

**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION**

Before the Atomic Safety and Licensing Board

In the Matter of)	
)	
Florida Power & Light Company)	Docket No. 50-250-LA
)	50-251-LA
(Turkey Point Units 3 and 4))	
)	ASLBP No. 15-935-02-LA-BD01

DECLARATION OF STEVEN D. SCROGGS

I, Steven D. Scroggs, do hereby state as follows:

1. I am employed by Florida Power & Light Company as Senior Director, Project Development. In this position, I am responsible for development of the Turkey Point Units 6 & 7 project. In 2014, I was assigned to oversee and direct the efforts to reduce salinity in the Cooling Canal System at Turkey Point. A statement of my professional qualifications is attached.
2. I am responsible for the paragraphs in the direct testimony on Contention 1 filed today that are marked with my initials.
3. I attest to the accuracy of those statements to the best of my knowledge, information, and belief, support them as my own, and endorse their introduction into the record of this proceeding.

4. I declare under penalty of perjury that the foregoing is true and correct. Executed on November 10, 2015.

Executed in Accord with 10 CFR 2.304(d)

Steven D. Scroggs
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408

Steven D. Scroggs

700 Universe Blvd, Juno Beach, FL 33408

Professional Experience

(5/03 - Present) Florida Power & Light Company – Increasing accountability managing key activities for a Fortune 200 company and leading U.S. Utility. Activities include representing company in industry forums, regulatory proceedings as an expert and fact witness, and bi-lateral or multi-lateral negotiations with commercial, regulatory and political stakeholders.

(7/06 – Present) Senior Director, Project Development – Turkey Point 6&7 New Nuclear
Primary responsibility for the development of a two unit AP1000 project in Miami-Dade County. Key achievements and responsibilities include:

- Participated in developing legislation, rulemaking and implementation of Nuclear Cost Recovery Rule to provide contemporaneous recovery of soft costs and construction interest for nuclear projects. Key witness in Need Determination and annual Cost Recovery docket.
- Obtained Zoning Approval for project at early stage to reduce regulatory risk and align local interests to support project.
- Negotiated with local municipalities, state and federal regulatory agencies to obtain necessary approvals, settlements and land exchanges required for the project.
- Manages an annual budget (ranging from \$25 million to \$40 million) orchestrating a matrixed business unit support arrangement and multiple contractors and subcontractors. Exemplary audit history throughout project.

(5/03 – 6/06) Manager, Integrated Resource Planning

- Supervise generation production cost and Integrated Resource Planning analytics group. Managing RFP and Need Filing processes and conducting analysis to support cost recovery under various regulatory clauses for the regulated utility.
- Facilitate development and analysis of generation alternatives with multiple business units and lead discussion with Executive Management. Presents direct and rebuttal testimony as expert witness before the Florida Public Service Commission.
- Represent the company as a member of State FRCC Resource Working Group and NERC Standards Drafting Committee.
- Conduct project analysis of various generation alternatives to maximize cost-effectiveness in the regulated environment. Develop project schedule and cost models to identify pivotal risk items and formulate mitigation strategies.
- Responsible for adapting and enhancing analytics of top ten electric utility. Analyses address fuel supply, fuel diversity and transmission related costs in an integrated framework with self-build, purchased and existing generation portfolio.

(1/02 – 4/03) Calpine Corporation – Plant Optimization Group. Manager of Engineering Services leading Performance Engineering, Thermal Modeling and Systems Engineering (AGC/EMS connectivity) departments. 16 direct reports. Accomplishments include:

- Coordination and supervision of all new build Performance Guarantee testing on over 8,000 MW of new simple and combined cycle generation. Coordinated with Bank's Independent Engineer to expedite financial closing.
- Defense and negotiation of performance related liquidated damages versus General Electric, Siemens-Westinghouse, Nooter-Eriksen, and Toshiba.
- Development and implementation of a real-time thermal performance benchmarking program using OSI/PI Process Book and WAN connectivity.
- Direction of detailed performance assessments to uncover immediate, mid-term and long-term improvement opportunities.

(3/01 – 12/01) Control Solutions, LLC, Inc. Business Unit Leader of a building automation systems/energy services company (\$2.5 million annual revenue) servicing commercial, institutional, governmental building energy management and light industrial process controls.

- Profit and loss responsibility for the business unit participating in plan and specification competitive bids, design-build contracting, energy performance contracting, and post-installation service markets.
- Successful turn-around management of an under performing unit. Immediate management of contractual risk exposure, collections on extended receivables with a focus on development of self-sustaining cash flow projects.

(6/96 – 3/01) DAI Management Consultants, Inc. Five years as a key contributor in a power and process consulting firm supporting major utilities, financial institutions and other Fortune 500 clients while serving as Vice President of a 30 MW CCGT operating subsidiary.

- Consulting Practice. Managed a team of financial and technical analysts providing customer services in asset valuation, portfolio valuation, engineering due diligence and quantitative risk analysis. Relevant projects include:
 - Asset Optimization. Turnaround management of distressed assets.
 - Merger and Acquisition Analysis, Asset Valuation and Appraisal.
 - Project Development Decision Analysis using Quantitative Risk Analysis (QRA).
 - Efficient Frontier analysis of utility portfolios under a wide range of potential futures.
- Operating Subsidiary. Vice President of 30 MW combined cycle cogeneration facility (SO-4 contract) with responsibility for all aspects of operations. Developed and implemented managerial strategy during PG&E Force Majeure

(12/00 – 03/01), gaining consensus of Debt and Equity participants. Turnaround strategy restored a foreclosure project to profitability.

(12/84 – 6/94) Nuclear Submarine Officer. Served in a demanding technical and managerial environment with direct nuclear plant operations and maintenance experience. Qualified as a Nuclear Engineering Officer and Submarine Department Head (four divisions – 35 personnel).

Formal Education

MSME (5/96) - The Pennsylvania State University. (3.40/4.00) with emphasis on compressible fluid dynamics and enhanced heat transfer technology.

BSME (12/84) – University of Missouri-Columbia. (3.46/4.00) Honors.