

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of 2022-2031 Storm Protection
Plan, pursuant to Rule 25-6.030, F.A.C.,
Tampa Electric Company

DOCKET NO.: 20220048-EI
FILED: July 13, 2022

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

The Florida Industrial Power Users Group (FIPUG), pursuant to Order Establishing Procedure (Order No. PSC-2022-0119-PCO-EI) issued March 17, 2022 and as modified by the First Order Modifying the Order Establishing Procedure (Order No. PSC-2022-0226-PCO-EI) files its Prehearing Statement.

A. APPEARANCES:

Jon C. Moyle, Jr.
Karen Putnal
Moyle Law Firm, P.A.
118 North Gadsden Street
Tallahassee, FL 32312

Attorneys for the Florida Industrial Power Users Group

B. WITNESSES AND EXHIBITS:

FIPUG reserves the right to call witnesses listed by other parties in this docket.

C. STATEMENT OF BASIC POSITION:

Only reasonable, cost-effective, and prudent costs should be set forth in the company's transmission and distribution storm protection plan. The company must demonstrate and carry its burden of proof that each component of its plan is in the public interest. The company must prove that each component of its plan is expected to reduce restoration costs and outage times. The company must prove that each component of its plan will enhance electric system reliability. The company must meet its burden to satisfactorily establish the estimated annual rate impact of the plan for the first 3 years addressed in the plan.

D. STATEMENT OF ISSUES AND POSITIONS:

ISSUE 1: Does the Company's Storm Protection Plan contain all of the elements, including but not limited to, a comparison of the costs and dollar benefits, required by Rule 25-6.030, Florida Administrative Code?

FIPUG: Adopt position of OPC.

ISSUE 2: To what extent, and by how much, are each of the Company's Storm Protection Plan programs and projects expected to reduce restoration costs and outage times associated with extreme weather events?

FIPUG: Adopt position of OPC.

ISSUE 3: To what extent does the Company's Storm Protection Plan prioritize areas of lower reliability performance?

FIPUG: Adopt position of OPC.

ISSUE 4: To what extent is the Company's Storm Protection Plan regarding transmission and distribution infrastructure feasible, reasonable, or practical in certain areas of the Company's service territory, including, but not limited to, flood zones and rural areas?

FIPUG: Adopt position of OPC.

ISSUE 5: What are the estimated costs and dollar benefits to the Company and its customers of the Storm Protection Plan programs and projects?

FIPUG: Adopt position of OPC.

ISSUE 6: What are the estimated annual rate impacts resulting from implementation of the Company's Storm Protection Plan during the first 3 years addressed in the plan, and are those impacts properly calculated?

FIPUG: Adopt position of OPC.

ISSUE 7: Should the Commission approve, approve with modification, or deny FPL's new Distribution Winterization Program?

FIPUG: Issue Withdrawn.

ISSUE 8: Should the Commission approve, approve with modification, or deny FPL's new Transmission Winterization Program?

FIPUG: Issue Withdrawn.

ISSUE 9: Should the Commission approve, approve with modification, or deny FPL's new Transmission Access Enhancement Program?

FIPUG: Adopt position of OPC.

ISSUE 10: Is it in the public interest to approve, approve with modification, or deny the Company's Storm Protection Plan?

FIPUG: Adopt position of OPC.

ISSUE 11: Should this docket be closed?

FIPUG: Yes.

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:

None at this time.

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

Jon C. Moyle, Jr.

Karen A. Putnal

Moyle Law Firm, P.A.

118 North Gadsden Street

Tallahassee, Florida 32301

Telephone: (850)681-3828

Facsimile: (850)681-8788

jmoyle@moylelaw.com

kputnal@moylelaw.com

Attorneys for Florida Industrial Power Users Group

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic mail this 13th day of July 2022 to the following:

Jacob Imig
Theresa Tan
Walter Trierweiler
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399
jimig@psc.state.fl.us
itan@psc.state.fl.us
wtrierwe@psc.state.fl.us

Richard Gentry
Samantha Morse
Charles Rehwinkel
Anastacia Pirrello
Office of Public Counsel
111 W. Madison Street, Room 812
Tallahassee FL 32399
gentry.richard@leg.state.fl.us
morse.stephanie@leg.state.fl.us
rehwinkel.charles@leg.state.fl.us
Pirrello,anastacia@leg.state.fl.us

Christopher T. Wright
Florida Power & Light Company
700 Universe Boulevard
Juno Beach FL 33408-0420
Christopher.Wright@fpl.com

Kenneth A. Hoffman
Florida Power & Light Company
134 West Jefferson Street
Tallahassee FL 32301-1713
ken.hoffman@fpl.com

Ms. Paula K. Brown
Tampa Electric Company
Regulatory Affairs

P. O. Box 111
Tampa FL 33601-0111
regdept@tecoenergy.com

JEFFRY WAHLEN
MALCOLM N. MEANS
Ausley McMullen
Post Office Box 391
Tallahassee, Florida 32302
jwahlen@ausley.com
mmeans@ausley.com

Dianne M. Triplett
Duke Energy
299 1st Avenue North
St. Petersburg FL 33701
Dianne.triplett@duke-energy.com

Matthew R. Bernier
Mr. Robert Pickels
Duke Energy
106 E. College Avenue, Ste. 800
Tallahassee FL 32301
matthew.bernier@duke-energy.com
Robert.pickels@duke-energy.com

James W. Brew
Laura Wynn Baker
Stone Mattheis Xenopoulos & Brew, PC
1025 Thomas Jefferson Street, NW,
Suite 800 West
Washington, DC 20007-5201
jbrew@smxblaw.com
lwb@smxblaw.com

/s/ Jon C. Moyle
Jon C. Moyle