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April 28, 2025

**VIA E-PORTAL**

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

**Re: Docket No. 20250017-EI – Review of 2026-2035 Storm Protection Plan, pursuant to Rule 25-6.030, F.A.C., Florida Public Utilities Company.**

Dear Mr. Teitzman:

Attached for filing, please find FPUC's Prehearing Statement.

Thank you for your assistance with this filing. As always, please don't hesitate to let me know if you have any questions whatsoever.

Sincerely,



Beth Keating  
Gunster, Yoakley & Stewart, P.A.  
215 South Monroe St., Suite 601  
Tallahassee, FL 32301  
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MEK  
Cc://(certificate of service)

**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 Public Utilities Company.

DOCKET NO. 20250017-EI

DATED: April 28, 2025

**FLORIDA PUBLIC UTILITIES COMPANY'S  
PREHEARING STATEMENT**

Consistent with Order No. PSC-2025-0029-PCO-EI, issued January 24, 2025, Florida  
Public Utilities Company ("FPUC") hereby submits this Prehearing Statement:

a. All Known Witnesses

**Direct**

<b><u>Witness</u></b>	<b><u>Subject</u></b>	<b><u>Issue</u></b>
P. Mark Cutshaw	FPUC's 2026 – 2035 Storm Protection Plan	1 & 2

**Rebuttal**

P. Mark Cutshaw	Rebuttal to OPC Witness Mara	1 & 2
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b. All Known Exhibits

<b><u>Witness</u></b>	<b><u>Exhibit</u></b>	<b><u>Title</u></b>	<b><u>Issue</u></b>
P. Mark Cutshaw	PMC-01	FPUC Storm Protection Plan 2026-2035	1 & 2

c. FPUC's Statement of Basic Position

FPUC: Pursuant to Section 366.96, Florida Statutes and Rule 25-6.030, Florida Administrative Code, FPUC submitted its Storm Protection Plan ("SPP") for 2026 through 2035 for approval on January 15, 2025. In accordance with Section 366.96(3), Florida Statutes, the programs and projects contemplated therein meet the statutory objectives of reducing restoration costs and outage times associated with extreme weather events and enhancing reliability. Overall, the SPP combines the beneficial legacy Storm Hardening programs with new programs developed based upon resiliency risk scores from across FPUC's electric system to provide an organized, highly navigable "roadmap" for the investments necessary to fully implement the SPP statutory objectives. The SPP put forth by FPUC is consistent with the Legislative directive of Section 366.96, Florida Statutes, and it includes the details and information required by Rule 25-6.030, Florida Administrative. To a large extent, FPUC's 2026-2035 SPP reflects the programs and projects reflected in the final, approved version of the Company's 2022-2031 SPP.

The Company has included one new program, the Distribution Connectivity and Automation Program, which, when fully implemented, will enable the Company to: 1) balance loads more effectively; 2) allow power to flow from an alternative path minimizing downtime and improving overall system resilience; and 3) provide automated communication and restoration capabilities, which will reduce both the duration of outages and the costs associated with restoration.

In developing its SPP, FPUC appropriately considered the costs, benefits, historic service reliability performance, and appropriate prioritization of the various programs and projects, including an analysis of the costs of its various programs and projects balanced

with the benefits of reduced outage times for its customers, including critical load customers. Also, in its initial 2022-2031 SPP, FPUC incorporated a methodical “ramp-up” approach in the first three years in order to mitigate the rate impact in those years. The Company’s 2026-2035 SPP reflects the continuation of that “ramp up” approach, which also recognized that the Hurricane Michael Storm Surcharge will terminate in January 2026.

The criteria applied by FPUC to select the programs and projects for inclusion in its SPP are consistent with the statute and in the public interest. Implementation of FPUC’s plan, as filed, would be in the public interest; therefore, FPUC asks that it be approved.

d. FPUC’s Position on the Issues

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

FPUC: Yes. The Distribution Connectivity and Automation Program (“DCA”) will enable the Company to: 1) balance loads more effectively; 2) allow power to flow from an alternative path, which will minimize downtime and improve overall system resilience; and 3) provide automated communication and restoration capabilities, which will reduce both the duration of outages and the costs associated with restoration. Deployment of feeder protective interrupting devices with automation capabilities have proven reliability benefits in Florida Grids. The automation features, including fault detection and restoration, reduce truck rolls, enhance crew productivity, and strengthen the system's ability to react to disruptions in real-time. The DCA will give FPUC advanced capabilities to detect faults and either restore or isolate the impacted section(s)

of the grid based on analyzed fault information. As such, implementation of the DCA is expected to reduce storm restoration costs and increase service reliability during both extreme and non-extreme weather conditions. The DCA program, therefore, meets the purposes of Section 366.96, F.S., and its inclusion in FPUC's SPP is consistent with the public interest.

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

FPUC: The Commission should approve FPUC's 2026-2025 SPP as filed. Implementation of FPUC's SPP will result in a reduction to future restoration costs from severe storms because the projects and programs in the SPP will enhance system reliability and ultimately result in less damage in a storm event. The Risk Resiliency Model used to develop the SPP considered, among other things, geographic location and population; thus, flood zones and rural areas have been considered. The proposed 2026-2035 SPP is largely a continuation of the 2022-2031 SPP and enhances those efforts through an additional program that will further enhance the reliability and resiliency of FPUC's electric system in a cost-effective manner. Using the Risk Resiliency Model, FPUC historical data was analyzed, critical load was categorized, number of customers served by circuits was assessed, and an Interruption Cost Estimate (ICE) calculator was utilized to estimate the cost impact of outages. In addition, location and historical weather patterns were taken into consideration.

The estimated annual rate impact associated with implementation of FPUC's SPP is set forth in Section 5.0 of Exhibit No. PMC-01, at page 40, which provides the estimated impact in 2026, 2027, and 2028 for residential, commercial, and industrial customers.

The Company's 2026-2035 SPP reflects the continuation of the "ramp up" approach originally contemplated in its 2022-2031 SPP. The "ramp up" in activity also recognized that the Hurricane Michael Storm Surcharge will terminate in January 2026. Any reduction in this "ramp up" approach or other delay in FPUC's SPP projects will only serve to delay the benefits of the SPP contemplated by Section 366.96, Florida Statutes.

All proposed programs and subsequent projects provide economic benefits, including reduced restoration costs associated with improved resiliency of its facilities and economic benefits to customers whose power delivery will either be uninterrupted or be restored more expeditiously because of these initiatives.

The criteria applied by FPUC to select the programs and projects for inclusion in its SPP are consistent with the statute and in the public interest and continued implementation of FPUC's plan, as filed, would be in the public interest. FPUC, therefore, asks that it be approved. (*Witness Cutshaw*).

**ISSUE 3: Should this docket be closed?**

FPUC: Yes.

e. Stipulated Issues

While not a party to any stipulations at this time, FPUC believes that it should be possible to reach a stipulation on each of the issues as they pertain to FPUC.

f. Pending Motions

FPUC has no pending motions.

g. Pending Confidentiality Claims or Requests

FPUC has no pending request for confidential classification.

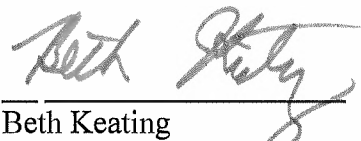
h. Objections to Witness Qualifications as an Expert

FPUC has no objections to any witnesses' qualifications at this time nor does FPUC request sequestration of witnesses.

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

FPUC has complied with all requirements of the Order Establishing Procedure entered in this docket.

RESPECTFULLY SUBMITTED this 28th day of April, 2025.

A handwritten signature in dark ink, appearing to read "Beth Keating", is written over a horizontal line.

Beth Keating  
Gunster, Yoakley & Stewart, P.A.  
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**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 of record this 28th day of April, 2025.

Office of Public Counsel Walter Trierweiler/Charles Rehwinkel c/o The Florida Legislature 111 West Madison Street, Room 812 Tallahassee, FL 32399-1400 <a href="mailto:Trierweiler.Walt@leg.state.fl.us">Trierweiler.Walt@leg.state.fl.us</a> <a href="mailto:Rehwinkel.Charles@leg.state.fl.us">Rehwinkel.Charles@leg.state.fl.us</a> <a href="mailto:Christensen.Patty@leg.state.fl.us">Christensen.Patty@leg.state.fl.us</a> <a href="mailto:Wessling.Mary@leg.state.fl.us">Wessling.Mary@leg.state.fl.us</a> <a href="mailto:Ponce.Octavio@leg.state.fl.us">Ponce.Octavio@leg.state.fl.us</a> <a href="mailto:Watrous.Austin@leg.state.fl.us">Watrous.Austin@leg.state.fl.us</a>	Michelle D. Napier Director, Regulatory Affairs Distribution Florida Public Utilities Company 1635 Meathe Drive West Palm Beach, Florida 33411 W: (561) 838-1712 <a href="mailto:mnapier@fpuc.com">mnapier@fpuc.com</a>  Mike Cassel Florida Public Utilities Company 208 Wildlight Avenue Yulee, FL 32097 <a href="mailto:mcassel@fpuc.com">mcassel@fpuc.com</a>
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