

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Nuclear Cost     )  
Recovery Clause     )

Docket No. 20170009-EI  
Filed: July 20, 2017

**FLORIDA POWER & LIGHT COMPANY’S PREHEARING STATEMENT**

Florida Power & Light Company (“FPL” or the “Company”), pursuant to Section 366.93, Florida Statutes, and Rule 25-6.0423, Florida Administrative Code, hereby files with the Florida Public Service Commission (“FPSC” or “Commission”) its Prehearing Statement in connection with its petitions filed March 1, 2017, and May 1, 2017.

**I. FPL WITNESSES**

**A. DIRECT**

<b>Witness</b>	<b>Subject Matter</b>	<b>Issues</b>
Steven D. Scroggs FPL	Describes the deliberate, step-wise process FPL is employing in the development of the Turkey Point 6 & 7 project; provides a description of key project management decisions and internal project budget, schedule, and cost controls; supports the prudence of actual costs incurred for the project during 2015 and 2016 and the reasonableness of FPL’s decision to complete its licensing efforts; also supports FPL’s request to defer cost recovery beginning in 2017.	1, 2, 3, 5, 9, 10
Jennifer Grant-Keene FPL	Computes and presents the final true-up of 2015 and 2016 costs, resulting in a \$7.3 million over-recovery to be reflected in the capacity cost recovery clause (“CCRC”) in 2018; discusses the accounting controls FPL relies upon to help ensure only correct costs are appropriately charged to the Turkey Point 6 & 7 project.	1, 2, 8

**B. REBUTTAL**

Steven D. Scroggs FPL	Rebuts Mr. Meehan’s assertions that an economic feasibility analysis as well as a quantification of project benefits and a real option value analysis are necessary at this time for the Commission to consider whether FPL’s decision to complete final licensing steps is reasonable; explains that completing licensing is necessary for FPL’s customers to secure the potential to obtain value from the licensing investment made thus far.	5
John J. Reed Concentric Energy Advisors	Rebuts Mr. Meehan’s testimony by supporting the reasonableness of FPL’s decision to complete Turkey Point 6 & 7 licensing, particularly in light of the low level of incremental costs needed to obtain the COL; points out that FPL’s actions are consistent with others in the industry; concludes it would be unreasonable and imprudent for FPL to abandon the Project at this late stage of licensing.	5

**II. EXHIBITS**

**A. DIRECT**

<b>Exhibits</b>	<b>Witness</b>	<b>Sponsor</b>	<b>Description</b>
SDS-1	Steve Scroggs/Jennifer Grant-Keene	FPL	2015 T- Schedules Turkey Point 6 & 7 Site Selection and Pre-Construction Costs
SDS-2	Steve Scroggs/Jennifer Grant-Keene	FPL	2016 T- Schedules Turkey Point 6 & 7 Site Selection and Pre-Construction Costs
SDS-3	Steve Scroggs	FPL	Turkey Point 6 & 7 Licenses, Permits and Approvals
SDS-4	Steve Scroggs	FPL	Turkey Point 6 & 7 Procedures and Work Instructions
SDS-5	Steve Scroggs	FPL	Turkey Point 6 & 7 Project Reports
SDS-6	Steve Scroggs	FPL	Turkey Point 6 & 7 Project Instructions and Forms
SDS-7	Steve Scroggs	FPL	Turkey Point 6 & 7 Summary Tables of the 2015 Expenditures
SDS-8	Steve Scroggs	FPL	Turkey Point 6 & 7 Summary Tables of the 2016 Expenditures

SDS-9	Steve Scroggs/Jennifer Grant-Keene	FPL	Turkey Point 6 & 7 Site Selection and Pre-construction Nuclear Filing Requirement Schedules
SDS-10	Steve Scroggs	FPL	Steps in Turkey Point 6 & 7 Licensing
JGK-1	Jennifer Grant-Keene	FPL	Final True-Up of 2015 Revenue Requirements
JGK-2	Jennifer Grant-Keene	FPL	Final True-Up of 2016 Revenue Requirements
JGK-3	Jennifer Grant-Keene	FPL	2018 Revenue Requirements

## B. REBUTTAL

Exhibits	Witness	Sponsor	Description
JJR-1	John Reed	FPL	John J. Reed Resume
JJR-2	John Reed	FPL	Expert Testimony of John J. Reed

In addition to the above pre-filed exhibits, FPL reserves the right to utilize any exhibit introduced by any other party. FPL additionally reserves the right to introduce any additional exhibits necessary for rebuttal, cross-examination, or impeachment at the hearing.

## III. STATEMENT OF BASIC POSITION

Section 403.519(4), Florida Statutes, Section 366.93, Florida Statutes, and Rule 25-6.0423, Florida Administrative Code (“the Rule”) establish the legal and regulatory framework for the recovery of costs in the development of nuclear generation in Florida.<sup>1</sup> Section 403.519(4), Florida Statutes, applies to the determination of need for a nuclear-fueled power plant as well as the cost recovery process. This section emphasizes the Florida Legislature’s desire to improve fuel diversity, reduce dependence on fuel oil and natural gas, reduce air emission compliance costs, and contribute to the long-term stability and reliability of the electric

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<sup>1</sup>All statutory references are to the 2016 Florida Statutes, and all rule references are to the Florida Administrative Code.

grid in Florida; establishes the prudence standard that shall be applied in nuclear cost recovery proceedings; and makes clear that a utility is entitled to recover all prudently incurred costs. Specifically, the statute states that after a determination of need is granted, “the right of a utility to recover any costs incurred prior to commercial operation, including but not limited to costs associated with the siting, design, licensing, or construction of the plant...shall not be subject to challenge” unless a preponderance of the evidence supports a finding that “certain costs” were imprudently incurred. Section 403.519(4)(e) further makes clear that (i) proceeding with the construction of the nuclear power plant following an order by the Commission approving the need for it “shall not constitute or be evidence of imprudence” and (ii) “imprudence shall not include any cost increases due to events beyond the utility’s control.” *See* § 403.519(4)(e), Fla. Stat.

Section 366.93, Florida Statutes, requires the Commission to establish by rule a cost recovery framework that promotes utility investment in nuclear power plants and allows for the recovery of all prudently incurred preconstruction costs and the carrying costs on construction cost balances. It also entitles utilities to increase their base rates upon commercial operation of the nuclear power plant, requires annual reporting of budgeted and actual costs, and provides for cost recovery should the project be cancelled. *See* §366.93(4), (5), and (6), Fla. Stat., respectively. In response to this legislative direction, the Commission promulgated Rule 25-6.0423, Florida Administrative Code (“the Rule”). The stated purpose of the Rule is to establish an alternative cost recovery mechanism that promotes utility investment in nuclear power plants and to allow for recovery of all prudently incurred costs. It also provides for the recovery of reasonable actual/estimated costs for the current year and reasonable projected costs for the following year.

FPL's Turkey Point 6 & 7 project qualifies for cost recovery pursuant to the Nuclear Cost Recovery ("NCR") statute and Rule. The project was granted an affirmative determination of need by the Commission pursuant to Section 403.519(4), Florida Statutes, and FPL therefore is entitled to recover all its prudent and reasonable costs. *See* Order No. PSC-08-0237-FOF-EI, issued April 11, 2008 (making an affirmative determination of need for Turkey Point 6 & 7).

Rather than seeking recovery of FPL's 2017 and 2018 Turkey Point 6 & 7 costs at this time,<sup>2</sup> FPL has requested to defer cost recovery and the Commission's related reviews until such time as the Company makes a decision regarding the initiation of preconstruction work on the Project. Granting FPL's request would have the effect of suspending the NCR-related charges to customers as well as obviating the need for the FPL portion of the annual NCR proceeding during the time of the deferral. FPL's proposal is particularly appropriate given the stage of the Project: FPL is completing its licensing activities and entering a period of reduced spending while FPL "pauses" to maintain the approvals it has received and observe the progress being made, and issues being faced, at other new nuclear construction projects.

FPL's deferral request is consistent with the Commission's prior decisions allowing for the deferral of cost recovery as well as its prior determination that it has "the authority to address options relating to the timing of recovery..." pursuant to its "broad ratemaking powers" so long as the Commission does not run afoul of the statutory mandate to allow a utility to recover all prudently incurred costs. *See* Docket No. 100009-EI, Order No. PSC-11-0095-FOF-EI, pp. 8-9 (explaining that the Commission had the authority to approve a rate management plan for Progress Energy Florida, but did not have the authority to require a risk sharing mechanism). FPL's deferral request invokes the Commission's broad ratemaking authority while preserving the Commission's ability to allow for the recovery of all prudently incurred costs pursuant to

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<sup>2</sup> Pursuant to Section 366.93(3) and Rule 25-6.0423(6), a utility "may" petition for cost recovery.

Section 366.93 and Rule 25-6.0423 upon request, satisfaction of all necessary reviews, and consideration of any challenges at a future time.

The final true-up of FPL's 2015 and 2016 costs, which have been the subject of prior cost recovery requests, is unaffected by FPL's deferral request. As demonstrated in the testimony, exhibits, and NFRs filed in this docket, FPL's expenditures in 2015 and 2016 were prudently incurred. No party has filed testimony disputing the prudence of any particular 2015 or 2016 cost or the calculation of the \$7.3 million over-recovery that FPL proposes to return to customers through the CCRC in 2018. Additionally, the FPSC Office of Auditing Performance and Analysis's 2015 and 2016 reports on FPL's project management internal controls conclude that FPL's project internal controls, risk evaluation, and management oversight for the Turkey Point 6 & 7 project are adequate and responsive to current project requirements. Accordingly, the prudence and final true-up of FPL's 2015 and 2016 Turkey Point 6 & 7 costs are unopposed and should be approved.

Lastly, FPL has requested the Commission to determine that FPL's decision to complete the final licensing steps underway for Turkey Point 6 & 7 is reasonable and appropriate. This issue is similar to issues considered by the Commission in prior NCR dockets, in which the Commission was asked to review the reasonableness of a company decision or action.<sup>3</sup> This is the only portion of FPL's request that is the subject of any prefiled intervenor testimony in this

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<sup>3</sup> See Order No. PSC-09-0604-PHO-EI ("Issue 7A: Is FPL's decision in 2008 to pursue an alternative to an Engineering Procurement Construction (EPC) contract for the Turkey Point 6 & 7 project prudent and reasonable?" and "Issue 21A: Was it reasonable and prudent for PEF to execute its EPC contract at the end of 2008? If the Commission finds that this action was not reasonable and prudent, what actions, if any, should the Commission take?"); Order No. PSC-10-0538-PHO-EI ("Issue 7: Is PEF's decision to continue pursuing a Combined Operating License from the Nuclear Regulatory Commission for Levy Units 1 & 2 reasonable? If not, what action, if any, should the Commission take?" and "Issue 19: Is FPL's decision to continue pursuing a Combined Operating License from the Nuclear Regulatory Commission for Turkey Point Units 6 & 7 reasonable? If not, what action, if any, should the Commission take?"); Order No. PSC-11-0335-PHO-EI ("Issue 3A: Was FPL's 2010 decision to continue pursuing a Combined Operating License from the Nuclear Regulatory Commission for Turkey Point Units 6 & 7 reasonable? If not, what action, if any, should the Commission take?"); Order No. PSC-12-0455-PHO-EI ("Issue 16: Is it reasonable for PEF to incur or expend all of the estimated and projected Crystal River Unit 3 Uprate project expenditures in 2012 and 2013 in the absence of a final decision to repair or retire CR3?")

case. Mr. Meehan, on behalf of the City of Miami, claims an economic feasibility analysis and other quantitative analyses are necessary for the Commission to assess the reasonableness of completing licensing. Respectfully, his conclusions are not supportable. His testimony overlooks just how meaningless such analyses would be at this time from a project management perspective and, therefore, from the Commission's perspective. As further explained by FPL witness Scroggs, completing the licensing phase would secure the opportunity to add nuclear generation for at least the next 20 years, while halting the licensing work at this stage could permanently prevent FPL's customers from being able to attain any value from the licensing investment made thus far. As discussed further in Mr. Scroggs's and Mr. Reed's rebuttal testimonies, it is reasonable for FPL to complete licensing.

#### **IV. ISSUES AND POSITIONS**

##### **A. FPL SPECIFIC ISSUES**

**ISSUE 1: Should the Commission find that FPL's 2015 and 2016 project management, contracting, accounting and cost oversight controls were reasonable and prudent for the Turkey Point Units 6 & 7 project?**

**FPL:** Yes. FPL relied on its comprehensive corporate and overlapping business unit controls. These controls included FPL's Accounting Policies and Procedures; financial systems and related controls; procurement processes and controls; and Business Unit specific controls. Project specific controls include procedures and work/desktop instructions and regular reporting, providing governance and oversight of project cost and schedule processes. The project management, cost estimation, and risk management attributes of FPL were highly developed, well documented, and adhered to by the project team. FPL's management decisions with respect to the Turkey Point 6 & 7 project were the product of properly qualified, well-informed FPL management following appropriate procedures and internal controls. There is no testimony to the contrary. (Scroggs, Grant-Keene)

**ISSUE 2: What jurisdictional amounts should the Commission approve as FPL's actual 2015 and 2016 prudently incurred costs and final true-up amounts for the Turkey Point Units 6 & 7 Project?**

**FPL:** 2015: For cost recovery purposes, the Commission should approve FPL’s final 2015 Preconstruction expenditures of \$17,309,494 (jurisdictional, excluding Initial Assessment costs), and the resulting 2015 true-up amount of (\$1,328,727). The Commission also should approve actual 2015 Preconstruction carrying charges of \$6,668,729 and the resulting true-up amount of \$22,171; and actual 2015 Site Selection carrying charges of \$160,088 and the resulting true-up amount of \$345. FPL’s 2015 expenditures were supported by comprehensive procedures, processes and controls that help ensure those expenditures were prudently incurred. The net 2015 jurisdictional true-up amount of (\$1,306,211) should be included in FPL’s 2018 NCR amount. There is no testimony to the contrary. (Scroggs, Grant-Keene)

2016: For cost recovery purposes, the Commission should approve FPL’s final 2016 Preconstruction expenditures of \$15,673,982 (jurisdictional), and the resulting 2016 true-up amount of (\$5,383,328). The Commission also should approve actual 2016 Preconstruction carrying charges of \$7,007,051 and the resulting true-up amount of (\$615,469); and actual 2016 Site Selection carrying charges of \$159,395 and the resulting true-up amount of (\$193). FPL’s 2016 expenditures were supported by comprehensive procedures, processes and controls that help ensure those expenditures were prudently incurred. The net 2016 jurisdictional true-up amount of (\$5,998,991) should be included in FPL’s 2018 NCR amount. There is no testimony to the contrary. (Scroggs, Grant-Keene)

**ISSUE 3:** **Should the Commission approve FPL’s request to defer recovery of costs for the Turkey Point Units 6 & 7 Project incurred after December 31, 2016, pursuant to Section 366.93 F.S., and Rule 25-6.0423 F.A.C.? If so, what type of information should FPL report on an annual basis in the Nuclear Cost Recovery docket?**

**FPL:** Yes. FPL expects to receive its Combined Operating License from the Nuclear Regulatory Commission in late 2017 or early 2018, and FPL’s near term plan is to “pause” to focus only on completing licensing, maintaining approvals received, and learning from the experience at first wave new nuclear construction projects. FPL’s deferral request relieves the Commission, its Staff, and all parties from the administrative burden of an annual docketed proceeding during a time of relatively low project spending, while preserving all parties’ opportunities to challenge cost recovery in the future, when it is requested. (Scroggs)

Nothing in Section 366.93 or Rule 25-6.0423 precludes the Commission from granting FPL’s request. Indeed, deferral is consistent with the Commission’s broad ratemaking authority as well as its specific statutory authority to allow FPL’s recovery of all prudently incurred costs. *See* Order No. PSC-11-0095-FOF-EI, pp. 8-9. Several NCR deferral requests,

for both FPL and Duke Energy Florida, have been granted in the past. *See, e.g.*, Order No. PSC-16-0266-PCO-EI, p. 3 (approving FPL’s motion to defer and noting that “neither Section 366.93 F.S., nor Rule 25-6.0423, F.A.C., require a utility to seek recovery of nuclear project costs in any given year”); *see also*, Order No. PSC-15-0521-FOF-EI, pp. 31-32 (approving the deferral of costs associated with FPL’s Initial Assessments until FPL petitions for approval to proceed with preconstruction work).

FPL will continue to file with its Annual Report (*see* Rule 25-6.135) the budgeted and actual costs of the project as compared to the estimated in-service cost of the power plant pursuant to Section 366.93(5) and Rule 25-6.0423(9)(f).

**ISSUE 4: If FPL continues to seek its combined operating license and defers the associated costs, are these costs eligible for cost recovery in a future time period pursuant to Section 366.93 F.S., and Rule 25-6.0423 F.A.C.?**

**FPL:** Yes. Nothing in Section 366.93 or Rule 25-6.0423 precludes the deferral and later recovery of NCR eligible costs. Please see FPL’s position on Issue 3, above.

**ISSUE 5: A) Is FPL’s decision to continue pursuing a combined operating license from the Nuclear Regulatory Commission for Turkey Point Units 6 & 7 reasonable? (STAFF)**

**FPL:** FPL’s decision to complete the final licensing steps for Turkey Point 6 & 7 is eminently reasonable. Possession of a valid COL and associated approvals will enable FPL to move forward with preconstruction work at the right time. The license may be acted upon for a period of at least 20 years once issued, providing a significant window of time during which factors influencing a decision to move to construction may change. The alternative – halting licensing work at this time – could permanently preclude FPL’s customers from ever attaining value from the licensing investment made thus far. These considerations, coupled with the comparatively low level of costs required to complete the licensing phase, demonstrate that FPL’s decision to complete licensing is reasonable. (Scroggs, Reed)

**B) Is FPL’s decision to continue pursuing a combined operating license from the Nuclear Regulatory Commission for Turkey Point Units 6 & 7 reasonable pursuant to Section 366.93 F.S., and Rule 25-6.0423 F.A.C.? (OPC) (CONTESTED)**

**FPL:** FPL objects to OPC’s revision to Staff’s Issue 5A, presented as Issue 5B, because it (i) inaccurately represents FPL’s requested relief in this docket; (ii) inappropriately limits the framework available to the Commission for

its consideration of the issue; and (iii) is unnecessary in light of the fact that all parties can take positions regarding the interaction, if any, of FPL's request with Section 366.93 and Rule 25-6.0423, in response to the issue as originally proposed by Staff. FPL's position on Staff's Issue 5A is above.

**ISSUE 6: A) Should the Commission approve what FPL has submitted as its 2017 annual detailed analysis of the long term feasibility of completing the Turkey Point 6 & 7 project as provided for in Rule 25-6.0423, F.A.C.? (SACE) (CONTESTED)**

**FPL:** FPL objects to the inclusion of this issue. It improperly assumes a counter-factual scenario in which FPL has filed an "annual detailed analysis of the long term feasibility of completing" Turkey Point 6 & 7 for the Commission's approval. It also assumes that the feasibility provision of Rule 25-6.0423 applies despite the fact that FPL has not sought cost recovery – a legal conclusion with which FPL disagrees.

**B) Was FPL required to file an annual detailed analysis of the long term feasibility of completing the Turkey Point Unit 6 & 7 project, pursuant to Rule 25-6.0423(6)(c)5., F.A.C.,? If so, has FPL complied with that requirement?**

**FPL:** No, FPL was not required to file an annual detailed analysis of the long term feasibility of completing the Turkey Point 6 & 7 project in this docket. Section (6) makes filing for cost recovery optional. Subsection (6)(c) applies to the process for seeking cost recovery, but FPL is not seeking cost recovery at this time. Accordingly, parts (6)(c)1.b and (6)(c)1.c; portions of (6)(c)2 and (6)(c)4; and (6)(c)5 (requiring the annual feasibility analysis) do not apply in this proceeding.

**ISSUE 7: Has FPL complied with Order No. PSC-16-0266-PCO-EI? If not, what action should the Commission take, if any?**

**FPL:** Yes. Order No. PSC-16-0266-PCO-EI did not require FPL to take any particular actions. Instead, that order granted FPL's Motion to Defer Consideration of Issues and Cost Recovery. In doing so, the order recited two representations made by FPL in its motion and at the agenda conference during which the motion was considered. Those representations were that (1) FPL would withdraw its Petition for Waiver of Rule 25-6.0423(6)(c)5; and (2) FPL planned to file a long-term feasibility analysis during the ordinary course of the 2017 NCR cycle. FPL did withdraw its Petition for Waiver of Rule 25-6.0423(6)(c)5. FPL also accurately represented its plan and intention to file a feasibility analysis in the 2017 NCR docket. That remained FPL's plan several months into 2017.

FPL's subsequent decision to not seek cost recovery in the 2017 NCR docket reflected a material change in FPL's filing plans. As a result of FPL's decision to not seek contemporaneous cost recovery, the requirement found in Rule 25-6.0423(6)(c)5 does not apply, and FPL's plan to file a feasibility analysis pursuant to that rule provision became moot.

**ISSUE 8: What is the total jurisdictional amount to be included in establishing FPL's 2018 Capacity Cost Recovery Clause factor?**

**FPL:** The total jurisdictional amount of (\$7,305,202) should be included in establishing FPL's 2018 CCRC factor. There is no testimony to the contrary. (Grant-Keene)

**ISSUE 9: What is the current total estimated all-inclusive cost (including AFUDC and sunk costs) of the proposed Turkey Point Units 6 & 7 nuclear project?**

**FPL:** When time-related costs such as inflation and carrying costs are included, and in-service dates of 2031 and 2032 are assumed, the total non-binding cost estimate range is \$14.96 to \$21.87 billion for the 2,200 MW project. There is no testimony to the contrary. (Scroggs)

**ISSUE 10: What is the current estimated planned commercial operation date of the planned Turkey Point Units 6 & 7 nuclear facility?**

**FPL:** FPL has assumed in-service dates of 2031 and 2032 for purposes of updating its non-binding cost estimate range. FPL intends to update its project schedule when the first wave of new nuclear construction projects (*i.e.*, Georgia Power Company's Vogtle project and South Carolina Electric & Gas's Summer project) are complete. There is no testimony to the contrary. (Scroggs)

**B. DEF SPECIFIC ISSUES**

**ISSUE 11-15:** FPL takes no position on the DEF Specific Issues.

**V. STIPULATED ISSUES**

There are no stipulated issues at this time.

**VI. PENDING MOTIONS**

<b>Motion Document No.</b>	<b>Date</b>	<b>Description</b>
04737-2017	05/08/2017	Motion for protective order to protect confidential documents produced to the City of Miami

**VII. PENDING REQUESTS FOR CONFIDENTIAL CLASSIFICATION**

<b>Request Document No.</b>	<b>Date</b>	<b>Description</b>
05580-2017	06/27/2017	Request for confidential classification of [DN 05581-17] Audit Control No. 17-006-4-1 work papers
05367-2017	06/16/2017	First request for extension of confidential classification of Audit [Control No.] PA-15-01-002 work papers
04208-2017	04/13/2017	First request for extension of confidential classification of [DN 04142-15] Audit [Control No.] 15-005-4-1 work papers
04205-2017	04/13/2017	First request for extension of confidential classification of Exh SDS-8 [to testimony of Steven D. Scroggs (DN 02488-15)]
02632-2017	03/01/2017	Request for confidential classification of [DN 02633-17] Exhs SDS-1 and SDS-2
09290-2016	12/13/2016	First request for extension of confidential classification of portions of Exh SDS-1 [to testimony of Steven D. Scroggs, DN 01215-15]
04207-2016	07/01/2016	Request for confidential classification of [DN 04208-16] Audit Control No. 16-005-4-1 work papers
02707-16	05/04/2016	First request for extension of confidential classification of [DN 04981-14] Audit Control No. 14-01-001 work papers
02620-16	04/29/2016	First request for extension of confidential classification of Audit Control No. 12-010-4-1 workpapers [DN 04013-12]
02621-16	04/29/2016	First request for extension of confidential classification of Audit Control No. 12-010-4-2 [DN 04112-12]
03675-15	06/16/2015	Request for confidential classification of [DN 03676-15] Audit Report [No.] PA 15-01-002

**VIII. OBJECTIONS TO WITNESSES' QUALIFICATIONS**

At this time, FPL has no objections to any witness's qualifications.

**IX. WITNESS SEQUESTRATION**

FPL does not request sequestration of any witnesses.

**X. REQUIREMENTS OF THE ORDER ESTABLISHING PROCEDURE THAT CANNOT BE MET**

At this time, FPL is not aware of any requirements in the Order Establishing Procedure with which it cannot comply.

Respectfully submitted this 20<sup>th</sup> day of July, 2017.

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**CERTIFICATE OF SERVICE  
DOCKET NO. 20170009-EI**

I HEREBY CERTIFY that a true and correct copy of FPL's Prehearing Statement was electronically served this 20th day of July 2017, to the following:

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