

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of 2026-2035 Storm Protection Plan, pursuant to Rule 25-6.030, F.A.C., Florida Power & Light Company.	DOCKET NO. 20250014-EI
In re: Review of 2026-2035 Storm Protection Plan, pursuant to Rule 25-6.030, F.A.C., Duke Energy Florida, LLC.	DOCKET NO. 20250015-EI
In re: Review of 2026-2035 Storm Protection Plan, pursuant to Rule 25-6.030, F.A.C., Tampa Electric Company.	DOCKET NO. 20250016-EI
In re: Review of 2026-2035 Storm Protection Plan, pursuant to Rule 25-6.030, F.A.C., Florida Public Utilities Company.	DOCKET NO. 20250017-EI
	DATED: April 28, 2025

COMMISSION STAFF'S PREHEARING STATEMENT

Pursuant to Order No. PSC-2025-0029-PCO-EI, filed January 24, 2025, the Staff of the Florida Public Service Commission files its Prehearing Statement.

1. All Known Witnesses

There are no known witnesses at this time.

2. All Known Exhibits

There are no known exhibits at this time.

3. Staff's Statement of Basic Position

Staff's positions are preliminary and based on materials filed by the parties and on discovery. The preliminary positions are offered to assist the parties in preparing for the hearing. Staff's final positions will be based upon all the evidence in the record and may differ from the preliminary positions stated herein.

4. Staff's Position on the Issues

20250014-EI (FPL)

ISSUE 1: Should the Commission approve, approve with modification, or deny FPL's Storm Protection Plan?

POSITION: Staff has no position at this time.

ISSUE 2: Should this docket be closed?

POSITION: Staff has no position at this time.

20250015-EI (DEF)

ISSUE 1: Should the proposed Insulator Upgrade Sub-Program be included in DEF's proposed 2026-2035 SPP?

POSITION: Staff has no position at this time.

ISSUE 2: Should the Commission approve, approve with modification, or deny DEF's Storm Protection Plan?

POSITION: Staff has no position at this time.

ISSUE 3: Should this docket be closed?

POSITION: Staff has no position at this time.

20250016-EI (TECO)

ISSUE 1: Should the proposed Distribution Storm Surge Hardening Program be included in TECO's proposed 2026-2035 SPP?

POSITION: Staff has no position at this time.

ISSUE 2: Should the proposed Transmission Switch Hardening Program be included in TECO's proposed 2026-2035 SPP?

POSITION: Staff has no position at this time.

ISSUE 3: Should the Commission approve, approve with modification, or deny TECO's Storm Protection Plan?

POSITION: Staff has no position at this time.

ISSUE 4: Should this docket be closed?

POSITION: Staff has no position at this time.

20250017-EI (FPUC)

ISSUE 1: Should the proposed Distribution Connectivity and Automation Program be included in FPUC's proposed 2026-2035 SPP?

POSITION: Staff has no position at this time.

ISSUE 2: Should the Commission approve, approve with modification, or deny FPUC's Storm Protection Plan?

POSITION: Staff has no position at this time.

ISSUE 3: Should this docket be closed?

POSITION: Staff has no position at this time.

CONTESTED ISSUES

20250015-EI (DEF)

OPC A: Has the scope of the Tower Upgrade subprogram been modified since it was approved in Docket No. 20220050-EI, and if so, what action, if any, should the Commission take with respect to the scope of the Tower Upgrade subprogram included in DEF's proposed 2026-2035 SPP?

OPC B: Has the scope of the Overhead Wire Upgrade (OHGW) subprogram been modified since it was approved in Docket No. 20220050-EI, and if so, what action, if any, should the Commission take with respect to the scope of the OHGW subprogram included in DEF's proposed 2026-2035 SPP?

OPC C: What is the preclusive effect, if any, of the prior litigation in Docket No. 20220050-EI and resulting orders, Commission Order No. PSC-2022-0388-EI and Citizens of the State of Fla. v. Fay, 395 So. 3d 549 (Fla. 2024), on the OPC's right to challenge previously approved subprograms in this docket?

5. Stipulated Issues

Commission staff has no stipulated issues at this time.

6. Pending Motions

Commission staff has no pending motions at this time.

7. Pending Confidentiality Claims or Requests

Commission staff has no pending confidentiality claims or requests at this time.

8. Objections to Witness Qualifications as an Expert

Commission staff has no objections to witness qualifications at this time.

9. Requests for Sequestration of Witnesses

None.

10. Compliance with Order No. PSC-2025-0029-PCO-EI

Staff has complied with all requirements of the Order Establishing Procedure and Consolidating Docket Nos. 20250014-EI, 20250015-EI, 20250016-EI, and 20250017-EI for Hearing entered in these dockets.

Respectfully submitted this 28th day of April, 2025.

/s/ Jacob Imig

JACOB IMIG

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DOCKET NO. 20250017-EI

DATED: April 28, 2025

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that STAFF'S PREHEARING STATEMENT has been filed with the Office of Commission Clerk and that a true copy has been furnished to the following by electronic mail this 28th day of April, 2025:

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