

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Environmental Cost Recovery Clause

Docket No. 20250007-EI

Dated: October 6, 2025

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

Pursuant to the Order Establishing Procedure No. PSC-2025-0049-PCO-EI, Duke Energy Florida, LLC (“DEF”), hereby submits its Prehearing Statement:

1. **Known Witnesses** –intends to offer the Testimony of:

<u>Witness</u>	<u>Subject Matter</u>	<u>Issues</u>
Gary P. Dean	Final True-Up; Estimated True-up; Environmental Compliance Cost Projections and Final 2026 ECRC Factors	1-9, 12
Eric Szkolnyj	Final and Estimated True-Up variances and Environmental Compliance Cost Projections	1-3
Reginald Anderson	Final and Estimated True-Up variances and Environmental Compliance Cost Projections	1-3
Wyatt Grant adopted Testimony of Patricia Q. West	Final and Estimated True-Up variances and Environmental Compliance Cost Projections, and Review of DEF’s Integrated Clean Air Compliance Plan	1-3

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

Witness	Proffered By	Exhibit #	Description	Issue #
Gary P. Dean	DEF	GPD-1	Forms 42-1A - 42-9A January 2024 – December 2024	1
Gary P. Dean	DEF	GPD-2	Forms 42-1E – 42-9E January 2025 – December 2025	2
Gary P. Dean	DEF	GPD-3	Forms 42-1P – 42-8P January 2026 - December 2026	1, 2, 3, 4, 5, 6, 7, 8, 9,
Eric Szkolnyj	DEF	GPD-3	Form 42-5P, page 23	1, 2, 3, 4, 5, 6, 7, 8, 9
Reginald Anderson	DEF	GPD-3	Form 42-5P, pages 7 and 20 through 22	1, 2, 3, 4, 5, 6, 7, 8, 9
Wyatt Grant adopted Testimony of Patricia Q. West	DEF	PQW-1	Review of Integrated Clean Air Compliance Plan	1
Wyatt Grant adopted Testimony of Patricia Q. West	DEF	GPD-3	Form 42-5P, pages 1-4, 6, 8-19, and 24-26	1, 2, 3, 4, 5, 6, 7, 8, 9

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

3. **Statement of Basic Position** – DEF’s positions to specific issues are listed below.
4. **Statement of Facts**

ISSUES

GENERIC ENVIRONMENTAL COST RECOVERY ISSUES

DEF’s positions on the issues identified in this proceeding are as follows:

ISSUE 1: What are the final environmental cost recovery true-up amounts for the period January 2024 through December 2024?

DEF: \$2,943,654 over-recovery. (Dean, Anderson, Szkolnyj, Grant)

ISSUE 2: What are the actual/estimated environmental cost recovery true-up amounts for the period January 2025 through December 2025?

DEF: \$1,379,869 under-recovery. (Dean, Anderson, Szkolnyj, Grant)

ISSUE 3: What are the projected environmental cost recovery amounts for the period January 2026 through December 2026?

DEF: \$17,408,413. (Dean, Anderson, Szkolnyj, Grant)

ISSUE 4: What are the environmental cost recovery amounts, including true-up amounts, for the period January 2026 through December 2026?

DEF: \$15,844,628. (Dean)

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 2026 through December 2026?

DEF: The depreciation rates used to calculate depreciation expense should be the rates that are in effect during the period the allowed capital investment is in service. (Dean)

ISSUE 6: What are the appropriate jurisdictional separation factors for the projected period January 2026 through December 2026?

DEF: The separation factors are below and are consistent with Docket No. 20240025 - Petition for Rate Increase by Duke Energy Florida, LLC - Joint Motion for Approval of Settlement Agreement filed 7/15/24 and approved by the Commission on 8/21/24.

Transmission Demand – 70.369%
Distribution Primary Demand – 100.000%

Production Demand:
Production Base – 100.000%
Production Intermediate – 95.212%

Production Peaking – 97.632%
 Production A&G – 97.366%

(Dean)

ISSUE 7: What are the appropriate environmental cost recovery factors for the period January 2026 through December 2026 for each rate group?

DEF: The appropriate recovery factors are as follows: (Dean)

RATE CLASS	ECRC FACTORS
Residential	0.040 cents/kWh
General Service Non-Demand	
@ Secondary Voltage	0.038 cents/kWh
@ Primary Voltage	0.038 cents/kWh
@ Transmission Voltage	0.037 cents/kWh
General Service 100% Load Factor	0.036 cents/kWh
General Service Demand	
@ Secondary Voltage	0.037 cents/kWh
@ Primary Voltage	0.037 cents/kWh
@ Transmission Voltage	0.036 cents/kWh
Curtable	
@ Secondary Voltage	0.035 cents/kWh
@ Primary Voltage	0.035 cents/kWh
@ Transmission Voltage	0.034 cents/kWh
Interruptible	
@ Secondary Voltage	0.035 cents/kWh
@ Primary Voltage	0.035 cents/kWh
@ Transmission Voltage	0.034 cents/kWh
Lighting	0.031 cents/kWh

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

DEF: The factors should be effective beginning with the specified environmental cost recovery cycle and thereafter for the period January 2026 through December 2026. Billing cycles may start before January 1, 2026 and the last cycle may read after December 31, 2026, so that each customer is billed for twelve months regardless of when the adjustment factor became effective. These charges will continue in effect until modified by the Commission. (Dean)

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?

DEF: Yes. (Dean)

COMPANY-SPECIFIC ENVIRONMENTAL COST RECOVERY ISSUES

Tampa Electric Company

ISSUE 10: Should the Commission approve TECO's Big Bend CCR Rule Legacy Amendment Study project for cost recovery through the environmental cost recovery clause?

DEF: No position.

ISSUE 11: How should the approved costs related to TECO's Big Bend CCR Rule Legacy Amendment Study project be allocated to the rate classes?

DEF: No position.

ISSUE 12: Should this docket be closed?

DEF: No. While a separate docket number is assigned each year for administrative convenience, this is a continuing docket and shall remain open. (Dean)

5. **Stipulated Issues** – None at this time

6. **Pending Motions** – DEF does not have any pending motions at this time.
7. **Requests for Confidentiality** – DEF does not have a request for confidentiality pending at this time.
8. **Objections to Qualifications** – DEF has no objections to the qualifications of any expert witnesses in this proceeding at this time.
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 of which it will be unable to comply.

Respectfully submitted this 6th day of October, 2025.

/s/Stephanie A. Cuello

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CERTIFICATE OF SERVICE

Docket No. 20240007-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic mail to the following this 6th day of October, 2025.

/s/ Stephanie A. Cuello

Attorney

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