

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

**In re: Review of Storm Protection Plan,
pursuant to Rule 25-6.030, F.A.C., Florida
Power & Light Company**

DOCKET NO. 20220051

Filed: July 13, 2022

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

Consistent with Order No. PSC-2022-0119-PCO-EI, issued March 17, 2022, Southern Alliance for Clean Energy (“SACE”) hereby submits this Prehearing Statement:

A. All Known Witnesses

SACE is not sponsoring any witnesses

B. All Known Exhibits

SACE does not plan to offer any exhibits at this time, but may introduce exhibits during the course of cross-examination.

C. SACE’s Statement of Basic Position

SACE’s position is that Florida Power and Light Company (“FPL”) bears the burden of proof to justify the approval of all proposed projects and programs in its proposed Storm Protection Plan. Please note that SACE’s responses below are limited to Docket No. 20220051.

D. SACE’s Position on the Issues

ISSUE 1: Does the Company's Storm Protection Plan contain all of the elements, including but not limited to, a comparison of the costs and dollar benefits, required by Rule 25-6.030, Florida Administrative Code?

- a. Docket No. 20220048-EI for TECO's Storm Protection Plan.
- b. Docket No. 20220049-EI for FPUC's Storm Protection Plan.
- c. Docket No. 20220050-EI for DEF's Storm Protection Plan.
- d. Docket No. 20220051-EI for FPL's Storm Protection Plan.

SACE: **No, this information was not fully provided.**

ISSUE 2: To what extent, and by how much, are each of the Company's Storm Protection Plan programs and projects expected to reduce restoration costs and outage times associated with extreme weather events?

- a. Docket No. 20220048-EI for TECO's Storm Protection Plan.
- b. Docket No. 20220049-EI for FPUC's Storm Protection Plan.
- c. Docket No. 20220050-EI for DEF's Storm Protection Plan.
- d. Docket No. 20220051-EI for FPL's Storm Protection Plan.

SACE: **This information was not fully provided.**

ISSUE 3: To what extent does the Company's Storm Protection Plan prioritize areas of lower reliability performance?

- a. Docket No. 20220048-EI for TECO's Storm Protection Plan.
- b. Docket No. 20220049-EI for FPUC's Storm Protection Plan.
- c. Docket No. 20220050-EI for DEF's Storm Protection Plan.
- d. Docket No. 20220051-EI for FPL's Storm Protection Plan.

SACE: **No position.**

ISSUE 4: To what extent is the Company's Storm Protection Plan regarding transmission and distribution infrastructure feasible, reasonable, or practical in certain areas of the Company's service territory, including, but not limited to, flood zones and rural areas?

- a. Docket No. 20220048-EI for TECO's Storm Protection Plan.
- b. Docket No. 20220049-EI for FPUC's Storm Protection Plan.
- c. Docket No. 20220050-EI for DEF's Storm Protection Plan.
- d. Docket No. 20220051-EI for FPL's Storm Protection Plan.

SACE: **No position.**

ISSUE 5: What are the estimated costs and dollar benefits to the Company and its customers of the Storm Protection Plan programs and projects?

- a. Docket No. 20220048-EI for TECO's Storm Protection Plan.
- b. Docket No. 20220049-EI for FPUC's Storm Protection Plan.
- c. Docket No. 20220050-EI for DEF's Storm Protection Plan.
- d. Docket No. 20220051-EI for FPL's Storm Protection Plan.

SACE: **This information was not fully provided.**

ISSUE 6: What are the estimated annual rate impacts resulting from implementation of the Company's Storm Protection Plan during the first 3 years addressed in the plan, and are those impacts properly calculated?

- a. Docket No. 20220048-EI for TECO's Storm Protection Plan.
- b. Docket No. 20220049-EI for FPUC's Storm Protection Plan.
- c. Docket No. 20220050-EI for DEF's Storm Protection Plan.
- d. Docket No. 20220051-EI for FPL's Storm Protection Plan.

SACE: **No position.**

ISSUE 7: **Withdrawn**

ISSUE 8: **Withdrawn**

ISSUE 9: Should the Commission approve, approve with modification, or deny FPL's new Transmission Access Enhancement Program?

SACE: **No position.**

ISSUE 10: Is it in the public interest to approve, approve with modification, or deny the Company's Storm Protection Plan?

- a. Docket No. 20220048-EI for TECO's Storm Protection Plan.
- b. Docket No. 20220049-EI for FPUC's Storm Protection Plan.
- c. Docket No. 20220050-EI for DEF's Storm Protection Plan.
- d. Docket No. 20220051-EI for FPL's Storm Protection Plan.

SACE: **The Company should fully provide the required information to make such a determination.**

ISSUE 11: Should this docket be closed?

- a. Docket No. 20220048-EI for TECO's Storm Protection Plan.
- b. Docket No. 20220049-EI for FPUC's Storm Protection Plan.
- c. Docket No. 20220050-EI for DEF's Storm Protection Plan.
- d. Docket No. 20220051-EI for FPL's Storm Protection Plan.

SACE: **No Position**

E. Stipulated Issues

None at this time.

F. Pending Motions

SACE has no pending motions.

G. Pending Confidentiality Claims or Requests.

SACE has no pending requests.

H. Objections to Witness Qualifications as an Expert

SACE has no objections to any witness qualifications at this time.

I. Compliance with Order No. PSC-2022-0119-PCO-EI

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

RESPECTFULLY SUBMITTED this 13th day of July, 2022.

/s/ George Cavros

George Cavros

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy and correct copy of the foregoing was served on
this 13th day of July, 2022 via electronic mail on:

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