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October 6, 2025

**BY E-PORTAL**

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


**Re: Docket No. 20250001-EI: Fuel and Purchased Power Cost Recovery Clause with  
Generating Performance Incentive Factor**

Dear Mr. Teitzman:

Attached for filing, please find the Florida Public Utilities Company'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  
(850) 521-1706

MEK

cc:/ (certificate of service)

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Fuel and purchased power cost recovery clause with generating performance incentive factor.	DOCKET NO. 20250001-EI DATED: October 6, 2025
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**FLORIDA PUBLIC UTILITIES COMPANY’S  
PREHEARING STATEMENT**

In accordance with the Order Establishing Procedure for this Docket, Order No. PSC-2025-0052-PCO-EI, issued February 10, 2025, Florida Public Utilities Company (“FPUC,” or “Company”) hereby files its Prehearing Statement.

**A. APPEARANCES**

Beth Keating  
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215 South Monroe St., Suite 601  
Tallahassee, FL 32301  
(850) 521-1706  
On behalf of Florida Public Utilities Company

**B. WITNESSES AND EXHIBITS**

i. All Known Witnesses

<u>Witness</u>	<u>Subject</u>	<u>Issue</u>
Jessica Husted* <sup>1</sup>	Final True Up 2024	5
Jessica Husted	Estimated/Actual 2025	6
Jessica Husted	Projection for 2026	7, 8, 14, 15, 16, 17, 18, 29, 30, 31
P. Mark Cutshaw	Special Projects	9, 10

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<sup>1</sup> \*Adopting the Testimony of Brittnee Baker.

ii. All Known Exhibits

<u>Witness</u>	<u>Exhibit</u>	<u>Title</u>	<u>Issue</u>
Baker*	BB-1	Final True Up Schedules (Schedules A, C1 and E1- B for FPUC's Divisions)	5
Husted	JH-1	Estimated/Actual (Schedules E1-A, E1-B, and E1- B1)	6
Husted	JH-2	Schedules E1, E1A, E2, E7, E8, E10 and Schedule A	7, 8, 14, 15, 16, 17, 18, 29, 30, 31

\*Adopted by Witness Jessica Husted by Notice of Substitution of July 25, 2025.

**C. STATEMENT OF BASIC POSITION**

FPUC's Statement of Basic Position

FPUC: The Commission should approve Florida Public Utilities Company's final net true-up for the period January through December 2024, the estimated true-up for the period January through December 2025, and the purchase power cost recovery factors for the period January through December 2026, until subsequently revised by the Commission.

**D. FPUC's POSITION ON THE ISSUES**

**I. FUEL ISSUES**

**COMPANY-SPECIFIC FUEL ADJUSTMENT ISSUES**

**Duke Energy Florida, LLC.**

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

FPUC's Position: No position.

**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?

FPUC's Position: No position.

**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?

FPUC's Position: No position.

**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?

FPUC's Position: No position.

**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?

FPUC's Position: 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?

FPUC's Position: 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?

FPUC's Position: 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?

FPUC's Position: 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?

FPUC's Position: No position.

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

FPUC's Position: No position.

### **Florida Public Utilities Company**

No company-specific fuel issues for Florida Public Utilities Company have been identified at this time.

### **Tampa Electric 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?

FPUC's Position: No position.

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

FPUC's Position: 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?

FPUC's Position: The final, end of period true-up amount for 2024 is an over-recovery of \$3,131,443.

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

FPUC's Position: The Company projects a consolidated over-recovery of \$80,530.

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

FPUC's Position: The total true-up amount to be refunded in 2026 is \$3,211,973.

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

FPUC's Position: The appropriate projected total fuel and purchased power cost recovery amount for the period January 2026 through December 2026 is \$64,162,597. (*Husted, Cutshaw*)

## **COMPANY-SPECIFIC GENERATING PERFORMANCE INCENTIVE FACTOR ISSUES**

### **Duke Energy Florida, LLC.**

**No company-specific GPIF issues for Duke Energy Florida, Inc. have been identified at this time. If such issues are identified, they shall be numbered 9A, 9B, 9C, and so forth, as appropriate.**

### **Florida Power & Light Company**

**No company-specific GPIF issues for Florida Power and Light Company have been identified at this time. If such issues are identified, they shall be numbered 10A, 10B, 10C, and so forth, as appropriate.**

### **Tampa Electric Company**

No company-specific GPIF issues for Tampa Electric Company have been identified at this time. If such issues are identified, they shall be numbered 11A, 11B, 11C, and so forth, as appropriate.

### **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?

FPUC's Position: 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?

FPUC's Position: 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?

FPUC's Position: 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 is \$60,950,524, which includes prior period true-ups. *(Husted)*

**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?

FPUC's Position: The appropriate tax revenue factor is 1.000848. *(Husted)*

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

FPUC's Position: The appropriate factor is 7.580¢ per kWh. *(Husted)*

**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?

FPUC's Position: The appropriate line loss multiplier is 1.0000. *(Husted)*

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

**FPUC's Position:** The appropriate levelized fuel adjustment and purchased power cost recovery factors for the period January 2026 through December 2026 for the Consolidated Electric Division, adjusted for line loss multipliers and including taxes, are as follows:

<i>Rate Schedule</i>	<i>Adjustment</i>
RS	\$0.09178
GS	\$0.09206
GSD	\$0.08861
GSLD	\$0.08711
LS	\$0.07818
<u>Step rate for RS</u>	
RS Sales	\$0.09178
RS with less than 1,000 kWh/month	\$0.08820
RS with more than 1,000 kWh/month	\$0.10070

## **II. CAPACITY ISSUES**

### **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 2025?

**FPUC's Position:** No position.



### **Florida Power & Light Company**

No company-specific capacity cost recovery factor issues for Florida Power & Light Company have been identified at this time. If such issues are identified, they will be numbered 20A, 20B, 20C, and so forth, as appropriate.

### **Tampa Electric Company**

No company-specific capacity cost recovery factor issues for Tampa Electric Company have been identified at this time. If such issues are identified, they will be numbered 21A, 21B, 21C, and so forth, as appropriate.

## **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?

**FPUC's Position:** No position.

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

**FPUC's Position:** 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?

**FPUC's Position:** No position.

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

**FPUC's Position:** 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?

**FPUC's Position:** 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?

FPUC's Position: No position.

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

FPUC's Position: No position.

### **III. EFFECTIVE DATE**

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

FPUC's Position: The effective date for FPUC's cost recovery factors should be the first billing cycle for January 1, 2026, which could include some consumption from the prior month. Thereafter, customers should be billed the approved factors for a full 12 months, unless the factors are otherwise modified by the Commission. (*Husted*)

**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?

FPUC's Position: Yes. The Commission should approve revised tariffs reflecting the fuel adjustment factors and capacity cost recovery factors determined to be appropriate in this proceeding. The Commission should direct staff to verify that the revised tariffs are consistent with the Commission's decision. (*Husted*)

### **IV. MISCELLANEOUS ISSUES**

**ISSUE 31:** Should this docket be closed?

FPUC's Position: This is a continuing docket and should remain open.

**V. OTHER**

e. Stipulated Issues

While not a party to 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 at this time.

g. Pending Confidentiality Claims or Requests

FPUC has no pending requests for confidential classification.

h. Objections to Witness Qualifications as an Expert

FPUC has no objections to any witnesses' qualifications at this time.

i. Compliance with Order No. PSC-2025-0052-PCO-EI

FPUC has complied with all requirements of the Order Establishing Procedure entered in this docket, as well as the subsequent orders issued modifying that Order.

RESPECTFULLY SUBMITTED this 6th day of October, 2025.

BY: 

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215 South Monroe St., Suite 601  
Tallahassee, FL 32301  
(850) 521-1706


*Attorneys for Florida Public Utilities Company*

**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 6th day of October, 2025:

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