### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Storm protection plan cost recovery clause.

DOCKET NO. 20250010-EI

DATED: October 10, 2025

### COMMISSION STAFF'S PREHEARING STATEMENT

Pursuant to Order No. PSC-2025-0048-PCO-EI, filed February 10, 2025, the Staff of the Florida Public Service Commission files its Prehearing Statement.

### 1. All Known Witnesses

| Witness            | Subject Matter       | Issues # |
|--------------------|----------------------|----------|
| Direct             |                      |          |
| Gabrielle Dearmond | Staff's audit report | 1D       |
|                    | of DEF Storm         |          |
|                    | Protection Plan Cost |          |
|                    | Recovery Clause      |          |

### 2. All Known Exhibits

| Witness   | Proffered<br>By | Exhibit<br># | Description  |
|-----------|-----------------|--------------|--------------|
| Direct    |                 |              |              |
| Gabrielle | Commission      | GD-1         | Auditor's    |
| Dearmond  | Staff           |              | Report - DEF |

#### 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 2024 prudently incurred costs and final true-up revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

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**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?

**POSITION:** Staff has no position at this time.

**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?

**POSITION:** Staff has no position at this time.

**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?

**POSITION:** Staff has no position at this time.

**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?

**POSITION:** Staff has no position at this time.

**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?

**POSITION:** Staff has no position at this time.

**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?

**POSITION:** Staff has no position at this time.

**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?

**POSITION:** Staff has no position at this time.

**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?

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**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?

**POSITION:** Staff has no position at this time.

**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?

**POSITION:** Staff has no position at this time.

**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?

**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 2026 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 2026 Storm Protection Plan Cost Recovery factors for TECO?

**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 2026 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 2026 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 2026 Storm Protection Plan Cost Recovery Clause amounts for FPL?

**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?

**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 2026 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 2026 Storm Protection Plan Cost Recovery Clause amounts

for DEF?

**POSITION:** Staff has no position at this time.

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

**POSITION:** Staff has no position at this time.

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

**POSITION:** Staff has no position at this time.

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

**POSITION:** Staff has no position at this time.

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

**POSITION:** Staff has no position at this time.

**ISSUE 7A:** What are the appropriate 2026 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 2026 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 2026 Storm Protection Plan Cost Recovery Clause

factors for each rate class for FPUC?

**ISSUE 7D:** What are the appropriate 2026 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 2026 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 2026 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 2026 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 2026 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 2026 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 2026 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 2026 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 2026 Storm

Protection Plan Cost Recovery Clause factors determined to be appropriate in this

proceeding for DEF?

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**POSITION:** Staff has no position at this time.

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

**POSITION:** No. This is a continuing docket and should remain open.

### 5. <u>Stipulated Issues</u>

Staff has no stipulated issues at this time.

### 6. Pending Motions

Staff has no pending motions at this time.

## 7. <u>Pending Confidentiality Claims or Requests</u>

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-2025-0048-PCO-EI

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

Respectfully submitted this 10th day of October, 2025.

/s/ Daniel Dose

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DATED: October 10, 2025

#### 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 10th day of October, 2025:

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