

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchased Power Cost Recovery
Clause and Generating Performance Incentive Factor

Docket No. 20250001-EI

Filed: October 6, 2025

FLORIDA POWER & LIGHT COMPANY'S PREHEARING STATEMENT

Florida Power & Light Company ("FPL"), pursuant to Order No. PSC-2025-0052-PCO-EI, hereby submits its Prehearing Statement regarding the issues to be addressed at the hearing scheduled for November 4-7, 2025.

1. WITNESSES

WITNESS	SUBJECT MATTER	ISSUE Nos.
Direct		
Michael V. Cashman	2024 Asset Optimization Program Gains; Incremental Optimization Costs; 2026 Risk Management Plan;	2A-2D, 2F, 5-8
Daniel DeBoer	Projected Nuclear Fuel Costs; Projected Incremental Plant Security; Fukushima-Related Costs	8
Charles R. Rote	FPL 2024 Generation Performance Incentive Factor ("GPIF") Reward/Penalty; FPL 2026 GPIF Target/Ranges	12, 13
Amin Mohomed	FPL Fuel Adjustment True-ups and Projections; FPL SolarTogether Subscription Credit; FPL Capacity Cost Recovery True-ups and Projections; Fuel Cost Recovery Factor Calculations; Capacity Cost Recovery Factor Calculations; FPL's 2026 Project Revenue Requirements; Tariff Rates; Request for Tariff Approval; 2026 FCR and CCR Factors Effective Date	2E, 5-8, 14-18, 22-28

2. EXHIBITS

WITNESS	PROFFERED BY	EXHIBIT No.	DESCRIPTION	ISSUE No.
Direct				
Charles R. Rote	FPL	CRR-1	2024 GPIF Results	12
Charles R. Rote	FPL	CRR-2	Generating Performance Incentive Factor	13
Michael V. Cashman	FPL	MVC-1	2024 Asset Optimization Program Results (Confidential)	2A
Michael V. Cashman	FPL	MVC-2	2026 Projected Dispatch Costs and Availability	8
Amin Mohomed	FPL	AM-1	2024 FCR Final True-Up	5
Amin Mohomed	FPL	AM-2	2024 CCR Final True-Up (Confidential)	22
Amin Mohomed	FPL	AM-3	2025 FCR Actual Estimated	8
Amin Mohomed	FPL	AM-4	2025 CCR Actual Estimated	23
Amin Mohomed	FPL	AM-5	2026 FCR Projections	8, 14-18
Amin Mohomed	FPL	AM-6	2026 FCR Projections (Confidential)	24-28

3. STATEMENT OF BASIC POSITION

FPL’s 2026 Fuel and Purchased Power Cost Recovery factors and Capacity Cost Recovery factors are appropriate and reasonable and should be approved. FPL’s proposed FCR factors for the period January 2026 through December 2026 reflect the recovery of projected total net fuel costs of \$4,096,060,586. This amount includes an estimated 2025 net true-up, the Generating Performance Incentive Factor (“GPIF”) penalty, FPL’s 2026 projected fuel costs, FPL’s portion of the 2024 Jurisdictional Asset Optimization Gains, and the projected 2026 FPL SolarTogether Credit. FPL’s proposed CCR factors for the period January 2026 through December 2026 reflect the recovery of projected total net capacity costs of \$60,446,078. This amount includes the 2024 final true-up, the 2025 actual/estimated under-recovery, and FPL’s 2026 projected fuel costs. In addition, FPL’s 2026 Risk Management Plan and GPIF targets and ranges are reasonable and should be approved.

4. STATEMENT OF ISSUES AND POSITIONS

COMPANY-SPECIFIC FUEL ADJUSTMENT ISSUES

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?

FPL: FPL's asset optimization activities in 2024 delivered total gains of \$125,038,686. Of the total gains, FPL is allowed to retain \$47,019,343 (system). (Cashman)

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?

FPL: The amount of Incremental Optimization Costs for Personnel, Software, and Hardware Costs that FPL should be allowed to recover through the fuel clause is \$864,547 for the period January 2024 through December 2024. (Cashman)

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?

FPL: The amount of Incremental Optimization Costs under the Asset Optimization Program that FPL should be allowed to recover through the fuel clause for variable power plant O&M attributable to off-system sales for the period January 2024 through December 2024 is \$1,253,117. (Cashman)

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?

FPL: FPL has included a credit of \$56,356 as the amount of Incremental Optimization Costs under the Asset Optimization Program for variable power plant O&M avoided due to economy purchases for the period January 2024 through December 2024. The Commission should authorize FPL to flow this credit to customers through the Fuel Clause. (Cashman)

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?

FPL: \$260,786,194. (Mohomed)

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

FPL: Yes. FPL’s 2026 Risk Management Plan complies with the Hedging Guidelines established by this Commission and should be approved. (Cashman)

GENERIC FUEL ADJUSTMENT ISSUES

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

FPL: \$122,946,987 over-recovery. (Mohomed)

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

FPL: \$260,204,595 under-recovery. (Mohomed)

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

FPL: \$137,257,698 under-recovery. (Mohomed)

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

FPL: \$3,656,663,150 jurisdictionalized and adjusted for line losses, excluding prior period true-ups, FPL’s portion of Asset Optimization Program gains, FPL’s projected 2026 SolarTogether Credit amount and the GPIF penalty. (Mohomed)

COMPANY-SPECIFIC GPIF ISSUES

No company-specific GPIF issues for FPL have been identified at this time. If such issues are identified, they shall be numbered 10A, 10B, 10C, 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?

FPL: \$3,499,890 net penalty. (Rote)

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?

FPL: FPL's GPIF targets and ranges for January 2026 through December 2026 are:

Plant/Unit	EAF			ANOHR		
	Target	Maximum		Target	Maximum	
	EAF (%)	EAF (%)	Savings (\$000's)	ANOHR BTU/KWH	ANOHR BTU/KWH	Savings (\$000's)
Cape Canaveral 3	80.6	83.1	787	6,813	6,904	1,648
Dania Beach 7	72.9	76.4	2,748	6,474	6,611	2,584
Fort Myers 2	93.4	95.9	175	7,394	7,641	3,742
Manatee 3	88.4	91.9	1,516	6,607	7,041	9,987
Martin 8	88.5	92.0	920	6,555	6,825	18,554
Okeechobee 1	72.4	75.9	696	6,392	6,469	11,425
Port Everglades 5	92.5	95.0	2,802	6,775	6,951	1,959
Riviera 5	71.6	74.1	244	6,670	6,751	3,982
Sanford 5	91.7	94.7	165	7,275	7,388	1,791
St. Lucie 1	93.6	96.6	6,377	10,385	10,482	447
St. Lucie 2	82.1	85.1	5,087	10,312	10,414	306
Turkey Point 3	73.1	76.1	4,166	10,584	10,707	465
Turkey Point 4	93.6	96.6	5,451	10,438	10,559	490
Turkey Point 5	94.6	97.1	1,351	7,140	7,260	1,558
West County 1	77.1	80.1	690	7,103	7,225	2,490
West County 2	87.4	89.9	789	7,012	7,116	3,060
West County 3	85.8	88.3	784	7,140	7,241	2,640

(Rote)

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?

FPL: \$4,096,060,586 including the estimated true-up, FPL's portion of Asset Optimization gains, FPL's 2026 SolarTogether Credit amount and the GPIF penalty. (Mohomed)

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?

FPL: 0%. FPL's 2021 Settlement Agreement removed the Regulatory Assessment Fee from base and clause rates and is presented on the bill as its own line item. (Mohomed)

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

FPL: The Appropriate levelized fuel cost recovery factor is 3.189 cents/kWh. (Mohomed)

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?

FPL: The appropriate fuel cost recovery line loss multipliers are provided in response to Issue No. 20. (Mohomed)

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

FPL:

ESTIMATED FOR THE PERIOD OF: JANUARY 2026 THROUGH DECEMBER 2026					
			(1)	(2)	(3)
Line No.	Groups	Rate Classes	Average Factor	Fuel Recovery Loss Multiplier	Fuel Recovery Factor
1	A	RS-1 first 1,000 kWh	3.189	1.00393	2.893
2	A	RS-1 all additional kWh	3.189	1.00393	3.893
3					
4	A	GS-1, SL-2, SL-2M, GSCU-1	3.189	1.00393	3.202
5					
6	A-1	SL-1, SL-1M, OL-1, PL-1, LT-1, OS 1/III ⁽¹⁾	3.143	1.00393	3.156
7					
8	B	GSD-1, GSD-1EV	3.189	1.00384	3.201
9					
10	C	GSLD-1, GSLD-1EV, CS-1	3.189	1.00272	3.198
11					
12	D	GSLD-2, CS-2, OS-2, MET, GSLD-2EV	3.189	0.99238	3.165
13					
14	E	GSLD-3, CS-3, LLCs1, LLCs2	3.189	0.98412	3.075
15					
16	A	GST-1 On-Peak	3.414	1.00393	3.428
17	A	GST-1 Off-Peak	3.092	1.00393	3.104
18					
19	A	RTR-1 On-Peak			0.226
20	A	RTR-1 Off-Peak			(0.098)
21					
22	A	RS2-EV On-Peak	3.414	1.00393	3.428
23	A	RS2-EV Off-Peak	3.092	1.00393	3.104
24					
25	B	GSDT-1, CILC-1(G), SST-1D(1), HLFT-1 On-Peak	3.414	1.00384	3.428
26	B	GSDT-1, CILC-1(G), SST-1D(1), HLFT-1 Off-Peak	3.092	1.00384	3.103
27					
28	C	GSLDT-1, CST-1, SST-1D(2), HLFT-2 On-Peak	3.414	1.00272	3.424
29	C	GSLDT-1, CST-1, SST-1D(2), HLFT-2 Off-Peak	3.092	1.00272	3.100
30					
31	D	GSLDT-2, CST-2, SST-1D(3), HLFT-3 On-Peak	3.414	0.99273	3.390
32	D	GSLDT-2, CST-2, SST-1D(3), HLFT-3 Off-Peak	3.092	0.99273	3.089
33					
34	E	GSLDT-3, CST-3, CILC-1(T), SST-1(T), ISST-1(T) On-Peak	3.414	0.98412	3.292
35	E	GSLDT-3, CST-3, CILC-1(T), SST-1(T), ISST-1(T) Off-Peak	3.092	0.98412	2.981
36					
37	F	CILC-1(D), ISST-1(D) On-Peak	3.414	0.99141	3.385
38	F	CILC-1(D), ISST-1(D) Off-Peak	3.092	0.99141	3.085
39					
40		⁽¹⁾ Weighted average 18% on-peak and 84% off-peak			

ESTIMATED FOR THE PERIOD OF: JANUARY 2026 THROUGH DECEMBER 2026					
			(1)	(2)	(3)
Line No.	Groups	Rate Schedule	Average Factor	Fuel Recovery Loss Multiplier	Fuel Recovery Factor
1	B	GSD(T)-1 On-Peak	3.479	1.00384	3.492
2	B	GSD(T)-1 Off-Peak	3.151	1.00384	3.163
3					
4	C	GSLD(T)-1 On-Peak	3.479	1.00272	3.489
5	C	GSLD(T)-1 Off-Peak	3.151	1.00272	3.159
6					
7	D	GSLD(T)-2 On-Peak	3.479	0.99273	3.454
8	D	GSLD(T)-2 Off-Peak	3.151	0.99273	3.128

(Mohomed)

COMPANY-SPECIFIC CAPACITY COST RECOVERY FACTOR ISSUES

No company-specific capacity cost recovery factor issues for FPL have been identified at this time. If such issues are identified, they will be numbered 20A, 20B, 20C, 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?

FPL: \$11,087,053 over-recovery. (Mohomed)

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

FPL: \$3,251,278 under-recovery. (Mohomed)

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?

FPL: \$7,717,318 over-recovery. (Mohomed)

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

FPL: \$68,163,396. (Mohomed)

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?

FPL: \$60,446,078. (Mohomed)

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?

FPL:

<u>ENERGY</u>	
Retail Energy Jurisdictional Factor - Base/Solar	95.7002%
Retail Energy Jurisdictional Factor - Intermediate	94.0004%
Retail Energy Jurisdictional Factor - Peaking	95.6020%
<u>DEMAND</u>	
Retail Demand Jurisdictional Factor - Transmission	88.4813%
Retail Demand Jurisdictional Factor - Base/Solar	95.9260%

Retail Demand Jurisdictional Factor - Intermediate	95.3530%
Retail Demand Jurisdictional Factor - Peaking	94.5168%
Retail Demand Jurisdictional Factor - Distribution	100.0000%

GENERAL PLANT

Retail General Plant Jurisdictional Factor - Labor	96.9171%
	(Mohomed)

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

FPL:

Capacity Recovery Factor (\$/KW)	Capacity Recovery Factor (\$/kwh)	RDC (\$/KW)	DDC (\$/KW)
	0.00052		
	0.00050		
0.16			
	0.00023		
0.18			
0.17			
0.17			
		0.02	0.01
		0.02	0.01
0.18			
0.17			
0.15			
	0.00006		
	0.00030		

(Mohomed)

EFFECTIVE DATE

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

FPL: The factors shall be effective commencing January 1, 2026. These charges should continue in effect until modified by subsequent order of this Commission.
(Mohomed)

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?

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

ISSUE 32: Should this docket be closed?

FPL: This is a continuing docket and should remain open. (Mohomed)

5. STIPULATED ISSUES

FPL: None at this time.

6. PENDING MOTIONS

FPL: None at this time.

7. PENDING REQUESTS FOR CONFIDENTIALITY

1. Florida Power & Light Company's Request for Confidential Classification of information provided in response to SACE's 1st Request for Production of Documents (Nos. 8 and 10), dated September 25, 2025. [DN 13963-2025]
2. Florida Power & Light Company's Request for Confidential Classification of materials provided in Exhibit AM-6 to prepared testimony of witness Amin Mohomed, dated September 4, 2025. [DN 09120-2025]
3. Florida Power & Light Company's Request for Confidential Classification of materials provided in revised 2026 risk management plan, dated September 2, 2025. [DN 08851-2025]
4. Florida Power & Light Company's Request for Extension of Confidential Classification of materials provided pursuant to Audit, dated August 29, 2025. [DN 08535-2025]

8. OBJECTIONS TO WITNESS QUALIFICATIONS AS AN EXPERT

FPL: None at this time.

9. REQUEST FOR SEQUESTRATION OF WITNESSES

FPL: None at this time.

10. STATEMENT OF COMPLIANCE WITH ORDER ESTABLISHING PROCEDURE

FPL: There are no requirements of the Order Establishing Procedure with which FPL cannot comply.

Respectfully submitted this 6th day of October 2025.

By: s/ Maria Jose Moncada

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CERTIFICATE OF SERVICE
Docket No. 20250001-EI

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished
by electronic delivery on this 6th day of October 2025 to the following:

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