# BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Energy conservation cost recovery clause

DOCKET NO.: 20250002-EG 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-2025-0047-PCO-EG, 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 ECCRC and any other relief DEF requests in this proceeding.

### E. STATEMENT ON SPECIFIC ISSUES

## **GENERIC CONSERVATION COST RECOVERY ISSUES**

**ISSUE 1**: What are the final conservation cost recovery 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 2**: What are the appropriate conservation 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 3:** What are the appropriate total conservation adjustment 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 4**: What are the total conservation cost recovery amounts to be collected during the period January 2026 through December 2026?

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

**ISSUE 5**: What are the conservation 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 6**: What should be the effective date of the new conservation cost recovery factors for billing purposes?

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

**ISSUE 7:** Should the Commission approve revised tariffs reflecting the energy conservation cost recovery factors determined to be appropriate in this proceeding?

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

# COMPANY SPECIFIC CONSERVATION COST RECOVERY ISSUES—TAMPA ELECTRIC COMPANY

**ISSUE 8:** What is the Contracted Credit Value for the GSLM-2 and GSLM-3 rate riders for Tampa Electric Company for the period January 2026 through December 2026?

• Nucor: No position.

**ISSUE 9:** What are the residential Price Responsive Load Management (RSVP-1) rate tiers for Tampa Electric Company for the period January 2026 through December 2026?

• Nucor: No position.

ISSUE 10: 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
Stephanie A. Cuello
Robert L. Pickels
106 E. College Avenue, Suite 800
Tallahassee, FL 32301
matthew.bernier@duke-energy.com
stephanie.cuello@duke-energy.com
robert.pickels@duke-energy.com
FLRegulatoryLegal@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
William P. Cox
Joel T. Baker
700 Universe Boulevard
Juno Beach, FL 33408
maria.moncada@fpl.com
will.p.cox@fpl.com
joel.baker@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

Brian Goff 208 Wildlight Ave. Yulee, FL 32097 bgoff@chpk.com

#### Florida Public Utilities Company

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

## Florida Public Utilities Company

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

Jacob Imig
Jennifer Augspurger
Shaw Stiller
Office of General Counsel
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
cmarquez@psc.state.fl.us
jimig@psc.state.fl.us
jaugspurger@psc.state.fl.us
SStiller@psc.state.fl.us
discovery-gcl@psc.state.fl.us

## Florida Industrial Power Users Group

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

<u>/s/ Michael K. Lavanga</u> Michael K. Lavanga