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July 27, 2021

VIA ELECTRONIC FILING

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

Re: Docket No. 20210010-EI; In re: Storm protection plan cost recovery clause

Dear Mr. Teitzman:

Please find enclosed for filing the Amended Prehearing Statement of Walmart Inc. ("Walmart") in the above-referenced case. The only change is Walmart's position as to Issue No. 10, where Walmart adopts the Office of Public Counsel's ("OPC") position on the Issue.

Please contact me if you have any questions concerning this filing.

Sincerely,

/s/ Stephanie U. Eaton

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SUE:sds

Enclosures

c: Parties of Record

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 this 27th day of July, 2021.

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/s/ Stephanie U. Eaton
Stephanie U. Eaton

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Storm protection plan cost recovery : **DOCKET NO. 20210010-EI**
clause. :
: **Filed: July 27, 2021**

**AMENDED PREHEARING STATEMENT OF
WALMART INC.**

Pursuant to Florida Public Service Commission's ("Commission") Order No. PSC-2021-0083-PCO-EI, issued February 17, 2021, Walmart Inc. ("Walmart") files its Prehearing Statement.

I. WITNESSES

<u>Witness</u>	<u>Subject</u>	<u>Issue No.</u>
Lisa V. Perry	Ms. Perry's testimony addresses: the cost allocation and rate design for Duke Energy Florida, LLC ("DEF"), Florida Power & Light Company's ("FPL"), Gulf Power Company's ("Gulf"), and Tampa Electric Company's ("TECO") (collectively, "Utilities") proposed Storm Protection Plan ("SPP") Cost Recovery Clause ("SPPCRC") filings.	7

II. EXHIBITS

<u>Exhibit</u>	<u>Description</u>
LVP-1	Witness Qualifications Statement

III. WALMART'S STATEMENT OF BASIC POSITION

The Commission should carefully consider the Utilities' respective SPP cost allocation proposals and rate design for this separate charge to their respective customers pursuant to the SPPCRC. *See* § 366.96(7), F.S.

As for cost allocation, DEF proposes to allocate the demand component based on each rate classes' contribution to monthly system peaks adjusted for certain losses and allocate the energy component based on each classes' contribution to total kWh sales adjusted for certain losses. *See* Direct Testimony of Christopher A. Menendez, p. 15, line 17 to p. 16, line 2. FPL/Gulf proposes to allocate SPP costs consistent with FPL's last rate case by allocating transmission costs to all rate classes based on the 12 monthly Coincident Peak, and distribution costs based on the Group Non-Coincident Peak. *See* Direct Testimony of Ranae B. Deaton, p. 13, lines 18-24. Lastly, TECO is proposing to allocate SPP costs consistent with its cost of service study prepared for Docket No. 20130040-EI and as applied for its current base rates. *See* Testimony and Exhibit of Mark R. Roche, p. 22, lines 10-15. Walmart is in agreement with the proposed cost allocations as set forth by the Utilities.

As to rate design, the Utilities, including DEF, are proposing to recover SPP costs from their demand customers through a demand charge, or \$/kW charge, in each Utility's SPPCRC.¹ Walmart does not oppose the Utilities' proposed methodology for allocating SPP costs and recovering those costs from their demand-metered customers through the demand charge, on a \$/kW basis. *See generally* Direct Testimony of Lisa V. Perry.

No other party has proposed an alternative allocation, rate design, or other modifications to the Utilities' proposed methodologies.

¹ *See* Direct Testimony of Christopher A. Menendez, Exh. No. ____ (CAM-2), Form 6P, p. 83; *see* Petition of Florida Power & Light Company for Approval of the 2021 Actual/Estimated Storm Protection Plan Cost Recovery Clause True-Up and the 2022 Projected Storm Protection Plan Cost Recovery Clause Factors, Form 5P; *see* Testimony and Exhibit of Mark R. Roche, p. 22, lines 19-20.

IV. ISSUES

GENERIC STORM PROTECTION PLAN COST RECOVERY ISSUES

Issue 1: What are the final Storm Protection Plan Cost Recovery Clause jurisdictional cost recovery true-up amounts for the period January 2020 through December 2020?

1A: TECO

Position: Walmart takes no position at this time.

1B: DEF

Position: Walmart takes no position at this time.

1C: Gulf

Position: Walmart takes no position at this time.

1D: FPL

Position: Walmart takes no position at this time.

Issue 2: What are the actual/estimated Storm Protection Plan Cost Recovery Clause jurisdictional cost recovery true-up amounts for the period January 2021 through December 2021?

1A: TECO

Position: Walmart takes no position at this time.

1B: DEF

Position: Walmart takes no position at this time.

1C: Gulf

Position: Walmart takes no position at this time.

1D: FPL

Position: Walmart takes no position at this time.

Issue 3: What are the projected Storm Protection Plan Cost Recovery Clause jurisdictional cost recovery amounts for the period January 2022 through December 2022?

1A: TECO

Position: Walmart takes no position at this time.

1B: DEF

Position: Walmart takes no position at this time.

1C: Gulf

Position: Walmart takes no position at this time.

1D: FPL

Position: Walmart takes no position at this time.

Issue 4: What are the Storm Protection Plan Cost Recovery Clause total jurisdictional cost recovery amounts, including true-ups, to be included in establishing Storm Protection Plan Cost Recovery factors for the period January 2022 through December 2022?

1A: TECO

Position: Walmart takes no position at this time.

1B: DEF

Position: Walmart takes no position at this time.

1C: Gulf

Position: Walmart takes no position at this time.

1D: FPL

Position: Walmart takes no position at this time.

Issue 5: What depreciation rates should be used to develop the depreciation expense included in the total Storm Protection Plan Cost Recovery Clause amounts for the period January 2022 through December 2022?

Position: Walmart takes no position at this time.

Issue 6: What are the appropriate jurisdictional separation factors for the projected period January 2022 through December 2022?

Position: Walmart takes no position at this time.

Issue 7: What are the appropriate Storm Protection Plan Cost Recovery Clause factors for the period January 2022 through December 2022 for each rate group?

Position: Walmart does not oppose the respective Utilities' proposed cost allocation and rate design.

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

Position: Walmart takes no position at this time.

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

Position: Walmart takes no position at this time.

COMPANY SPECIFIC STORM PROTECTION PLAN COST RECOVERY ISSUES

Florida Power & Light Company

Issue 10: In the event that the Commission declines to approve FPL's pending request for unified rates in Docket No. 20210015-EI, what are the appropriate Storm Protection Plan Cost Recovery Clause factors for the period January 2022 through December 2022?

Position: Walmart adopts the Office of Public Counsel's ("OPC") position on this Issue.

Issue 11: How should the assumptions used to develop FPL's 2022 Storm Protection Plan Cost Recovery Clause factors approved in this proceeding be revised to reflect any changes or modifications adopted by the Commission in the 2021 Rate Case pending in Docket No. 20210015-EI?

Position: Walmart takes no position at this time.

CLOSE THE DOCKET ISSUE

Issue 12: Should this docket be closed?

Position: Walmart takes no position at this time.

V. CONTESTED ISSUES

There are currently no contested issues.

VI. STIPULATED ISSUES

There are currently no stipulated issues.

VII. PENDING MOTIONS OR OTHER ACTIONABLE MATTERS

Walmart has no pending Motions at this time.

VIII. PENDING CONFIDENTIALITY REQUESTS OR CLAIMS

Walmart has no pending confidentiality requests or claims.

IX. OBJECTIONS TO WITNESS QUALIFICATIONS AS AN EXPERT

Walmart does not object to any witness's qualifications as an expert.

X. COMPLIANCE WITH ORDER NO. PSC-2021-0083-PCO-EI

There are no requirements of Order No. PSC-2021-0083-PCO-EI with which Walmart cannot comply.

Respectfully submitted,

By /s/ Stephanie U. Eaton

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Dated: July 27, 2021