### **Diamond Williams**

From:

Kim Hancock [khancock@kagmlaw.com]

Sent:

Wednesday, October 12, 2011 2:22 PM

To:

Filings@psc.state.fl.us

Cc:

Lee Eng Tan; suzannebrownless@comcast.net; jas@beggslane.com; rab@beggslane.com;

jbeasley@ausley.com; jwahlen@ausley.com; john.burnett@pgnmail.com;

christensen.patty@leg.state.fl.us; bkeating@gunster.com; ken.rubin@fpl.com; george@cavros-law.com; jbrew@bbrslaw.com; karen.white@tyndall.af.mil; Vicki Gordon Kaufman; Jon Moyle

Subject:

Docket No. 110002-EG

Attachments: FIPUG's Prehearing Statement 10.12.11.pdf

In accordance with the electronic filing procedures of the Florida Public Service Commission, the following filing is made:

a. The name, address, telephone number and email for the person responsible for the filing is:

Vicki Gordon Kaufman Keefe Anchors Gordon & Moyle 118 North Gadsden Street Tallahassee, FL 32301 (850) 681-3828

vkaufman@kagmlaw.com

- b. This filing is made in Docket No. 110002-EG.
- c. The document is filed on behalf of FLORIDA INDUSTRIAL POWER USERS GROUP.
- d. The total pages in the document are 3 pages.
- e. The attached document is THE FLORIDA INDUSTRIAL POWER USERS GROUP'S PREHEARING STATEMENT.

Kim Hancock khancock@kagmlaw.com



Keefe, Anchors, Gordon and Moyle, P.A. The Perkins House
118 North Gadsden Street
Tallahassee, Florida 32301
(850) 681-3828 (Voice)
(850) 681-8788 (Fax)
www.kagmlaw.com

The information contained in this e-mail is confidential and may be subject to the attorney client privilege or may constitute privileged work product. The information is intended only for the use of the individual or entity to whom it is addressed. If you are not the intended recipient, or the agent or employee responsible to deliver it to the intended recipient, you are hereby notified that any use, dissemination, distribution or copying of this communication is strictly prohibited. If you receive this e-mail in error, please notify us by telephone or return e-mail immediately. Thank you.

DOCUMENT NUMBER-DATE

07482 OCT 12 =

### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Energy Conservation Cost

Recover y Clause

/ Filed: October 12, 2011

## THE FLORIDA INDUSTRIAL POWER USERS GROUP'S <u>PREHEARING STATEMENT</u>

The Florida Industrial Power Users Group (FIPUG), pursuant to Order No. PSC-11-0136-

PCO-EG, files its Prehearing Statement.

### A. APPEARANCES:

VICKI GORDON KAUFMAN JON MOYLE, JR. Keefe, Anchors, Gordon & Moyle, PA 118 North Gadsden Street Tallahassee, FL 32312

Attorneys for the Florida Industrial Power Users Group

## B. WITNESSES AND EXHIBITS:

All witnesses and exhibits listed by other parties in this proceeding.

## C. <u>STATEMENT OF BASIC POSITION:</u>

# GENERIC CONSERVATION COST RECOVERY ISSUES

ISSUE 1: What are the final conservation cost recovery true-up amounts for the period

January 2010 through December 2010?

POSITION: FIPUG has no position at this time.

ISSUE 2: What are the total conservation cost recovery amounts to be collected during the

period January 2012 through December 2012?

POSITION: FIPUG has no position at this time.

ISSUE 3: What are the conservation cost recovery factors for the period January 2012

through December 2012?

POSITION: FIPUG has no position at this time.

DOCUMENT NUMBER - DATE

07482 OCT 12 =

ISSUE 4: What should be the effective date of the new conservation cost recovery factors

for billing purposes?

POSITION: FIPUG has no position at this time.

## COMPANY SPECIFIC CONSERVATION COST RECOVERY ISSUES

## Tampa Electric Company

ISSUE 5: What is the Contracted Credit Value for the GSLM-2 and GSLM-3 rate riders for

Tampa Electric Company for the period January 2012 through December 2012?

POSITION: FIPUG has no position at this time.

ISSUE 6: What are the residential Price Responsive Load Management (RSVP-1) rate tiers

for Tampa Electric Company for the period January 2012 through December

2012?

POSITION: FIPUG has no position at this time.

### Gulf Power Company

ISSUE 7: Should the Commission approve Gulf Power Company's proposed modified

methodology for apportioning conservation costs among customer classes?

POSITION: Yes. This methodology more fairly allocates costs.

ISSUE 8: Should the Commission approve the rates associated with the two Price

Responsive Load Management (RSVP) rate proposals, one of which would only become effective contingent upon a Commission decision in Gulf Power

Company's currently pending rate case (Docket No. 110138-EI)?

POSITION: FIPUG has no position at this time.

s/ Vicki Gordon Kaufman

Vicki Gordon Kaufman

Jon C. Moyle, Jr.

Keefe Anchors Gordon & Moyle, PA

118 North Gadsden Street

Tallahassee, Florida 32301

Telephone: (850)681-3828

Facsimile: (850)681-8788

Attorneys for Florida Industrial Power Users Group

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of FIPUG's Prehearing Statement

was furnished to the following by Electronic Mail and United States Mail, on this 12th day of

October, 2011:

Lee Eng Tan
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

James D. Beasley
J. Jeffry Wahlen
Ausley & McMullen Law Firm
P. O. Box 391
Tallahassee, FL 32302

John T. Burnett Associate General Counsel Progress Energy Service Company, LLC 299 First Avenue North St. Petersburg, FL 33701

Patricia Christensen Office of Public Counsel c/o The Florida Legislature 111 West Madison Street, #812 Tallahassee, FL 32399

Jeffrey A. Stone Russell A. Badders Beggs & Lane Law Firm P. O. Box 12950 Pensacola, FL 32591 Beth Keating Gunster, Yoakley & Stewart, P.A. 215 S. Monroe Street, Suite 618 Tallahassee, Florida 32301

Kenneth M. Rubin Florida Power & Light 700 Universe Blvd. Juno Beach, FL 33408-00420

Suzanne Brownless, PA 433 N. Magnolia Drive Tallahassee, FL 32308

George Cavros Southern Alliance for Clean Energy 120 East Oakland Park Blvd., Suite 105 Fort Lauderdale, FL 33334

James W. Brew/F. Alvin Taylor Brickfield Law Firm Eighth Floor, West Tower 1025 Thomas Jefferson Street, NW Washington, DC 20007-5201

Karen S. White, Staff Attorney c/o AFCESA-ULFSC 139 Barnes Drive, Suite 1 Tyndall Afb, FL 32403-5319

s/ Vicki Gordon Kaufman

Vicki Gordon Kaufman