

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition to determine need for modernization of Port Everglades Plant, by Florida Power & Light Company.

DOCKET NO. 110309-EI

DATED: January 17, 2012

COMMISSION  
CLERK

12 JAN 17 AM 9:23

RECEIVED-FPSC

COMMISSION STAFF'S PREHEARING STATEMENT

Pursuant to Order No. PSC-11-0565-PCO-EI, issued December 9, 2011, the Staff of the Florida Public Service Commission files its Prehearing Statement.

a. All Known Witnesses

Staff has no known witnesses at this time.

b. All Known Exhibits

Staff has no known exhibits at this time.

c. Staff's Statement of Basic Position

Staff's positions are preliminary and based on materials filed by the parties and on discovery. The preliminary positions are offered to assist the parties in preparing for the hearing. Staff's final positions will be based upon all the evidence in the record and may differ from the preliminary positions stated herein.

d. Staff's Position on the Issues

**ISSUE 1:** Is there a need for the proposed modernization of Florida Power & Light's Port Everglades plant, taking into account the need for electric system reliability and integrity, as this criterion is used in Section 403.519(3), Florida Statutes?

**POSITION:** Staff has no position at this time.

**ISSUE 2:** Are there any renewable energy sources and technologies or conservation measures taken by or reasonably available to Florida Power & Light Company which might mitigate the need for the proposed modernization of Florida Power & Light's Port Everglades plant?

**POSITION:** Staff has no position at this time.

**ISSUE 3:** Is there a need for the proposed modernization of Florida Power & Light's Port Everglades plant, taking into account the need for adequate electricity at a reasonable cost, as this criterion is used in Section 403.519(3), Florida Statutes?

**POSITION:** Staff has no position at this time.

DOCUMENT NUMBER-DATE

00310 JAN 17 2012

FPSC-COMMISSION CLERK

**ISSUE 4:** Is there a need for the proposed modernization of Florida Power & Light's Port Everglades plant, taking into account the need for fuel diversity, as this criterion is used in Section 403.519(3), Florida Statutes?

**POSITION:** Staff has no position at this time.

**ISSUE 5:** Will the proposed modernization of Florida Power & Light's Port Everglades plant provide the most cost-effective source of power, as this criterion is used in Section 403.519(3), Florida Statutes?

**POSITION:** Staff has no position at this time.

**ISSUE 6:** Based on the resolution of the foregoing issues, should the Commission grant Florida Power & Light Company's petition to determine the need for the proposed modernization of Florida Power & Light's Port Everglades plant?

**POSITION:** Staff has no position at this time.

**ISSUE 7:** Should this docket be closed?

**POSITION:** Staff has no position at this time.

e. Stipulated Issues

Staff is not aware of any stipulated issues at this time.

f. Pending Motions

Staff has no pending motions.

g. Pending Confidentiality Claims or Requests

Staff has no pending claims of confidentiality.

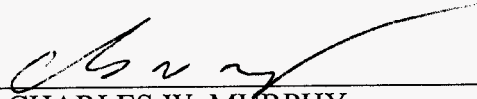
h. Objections to Witness Qualifications as an Expert

Staff has no objections to any witness' qualifications as an expert in this proceeding.

i. Compliance with Order No. PSC-11-0565-PCO-EI

Staff has complied with all requirements of the Order Establishing Procedure entered in this docket.

Respectfully submitted this 17th day of January, 2012.



---

CHARLES W. MURPHY  
STAFF COUNSEL  
FLORIDA PUBLIC SERVICE COMMISSION  
Gerald L. Gunter Building  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850  
Telephone: (850) 413-6199

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition to determine need for  
modernization of Port Everglades Plant, by  
Florida Power & Light Company.

DOCKET NO. 110309-EI


DATED: January 17, 2012

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original of STAFF'S PREHEARING STATEMENT has been filed with Office of Commission Clerk and one copy has been furnished to the following by electronic and U.S. Mail, on this 17th day of January, 2012:

Florida Power & Light Company  
Mr. Ken Hoffman  
215 South Monroe Street  
Suite 810  
Tallahassee FL 32301-1858

Florida Power & Light Company  
John T. Butler  
700 Universe Blvd  
Juno Beach FL 33408-0420



CHARLES W. MURPHY  
STAFF COUNSEL  
FLORIDA PUBLIC SERVICE COMMISSION  
Gerald L. Gunter Building  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850  
Telephone: (850) 413-6199