

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Energy Cost Recovery Clause)
) Docket No. 20210007-EI
) Filed: October 6, 2021
)
_____)

**PREHEARING STATEMENT OF
NUCOR STEEL FLORIDA, INC.**

Pursuant to the Florida Public Service Commission’s *Order Establishing Procedure*, Order No. PSC-2021-0078-PCO-EI, issued February 11, 2021, as modified by the *First Order Modifying Order Establishing Procedure*, Order No. PSC-2021-0210-PCO-EI, issued on June 7, 2021, and as further modified by the *Second Order Modifying Order Establishing Procedure*, Order No. PSC-2021-0338-PCO-EI, issued September 14, 2021, Nucor Steel Florida, Inc. (“Nucor”) hereby files its Prehearing Statement in this case.

A. APPEARANCES

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B. WITNESSES

Nucor does not plan to call any witnesses at this time.

C. EXHIBITS

Nucor does not plan to offer any exhibits at this time.

D. STATEMENT OF BASIC POSITION

Nucor’s basic position is that Duke Energy Florida, LLC (“DEF”) bears the burden of proof to justify the costs it seeks to recover through the ECRC and any other relief DEF requests in this proceeding.

E. STATEMENT ON SPECIFIC ISSUES

GENERIC ENVIRONMENTAL COST RECOVERY ISSUES

ISSUE 1: What are the final environmental cost recovery true-up amounts for the period January 2020 through December 2020?

Nucor: No position at this time.

ISSUE 2: What are the estimated/actual environmental cost recovery true-up amounts for the period January 2021 through December 2021?

Nucor: No position at this time.

ISSUE 3: What are the projected environmental cost recovery amounts for the period January 2022 through December 2022?

Nucor: No position at this time.

ISSUE 4: What are the environmental cost recovery amounts, including true-up amounts, for the period January 2022 through December 2022?

Nucor: No position at this time.

ISSUE 5: What depreciation rates should be used to develop the depreciation expense included in the total environmental cost recovery amounts for the period January 2022 through December 2022?

Nucor: No position at this time.

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

Nucor: No position at this time.

ISSUE 7: What are the appropriate environmental cost recovery factors for the period January 2022 through December 2022 for each rate group?

Nucor: No position at this time.

ISSUE 8: What should be the effective date of the new environmental cost recovery factors for billing purposes?

Nucor: No position at this time.

ISSUE 9: Should the Commission approve revised tariffs reflecting the environmental cost recovery amounts and environmental cost recovery factors determined to be appropriate in this proceeding?

Nucor: No position at this time.

ISSUE 10: Should this docket be closed?

Nucor: No position.

COMPANY SPECIFIC ENVIRONMENTAL COST RECOVERY ISSUES

Florida Power & Light Company (FPL)

ISSUE 11: Should the Commission approve FPL's Miami-Dade Clean Water Recovery Center Project for cost recovery through the Environmental Cost Recovery Clause?

Nucor: No position.

ISSUE 12: How should any approved Environmental Cost Recovery Clause costs associated with FPL's Miami-Dade Clean Water Recovery Center Project be allocated to the rate classes?

Nucor: No position.

ISSUE 13: Should FPL be allowed to recover, through the ECRC, prudently incurred costs associated with its proposed modification to its Turkey Point Cooling Canal Monitoring Plan Project?

Nucor: No position.

ISSUE 14: Should FPL be allowed to recover, through the ECRC, prudently incurred costs associated with its proposed modification to its Lowest Quality Water Source Project?

Nucor: No position.

F. PENDING MOTIONS

None.

G. PENDING REQUESTS OR CLAIMS FOR CONFIDENTIALITY

None.

H. OBJECTIONS TO QUALIFICATIONS OF WITNESS AS EXPERT

None at this time.

I. REQUIREMENTS OF ORDER ESTABLISHING PROCEDURE

There are no requirements of the Procedural Orders with which Nucor cannot comply.

Respectfully submitted,

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Dated: October 6, 2021

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Prehearing Statement of Nucor Steel

Florida, Inc. has been furnished by electronic mail this 6th of October 2021, to the following:

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