

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Review of 2020-2029 Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Tampa Electric Company. : DOCKET NO. 20200067-EI
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In re: Review of 2020-2029 Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Duke Energy Florida, LLC. : DOCKET NO. 20200069-EI
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In re: Review of 2020-2029 Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Gulf Power Company. : DOCKET NO. 20200070-EI
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In re: Review of 2020-2029 Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Florida Power & Light Company. : DOCKET NO. 20200071-EI
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Filed: July 20, 2020

**PREHEARING STATEMENT OF
WALMART INC.**

Pursuant to Florida Public Service Commission's ("Commission") Order No. PSC-2020-0164-PCO-EI, filed May 19, 2020, Walmart Inc. ("Walmart") files its Prehearing Statement.

I. WITNESSES

<u>Witness</u>	<u>Subject</u>	<u>Issue No.</u>
Steve W. Chriss	Mr. Chriss' testimony addresses: the cost allocation, cost recovery, and illustrative rate designs proposed in the Storm Protection Plans ("SPPs").	N/A - to be deferred to 20200092-EI

<u>Witness</u>	<u>Subject</u>	<u>Issue No.</u>
Lisa V. Perry	Ms. Perry's addresses: collaboration between Tampa Electric Company ("TECO"), Duke Energy Florida, LLC ("DEF"), Gulf Power Company ("Gulf"), and Florida Power and Light ("FPL") (collectively, "Companies") and interested stakeholders during the interim period before the Companies' next required updated SPPs to develop ways in which customer-sited generation can be utilized as part of the SPPs to strengthen the Companies' transmission and distribution systems and provide customers with lower restoration costs, shorter outage periods, and more reliable electric service overall.	7

II. EXHIBITS

<u>Exhibit</u>	<u>Description</u>
SWC-1	Witness Qualifications Statement (N/A)
LVP-1	Witness Qualifications Statement
Ex. No. ___	Zitelman, Kiera, <i>Advancing Electric System Resilience with Distributed Energy Resources: Key Questions and Resources</i> , National Association of Regulatory Utility Commissioners, April 2020.
Ex. No. ___	Walmart 2019 Environmental, Social & Governance Report
Ex. No. ___	<i>What does Walmart do for local communities?</i> https://corporate.walmart.com/askwalmart/what-does-walmart-do-for-local-communities
Ex. No. ___	<i>Walmart, Sam's Club and Walmart.org Announce \$500,000 Commitment to Assist with Hurricane Dorian Relief and Recovery</i> , (Sept. 10, 2019) https://corporate.LVP-6walmart.com/newsroom/2019/09/10/walmart-sams-club-and-walmart-org-announce-500-000-commitment-to-assist-with-hurricane-dorian-relief-and-recovery
Ex. No. ___	<i>We've Got This: When your Job Skills Make you Valuable in a Disaster</i> , (Sep. 25, 2017) https://corporate.walmart.com/newsroom/community/20170925/weve-got-this-when-your-job-skills-make-you-valuable-in-a-disaster

III. WALMART'S STATEMENT OF BASIC POSITION

The Commission should carefully consider whether the SPPs proposed by the Companies are in the public interest. The Florida Legislature determined that there are four (4) factors the Commission must consider when determining whether to approve, approve with modifications, or deny SPPs. These factors include the extent to which the SPP will reduce restoration costs and power outage times, how practical a certain location selected for transmission and distribution ("T&D") infrastructure is relative to the utility's service territory, the cost/benefit to customers, and the impact on customers' bills. F.S. § 366.96(4)(a)-(d).

Walmart believes it would be in the public interest for the Commission to direct that the Companies collaborate with Walmart and other interested stakeholders during the interim period before their next required updated SPPs to develop ways in which customer-sited generation may be utilized as part of the SPP in order to strengthen the T&D systems and provide customers with lower restoration costs, shorter outage periods, and more reliable electric service overall.

Walmart had presented the testimony of Mr. Chriss, but the parties have agreed to address the issues raised by Mr. Chriss in the SPP Clause Docket, 20200092-EI as noted below. Accordingly, Walmart intends to request that Mr. Chriss be waived from appearing at the Hearing in these consolidated dockets.

IV. ISSUES

ISSUE 1 – ELEMENTS OF RULE 25-6.030, F.A.C.

Issue 1A: Does TECO's 2020-2029 Storm Protection Plan contain all of the elements required by Rule 25-6.030, Florida Administrative Code?

Position: Walmart takes no position at this time.

Issue 1B: Does DEF's 2020-2029 Storm Protection Plan contain all of the elements required by Rule 25-6.030, Florida Administrative Code?

Position: Walmart takes no position at this time.

Issue 1C: Does Gulf's 2020-2029 Storm Protection Plan contain all of the elements required by Rule 25-6.030, Florida Administrative Code?

Position: Walmart takes no position at this time.

Issue 1D: Does FPL's 2020-2029 Storm Protection Plan contain all of the elements required by Rule 25-6.030, Florida Administrative Code?

Position: Walmart takes no position at this time.

ISSUE 2 – CONSIDERATION OF 366.96(4)(a), F.S. – PART 1

Issue 2A: To what extent is TECO's 2020-2029 Storm Protection Plan expected to reduce restoration costs and outage times associated with extreme weather events and enhance reliability?

Position: Walmart takes no position at this time.

Issue 2B: To what extent is DEF's 2020-2029 Storm Protection Plan expected to reduce restoration costs and outage times associated with extreme weather events and enhance reliability?

Position: Walmart takes no position at this time.

Issue 2C: To what extent is Gulf's 2020-2029 Storm Protection Plan expected to reduce restoration costs and outage times associated with extreme weather events and enhance reliability?

Position: Walmart takes no position at this time.

Issue 2D: To what extent is FPL's 2020-2029 Storm Protection Plan expected to reduce restoration costs and outage times associated with extreme weather events and enhance reliability?

Position: Walmart takes no position at this time.

ISSUE 3 – CONSIDERATION OF 366.96(4)(a), F.S. – PART 2

Issue 3A: To what extent is TECO's 2020-2029 Storm Protection Plan prioritize areas of lower reliability performance?

Position: Walmart takes no position at this time.

Issue 3B: To what extent is DEF's 2020-2029 Storm Protection Plan prioritize areas of lower reliability performance?

Position: Walmart takes no position at this time.

Issue 3C: To what extent is Gulf's 2020-2029 Storm Protection Plan prioritize areas of lower reliability performance?

Position: Walmart takes no position at this time.

Issue 3D: To what extent is FPL's 2020-2029 Storm Protection Plan prioritize areas of lower reliability performance?

Position: Walmart takes no position at this time.

ISSUE 4 – CONSIDERATION OF 366.96(4)(b), F.S.

Issue 4A: To what extent is TECO's 2020-2029 Storm Protection Plan regarding transmission and distribution infrastructure feasible, reasonable, or practical in certain areas of TECO's service territory, including, but not limited to, flood zones and rural areas?

Position: Walmart takes no position at this time.

Issue 4B: To what extent is DEF's 2020-2029 Storm Protection Plan regarding transmission and distribution infrastructure feasible, reasonable, or practical in certain areas of DEF's service territory, including, but not limited to, flood zones and rural areas?

Position: Walmart takes no position at this time.

Issue 4C: To what extent is Gulf's 2020-2029 Storm Protection Plan regarding transmission and distribution infrastructure feasible, reasonable, or practical in certain areas of Gulf's service territory, including, but not limited to, flood zones and rural areas?

Position: Walmart takes no position at this time.

Issue 4D: To what extent is FPL's 2020-2029 Storm Protection Plan regarding transmission and distribution infrastructure feasible, reasonable, or practical in certain areas of FPL's service territory, including, but not limited to, flood zones and rural areas?

Position: Walmart takes no position at this time.

ISSUE 5 – CONSIDERATION OF 366.96(4)(c), F.S.

Issue 5A: What are the estimated costs and benefits to TECO and its customers of making the improvements proposed in the 2020-2029 Storm Protection Plan?

Position: Walmart takes no position at this time.

Issue 5B: What are the estimated costs and benefits to DEF and its customers of making the improvements proposed in the 2020-2029 Storm Protection Plan?

Position: Walmart takes no position at this time.

Issue 5C: What are the estimated costs and benefits to Gulf and its customers of making the improvements proposed in the 2020-2029 Storm Protection Plan?

Position: Walmart takes no position at this time.

Issue 5D: What are the estimated costs and benefits to FPL and its customers of making the improvements proposed in the 2020-2029 Storm Protection Plan?

Position: Walmart takes no position at this time.

ISSUE 6 – CONSIDERATION OF 366.96(4)(d), F.S.

Issue 6A: What is the estimated annual rate impact resulting from implementation of TECO's 2020-2029 Storm Protection Plan during the first 3 years addressed in the plan?

Position: Walmart takes no position at this time.

Issue 6B: What is the estimated annual rate impact resulting from implementation of DEF's 2020-2029 Storm Protection Plan during the first 3 years addressed in the plan?

Position: Walmart takes no position at this time.

Issue 6C: What is the estimated annual rate impact resulting from implementation of Gulf's 2020-2029 Storm Protection Plan during the first 3 years addressed in the plan?

Position: Walmart takes no position at this time.

Issue 6D: What is the estimated annual rate impact resulting from implementation of FPL's 2020-2029 Storm Protection Plan during the first 3 years addressed in the plan?

Position: Walmart takes no position at this time.

ISSUE 7 – PUBLIC INTEREST DETERMINATION PER 366.96(5), F.S.

Issue 7A: Is it in the public interest to approve, approve with modification, or deny TECO's 2020-2029 Storm Protection Plan?

Position: Walmart believes the public interest would benefit if the Commission directs each utility to collaborate with interested stakeholders during the interim period before their next required updated SPPs to develop ways in which customer-sited generation may be utilized as part of the SPP in order to strengthen the T&D systems and provide customers with lower restoration costs, shorter outage periods, and more reliable electric service overall.

Issue 7B: Is it in the public interest to approve, approve with modification, or deny DEF's 2020-2029 Storm Protection Plan?

Position: Walmart believes the public interest would benefit if the Commission directs each utility to collaborate with interested stakeholders during the interim period before their next required updated SPPs to develop ways in which customer-sited generation may be utilized as part of the SPP in order to strengthen the T&D systems and provide customers with lower restoration costs, shorter outage periods, and more reliable electric service overall.

Issue 7C: Is it in the public interest to approve, approve with modification, or deny Gulf's 2020-2029 Storm Protection Plan?

Position: Walmart believes the public interest would benefit if the Commission directs each utility to collaborate with interested stakeholders during the interim period before their next required updated SPPs to develop ways in which customer-sited generation may be utilized as part of the SPP in order to strengthen the T&D systems and provide customers with lower restoration costs, shorter outage periods, and more reliable electric service overall.

Issue 7D: Is it in the public interest to approve, approve with modification, or deny FPL's 2020-2029 Storm Protection Plan?

Position: Walmart believes the public interest would benefit if the Commission directs each utility to collaborate with interested stakeholders during the interim period before their next required updated SPPs to develop ways in which customer-sited generation may be utilized as part of the SPP in order to strengthen the T&D systems and provide customers with lower restoration costs, shorter outage periods, and more reliable electric service overall.

ISSUE 8 – CLOSE THE DOCKET

Issue 8A: Should Docket No. 20200067-EI be closed?

Position: Walmart takes no position at this time.

Issue 8B: Should Docket No. 20200069-EI be closed?

Position: Walmart takes no position at this time.

Issue 8C: Should Docket No. 20200070-EI be closed?

Position: Walmart takes no position at this time.

Issue 8D: Should Docket No. 20200071-EI be closed?

Position: Walmart takes no position at this time.

VI. CONTESTED ISSUES

OPC CONTESTED ISSUES

OPC Issue A: Are any of the proposed SPP project or program related costs, if approved, and presumably to be requested for recovery by the Company through the SPPCRC, costs recovered through the Company's base rates?

Position: Walmart takes no position at this time.

OPC Issue B: Should the Commission defer its determination of prudence for any of the Company's proposed programs and projects?

Position: Walmart takes no position at this time.

VI. STIPULATED ISSUES

1. Walmart's proposed Issue No. 1 in these SPP Dockets was as follows:

Should the Commission reject the proposed illustrative SPP rate designs of DEF and Gulf, which recover SPP costs from demand-metered customers through a \$/kWh energy charge or defer that issue to the SPP Clause Docket, 20200092-EI?

Walmart is submitting a Stipulation that Walmart's Proposed Issue No. 1 can be deferred for consideration by the Commission in the SPP Clause Docket, 20200092-EI, and agrees that the parties may offer revisions to the phrasing of the Issue in that Docket in accordance with the standard issue identification process.

VII. PENDING MOTIONS OR OTHER ACTIONABLE MATTERS

Walmart has no pending Motions at this time.

VIII. PENDING CONFIDENTIALITY REQUESTS OR CLAIMS

Walmart has no pending confidentiality requests or claims.

IX. OBJECTIONS TO WITNESS QUALIFICATIONS AS AN EXPERT

Walmart does not object to any witness's qualifications as an expert.

X. COMPLIANCE WITH ORDER NO. PSC-2019-0062-PCO-EG

There are no requirements of Order No. PSC-2020-0164-PCO-EI with which Walmart cannot comply.

Respectfully submitted,

By /s/ Stephanie U. Eaton

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Dated: July 20, 2020

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 this 20th day of July, 2020.

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Certificate of Service

Docket Nos. 20200067-EI, 20200069-EI, 20200070-EI, and 20200071-EI

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