

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Cost Recovery Clause

DOCKET NO. 20180009-EI

Date: July 12, 2018

**THE SOUTHERN ALLIANCE FOR CLEAN ENERGY'S
PREHEARING STATEMENT**

The Southern Alliance for Clean Energy ("SACE"), by and through its undersigned counsel, and pursuant to Order No. PSC-2018-0074-PCO-EI, filed February 9, 2018, hereby files its Prehearing Statement.

1. Appearances

George Cavros, Esq.
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George@cavros-law.com

Attorney for Southern Alliance for Clean Energy

2. Witnesses

SACE is not sponsoring any witnesses.

3. Statement of Basic Position

SACE supports the development of low cost, low risk energy resources primarily through increased energy efficiency implementation and ramping up renewable energy development. New nuclear development is neither low cost, nor low risk. SACE opposed the proposed Levy Nuclear Project ("LNP") in 2008, and supported Duke Energy Florida's decision to cancel the project in 2013. SACE was a party to the 2017 Second Revised and Restated Stipulation and Settlement Agreement ("RRSSA") approved by Order PSC-2017-0451-AS-EI. The RSSA closed the chapter on rate recovery for costs related to the LNP. The dollar amounts proposed for recovery in this docket addressed in the RSSA are the product of approved costs for the

retirement of the Crystal River Unit 3 (“CR3”) plant and uprate project - which were primarily addressed in a 2013 settlement agreement approved by the Commission in Order No PSC-13-0598-FOF-EI and subsequent dockets and orders in which SACE was not a party. SACE has consistently maintained that costs related to the CR3 retirement be closely scrutinized and minimized in order to protect the financial interests Duke Energy Florida’s customers.

While FPL did not file a petition for cost recovery in this year’s docket for costs related to the proposed Turkey Point 6 & 7 nuclear reactors, SACE maintains its opposition to any rate recovery from FPL’s customers for this project, which is effectively dead, in any future dockets before this Commission.

4. SACE’s Position on the Issues

ISSUE 1: What jurisdictional amounts should the Commission approve as DEF’s actual 2017 prudently incurred costs for the Crystal River Unit 3 Uprate Project?

SACE: No Position

ISSUE 2: What jurisdictional amounts should the Commission approve as reasonably estimated 2018 exit and wind down costs and carrying costs for the Crystal River Unit 3 Uprate Project?

SACE: No Position

ISSUE 3: What jurisdictional amounts should the Commission approve as reasonably projected 2019 exit and wind down costs and carrying costs for the Crystal River Unit 3 Uprate Project?

SACE: No Position

ISSUE: 4 What is the total jurisdictional amount for the Crystal River Unit 3 Uprate Project to be included in establishing DEF's 2019 Capacity Cost Recovery Clause Factor?

SACE: No Position

ISSUE 5: Is there a need, pursuant to Paragraph 9 of the 2017 Second Revised and Restated Stipulation and Settlement Agreement, approved in Order No. PSC-2017-0451-AS-EU, for DEF to participate in the 2019 NCRC Docket?

SACE: No Position

5. Stipulated Issues

None at this time.

6. Pending Motions

SACE has no pending motions at this time.

7. Pending Confidentiality Claims or Requests

SACE has no pending confidentiality claims or requests.

8. Objections to Witness Qualifications as an Expert

SACE has no objections to any witness's qualifications as an expert.

9. Compliance with Order Establishing Procedure

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

Dated: July 12, 2018

Respectfully Submitted,

/s/ George Cavros
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by electronic mail this 12th day of July 2018, to the following:

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/s/ George Cavros
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