

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for approval to include in base rates the revenue requirement for the CR3 regulatory asset, by Duke Energy Florida, Inc.

DOCKET NO. 150148-EI

In re: Petition for issuance of nuclear asset-recovery financing order, by Duke Energy Florida, Inc. d/b/a Duke Energy.

DOCKET NO. 150171-EI

FILED: September 21, 2015

PREHEARING STATEMENT OF THE OFFICE OF PUBLIC COUNSEL

The Citizens of the State of Florida, through the Office of Public Counsel (OPC), pursuant to the Order Establishing Procedure in these dockets, Order No. PSC-15-0238-PCO-EI, issued June 5, 2015 and Order No. PSC-15-0340-PCO-EI, issued August 21, 2015, hereby submit this Prehearing Statement.

APPEARANCES:

J.R. Kelly
Public Counsel
Charles J. Rehwinkel
Deputy Public Counsel
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street, Room 812
Tallahassee, Florida 32399-1400
On behalf of the Citizens of the State of Florida

1. **WITNESSES:**

Donna Ramas

Issues 2,4,5,6,7 (150148-EI)

2. EXHIBITS:

Through Donna Ramas, the Citizens intend to introduce the following exhibits:

DMR-1	Qualifications of Donna Ramas
DMR-2	Adjustments to CR3 Regulatory Assets

3. STATEMENT OF BASIC POSITION

The OPC has stipulated to the amount of the CR3 Regulatory Asset and related issues in the Docket No. 150148-EI portion of this consolidated case as approved by the Commission on September 15, 2015.

For the securitization portion of the consolidated case, the OPC is reviewing the rebuttal testimony by Duke and will participate in the depositions of the Duke witnesses before formulating any final positions (if any) on the remaining issues. The OPC will likely take the general position that the modifications proposed by staff witnesses in the interests of the ratepayers should be adopted absent very compelling evidence that they would not have the intended effect of producing the lowest overall costs to the customers consistent with the provisions of the RRSSA and the intent of the Legislature in adopting Section 366.95, Fla. Stat.

The securitization of the CR3 Regulatory Asset should be addressed in a Financing Order issued by the Commission that is structured primarily to serve and protect the interests of the ratepayers. This Financing Order should then be executed by the appropriately structured Bond Team in the interest of the ratepayers in a manner that delivers the lowest overall cost consistent with the intent and provisions of the RRSSA and the intent of the legislature in adopting Section 366.95, Fla. Stat.

4. STATEMENT OF FACTUAL ISSUES AND POSITIONS

CR3 Regulatory Asset Issues

Issue 1: Has DEF provided adequate internal controls and management oversight of its CR3 investment recovery procedure and plan?

OPC: No Position.

Issue 2: Did DEF minimize the current and future costs of the CR3 Regulatory Asset and use reasonable and prudent efforts to curtail avoidable costs or to sell or otherwise salvage assets that would otherwise be included in the CR3 Regulatory Asset, as required by the Revised and Restated Stipulation and Settlement Agreement (RRSSA)?

OPC: See position in Exhibit 1 to the Stipulation attached to the August 31, 2015 Motion for Approval of Stipulation, approved by the Commission on September 15, 2015.

Issue 3: Should DEF be required to collect the 2016 CR3 Regulatory Asset carrying cost of \$1.50/mWh through the fuel clause as provided in the RRSSA and to reduce the CR3 Regulatory Asset by the projected amount to be recovered?

OPC: See position in Exhibit 1 to the Stipulation attached to the August 31, 2015 Motion for Approval of Stipulation, approved by the Commission on September 15, 2015.

Issue 4: Has DEF properly categorized and recorded costs associated with the CR3 Regulatory Asset as contemplated by the RRSSA?

OPC: See position in Exhibit 1 to the Stipulation attached to the August 31, 2015 Motion for Approval of Stipulation, approved by the Commission on September 15, 2015.

Issue 5: Did DEF appropriately apply the accelerated recovery of the carrying charge collected through the Fuel Adjustment Clause to the CR3 Regulatory Asset?

OPC: See position in Exhibit 1 to the Stipulation attached to the August 31, 2015 Motion for Approval of Stipulation, approved by the Commission on September 15, 2015.

Issue 6: What is the appropriate projected amount of the CR3 Regulatory Asset at December 31, 2015?

OPC: See position in Exhibit 1 to the Stipulation attached to the August 31, 2015 Motion for Approval of Stipulation, approved by the Commission on September 15, 2015.

Issue 7: Has DEF calculated the annual revenue requirement for the CR3 Regulatory Asset consistent with the requirements of the RRSSA?

OPC: See position in Exhibit 1 to the Stipulation attached to the August 31, 2015 Motion for Approval of Stipulation, approved by the Commission on September 15, 2015.

Issue 8: What is the appropriate amortization period and annual revenue requirement to amortize the CR3 Regulatory Asset?

OPC: See position in Exhibit 1 to the Stipulation attached to the August 31, 2015 Motion for Approval of Stipulation, approved by the Commission on September 15, 2015.

Issue 9: Should the Commission approve DEF's proposed treatment to account for nuclear fuel proceeds that will not be received until the future, through the capacity cost recovery clause?

OPC: See position in Exhibit 1 to the Stipulation attached to the August 31, 2015 Motion for Approval of Stipulation, approved by the Commission on September 15, 2015.

Issue 10: Has DEF calculated the base rate increase consistent with the requirements of the RRSSA?

OPC: See position in Exhibit 1 to the Stipulation attached to the August 31, 2015 Motion for Approval of Stipulation, approved by the Commission on September 15, 2015.

Issue 11: If the Commission does not issue a financing order pursuant to DEF's Petition, should the projected amounts included in the CR3 Regulatory Asset be trued-up? If so, how should the true-up be accomplished?

OPC: See position in Exhibit 1 to the Stipulation attached to the August 31, 2015 Motion for Approval of Stipulation, approved by the Commission on September 15, 2015.

Issue 12: If the Commission does not issue a financing order pursuant to DEF's Petition, what is the proposed uniform percentage rate increase to the demand and energy charges by customer rate schedule?

OPC: See position in Exhibit 1 to the Stipulation attached to the August 31, 2015 Motion for Approval of Stipulation, approved by the Commission on September 15, 2015.

Issue 13: If the Commission does not issue a financing order pursuant to DEF's Petition, what should be the effective date of the requested base rate increase for billing purposes?

OPC: See position in Exhibit 1 to the Stipulation attached to the August 31, 2015 Motion for Approval of Stipulation, approved by the Commission on September 15, 2015.

Financing Order Issues (Staff/DEF combined)

Issue 14: Do the cost amounts contained in DEF’s CR3 Regulatory Asset meet the definition of “nuclear asset-recovery costs” pursuant to Section 366.95(1)(k), Florida Statutes?

OPC: Yes.

Issue 15: Do the ongoing financing costs identified in DEF’s Petition qualify as “financing costs” pursuant to Section 366.95(1)(e), Florida Statutes?

OPC: Generally yes, they appear to so qualify but the OPC takes no final position at this time pending review of rebuttal testimony and discovery. However, as a general and preliminary matter, the OPC takes the position that the modifications proposed by staff witnesses in the interests of the ratepayers should be adopted absent very compelling evidence that they would not have the intended effect of producing the lowest overall costs to the customers consistent with the provisions of the RRSSA and Section 366.95, Fla. Stat.

Issue 16: Has DEF demonstrated that securitization has a significant likelihood of resulting in lower overall costs or would avoid or significantly mitigate rate impacts compared to the traditional method of cost recovery pursuant to Section 366.95(2)(a)6., Florida Statutes?

OPC: The OPC takes no final position at this time pending review of rebuttal testimony and discovery. However, as a general and preliminary matter, the OPC takes the position that the modifications proposed by staff witnesses in the interests of the ratepayers should be adopted absent very compelling evidence that they would not have the intended effect of producing the lowest overall costs to the customers consistent with the provisions of the RRSSA and Section 366.95, Fla. Stat.

Issue 17: What amount, if any, should the Commission authorize DEF to recover through securitization?

OPC: The OPC takes no final position at this time pending review of testimony and discovery. The amounts to be authorized should meet the criteria set out in Section 366.05, Fla. Stat. By the nature of this proceeding that amount will not be known with precision until after the Financing Order is issued. The amount should be at least \$1,283,012, representing the CR3 Regulatory Asset. However, as a general and preliminary matter, the OPC takes the position that the modifications proposed by staff witnesses in the interests of the ratepayers should be adopted absent very compelling evidence that they would not have the intended effect of producing the lowest overall costs to the customers consistent with the provisions of the RRSSA and Section 366.95, Fla. Stat.

Issue 18: What is the appropriate treatment of the deferred tax liability consistent with paragraph 5(j) of the RRSSA?

OPC: The OPC takes no final position at this time pending review of rebuttal testimony and discovery. However, any treatment of deferred taxes under a securitization cost recovery scenario must comport with the intent of the RRSSA and Section 366.95, Fla. Stat.

Issue 19: Should DEF indemnify customers to the extent customers incur losses associated with higher servicing fees payable to a substitute servicer, or with higher administration fees payable to a substitute administrator, as a result of DEF's termination for cause?

OPC: The OPC takes no final position at this time pending review of rebuttal testimony and discovery. However, as a general and preliminary matter, the OPC takes the position that the modifications proposed by staff witnesses in the interests of the ratepayers should be adopted absent very compelling evidence that they would not have the intended effect of producing the lowest overall costs to the customers consistent with the provisions of the RRSSA and Section 366.95, Fla. Stat.

Issue 20: What should be the up-front and ongoing fee for the role of servicer throughout the term of the nuclear asset-recovery bonds?

OPC: The OPC takes no final position at this time pending review of rebuttal testimony and discovery. However, as a general and preliminary matter, the OPC takes the position that

the modifications proposed by staff witnesses in the interests of the ratepayers should be adopted absent very compelling evidence that they would not have the intended effect of producing the lowest overall costs to the customers consistent with the provisions of the RRSSA and Section 366.95, Fla. Stat.

Issue 21: What amount, if any, of DEF's periodic servicing fee in this transaction should DEF be required to credit back to customers through an adjustment to other rates and charges?

OPC: The OPC takes no final position at this time pending review of rebuttal testimony and discovery. However, as a general and preliminary matter, the OPC takes the position that the modifications proposed by staff witnesses in the interests of the ratepayers should be adopted absent very compelling evidence that they would not have the intended effect of producing the lowest overall costs to the customers consistent with the provisions of the RRSSA and Section 366.95, Fla. Stat.

Issue 22: What should be the ongoing fee for the role of the administrator throughout the term of the nuclear asset-recovery bonds?

OPC: The OPC takes no final position at this time pending review of rebuttal testimony and discovery. However, as a general and preliminary matter, the OPC takes the position that the modifications proposed by staff witnesses in the interests of the ratepayers should be adopted absent very compelling evidence that they would not have the intended effect of producing the lowest overall costs to the customers consistent with the provisions of the RRSSA and Section 366.95, Fla. Stat.

Issue 23: What amount, if any, of DEF's periodic administration fee in this transaction should DEF be required to credit back to customers through an adjustment to other rates and charges?

OPC: The OPC takes no final position at this time pending review of rebuttal testimony and discovery. However, as a general and preliminary matter, the OPC takes the position that the modifications proposed by staff witnesses in the interests of the ratepayers should be adopted absent very compelling evidence that they would not have the intended effect of producing the lowest overall costs to the customers consistent with the provisions of the RRSSA and Section 366.95, Fla. Stat.

Issue 24: How frequently should DEF in its role as servicer be required to remit funds collected from customers to the SPE?

OPC: The OPC takes no final position at this time pending review of rebuttal testimony and discovery. At this time, however, OPC preliminarily agrees with Staff witness Sutherland on this issue. Furthermore, as a general and preliminary matter, the OPC takes the position that the modifications proposed by staff witnesses in the interests of the ratepayers should be adopted absent very compelling evidence that they would not have the intended effect of producing the lowest overall costs to the customers consistent with the provisions of the RRSSA and Section 366.95, Fla. Stat.

Issue 25: If remittances are not daily, should DEF be required periodically to remit actual earnings on collections pending remittance?

OPC: The OPC takes no final position at this time pending review of rebuttal testimony and discovery. At this time, however, OPC preliminarily agrees with Staff witness Sutherland on this issue. Furthermore, as a general and preliminary matter, the OPC takes the position that the modifications proposed by staff witnesses in the interests of the ratepayers should be adopted absent very compelling evidence that they would not have the intended effect of producing the lowest overall costs to the customers consistent with the provisions of the RRSSA and Section 366.95, Fla. Stat.

Issue 26: Is DEF's proposed process for determining whether the upfront bond issuance costs satisfy the statutory standard of Section 366.95(2)(c)5., Florida Statutes, reasonable and should it be approved?

OPC: The OPC takes no final position at this time pending review of rebuttal testimony and discovery. However, as a general and preliminary matter, the OPC takes the position that the modifications proposed by staff witnesses in the interests of the ratepayers should be adopted absent very compelling evidence that they would not have the intended effect of producing the lowest overall costs to the customers consistent with the provisions of the RRSSA and Section 366.95, Fla. Stat.

Issue 27: [Issue Dropped]

Issue 28: What additional conditions, if any, should be made in the financing order that are authorized by Section 366.95(2)(c)2.i.?

OPC: The OPC takes no final position at this time pending review of rebuttal testimony and discovery. However, as a general and preliminary matter, the OPC takes the position that the modifications proposed by staff witnesses in the interests of the ratepayers should be adopted absent very compelling evidence that they would not have the intended effect of producing the lowest overall costs to the customers consistent with the provisions of the RRSSA and Section 366.95, Fla. Stat.

Issue 29: Should all legal opinions be subject to review by the Bond Team?

OPC: The OPC takes no final position at this time pending review of rebuttal testimony and discovery. However, as a general and preliminary matter, the OPC takes the position that the modifications proposed by staff witnesses in the interests of the ratepayers should be adopted absent very compelling evidence that they would not have the intended effect of producing the lowest overall costs to the customers consistent with the provisions of the RRSSA and Section 366.95, Fla. Stat.

Issue 30: Should all transaction documents and subsequent amendments be filed with the Commission before becoming operative?

OPC: The OPC takes no final position at this time pending review of rebuttal testimony and discovery. However, as a general and preliminary matter, the OPC takes the position that the modifications proposed by staff witnesses in the interests of the ratepayers should be adopted absent very compelling evidence that they would not have the intended effect of producing the lowest overall costs to the customers consistent with the provisions of the RRSSA and Section 366.95, Fla. Stat.

Issue 31: Is DEF's proposed pre-issuance review process reasonable and should it be approved?

OPC: The OPC takes no final position at this time pending review of rebuttal testimony and discovery. However, as a general and preliminary matter, the OPC takes the position that the modifications proposed by staff witnesses in the interests of the ratepayers should be adopted absent very compelling evidence that they would not have the intended effect of

producing the lowest overall costs to the customers consistent with the provisions of the RRSSA and Section 366.95, Fla. Stat.

Issue 32: Should the Financing Documents be approved in substantially the form proposed by DEF, subject to modifications as addressed in the draft form of the financing order?

OPC: The OPC takes no final position at this time pending review of rebuttal testimony and discovery. However, as a general and preliminary matter, the OPC takes the position that the modifications proposed by staff witnesses in the interests of the ratepayers should be adopted absent very compelling evidence that they would not have the intended effect of producing the lowest overall costs to the customers consistent with the provisions of the RRSSA and Section 366.95, Fla. Stat.

Issue 33: Is DEF's proposed Issuance Advice Letter process reasonable and consistent with the statutory financing cost objective contained in Section 366.95(2)(c)2.b., Florida Statutes?

OPC: The OPC takes no final position at this time pending review of rebuttal testimony and discovery. At this time, however, the OPC preliminarily agrees with the position contained in the testimony of Staff witness Schoenblum. Furthermore, as a general and preliminary matter, the OPC takes the position that the modifications proposed by staff witnesses in the interests of the ratepayers should be adopted absent very compelling evidence that they would not have the intended effect of producing the lowest overall costs to the customers consistent with the provisions of the RRSSA and Section 366.95, Fla. Stat.

Issue 34: Should the Standard True-up Letter be approved in substantially the form proposed by DEF?

OPC: The OPC takes no final position at this time pending review of rebuttal testimony and discovery. However, as a general and preliminary matter, the OPC takes the position that the modifications proposed by staff witnesses in the interests of the ratepayers should be adopted absent very compelling evidence that they would not have the intended effect of producing the lowest overall costs to the customers consistent with the provisions of the RRSSA and Section 366.95, Fla. Stat.

Issue 35: Is DEF's proposed process for determining whether the structure, plan of marketing, expected pricing and financing costs of the nuclear asset-recovery bonds have a significant likelihood of resulting in lower overall costs or would avoid or significantly mitigate rate impacts to customers as compared with the traditional method of financing and recovering nuclear asset-recovery costs pursuant to Section 366.95(2)(c)2.b., Florida Statutes, reasonable and should it be approved?

OPC: The OPC takes no final position at this time pending review of rebuttal testimony and discovery. However, as a general and preliminary matter, the OPC takes the position that the modifications proposed by staff witnesses in the interests of the ratepayers should be adopted absent very compelling evidence that they would not have the intended effect of producing the lowest overall costs to the customers consistent with the provisions of the RRSSA and Section 366.95, Fla. Stat.

Issue 36: Is the degree of flexibility afforded to DEF in establishing the terms and conditions of the nuclear asset-recovery bonds as described in the proposed form of financing order, reasonable and consistent with Section 366.95(2)(c)2.f., Florida Statutes?

OPC: The OPC takes no final position at this time pending review of rebuttal testimony and discovery. However, as a general and preliminary matter, the OPC takes the position that the modifications proposed by staff witnesses in the interests of the ratepayers should be adopted absent very compelling evidence that they would not have the intended effect of producing the lowest overall costs to the customers consistent with the provisions of the RRSSA and Section 366.95, Fla. Stat.

Issue 37: What persons or entities should be represented on the Bond Team?

OPC: The OPC takes no final position at this time pending review of rebuttal testimony and discovery. At this point, the Public Counsel believes that the OPC having a position on the Bond Team could constitute a conflict of interest. Furthermore, as a general and preliminary matter, the OPC takes the position that the modifications proposed by staff witnesses in the interests of the ratepayers should be adopted absent very compelling evidence that they would not have the intended effect of producing the lowest overall costs to the customers consistent with the provisions of the RRSSA and Section 366.95, Fla. Stat.

Issue 38: Based on resolution of the preceding issues, should a financing order in substantially the form proposed by DEF be approved, including the findings of fact and conclusions of law as proposed?

OPC: The OPC takes no final position at this time pending review of rebuttal testimony and discovery. However, as a general and preliminary matter, the OPC takes the position that the modifications proposed by staff witnesses in the interests of the ratepayers should be adopted absent very compelling evidence that they would not have the intended effect of producing the lowest overall costs to the customers consistent with the provisions of the RRSSA and Section 366.95, Fla. Stat.

Issue 39: If the Commission votes to issue a financing order, what post-financing order regulatory oversight is appropriate and how should that oversight be implemented?

OPC: The OPC takes no final position at this time pending review of rebuttal testimony and discovery. However, as a general and preliminary matter, the OPC takes the position that the modifications proposed by staff witnesses in the interests of the ratepayers should be adopted absent very compelling evidence that they would not have the intended effect of producing the lowest overall costs to the customers consistent with the provisions of the RRSSA and Section 366.95, Fla. Stat.

Issue 40: Are the energy sales forecasts used to develop the bond amortization schedules and the recovery mechanism appropriate?

OPC: No Position at this time.

Issue 41: If the Commission approves recovery of any nuclear asset-recovery related costs through securitization, how should the recovery of these costs be allocated to the rate classes consistent with Section 366.95(2)(c)2.g., Florida Statutes?

OPC: No Position.

Issue 42: If the Commission approves recovery of any nuclear asset-recovery related costs through securitization, what is the appropriate recovery period for the Nuclear Asset-Recovery Charge?

OPC: The OPC takes no final position at this time pending review of rebuttal testimony and discovery. However the scheduled maturity of the bonds should be designed to occur as close as is reasonably possibly to the 240-month period agreed to by all parties in the RRSSA. Furthermore, as a general and preliminary matter, the OPC takes the position that the modifications proposed by staff witnesses in the interests of the ratepayers should be adopted absent very compelling evidence that they would not have the intended effect of producing the lowest overall costs to the customers consistent with the provisions of the RRSSA and Section 366.95, Fla. Stat.

Issue 43: [Issue Dropped]

Issue 44: What should be the scheduled final maturity and the legal final maturity of the nuclear asset-recovery bonds?

OPC: These dates will be determined after the issuance of the Financing Order. The dates should be consistent with the RRSSA as amended on August 31, 2015 (as such amendment was approved by the Commission on September 15, 2015) and with the requirements of the rating agencies consistent with the Financing Order and Section 366.95, Fla. Stat. Furthermore, as a general and preliminary matter, the OPC takes the position that the modifications proposed by staff witnesses in the interests of the ratepayers should be adopted absent very compelling evidence that they would not have the intended effect of producing the lowest overall costs to the customers consistent with the provisions of the RRSSA and Section 366.95, Fla. Stat.

Issue 45: Is DEF's proposed Nuclear Asset-Recovery Charge True-Up Mechanism appropriate and consistent with Section 366.95, Florida Statutes, and should it be approved?

OPC: The OPC takes no final position at this time pending review of rebuttal testimony and discovery. However, as a general and preliminary matter, the OPC takes the position that the modifications proposed by staff witnesses in the interests of the ratepayers should be adopted absent very compelling evidence that they would not have the intended effect of

producing the lowest overall costs to the customers consistent with the provisions of the RRSSA and Section 366.95, Fla. Stat.

Issue 46: How frequently should the Nuclear Asset-Recovery Charge True-up Mechanism be conducted?

OPC: The OPC takes no final position at this time pending review of rebuttal testimony and discovery. However, as a general and preliminary matter, the OPC takes the position that the modifications proposed by staff witnesses in the interests of the ratepayers should be adopted absent very compelling evidence that they would not have the intended effect of producing the lowest overall costs to the customers consistent with the provisions of the RRSSA and Section 366.95, Fla. Stat.

Issue 47: If the Commission approves an amount to be securitized, on what date should the Nuclear Asset-Recovery Charge become effective?

OPC: The OPC takes no final position at this time pending review of rebuttal testimony and discovery.

Issue 48: [Issue Dropped]

Issue 49: If the Commission denies DEF's request for a financing order, or if the nuclear asset-recovery bonds are not issued for any reason after the Commission issues a financing order, should the Commission approve DEF's alternative request for a base rate increase pursuant to the RRSSA, to be implemented beginning six months after the final order rejecting DEF's request (in the event the financing order is not issued) or the date upon which DEF notifies the Commission that the bonds will not be issued (in the event the financing order is issued), with carrying costs on the nuclear asset-recovery costs collected from January 1, 2016, through the Capacity Cost Recovery Clause, until such time as the base rate increase goes into effect?

OPC: The OPC takes no final position at this time pending review of rebuttal testimony and discovery. However, as a general and preliminary matter, the OPC takes the position that the modifications proposed by staff witnesses in the interests of the ratepayers should be adopted absent very compelling evidence that they would not have the intended effect of producing the lowest overall costs to the customers consistent with the provisions of the RRSSA and Section 366.95, Fla. Stat.

Issue 50: Should the form of tariff sheets to be filed under DEF's tariff, as provided in Exhibit __ (MO-6A) of Witness Olivier's testimony, be approved?

OPC: Yes.

Issue 51: In accordance with Section 366.95(2)(c)2.h., Florida Statutes, if the Commission does not issue a stop order by 5:00 p.m. on the third business day after pricing, should the nuclear asset-recovery charges become final and effective without further action from the Commission?

OPC: The OPC takes no final position at this time pending review of rebuttal testimony and discovery. However, as a general and preliminary matter, the OPC takes the position that the modifications proposed by staff witnesses in the interests of the ratepayers should be adopted absent very compelling evidence that they would not have the intended effect of producing the lowest overall costs to the customers consistent with the provisions of the RRSSA and Section 366.95, Fla. Stat.

Issue 52: Should this docket be closed?

OPC: No.

5. STIPULATED ISSUES:

The Parties have stipulated the CR3 Regulatory Asset amount and associated issues as contained in the stipulation approved by the Commission on September 15, 2015.

6. PENDING MOTIONS:

None

7. STATEMENT OF PARTY'S PENDING REQUESTS OR CLAIMS FOR
CONFIDENTIALITY:

None.

8. OBJECTIONS TO QUALIFICATION OF WITNESSES AS AN EXPERT:

None at this time.

9. STATEMENT OF COMPLIANCE WITH ORDER ESTABLISHING PROCEDURE:

There are no requirements of the Order Establishing Procedure with which the Office of Public Counsel cannot comply.

Dated this 21st day of September, 2015

Respectfully submitted,

J.R. Kelly
Public Counsel



Charles J. Rehwinkel
Deputy Public Counsel

c/o The Florida Legislature
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Attorney for the Citizens
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and foregoing **PREHEARING STATEMENT OF THE OFFICE OF PUBLIC COUNSEL** has been furnished by electronic mail on this 21st day of September, 2015.


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