

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Environmental Cost
Recovery Clause

DOCKET NO. 150007-EI
FILED: October 9, 2015

**THE FLORIDA INDUSTRIAL POWER USERS GROUP'S
PREHEARING STATEMENT**

The Florida Industrial Power Users Group (FIPUG), pursuant to Order No. PSC-15-0097-PCO-EI, files its Prehearing Statement.

A. APPEARANCES:

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B. WITNESSES AND EXHIBITS:

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

C. STATEMENT OF BASIC POSITION:

Only costs legally authorized should be recovered through the environmental cost recovery clause. FIPUG maintains that the respective utilities must satisfy their burden of proof for any and all monies or other relief sought in this proceeding.

D. STATEMENT OF ISSUES AND POSITIONS:

GENERIC ISSUES

ISSUE 1. What are the final environmental cost recovery true-up amounts for the period January 2014 through December 2014?

FIPUG: The respective utilities must meet their burden of proof.

ISSUE 2. What are the estimated/actual environmental cost recovery true-up amounts for the period January 2015 through December 2015?

- FIPUG:** The respective utilities must meet their burden of proof.
- ISSUE 3.** What are the projected environmental cost recovery amounts for the period January 2016 through December 2016?
- FIPUG:** The respective utilities must meet their burden of proof.
- ISSUE 4.** What are the environmental cost recovery amounts, including true-up amounts, for the period January 2016 through December 2016?
- FIPUG:** The respective utilities must meet their burden of proof.
- ISSUE 5.** What depreciation rates should be used to develop the depreciation expense included in the total environmental cost recovery amounts for the period January 2016 through December 2016?
- FIPUG:** The respective utilities must meet their burden of proof.
- ISSUE 6.** What are the appropriate jurisdictional separation factors for the projected period January 2016 through December 2016?
- FIPUG:** The respective utilities must meet their burden of proof.
- ISSUE 7.** What are the appropriate environmental cost recovery factors for the period January 2016 through December 2016 for each rate group?
- FIPUG:** The respective utilities must meet their burden of proof.
- ISSUE 8.** What should be the effective date of the new environmental cost recovery factors for billing purposes?
- FIPUG:** The respective utilities must meet their burden of proof.

COMPANY-SPECIFIC ISSUES

Florida Power and Light (FPL)

- FIPUG 9A.** Should FPL be allowed to recover, through the ECRC, prudently incurred costs associated with its proposed Coal Combustion Residuals (CCR) Disposal Project?
- FIPUG:** No, unless FPL meets its burden of proof.
- FIPUG 9B.** How should the costs associated with FPL's proposed CCR Disposal Project be allocated to the rate classes?
- FIPUG:** If recovery is permitted, costs should be allocated as set forth the Settlement Agreement approved by the Commission in FPL's most recent rate case.

FIPUG 10A. Should DEF be allowed to recover, through the ECRC, prudently incurred costs associated with its Coal Combustion Residual (CCR) Rule Program?

FIPUG: No, unless DEF meets its burden of proof.

FIPUG 10B. How should costs associated with DEF's proposed CCR Rule Program be allocated to rate classes?

FIPUG: If recovery is permitted, costs should be allocated as set forth the settlement agreement approved by the Commission in DEF's most recent rate case.

FIPUG 11A. Should Gulf be allowed to recover, through the ECRC, prudently incurred costs associated with its Coal Combustion Residual (CCR) program?

FIPUG: No, unless Gulf meets its burden of proof.

FIPUG 11B. How should costs associated with Gulf's proposed CCR program be allocated to rate classes?

FIPUG: If recovery is permitted, costs should be allocated as set forth the settlement agreement approved by the Commission in Gulf's most recent rate case.

FIPUG 12A. Should Gulf be allowed to recover, through the ECRC, prudently incurred costs associated with its Steam Electric Power Effluent Limitations Guidelines (ELG) program?

FIPUG: No, unless DEF meets its burden of proof.

FIPUG 12B. How should costs associated with Gulf's proposed ELG program be allocated to rate classes?

FIPUG: If recovery is permitted, costs should be allocated as set forth the settlement agreement approved by the Commission in Gulf's most recent rate case.

FIPUG 13. Should the Commission approve revised tariffs reflecting the environmental cost recovery amounts and environmental cost recovery factors determined to be appropriate in this proceeding?

FIPUG: No, unless the respective utilities meet their burden of proof.

E. STIPULATED ISSUES:

None at this time.

F. PENDING MOTIONS:

None at this time.

G. STATEMENT OF PARTY'S PENDING REQUESTS OR CLAIMS FOR CONFIDENTIALITY:

None.

H. OBJECTIONS TO QUALIFICATION OF WITNESSES AS AN EXPERT:

Yes, unless the witness in question affirmatively states the subject matter area(s) in which he or she claims expertise.

I. STATEMENT OF COMPLIANCE WITH ORDER ESTABLISHING PROCEDURE:

There are no requirements of the Order Establishing Procedure with which the Florida Industrial Power Users Group cannot comply at this time.

s/ Jon C. Moyle, Jr. _____

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished to the following by Electronic Mail, on this 9th day of October, 2015:

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