

**BEFORE THE PUBLIC SERVICE COMMISSION**

In re: Fuel and purchased power cost recovery clause with generating performance incentive factor.	DOCKET NO. 20210001-EI
	DATED: October 6, 2021

**DUKE ENERGY FLORIDA, LLC’S  
PREHEARING STATEMENT**

Pursuant to the Order Establishing Procedure No. PSC-2021-0074-PCO-EI, Amendatory Order Amending the Order Establishing Procedure No. PSC-2021-0074A-PCO-EI, the First Order Modifying the Order Establishing Procedure No. PSC-2021-0211-PCO-EI and the Second Order Modifying the Order Establishing Procedure No. PSC-2021-0340-PCO-EI, Duke Energy Florida, LLC (“DEF”), hereby submits its Prehearing Statement with respect to its levelized fuel and capacity cost recovery factors and its Generating Performance Incentive Factor (GPIF) for the period of January 2022 through December 2022:

1. **Known Witnesses** - DEF intends to offer the testimony of:

<b>Witness</b>	<b>Direct Subject Matter</b>	<b>Issues#</b>
Gary P. Dean	Fuel Cost Recovery True-Up (2020); Capacity Cost Recovery True-Up (2020); Actual / Estimated and Projection Schedules; Other Matters	1B-1D, 6-11, 18-22, 23A-23B and 27-36
Mary Ingle Lewter	Calculation of GPIF Reward for (2021); GPIF Targets/Ranges (2022)	16 and 17
Joseph Simpson	Crystal River Unit 4 (CR4) Spring Outage	1C
Jim McClay	Risk Management Plan	1A

2. **Known Exhibits** - DEF intends to offer the following exhibits:

<b>Witness</b>	<b>Proffered By</b>	<b>Exhibit #</b>	<b>Description</b>
Gary Dean	DEF	(GPD-1T)	Fuel Cost Recovery True-Up (Jan – Dec. 2020)
Gary Dean	DEF	(GPD-2T)	Capacity Cost Recovery True-Up (Jan – Dec. 2020)
Gary Dean	DEF	(GPD-3T)	Schedules A1 through A3, A6 and A12 for Dec 2020
Gary Dean	DEF	(GPD-4T)	2020 Capital Structure and Cost Rates Applied to Capital Projects
Gary Dean	DEF	(GPD-2)	Actual/Estimated True-up Schedules for period January – December 2021
Gary Dean	DEF	(GPD-3)	Projection Factors for January - December 2022
Joseph Simpson	DEF	(JS-1)	Root Cause Analysis
Joseph Simpson	DEF	(JS-2)	Repair Evaluation Report
Jim McClay	DEF	JM-1P	Hedging Testimony <b>CONFIDENTIAL</b> 2022 Risk Management Plan <b>CONFIDENTIAL</b>
Mary Ingle Lewter	DEF	(MIL-1T)	Calculation of GPIF Reward for January - December 2020
Mary Ingle Lewter	DEF	(MIL-1P)	GPIF Targets/Ranges Schedules for January – December 2022

DEF reserves the right to identify additional exhibits for the purpose of cross-examination or rebuttal.

3. **Statement of Basic Position** - Not applicable. DEF’s positions on specific issues are listed below.

4. **Statement of Facts**

**FUEL ISSUES**

**COMPANY SPECIFIC FUEL ADJUSTMENT ISSUES**

**Duke Energy Florida, LLC**

**ISSUE 1A:** Should the Commission approve DEF's Risk Management Plan?

**DEF:** Yes. (McClay)

**ISSUE 1B:** What is the appropriate bill credit associated with DEF's Clean Energy Connection Program approved by Order No. PSC-2021-0059-S-EI to be included for recovery in 2022?

**DEF:** \$11,109,749. (Dean)

**ISSUE 1C:** Has DEF made appropriate adjustments, if any are needed, to account for replacement power costs associated with the January 2021 to April 2021 Crystal River Unit No. 4 outage? If appropriate adjustments are needed and have not been made, what adjustments should be performed?

**DEF:** No adjustments were needed. (Dean, Simpson)

**ISSUE 1D:** Should the Commission allow the \$246.8 million estimated 2021 true-up to be recovered over 2022 and 2023?

**DEF:** Yes. DEF's estimated 2021 true-up under-recovery balance is \$246,837,576. DEF seeks to recover this amount over two years (2022 and 2023) and has included \$123,418,788 of the total under-recovery in 2022 rates. (Dean)

**ISSUE 1E:** Has DEF made appropriate adjustments, if any are needed, to account for power costs associated with the January 2021 to April 2021 outage in Bartow CC unit 4A and/or the May 2021 to July 2021 outage in Bartow CC unit 4C? If appropriate adjustments are needed and have not been made, what adjustments should be performed?

**DEF:** This issue is not ripe for a decision in this docket and should be deferred.

**Florida Power and Light**

**ISSUE 2A:** What is the appropriate revised SoBRA factor for the 2019 projects to reflect actual construction costs that are less than the projected costs used to develop the initial SoBRA factor?

**DEF:** No position.

**ISSUE 2B:** What is the appropriate revised SoBRA factor for the 2020 projects to reflect actual construction costs that are less than the projected costs used to develop the initial SoBRA factor?

**DEF:** No position.

**ISSUE 2C:** What was the total gain under FPL's Incentive Mechanism approved by Order No. PSC-2016-0560-AS-EI that FPL may recover for the period January 2020 through December 2020, and how should that gain to be shared between FPL and customers?

**DEF:** No position.

**ISSUE 2D:** What is the appropriate amount of Incremental Optimization Costs under FPL's Incentive Mechanism approved by Order No. PSC-2016-0560-AS-EI that FPL should be allowed to recover through the fuel clause for Personnel, Software, and Hardware costs for the period January 2020 through December 2020?

**DEF:** No position.

**ISSUE 2E:** What is the appropriate amount of Variable Power Plant O&M Attributable to Off-System Sales under FPL's Incentive Mechanism approved by Order No. PSC-2016-0560-AS-EI that FPL should be allowed to recover through the fuel clause for the period January 2020 through December 2020?

**DEF:** No position.

**ISSUE 2F:** What is the appropriate amount of Variable Power Plant O&M Avoided due to Economy Purchases under FPL's Incentive Mechanism approved by Order No. PSC-2016-0560-AS-EI that FPL should be allowed to recover through the fuel clause for the period January 2020 through December 2020?

**DEF:** No position.

**ISSUE 2G:** What is the appropriate subscription credit associated with FPL's SolarTogether Program approved by Order No. PSC-2020-0084-S-EI, to be included for recovery in 2022?

**DEF:** No position.

**ISSUE 2H:** Should the Commission approve FPL's 2022 Risk Management Plan?

**DEF:** No position.

### **Florida Public Utilities Company**

No Company-specific fuel issues for Florida Public Utilities Company have been identified at this time. If such issues are identified, they shall be sequentially numbered 3A, 3B, 3C, etc.

### **Gulf Power Company**

**ISSUE 4A:** Should the Commission approve FPLs 2022 Risk Management Plan?

**DEF:** No position.

### **Tampa Electric Company**

**ISSUE 5A:** What was the total gain under TECO's Optimization Mechanism approved by Order No. PSC-2017-0456-S-EI that TECO may recover for the period January 2020 through December 2020, and how should that gain to be shared between TECO and customers?

**DEF:** No position.

## **GENERIC FUEL ADJUSTMENT ISSUES**

**ISSUE 6:** What are the appropriate actual benchmark levels for calendar year 2021 for gains on non-separated wholesale energy sales eligible for a shareholder incentive?

**DEF:** \$1,714,254. (Dean)

**ISSUE 7:** What are the appropriate estimated benchmark levels for calendar year 2022 for gains on non-separated wholesale energy sales eligible for a shareholder incentive?

**DEF:** \$1,408,076. (Dean)

**ISSUE 8:** What are the appropriate final fuel adjustment true-up amounts for the period January 2020 through December 2020?

**DEF:** \$39,503,838, which was collected as part of DEF's Fuel Midcourse approved in Order No. PSC-2021-0328-PCO-EI. (Dean)

**ISSUE 9:** What are the appropriate fuel adjustment actual/estimated true-up amounts for the period January 2021 through December 2021?

**DEF:** \$246,837,576 under-recovery. (Dean)

**ISSUE 10:** What are the appropriate total fuel adjustment true-up amounts to be collected/refunded from January 2022 through December 2022?

**DEF:** \$123,418,788 under-recovery. Pursuant the Rate Mitigation Plan filed in Docket No. 20210158, DEF will recover the total 2021 net true-up under-recovery of \$246,837,576 over two years (2022 and 2023). (Dean)

**ISSUE 11:** What are the appropriate projected total fuel and purchased power cost recovery amounts for the period January 2022 through December 2022?

**DEF:** \$1,431,565,051, which is adjusted for line losses and excludes prior period true-up GPIF amounts and CEC Bill Credits. (Dean)

## **COMPANY-SPECIFIC GENERATING PERFORMANCE INCENTIVE FACTOR ISSUES**

### **Duke Energy Florida, LLC**

No company-specific GPIF issues for Duke Energy Florida, LLC have been identified at this time. If such issues are identified, they shall be numbered 12A, 12B, 12C, and so forth, as appropriate.

### **Florida Power & Light, Co.**

No company-specific GPIF issues for Florida Power and Light Company have been identified at this time. If such issues are identified, they shall be numbered 13A, 13B, 13C, and so forth, as appropriate.

### **Gulf Power Company**

No company-specific GPIF issues for Gulf Power Company have been identified at this time. If such issues are identified, they shall be numbered 14A, 14B, 14C, and so forth, as appropriate.

### **Tampa Electric Company**

No company-specific GPIF issues for Tampa Electric Company have been identified at this time. If such issues are identified, they shall be numbered 15A, 15B, 15C, and so forth, as appropriate.

## **GENERIC GENERATING PERFORMANCE INCENTIVE FACTOR ISSUES**

**ISSUE 16:** What is the appropriate generation performance incentive factor (GPIF) reward or penalty for performance achieved during the period January 2020 through December 2020 for each investor-owned electric utility subject to the GPIF?

**DEF:** \$2,657,279 reward. (Lewter)

**ISSUE 17:** What should the GPIF targets/ranges be for the period January 2022 through December 2022 for each investor-owned electric utility subject to the GPIF??

**DEF:** The appropriate targets and ranges are shown on Page 4 of Exhibit MIL-1P filed on September 3, 2021 with the Direct Testimony of Mary Ingle Lewter. (Lewter)

## **FUEL FACTOR CALCULATION ISSUES**

**ISSUE 18:** What are the appropriate projected net fuel and purchased power cost recovery and Generating Performance Incentive amounts to be included in the recovery factor for the period January 2020 through December 2020?

**DEF:** \$1,568,750,867 (Dean)

**ISSUE 19:** What is the appropriate revenue tax factor to be applied in calculating each investor-owned electric utility's levelized fuel factor for the projection period January 2022 through December 2022?

**DEF:** Pursuant to the 2021 Settlement approved in Order No. PSC-2021-0202-AS-EI, DEF has removed the Regulatory Assessment Fee from the 2022 Projection Filing and included it with the Gross Receipts Tax on customer bills. (Dean)

**ISSUE 20:** What are the appropriate levelized fuel cost recovery factors for the period January 2022 through December 2022?

**DEF:** 3.986 cents/kWh (adjusted for jurisdictional losses) (Dean)

**ISSUE 21:** What are the appropriate fuel recovery line loss multipliers to be used in calculating the fuel cost recovery factors charged to each rate class/delivery voltage level class?

**DEF:**

<u>Group</u>	<u>Delivery Voltage Level</u>	<u>Line Loss Multiplier</u>
A	Transmission	0.9800
B	Distribution Primary	0.9900
C	Distribution Secondary	1.0000
D	Lighting Service	1.0000

(Dean)

**ISSUE 22:** What are the appropriate fuel cost recovery factors for each rate class/delivery voltage level class adjusted for line losses?

**DEF:**

Fuel Cost Factors (cents/kWh)							
Group	Delivery Voltage Level	First Tier Factor	Second Tier Factors	Levelized Factors	On-Peak	Time of Use	
						Off-Peak	Super Off-Peak
A	Transmission	--	--	3.912	5.011	3.849	2.864
B	Distribution Primary	--	--	3.952	5.063	3.889	2.893
C	Distribution Secondary	3.681	4.751	3.992	5.114	3.928	2.922
D	Lighting Secondary	--	--	3.700	--		--

(Dean)

**II. CAPACITY ISSUES**

**COMPANY-SPECIFIC CAPACITY COST RECOVERY FACTOR ISSUES**

**Duke Energy Florida, LLC**

**ISSUE 23A:** What adjustment amounts should the Commission approve to be refunded through the capacity clause in 2022 associated with the SoBRA III project, specifically Plants Santa FE and Twin Rivers approved in Docket No. 20200245-EI?

**DEF:** The Commission should approve credits of \$257,563 and \$355,679 through the capacity clause for the final cost true ups for the Santa Fe and Twin Rivers projects, respectively. The Commission should also approve credits of \$386,291 and \$533,447 for the reduction of the revenue requirements for Santa Fe and Twin Rivers, respectively, in lieu of reflecting these reductions in base rates. In addition, the Commission should approve \$7,386,099 in credits for the unexpected delay in the Charlie Creek and Sandy Creek in-service dates. (Dean)

**ISSUE 23B:** What is the appropriate amount of costs for the Independent Spent Storage Installation (ISFSI) that DEF should be allowed to recover through the capacity cost recovery clause pursuant to DEF's 2017 Settlement?

**DEF:** \$6,885,232 (Dean)

### **Florida Power & Light Company**

**ISSUE 24A:** What is the appropriate true-up adjustment amount associated with the 2019 SOBRA projects to be refunded through the capacity clause in 2022?

**DEF:** No position.

**ISSUE 24B:** What is the appropriate true-up adjustment amount associated with the 2020 SOBRA projects to be refunded through the capacity clause in 2022?

**DEF:** No position.

**ISSUE 24C:** What are the appropriate Indiantown non-fuel base revenue requirements to be recovered through the Capacity Clause pursuant to the Commission's approval of the Indiantown transaction in Docket No. 160154-EI (Order No. PSC-16-0506-FOF-EI) for 2022?

**DEF:** No position.

**ISSUE 24D:** What is the appropriate true-up adjustment amount associated with Okeechobee Clean Energy Center Generation Limited Scope Adjustment as required by Order No. PSC-2016-0560-AS-EI?

**DEF:** No position.

### **Gulf Power Company**

No company-specific capacity cost recovery factor issues for Gulf Power Company have been identified at this time. If such issues are identified, they shall be numbered 25A, 25B, 25C, and so forth, as appropriate.

### **Tampa Electric Company**

No company-specific capacity cost recovery factor issues for Tampa Electric Company have been identified at this time. If such issues are identified, they shall be numbered 26A, 26B, 26C, and so forth, as appropriate.

### **GENERIC CAPACITY COST RECOVERY FACTOR ISSUES**

**ISSUE 27:** What are the appropriate final capacity cost recovery true-up amounts for the period January 2020 through December 2020?

**DEF:** \$6,533,167 over-recovery (Dean)

**ISSUE 28:** What are the appropriate capacity cost recovery actual/estimated true-up amounts for the period January 2021 through December 2021?

**DEF:** \$3,814,896 under-recovery (Dean)

**ISSUE 29:** What are the appropriate total capacity cost recovery true-up amounts to be collected/refunded during the period January 2022 through December 2022?

**DEF:** \$2,718,273 over-recovery (Dean)

**ISSUE 30:** What are the appropriate projected total capacity cost recovery amounts for the period January 2022 through December 2022, excluding the total capacity cost recovery true-up amounts to be collected/refunded during the same period?

**DEF:** \$402,634,269 (Dean)

**ISSUE 31:** What are the appropriate projected net purchased power capacity cost recovery amounts to be included in the recovery factor for the period January 2022 through December 2022?

**DEF:** \$406,801,229 (Dean)

**ISSUE 32:** What are the appropriate jurisdictional separation factors for capacity revenues and costs to be included in the recovery factor for the period January 2022 through December 2022?

**DEF:** Base – 92.865%, Intermediate – 88.321%, Peaking – 90.678%, consistent with the 2021 Settlement approved in Order No. PSC-2017-0451-AS-EI. (Dean)

**ISSUE 33:** What are the appropriate capacity cost recovery factors for the period January 2022 through December 2022?

**DEF:**

Rate Class	Jan-Apr 2022 CCR Factor	May-Dec 2022 CCR Factor
Residential	1.103 cents/kWh	1.181 cents/kWh
General Service Non-Demand @ Primary Voltage	0.966 cents/kWh 0.956 cents/kWh	1.044 cents/kWh 1.034 cents/kWh
@ Transmission Voltage	0.947 cents/kWh	1.023 cents/kWh
General Service 100% Load Factor	0.683 cents/kWh	0.730 cents/kWh
General Service Demand @ Primary Voltage	2.85 \$/kW-month 2.82 \$/kW-month	3.04 \$/kW-month 3.01 \$/kW-month
@ Transmission Voltage	2.79 \$/kW-month	2.98 \$/kW-month
Curtaillable @ Primary Voltage	1.19 \$/kW-month 1.18 \$/kW-month	1.26 \$/kW-month 1.25 \$/kW-month
@ Transmission Voltage	1.16 \$/kW-month	1.23 \$/kW-month
Interruptible @ Primary Voltage	2.26 \$/kW-month 2.24 \$/kW-month	2.40 \$/kW-month 2.38 \$/kW-month
@ Transmission Voltage	2.21 \$/kW-month	2.35 \$/kW-month
Standby Monthly @ Primary Voltage	0.274 \$/kW-month 0.271 \$/kW-month	0.292 \$/kW-month 0.289 \$/kW-month
@ Transmission Voltage	0.268 \$/kW-month	0.286 \$/kW-month
Standby Daily @ Primary Voltage	0.130 \$/kW-month 0.129 \$/kW-month	0.139 \$/kW-month 0.138 \$/kW-month
@ Transmission Voltage	0.127 \$/kW-month	0.136 \$/kW-month
Lighting	0.285 cents/kWh	0.304 cents/kWh

(Dean)

### **III. EFFECTIVE DATE**

**ISSUE 34:** What should be the effective date of the fuel adjustment factors and capacity cost recovery factors for billing purposes?

**DEF:** The new factors should be effective beginning with the first billing cycle for January 2022 through the last billing cycle for December 2022. The first billing cycle may start before January 1, 2022, and the last billing cycle may end after December 31, 2022, so long as each customer is billed for twelve months regardless of when the factors became effective. (Dean)

**ISSUE 35:** Should the Commission approve revised tariffs reflecting the fuel adjustment factors and capacity cost recovery factors determined to be appropriate in this proceeding?

**DEF:** Yes. The Commission should approve revised tariffs reflecting the fuel adjustment factors and capacity cost recovery factors determined to be appropriate in this proceeding. The Commission should direct Staff to verify that the revised tariffs are consistent with the Commission decision. (Dean)

### **CONTESTED ISSUES**

**ISSUE 1F:** What is the impact upon this docket if a decision is issued in case SC20-1601 before January 1, 2022?

**DEF:** DEF and the OPC have proposed a stipulation that would defer this issue to the 2022 docket. (Dean)

**ISSUE 1G:** If the decision in case SC20-1601 orders the return of replacement power costs to customers, what interest amount should be applied?

**DEF:** DEF and the OPC have proposed a stipulation that would defer this issue to the 2022 docket.

#### 5. **Stipulated Issues** -

**ISSUE 36:** Should this docket be closed?

**DEF:** This is a continuing docket and should remain open.

#### 6. **Pending Motions** -

DEF has the following pending motions:

- DEF's Unopposed Motion to Approve Rate Mitigation Agreement. DN 10082-2021, filed Sept. 3, 2021.

#### 7. **Requests for Confidentiality**

DEF has the following pending requests for confidential classification:

- February 17, 2021 – DEF's First Request for Extension of Confidential Classification regarding DEF's Response to OPC's Second Request to Produce, originally filed in

- 20190001 (DN 02261-2021).
- February 17, 2021 – DEF’s Second Request for Extension of Confidential Classification regarding certain information contained in Hedging Workpapers 2017-048-2-1, originally filed in 20170001 (DN 02262-2021).
  - April 15, 2021 – DEF’s First Request for Extension of Confidential Classification regarding certain information contained in Hedging Audit Workpapers 2019-070-2-1, originally filed in 20190001 (DN 03467-2021).
  - April 15, 2021 – DEF’s First Request for Extension of Confidential Classification regarding DEF’s Response to OPC’s Fourth Set of Interrogatories, originally filed in 20190001 (DN 03468-2021).
  - April 15, 2021 – DEF’s First Request for Extension of Confidential Classification regarding the Rebuttal Testimony of Jeffrey Swartz and Exhibit Nos. \_\_\_(JS-2), \_\_\_(JS-3), and \_\_\_(JS-4), originally filed in 20190001 (DN 03469-2021).
  - April 21, 2021 – DEF’s First Request for Extension of Confidential Classification regarding OPC’s Response and Amended Supplemental Response to DEF’s First Request for Production of Documents (Nos. 1-6), originally filed in 20190001 (DN 03637-2021).
  - April 21, 2021 – DEF’s First Request for Extension of Confidential Classification regarding the Direct Testimony of OPC’s Witness Richard Polich and Exhibit Nos. \_\_\_(RAP-3), \_\_\_(RAP-6), \_\_\_(RAP-7), and \_\_\_(RAP-8), originally filed in 20190001 (DN 03619-2021).
  - April 30, 2021 – DEF’s Request for Confidential Classification regarding certain information contained in DEF’s Response to OPC’s Amended First Request to Produce (Nos. 1-6) (DN 03776-2021).
  - June 18, 2021 – DEF’s Second Request for Extension of Confidential Classification for certain information provided in direct testimony of Jeffrey Swartz and Exhibit No. \_\_\_(JS-1) and Exhibit No. (CAM-2T) and Exhibit No. \_\_\_(CAM-3T) to the direct Testimony of Christopher Menendez, originally filed in 20190001 (DN 06182-2021).
  - July 27, 2021 – DEF’s Request for Confidential Classification regarding certain information contained in James McClay’s Testimony, Exhibit, and 2022 Risk Management Plan (DN 08414-2021).
  - July 30, 2021 – DEF’s Request for Confidential Classification regarding 423 Forms for docket shows 1/21-3/21 **should be** 4/21 through 6/21 (DN 08539-2021)
  - August 4, 2021 – DEF’s Request for Confidential Classification regarding DEF’s Response to Staff’s First Data Request (DN 08707-2021).

8. **Objections to Qualifications** - DEF has no objection to the qualifications of any expert witnesses in this proceeding at this time, subject to further discovery in this matter.

9. **Sequestration of Witnesses** - DEF has not identified any witnesses for sequestration at this time.
  
10. **Requirements of Order** - At this time, DEF is unaware of any requirements of the Order Establishing Procedure, Amendatory Order Establishing Procedure, or First and Second Order Modifying the Order Establishing Procedure, of which it will be unable to comply.

RESPECTFULLY SUBMITTED this 6<sup>th</sup> day of October, 2021.

*s/Matthew R. Bernier*

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**CERTIFICATE OF SERVICE**

Docket No. 20210001-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via email this 6<sup>th</sup> day of October, 2021 to all parties of record as indicated below.

*s/Matthew R. Bernier*

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