

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Nuclear Cost )  
Recovery Clause\_\_\_\_\_ )

Docket No. 150009-EI  
Date: July 22, 2015

**CITY OF MIAMI'S NOTICE OF OBJECTIONS  
AND MORE DEFINITE STATEMENT WITH REGARD TO MIAMI'S  
POSITIONS ON THE ISSUES IN THE DRAFT PREHEARING ORDER**

The City of Miami ("Miami") gives notice of service of its objections and, without waiving those objections, Miami also gives notices of serving a more definite statement of its positions on the issues in the draft Prehearing Order, circulated by Staff on July 22, 2015, to Martha Barrera, Esq.

**OBJECTIONS**

1. Miami filed its Prehearing Statement, pursuant to the Order Establishing Procedure in this docket, Order No. PSC-15-0082-PCO-EL, on July 8, 2015.
2. Also pursuant to the Order Establishing Procedure in this docket, Order No. PSC-15-0082-PCO-EL, Miami listed several of its positions as "No position at this time" to articulate its position in a post-hearing brief based on evidence adduced at hearing.
3. Staff also uses "No position pending evidence adduced at the hearing" for its position statements.
4. Nevertheless, Staff sought to alter Miami's positions from "No position at this time" to "No position" on July 22, 2015.
5. Miami objects to this practice and should be allowed to articulate its position after the hearing in the same manner as Staff.

**MORE DEFINITE STATEMENT OF POSITIONS**

6. Without waiving the objections above, Miami has served Staff by electronic mail with a redlined draft of the Prehearing Order stating its positions with more specificity.

7. Counsel for Miami was traveling between Tallahassee, Florida and Miami, Florida when Staff alerted Miami to its intent to alter its positions from “No position at this time” to “No position.”

8. Accordingly, Staff agreed to allow Miami to issue a more definite statement of its positions by 5:00pm eastern on July 22, 2015.

Respectfully submitted this 22<sup>nd</sup> day of July, 2015.

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**CERTIFICATE OF SERVICE DOCKET**  
**NO. 150009-EI**

I HEREBY CERTIFY that a true and correct copy of the City of Miami's Responses to the Staff of the Florida Public Service Commission's First Set of Interrogatories (Nos. 1-2) and First Request for Production of Documents (Nos. 1-2) was served electronically this 7<sup>th</sup> day of July, 2015, to the following:

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