, or exhibits related to FPL's SPPCRC projects, costs, and revenue requirements.

² Superseded by Amended Exhibit MJ-3.

³ Superseded by Amended Exhibit MJ-5.

⁴ Superseded by Amended Exhibit RLH-3.

			Factors (<i>If Commission declines to approve 2025 Rate Case Settlement</i>)	
Richard L. Hume	FPL	RLH-4	Retail Separation Factors (<i>If Commission declines to approve 2025 Rate Case Settlement</i>)	6A
Richard L. Hume	FPL	RLH-5	FPL 2026 Projection Comparison Summary	3A, 4A, 7A
Richard L. Hume	FPL	RLH-6	Alternative FPL 2026 Projections (<i>If Commission approves 2025 Rate Case Settlement</i>)	3A-7A
Richard L. Hume	FPL	RLH-7	Alternative Retail Separation Factors (<i>If Commission approves 2025 Rate Case Settlement</i>)	6A

In addition to the above pre-filed exhibits, FPL reserves the right to utilize any exhibit introduced by any other party. FPL additionally reserves the right to introduce any additional exhibit necessary for cross-examination or impeachment at the final hearing.

3. STATEMENT OF BASIC POSITION

FPL's final true-up of its 2024 SPP costs is consistent with the actual/estimated 2024 SPP costs approved by Commission in Docket No. 20240010-EI, consistent with FPL's 2023 SPP approved by the Commission in Docket No. 20220051-EI, applies the methodology and prescribed schedules contained in Commission Forms 1A through 8A, and meets the requirements of Section 366.96, Florida Statutes, and Rule 25-6.031(7)(a), Florida Administrative Code. No parties challenged or made any recommended adjustments to any of the SPP projects, costs, or revenue requirements included in FPL's 2024 SPPCRC final true-up. Therefore, the Commission should approve FPL's total net 2024 final true-up over-recovery amount of \$21,904,884, including interest, to be refunded through the 2026 SPPCRC Factors.

FPL's actual/estimated true-up of its 2025 SPP costs is consistent with the projected 2025 SPP costs approved by the Commission in Docket No. 20240010-EI, consistent with FPL's 2023 SPP approved by the Commission in Docket No. 20220051-EI, applies the methodology and

prescribed schedules contained in Commission Forms 1E through 8E, and meets the requirements of Section 366.96, Florida Statutes, and Rule 25-6.031(7)(b), Florida Administrative Code. No parties challenged or made any recommended adjustments to any of the SPP projects, costs, or revenue requirements included in FPL's 2025 SPPCRC actual/estimated true-up. Therefore, the Commission should approve FPL's 2025 actual/estimated true-up under-recovery of \$7,172,014, including interest, to be recovered through the 2026 SPPCRC Factors.

FPL's projected 2026 SPP costs are consistent with the 2026 SPP approved by the Commission in Docket No. 20250014-EI, apply the methodology and prescribed schedules contained in Commission Forms 1P through 7P, and meet the requirements of Section 366.96, Florida Statutes, and Rule 25-6.031(2) and (7)(c), Florida Administrative Code. No parties challenged or made any recommended adjustments to any of the individual 2026 SPP projects or associated costs.

On August 20, 2025, FPL and other signatory parties filed a Joint Motion for approval of the 2025 Rate Case Settlement Agreement, which is currently pending for the Commission's disposition in Docket No. 20250011-EI. If approved, the 2025 Rate Case Settlement Agreement requires changes to the costs and revenue requirements to be recovered through the 2026 SPPCRC Factors. In the event the Commission approves the 2025 Rate Case Settlement Agreement, the Commission should approve the alternative \$998,817,311 of projected revenue requirements associated with the 2026 SPP programs, which results in a total net projected jurisdictional revenue requirement of \$984,084,441 to be recovered through the 2026 SPPCRC Factors. In the event the Commission declines to approve the 2025 Rate Case Settlement Agreement, the Commission should approve the \$872,763,101 of projected revenue requirements associated with the 2026 SPP

programs, which results in a total net projected jurisdictional revenue requirement of \$858,030,231 to be recovered through the 2026 SPPCRC Factors.⁵

4. STATEMENT OF ISSUES AND POSITIONS

A. STAFF'S ISSUES⁶

Issue No. 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?

FPL Position: FPL's final total SPPCRC cost incurred for 2024 is \$1,555,096,790, which includes a total operations and maintenance ("O&M") expense of \$126,749,885 (Line 5 of Form 5A, Exhibit RLH-1, p. 5) and a total capital expenditure of \$1,428,346,905 (sum of Line 1a of Form 7A, Exhibit RLH-1, pp. 9-16).⁷ FPL's SPPCRC final jurisdictional revenue requirement true-up for the period January 2024 through December 2024, including interest, is an over-recovery of \$21,904,884 (Line 10 of Form 1A, Exhibit RLH-1, p. 1). (*FPL witnesses Jarro and Hume*)

Issue No. 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?

FPL Position: FPL's total SPPCRC cost estimated for 2025 is \$1,572,388,076, which includes a total O&M expense of \$134,864,800 (Line 5 of Form 5E, Exhibit RLH-2, p. 5) and a total capital expenditure of \$1,437,523,276 (sum of Line 1a of Form 7E, Exhibit

⁵ In the event that the Commission's final decision in Docket No. 20250011-EI requires modifications to the 2026 SPPCRC Factors, such modifications would be reflected in the ordinary course in FPL's actual/estimated true-up filing to be submitted in 2026.

⁶ Subparts B through D of Staff Issue Nos. 1-9 do not apply to FPL and are not addressed herein.

⁷ The jurisdictional separation factors are applied to the revenue requirements and not the costs incurred. Therefore, the total jurisdictional cost incurred for the applicable calendar year is not available.

RLH-2, pp. 8-15).⁸ FPL's SPPCRC actual/estimated jurisdictional revenue requirement true-up for the period January 2025 through December 2025, including interest, is an under-recovery of \$7,172,014 (Line 4 of Form 1E of Exhibit RLH-2, p. 1). (*FPL witnesses Jarro and Hume*)

Issue No. 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?

FPL Position:

In the event the Commission approves the 2025 Rate Case Settlement Agreement:

FPL's total SPPCRC cost projected for 2026 is \$1,243,737,019 which includes a total O&M expense of \$139,870,641 (Line 5 of Form 2P, Exhibit RLH-6, p. 2) and a total capital expenditure of \$1,103,866,378 (sum of Line 1a of Form, Exhibit RLH-6, pp. 4-11).⁹ FPL's projected SPPCRC jurisdictional revenue requirement for the period January 2026 through December 2026 is \$998,817,311 (Line 1 of Form 1P, Exhibit RLH-6, p. 1). (*FPL witnesses Jarro and Hume*)

In the event the Commission declines the 2025 Rate Case Settlement Agreement:

FPL's total SPPCRC cost projected for 2026 is \$1,243,737,019, which includes a total O&M expense of \$139,870,641 (Line 5 of Form 2P, Amended Exhibit RLH-3, p. 2) and a total capital expenditure of \$1,103,866,378 (sum of Line 1a of Form 3P, Amended Exhibit RLH-3, pp. 6-13).¹⁰ FPL's projected SPPCRC jurisdictional revenue requirement for the period January 2026 through December 2026 is

⁸ See Footnote 7.

⁹ See Footnote 7.

¹⁰ See Footnote 7.

\$872,763,101 (Line 1 of Form 1P, Amended Exhibit RLH-3, p. 1). (*FPL witnesses Jarro and Hume*)

Issue No. 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?

FPL Position:

In the event the Commission approves the 2025 Rate Case Settlement Agreement:

The projected total SPPCRC jurisdictional revenue requirement for the period January 2026 through December 2026, including true-up amounts, is \$984,084,441 (Line 4 of Form 1P, Exhibit RLH-6, p. 1). (*FPL witnesses Jarro and Hume*)

In the event the Commission declines the 2025 Rate Case Settlement Agreement:

The projected total SPPCRC jurisdictional revenue requirement for the period January 2026 through December 2026, including true-up amounts, is \$858,030,231 (Line 4 of Form 1P, Amended Exhibit RLH-3, p. 1). (*FPL witnesses Jarro and Hume*)

Issue No. 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?

FPL Position: The depreciation rates used to calculate the depreciation expense should be the Commission-approved depreciation rates that are in effect during the period the allowed capital investment is in service.

In the event the Commission approves the 2025 Rate Case Settlement Agreement:

The depreciation rates for the alternative 2026 SPPCRC Factors set forth in Exhibit RLH-6 are based on the depreciation lives and parameters agreed to in the pending

2025 Rate Case Settlement Agreement. In the event the Commission approves the pending 2025 Rate Case Settlement, those depreciation rates as reflected in Exhibit RLH-6 should be approved to be effective for the period January 2026 through December 2026. (*FPL witness Hume*).

In the event the Commission declines the 2025 Rate Case Settlement Agreement:

The depreciation rates for the 2026 SPPCRC Factors set forth in Amended Exhibit RLH-3 are based on the depreciation lives and parameters approved by Commission Order Nos. PSC-2021-0446-S-EI and PSC-2021-0446A-S-EI in Docket No. 20210015-EI. In the event the Commission declines the pending 2025 Rate Case Settlement, those depreciation rates as reflected in Amended Exhibit RLH-6 should be approved to be effective for the period January 2026 through December 2026. (*FPL witness Hume*).

Issue No. 6A: What are the appropriate 2026 jurisdictional separation factors for FPL?

FPL Position:

In the event the Commission approves the 2025 Rate Case Settlement Agreement:

As shown on page 1 of Exhibit RLH-7, FPL's retail jurisdictional separation factors for the period January 2026 through December 2026 are:

DEMAND

Transmission	0.886482
Distribution	1.000000

ENERGY

Total Sales	0.939057
Non-Stratified Sales	0.957002

GENERAL PLANT

Labor	0.969105
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In the event the Commission declines the 2025 Rate Case Settlement Agreement:

As shown on page 1 of Exhibit RLH-4, FPL's retail jurisdictional separation factors for the period January 2026 through December 2026 are:

DEMAND

Transmission	0.884813
Distribution	1.000000

ENERGY

Total Sales	0.939057
Non-Stratified Sales	0.957002

GENERAL PLANT

Labor	0.969171
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(FPL witness Hume)

Issue No. 7A: What are the appropriate 2026 Storm Protection Plan Cost Recovery Clause factors for each rate class for FPL?

FPL Position:

In the event the Commission approves the 2025 Rate Case Settlement Agreement:

As shown on Form 5P of Exhibit RLH-6, page 15, the appropriate FPL 2026 SPPCRC factors for each rate class are as follows:

Rate Class	SPP Factor (\$/kW)	SPP Factor (\$/kWh)	RDC (\$/KW)	SDD (\$/KW)
RS1/RTR1		0.00995		
GS1/GST1		0.00927		
GSD1/GSDT1/HLFT1/GSD1-EV	1.80			
OS2		0.02426		
GSLD1/GSLDT1/CS1/CST1/HLFT2/GSLD1-EV	1.81			
GSLD2/GSLDT2/CS2/CST2/HLFT3	1.66			
GSLD3/GSLDT3/CS3/CST3	0.19			

SST1T			0.02	0.01
SST1D1/SST1D2/SST1D3			0.29	0.14
CILC D/CILC G	1.66			
CILC T	0.18			
MET	2.15			
OL1/SL1/SL1M/PL1/OSI/II		0.00320		
SL2/SL2M/GSCU1		0.02623		

In the event the Commission declines the 2025 Rate Case Settlement Agreement:

As shown on Form 5P of Amended Exhibit RLH-3, page 15, the appropriate FPL

2026 SPPCRC factors for each rate class are as follows:

Rate Class	SPP Factor (\$/kW)	SPP Factor (\$/kWh)	RDC (\$/KW)	SDD (\$/KW)
RS1/RTR1		0.00868		
GS1/GST1		0.00805		
GSD1/GSDT1/HLFT1/GSD1-EV	1.57			
OS2		0.02118		
GSLD1/GSLDT1/CS1/CST1/HLFT2/GSLD1-EV	1.58			
GSLD2/GSLDT2/CS2/CST2/HLFT3	1.46			
GSLD3/GSLDT3/CS3/CST3	0.17			
SST1T			0.02	0.01
SST1D1/SST1D2/SST1D3			0.26	0.12
CILC D/CILC G	1.46			
CILC T	0.18			
MET	1.89			
OL1/SL1/SL1M/PL1/OSI/II		0.00278		
SL2/SL2M/GSCU1		0.02290		

(FPL witness Hume)

Issue No. 8A: What should be the effective date of the 2026 Storm Protection Plan Cost Recovery Clause factors for billing purposes for FPL?

FPL Position: The 2026 SPPCRC Factors should become effective for application to bills beginning the first billing cycle in January 2026 through the last billing cycle in December

2026 and continuing until modified by subsequent order of this Commission. (*FPL witness Hume*)

Issue No. 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?

FPL Position: Yes. The Commission should authorize Staff to approve administratively, revised tariffs reflecting the 2026 SPPCRC factors determined to be appropriate in this proceeding and subject to the Commission's final disposition of the 2025 Rate Case Settlement Agreement pending in Docket No. 20250011-EI. (*FPL witness Hume*)

Issue No. 10: Should this docket be closed?

FPL Position: No. While a separate docket number is assigned each year for administrative convenience, this is a continuing docket and should remain open. (*FPL witness Hume*)

B. CONTESTED ISSUES

None known at this time. In the event that any parties propose any modifications to the issues listed above and/or propose any additional issues, FPL reserves the right to object and oppose any such proposals if necessary and appropriate.

5. STIPULATED ISSUES

FPL is not currently aware of any stipulations. However, FPL remains willing and available to discuss settlement and/or stipulated facts and issues with the parties, including but not limited to stipulation of testimony and exhibits and waiver of cross-examination. Given there is

no testimony or exhibits submitted in opposition to FPL's proposed true-up amounts and SPPCRC Factors, FPL submits that appropriately tailored stipulations could avoid the unnecessary waste of time and resources for all parties, Staff, and the Commission.

6. PENDING MOTIONS

As of the date of this filing, FPL is not aware of any motions that remain pending.

7. PENDING REQUESTS FOR CONFIDENTIALITY

As of the date of this filing, FPL is not aware of any Requests for Confidential Classification that remain pending.

8. OBJECTIONS TO WITNESS QUALIFICATIONS AS AN EXPERT

FPL has no objections to the qualifications of any witness.

9. REQUEST FOR SEQUESTRATION OF WITNESSES

None.

10. STATEMENT OF COMPLIANCE WITH ORDER ESTABLISHING PROCEDURE

There are no requirements of the Order Establishing Procedure with which FPL cannot comply.

Respectfully submitted this 10th day of October 2025,

By: *s/Christopher T. Wright*

Christopher T. Wright, Managing Attorney

Fla. Auth. House Counsel No. 1007055

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copies of the foregoing have been furnished by Electronic Mail to the following parties of record this 10th day of October 2025:

<p>Shaw Stiller Daniel Dose Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399 ddose@psc.state.fl.us ssstiller@psc.state.fl.us discovery-gcl@psc.state.fl.us <i>For Commission Staff</i></p>	<p>Office of Public Counsel c/o The Florida Legislature 111 West Madison Street, Room 812 Tallahassee, FL 32399-1400 christensen.patty@leg.state.fl.us ponce.octavio@leg.state.fl.us rehwinkel.charles@leg.state.fl.us Trierweiler.walt@leg.state.fl.us watrous.austin@leg.state.fl.us wessling.mary@leg.state.fl.us <i>For Office of Public Counsel</i></p>
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s/ Christopher T. Wright

Christopher T. Wright

Managing Attorney

Fla. Auth. House Counsel No. 1007055

Attorney for Florida Power & Light Company