#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Energy Conservation Cost Recovery	)	
Clause	)	Docket No. 20210002-EG
	)	Filed: October 5, 2021
	)	

# PREHEARING STATEMENT OF NUCOR STEEL FLORIDA, INC.

Pursuant to the Florida Public Service Commission's *Order Establishing Procedure*, Order No. PSC-2021-0075-PCO-EG, issued February 10, 2021, as modified by the *First Order Modifying Order Establishing Procedure*, Order No. PSC-2021-0208-PCO-EG, issued on June 7, 2021, and as further modified by the *Second Order Modifying Order Establishing Procedure*, Order No. PSC-2021-0344-PCO-EG, issued September 15, 2021, Nucor Steel Florida, Inc. ("Nucor") hereby files its Prehearing Statement in this case.

#### A. APPEARANCES

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## B. WITNESSES

Nucor does not plan to call any witnesses at this time.

## C. EXHIBITS

Nucor does not plan to offer any exhibits at this time.

#### D. STATEMENT OF BASIC POSITION

Nucor's basic position is that DEF bears the burden of proof to justify the costs it seeks to recover through the ECCRC and any other relief DEF requests in this proceeding.

## E. STATEMENT ON SPECIFIC ISSUES

#### GENERIC STORM PROTECTION PLAN COST RECOVERY ISSUES

<u>ISSUE 1</u>: What are the final conservation cost recovery adjustment true-up amounts for January 2020 through December 2020?

**Nucor:** No position at this time.

<u>ISSUE 2</u>: What are the appropriate conservation adjustment actual/estimated true-up amounts for the period January 2021 through December 2021?

**Nucor:** No position at this time.

<u>ISSUE 3</u>: What are the appropriate total conservation adjustment true-up amounts to be collected/refunded from January 2022 through December 2022?

**Nucor:** No position at this time.

<u>ISSUE 4</u>: What is the total conservation cost recovery amount to be collected during the period January 2022 through December 2022?

**Nucor:** No position at this time.

<u>ISSUE 5</u>: What are the conservation cost recovery factors for the period January 2022 through December 2022?

**Nucor:** No position at this time.

<u>ISSUE 6</u>: Should the Commission approve revised tariffs reflecting the conservation cost recovery amounts and establishing conservation cost recovery factors determined to be appropriate in this proceeding?

**Nucor:** No position at this time.

<u>ISSUE 7</u>: What should be the effective date of the new conservation cost recovery factors

for billing purposes?

**Nucor:** No position at this time.

## **COMPANY SPECIFIC CONSERVATION COST RECOVERY ISSUES**

## **Tampa Electric Company**

<u>ISSUE 8</u>: What is the Contracted Credit Value for the GSLM-2 and GSLM-3 rate riders for

Tampa Electric Company for the period January 2022 through December 2022?

**Nucor:** No position.

<u>ISSUE 9:</u> What are the residential Price Responsive Load Management (RSVP-1) rate riders

for Tampa Electric Company for the period January 2022 through December 2022?

**Nucor:** No position.

### **CLOSE THE DOCKET ISSUE**

ISSUE 10: Should this docket be closed?

**Nucor:** No position.

## F. PENDING MOTIONS

None.

# G. PENDING REQUESTS OR CLAIMS FOR CONFIDENTIALITY

None.

## H. OBJECTIONS TO QUALIFICATIONS OF WITNESS AS EXPERT

None at this time.

# I. REQUIREMENTS OF ORDER ESTABLISHING PROCEDURE

There are no requirements of the Procedural Orders with which Nucor cannot comply.

Respectfully submitted,

STONE MATTHEIS XENOPOULOS & BREW, PC

# /s/ Michael K. Lavanga

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Attorneys for Nucor Steel Florida, Inc.

Dated: October 5, 2021

#### CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Prehearing Statement of Nucor Steel

Florida, Inc. has been furnished by electronic mail this 5th of October 2021, to the following:

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