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October 10, 2025

VIA E-PORTAL

Mr. Adam Teitzman
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

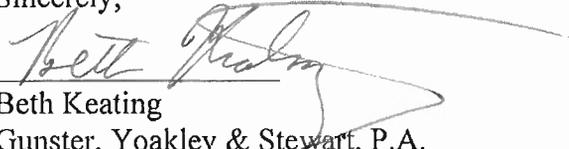
Re: Docket No. 20250010-EI - Storm protection plan cost recovery clause.

Dear Mr. Teitzman:

Attached for filing, please find the Prehearing Statement of Florida Public Utilities Company.

Thank you for your assistance with this filing. As always, please don't hesitate to let me know if you have any questions whatsoever.

Sincerely,



Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Storm Protection Plan Cost Recovery Clause | DOCKET NO. 20250010-EI

DATED: October 10, 2025

**FLORIDA PUBLIC UTILITIES COMPANY'S
PREHEARING STATEMENT**

In accordance with the Order Establishing Procedure for this Docket, Order No. PSC-2025-0048-PCO-EI, issued February 10, 2025, as amended by Order No. PSC-2025-0105-PCO-EI, issued April 1, 2025, Florida Public Utilities Company (“FPUC,” or “Company”) hereby files its Prehearing Statement.

A. APPEARANCES

Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
(850) 521-1706

B. WITNESSES AND EXHIBITS

i. All Known Witnesses

<u>Witness – Direct</u>	<u>Subject</u>	<u>Issue</u>
Brittnee Baker (adopted by Jessica Husted)	2024 Final True Up	1C
Mark Cutshaw	SPP work performed in May – December 2024 Final True Up Period	1C
Jessica Husted ¹	2025 Estimated and 2026 Projection; Calculation of Factors	2C-9C
Mark Cutshaw ²	SPP work to be performed in	2C-3C

¹ Filed July 7, 2025 with revised filing.

² Filed July 7, 2025 with revised filing.

<u>Witness – Direct</u>	<u>Subject</u>	<u>Issue</u>
	projection period	

ii. All Known Exhibits

<u>Witness</u>	<u>Exhibit</u>	<u>Title</u>	<u>Issue</u>
Husted	BB-1 ³	SPPCRC Schedules 1A-9A ⁵	1C
Husted	JH-1 ⁴	SPPCRC Schedules E and P	2C-9C

C. STATEMENT OF BASIC POSITION

. FPUC’s Statement of Basic Position

FPUC: The factors proposed by the Company have been developed through projections and calculations made in accordance with Rule 25-6.031, F.A.C., and the associated depreciation expense has been calculated in accordance with the rates approved in the Company’s last approved depreciation study. The factors are based upon actual, prudently incurred costs associated with the implementation of those aspects of FPUC’s Storm Protection Plan (“SPP”) approved by Order No. PSC-2025-0216-FOF-EI, issued June 19, 2025, as well as reasonable estimates of costs to be incurred in the remainder of 2025 and in 2026. As such, the Company asks that it be allowed to implement its proposed SPPCRC Factors for the January – December, 2026 period.

D. FPUC’s POSITION ON THE ISSUES

**For Issues 1A, 1B, and 1D through 9A, 9B, and 9D, FPUC takes the following position:*

FPUC: No position.

³ Revised May 2, 2025 Exhibit BB-1 of Brittnee Baker adopted by Witness Husted, substituting for Ms. Baker consistent with Notice filed June 20, 2025.

⁴ Filed July 7, 2025 with revised filing.

⁵ Schedule 8A jointly sponsored by Witness Cutshaw.

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

FPUC: The final, end of period true up amount to be included in the calculation of the 2026 cost recovery factors is an over-recovery of \$307,988, which reflects the difference between the actual, end of period under-recovery of \$812,316 based on actual expenditures, and the projected 2024 under-recovery of \$1,120,304. (Husted, Cutshaw)

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

FPUC: FPUC projects an end of period 2025 under-recovery of \$1,517,429 based on a revised 2025 revenue requirement of \$6,334,083, which is net of \$215,030 already recovered through base rates prior to implementation of new rates approved in Docket No. 20240099-EI. (Husted)

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

FPUC: FPUC projects total expenditures of \$21.30 million, with a revenue requirement of \$8,377,215. (Cutshaw, Husted)

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

FPUC: The total amount upon which FPUC’s proposed factors are calculated is \$9,594,785, which is adjusted for taxes. (Husted)

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?

FPUC: The appropriate depreciation rates are those approved in, Order No. PSC-2023-0384-PAA-EI, issued December 21, 2023, in Docket No. 20230079-EI. (Husted)

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

FPUC: There is no jurisdictional separation applicable to FPUC.

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

FPUC:

Rate Schedule	SPP FACTORS PER KWH
Residential	\$0.01656
General Service	\$0.02182
General Service Demand	\$0.01093
General Service Large Demand	\$0.00700
Industrial/Standby	\$0.04156
Lighting Service	\$0.18541

(Husted)

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

FPUC: The effective date for FPUC's cost recovery factors should be the first billing cycle for January 1, 2026, which could include some consumption from the prior month. Thereafter, customers should be billed the approved factors for a full 12 months, unless the factors are otherwise modified by the Commission. (Husted)

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

FPUC: Yes. The Commission should approve revised tariffs reflecting the SPPCRC 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. (Husted)

ISSUE 10: Should this docket be closed?

FPUC: This is a continuing docket and should remain open.

VI. OTHER

e. Stipulated Issues

While not a party to stipulations at this time, FPUC believes that it should be possible to reach a stipulation on each of the issues as they pertain to FPUC.

f. Pending Motions

FPUC has no pending motions at this time.

g. Pending Confidentiality Claims or Requests

FPUC has no pending motions at this time.

h. Objections to Witness Qualifications as an Expert

FPUC has no objections to any witnesses' qualifications at this time.

i. Request for Sequestration of Witnesses

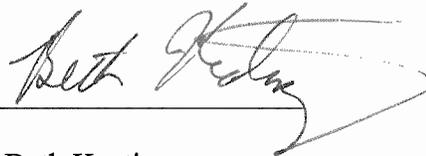
FPUC has no pending request.

j. Compliance with Order No. PSC-2025-0048-PCO-EI, Order No. PSC-2025-0105-PCO-EI

FPUC has complied with all requirements of the Order Establishing Procedure entered in this docket, as well as the subsequent orders issued modifying that Order.

RESPECTFULLY SUBMITTED this 10th day of October, 2025.

BY: _____



Beth Keating
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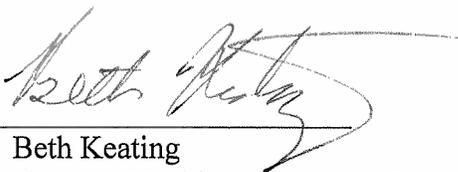
Attorneys for Florida Public Utilities Company

CERTIFICATE OF SERVICE

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

<p>Daniel Dose Shaw Stiller Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 Ddose@psc.state.fl.us sstiller@psc.state.fl.us discovery-gcl@psc.state.fl.us</p>	<p>J. Jeffrey Wahlen/Malcolm Means/Virginia Ponder Ausley Law Firm Post Office Box 391 Tallahassee, FL 32302 jwahlen@ausley.com mmeans@ausley.com vponder@ausley.com</p>
<p>Walt Trierweiler/P. Christensen / Charles Rehwinkel/Mary Wessling/Octavio Ponce/Austin Watrous Office of Public Counsel c/o The Florida Legislature 111 W. Madison Street, Room 812 Tallahassee, FL 32399-1400 Trierweiler.Walt@leg.state.fl.us Wessling.Mary@leg.state.fl.us Rehwinkel.Charles@leg.state.fl.us Christensen.patty@leg.state.fl.us Ponce.octavio@leg.state.fl.us Watrous.austin@leg.state.fl.us</p>	<p>James W. Brew/Laura Baker Stone Matheis Xenopoulos & Brew, PC Eighth Floor, West Tower 1025 Thomas Jefferson Street, NW Washington, DC 20007 jbrew@smxblaw.com lwb@smxblaw.com sbn@smxblaw.com</p>
<p>Christopher T. Wright Joel Baker Florida Power & Light Company 700 Universe Boulevard Juno Beach, FL 33408-0420 Christopher.Wright@fpl.com Joel.Baker@fpl.com</p>	<p>Kenneth Hoffman Florida Power & Light Company 215 South Monroe Street, Suite 810 Tallahassee, FL 32301 Ken.Hoffman@fpl.com</p>
<p>Ms. Paula K. Brown Tampa Electric Company Regulatory Affairs P.O. Box 111 Tampa, FL 33601-0111 Regdept@tecoenergy.com</p>	<p>Florida Industrial Users Power Group Jon C. Moyle, Jr. Moyle Law Firm 118 North Gadsden Street Tallahassee, FL 32301 jmoyle@moylelaw.com</p>

<p>Michelle Napier Jowi Baugh Florida Public Utilities Company 1635 Meathe Drive West Palm Beach FL 33411 mnapier@fpuc.com jbaugh@fpuc.com</p>	<p>Matthew Bernier Robert Pickels Stephanie Cuello Duke Energy 106 East College Avenue, Suite 800 Tallahassee, FL 32301 Matthew.Bernier@duke-energy.com Robert.Pickels@duke-energy.com Stephanie.Cuello@duke-energy.com</p>
<p>P. Mattheis/M. Lavanga/J. Briscar 1025 Thomas Jefferson St., NW Eighth Floor, West Tower Washington DC 20007 jrb@smxblaw.com mkl@smxblaw.com pjm@smxblaw.com</p>	<p>Dianne M. Triplett Duke Energy 299 First Avenue North St. Petersburg, FL 33701 Dianne.Triplett@duke-energy.com</p>

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