

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Fuel and purchased power cost
recovery clause with generating
performance incentive factor

DOCKET NO.: 20250001-EI
FILED: October 6, 2025

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

Pursuant to the Florida Public Service Commission's *Order Establishing Procedure*, Order No. PSC-2025-0052-PCO-EI, issued February 10, 2025, Nucor Steel Florida, Inc. ("Nucor") hereby files its Prehearing Statement in this case.

A. APPEARANCES

Peter J. Mattheis
Michael K. Lavanga
Joseph R. Briscar
Stone Mattheis Xenopoulos & Brew, PC
1025 Thomas Jefferson Street, NW
Suite E-3400
Washington, DC 20007
(202) 342-0800
(202) 342-0807 (fax)
Email: pjm@smxblaw.com
mkl@smxblaw.com
jrb@smxblaw.com

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 fuel clause and capacity cost recovery clause and any other relief DEF requests in this proceeding. Fuel expense makes up a large portion of DEF's revenues and therefore a large portion of the charges passed onto customers. The Commission should carefully review DEF's fuel costs to ensure that they were reasonably and prudently incurred.

E. STATEMENT ON SPECIFIC ISSUES

COMPANY-SPECIFIC FUEL ISSUES

Duke Energy Florida, LLC

ISSUE 1A: Should the Commission approve DEF's 2026 Risk Management Plan?

- **Nucor:** Agree with OPC.

ISSUE 1B: What is the appropriate subscription bill credit associated with DEF's Clean Energy Connection Program, approved by Order No. PSC-2021-0059-S-EI, to be included for recovery in 2026?

- **Nucor:** Agree with OPC.

ISSUE 1C: What is the appropriate Clean Energy Impact (CEI) credit, approved by Order No. PSC-2023-0191-TRF-EI, to be included in the fuel clause in 2026?

- **Nucor:** Agree with OPC.

ISSUE 1D: What is the appropriate amount of the storm cost recovery true-up to be credited to the fuel clause in the period January 2025 through December 2025 per Order No. PSC-2025-0204-FOF-EI?

- **Nucor:** Agree with OPC.

Florida Power & Light Company

ISSUE 2A: What was the total gain under FPL's Incentive Mechanism approved by Order No. PSC-2021-0446A-S-EI that FPL may recover for the period January 2024 through December 2024, and how should that gain to be shared between FPL and its customers?

- **Nucor:** No position.

ISSUE 2B: What is the appropriate amount of Incremental Optimization Costs under FPL's Incentive Mechanism approved by Order No. PSC-2021-0446A-S-EI that FPL should be allowed to recover through the fuel clause for Personnel, Software, and Hardware costs for the period January 2024 through December 2024?

- **Nucor:** No position.

ISSUE 2C: What is the appropriate amount of Variable Power Plant O&M Attributable to Off-System Sales under FPL's Incentive Mechanism approved by Order No. PSC-2021-0446A-S-EI that FPL should be allowed to recover through the fuel clause for the period January 2024 through December 2024?

- **Nucor:** No position.

ISSUE 2D: What is the appropriate amount of Variable Power Plant O&M Avoided due to Economy Purchases under FPL's Incentive Mechanism approved by Order No. PSC-2021-0446A-S-EI that FPL should be allowed to recover through the fuel clause for the period January 2024 through December 2024?

- **Nucor:** No position.

ISSUE 2E: What is the appropriate subscription credit associated with FPL's SolarTogether Program approved by Order No. PSC-2020-0084-S-EI, to be included for recovery in 2026?

- **Nucor:** No position.

ISSUE 2F: Should the Commission approve FPL's 2026 Risk Management Plan?

- **Nucor:** No position.

Tampa Electric Utilities Company

ISSUE 4A: What was the total gain under TECO's Optimization Mechanism approved by Order No. PSC-2021-0423-S-EI that TECO may recover for the period January 2024 through December 2024, and how should that gain to be shared between TECO and its customers?

- **Nucor:** No position.

ISSUE 4B: Should the Commission approve TECO's 2026 Risk Management Plan?

- **Nucor:** No position.

GENERIC FUEL ADJUSTMENT ISSUES

ISSUE 5: What are the appropriate final fuel adjustment true-up amounts for the period January 2024 through December 2024?

- **Nucor:** Regarding DEF, agree with OPC. For all other utilities, Nucor takes no position.

ISSUE 6: What are the appropriate fuel adjustment actual/estimated true-up amounts for the period January 2025 through December 2025?

- **Nucor:** Regarding DEF, agree with OPC. For all other utilities, Nucor takes no position.

ISSUE 7: What are the appropriate total fuel adjustment true-up amounts to be collected/refunded from January 2026 through December 2026?

- **Nucor:** Regarding DEF, agree with OPC. For all other utilities, Nucor takes no position.

ISSUE 8: What are the appropriate projected total fuel and purchased power cost recovery amounts for the period January 2026 through December 2026?

- **Nucor:** Regarding DEF, agree with OPC. For all other utilities, Nucor takes no position.

COMPANY-SPECIFIC GENERATING PERFORMANCE INCENTIVE FACTOR ISSUES

None.

GENERIC GPIF ISSUES

ISSUE 12: What is the appropriate GPIF reward or penalty for performance achieved during the period January 2024 through December 2024 for each investor-owned electric utility subject to the GPIF?

- **Nucor:** Regarding DEF, agree with OPC. For all other utilities, Nucor takes no position.

ISSUE 13: What should the GPIF targets/ranges be for the period January 2026 through December 2026 for each investor-owned electric utility subject to the GPIF?

- **Nucor:** Regarding DEF, agree with OPC. For all other utilities, Nucor takes no position.

FUEL FACTOR CALCULATION ISSUES

ISSUE 14: What are the appropriate projected net fuel and purchased power cost recovery and Generating Performance Incentive amounts to be included in the recovery factor for the period January 2026 through December 2026?

- **Nucor:** Regarding DEF, agree with OPC. For all other utilities, Nucor takes no position.

ISSUE 15: What is the appropriate revenue tax factor to be applied in calculating each investor-owned electric utility's levelized fuel factor for the projection period January 2026 through December 2026?

- **Nucor:** Regarding DEF, agree with OPC. For all other utilities, Nucor takes no position.

ISSUE 16: What are the appropriate levelized fuel cost recovery factors for the period January 2026 through December 2026?

- **Nucor:** Regarding DEF, agree with OPC. For all other utilities, Nucor takes no position.

ISSUE 17: What are the appropriate fuel recovery line loss multipliers to be used in calculating the fuel cost recovery factors charged to each rate class/delivery voltage level class?

- **Nucor:** Regarding DEF, agree with OPC. For all other utilities, Nucor takes no position.

ISSUE 18: What are the appropriate fuel cost recovery factors for each rate class/delivery voltage level class adjusted for line losses?

- **Nucor:** Regarding DEF, agree with OPC. For all other utilities, Nucor takes no position.

COMPANY SPECIFIC CAPACITY COST RECOVERY FACTOR ISSUES

Duke Energy Florida, LLC

ISSUE 19A: What is the appropriate amount of costs for the Independent Spent Fuel Storage Installation (ISFSI) that DEF should be allowed to recover through the capacity cost recovery clause pursuant to DEF's 2017 Settlement for 2026?

- **Nucor:** Agree with OPC.

GENERIC CAPACITY COST RECOVERY FACTOR ISSUES

ISSUE 22: What are the appropriate final capacity cost recovery true-up amounts for the period January 2024 through December 2024?

- **Nucor:** Regarding DEF, agree with OPC. For all other utilities, Nucor takes no position.

ISSUE 23: What are the appropriate capacity cost recovery actual/estimated true-up amounts for the period January 2025 through December 2025?

- **Nucor:** Regarding DEF, agree with OPC. For all other utilities, Nucor takes no position.

ISSUE 24: What are the appropriate total capacity cost recovery true-up amounts to be collected/refunded during the period January 2026 through December 2026?

- **Nucor:** Regarding DEF, agree with OPC. For all other utilities, Nucor takes no position.

ISSUE 25: What are the appropriate projected total capacity cost recovery amounts for the period January 2026 through December 2026?

- **Nucor:** Regarding DEF, agree with OPC. For all other utilities, Nucor takes no position.

ISSUE 26: What are the appropriate projected net purchased power capacity cost recovery amounts to be included in the recovery factor for the period January 2026 through December 2026?

- **Nucor:** Regarding DEF, agree with OPC. For all other utilities, Nucor takes no position.

ISSUE 27: What are the appropriate jurisdictional separation factors for capacity revenues and costs to be included in the recovery factor for the period January 2026 through December 2026?

- **Nucor:** Regarding DEF, agree with OPC. For all other utilities, Nucor takes no position.

ISSUE 28: What are the appropriate capacity cost recovery factors for the period January 2026 through December 2026?

- **Nucor:** Regarding DEF, agree with OPC. For all other utilities, Nucor takes no position.

EFFECTIVE DATE

ISSUE 29: What should be the effective date of the fuel adjustment factors and capacity cost recovery factors for billing purposes?

- **Nucor:** Regarding DEF, agree with OPC. For all other utilities, Nucor takes no position.

ISSUE 30: Should the Commission approve revised tariffs reflecting the fuel adjustment factors and capacity cost recovery factors determined to be appropriate in this proceeding?

- **Nucor:** Regarding DEF, agree with OPC. For all other utilities, Nucor takes no position.

ISSUE 31: Should this docket be closed?

- **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,

STONE MATTHEIS XENOPOULOS & BREW, PC

/s/ Michael K. Lavanga

Peter J. Mattheis

Michael K. Lavanga

Joseph R. Briscar

1025 Thomas Jefferson Street, NW

Suite E-3400

Washington, DC 20007

(202) 342-0800

(202) 342-0807 (fax)

E-mail: pjm@smxblaw.com

mkl@smxblaw.com

jrb@smxblaw.com

Attorneys for Nucor Steel Florida, Inc.

Dated: October 6, 2025

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, 2025, to the following:

Duke Energy

Matthew R. Bernier
Robert L. Pickels
Stephanie A. Cuello
106 E. College Avenue, Suite 800
Tallahassee, FL 32301
FLRegulatoryLegal@duke-energy.com
matthew.bernier@duke-energy.com
robert.pickels@duke-energy.com
stephanie.cuello@duke-energy.com

Duke Energy

Dianne M. Triplett
299 First Avenue North
St. Petersburg, FL 33701
Dianne.triplett@duke-energy.com

Tampa Electric Company

J. Jeffry Wahlen
Malcom N. Means
Virginia Ponder
Ausley McMullen
P.O. Box 391
Tallahassee, FL 32302
jwahlen@ausley.com
mmeans@ausley.com
vponder@ausley.com

Tampa Electric Company

Paula K. Brown
Regulatory Affairs
P.O. Box 111
Tampa, FL 33601-0111
regdept@tecoenergy.com

Florida Power & Light Company

Maria Jose Moncada
David M. Lee
700 Universe Boulevard
Juno Beach, FL 33408
maria.moncada@fpl.com
david.lee@fpl.com

Florida Power & Light Company

Kenneth A. Hoffman
134 W. Jefferson Street
Tallahassee, FL 32301-1859
ken.hoffman@fpl.com

Florida Public Utilities Company

Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
bkeating@gunster.com

Florida Public Utilities Company

Michelle D. Napier
Jowi Baugh
1635 Meathe Drive
West Palm Beach, FL 33411
mnapier@fpuc.com
jbaugh@chpk.com

Office of Public Counsel

Walt Trierweiler
Mary A. Wessling
Patricia A. Christensen
Octavio Ponce
Austin Watrous
Charles J. Rehwinkel
The Florida Legislature
111 W. Madison St., Suite 812
Tallahassee, FL 32399
Trierweiler.walt@leg.state.fl.us
wessling.mary@leg.state.fl.us
christensen.patty@leg.state.fl.us
ponce.octavio@leg.state.fl.us
watrous.austin@leg.state.fl.us
rehwinkel.charles@leg.state.fl.us

Florida Public Service Commission

Ryan Sandy
Office of General Counsel
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850
rsandy@psc.state.fl.us
discovery-gcl@psc.state.fl.us

Southern Alliance for Clean Energy

William C. Garner
Law Office of William C. Garner, PLLC
3425 Bannerman Road
Unit 105, No. 414
Tallahassee, Florida 32312
bgarner@wcglawoffice.com

PCS Phosphate - White Springs

James W. Brew
Laura Wynn Baker
Sarah B. Newman
Stone Mattheis Xenopoulos & Brew, PC
1025 Thomas Jefferson St., NW
Suite E-3400
Washington, DC 20007
jbrew@smxblaw.com
lwb@smxblaw.com
sbn@smxblaw.com

Florida Industrial Power Users Group

Jon C. Moyle, Jr.
Moyle Law Firm
118 North Gadsden Street
Tallahassee, FL 32301
jmoyle@moylelaw.com
mqualls@moylelaw.com

/s/ Michael K. Lavanga

Michael K. Lavanga