## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for a limited proceeding to<br/>approve clean energy connection program<br/>and tariff and stipulation, by Duke Energy<br/>Florida, LLC.:DOCKET NO. 20200176-EI::::Filed: October 28, 2020

# PREHEARING STATEMENT OF WALMART INC.

Pursuant to Florida Public Service Commission's ("Commission") Order No. PSC-2020-

0324-PCO-EI, issued September 22, 2020, Walmart Inc. ("Walmart") files its Prehearing

Statement.

### I. <u>WITNESSES</u>

<u>Witness</u>	<u>Subject</u>	Issue No.
Steve W. Chriss	Mr. Chriss' Oct. 2, 2020, testimony addresses Walmart's support for Duke Energy Florida LLC's ("DEF" or "Company") Clean Energy Connection ("CEC") Program and the Stipulation attached as Exhibit A to DEF's Application.	1

# II. <u>EXHIBITS</u>

<u>Exhibit</u>	Description
SWC-1	Witness Qualifications Statement
SWC-2	Stipulation (July 20, 2020, filed in connection with Storm Protection Plan Dockets)

#### III. WALMART'S STATEMENT OF BASIC POSITION

Walmart believes it is in the public interest for the Commission to approve DEF's CEC Program and accompanying Tariff and Stipulation filed July 1, 2020. As stated in the Petition, Walmart, Southern Alliance for Clean Energy ("SACE"), and Vote Solar signed a Stipulation with DEF supporting the proposed CEC Program. Walmart believes the CEC Program, as proposed by DEF, is designed to fully and fairly value solar resources, maximize opportunities for participation in the CEC Program -- including opportunities for low income customers, small businesses, and governmental entities -- and bring the lowest cost solar resources to customers over the life of the Program. In fact, 87.3% of the CEC Program and Tariff are in the public interest, and the Stipulation represents a fair, just, and reasonable resolution of issues that otherwise would have been litigated in this Docket.

### IV. <u>ISSUES</u>

## **<u>Issue 1</u>**: Should the Commission approve the Stipulation for approval of the Duke Energy Florida, LLC, Clean Energy Connection Program and Tariff, when taken as a whole, as in the public interest?

**Position:** Yes. The Commission should approve the Stipulation, DEF's CEC Program and Tariff, as filed on July 1, 2020, because, when taken as a whole, approval of DEF's CEC Program and Tariff is in the public interest.

### V. <u>PENDING MOTIONS OR OTHER ACTIONABLE MATTERS</u>

Walmart has no pending Motions at this time.

### VI. <u>PENDING CONFIDENTIALITY REQUESTS OR CLAIMS</u>

Walmart has no pending confidentiality requests or claims.

### VII. OBJECTIONS TO WITNESS QUALIFICATIONS AS AN EXPERT

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

#### VIII. COMPLIANCE WITH ORDER NO. PSC-2020-0324-PCO-EI

There are no requirements of Order No. PSC-2020-0324-PCO-EI with which Walmart

cannot comply.

Respectfully submitted,

By <u>/s/ Stephanie U. Eaton</u> Stephanie U. Eaton (FL State Bar No. 165610) SPILMAN THOMAS & BATTLE, PLLC 110 Oakwood Drive, Suite 500 Winston-Salem, NC 27103 Phone: (336) 631-1062 Fax: (336) 725-4476 seaton@spilmanlaw.com

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Counsel to Walmart Inc.

Dated: October 28, 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 28<sup>th</sup> day of October, 2020.

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