

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Fuel and Purchased Power Cost  
Recovery Clause with Generating Performance  
Incentive Factor

DOCKET NO. 20240001-EI

FILED: March 12, 2024

**FLORIDA INDUSTRIAL POWER USERS GROUP'S PRE-HEARING STATEMENT**

The Florida Industrial Power Users Group (FIPUG), by and through undersigned counsel, provides this Prehearing Statement.

**APPEARANCES:**

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**1. WITNESSES:**

FIPUG does not intend to call witnesses.

**2. EXHIBITS:**

FIPUG does not intend to introduce exhibits.

**3. STATEMENT OF BASIC POSITION**

Florida Power & Light Company ("FPL") and the Office of Public Counsel ("OPC") have reached a stipulation which addresses the two issues in this case. FIPUG takes no position on these two issues. Thus, FIPUG's position in this matter is that FIPUG takes no position.

**4. STATEMENT OF FACTUAL ISSUES AND POSITIONS**

**ISSUE 1:** What adjustment should be made with respect to replacement power costs associated with any unplanned outages that occurred at Turkey Point or St. Lucie during the calendar years 2020, 2021 and 2022?

FIPUG: No position at this time.

**ISSUE 2:** Should FPL be subject to a follow up nuclear operations and management audit covering the 2024 to 2029 time period?

FIPUG: No position at this time.

**5. STIPULATED ISSUES**

FIPUG has not stipulated to any matters in this matter, but understands that FPL and OPC have reached a stipulation on the two issues above. FIPUG takes no position at this time on these two issues. Should the Commission not approve this “Type 2” stipulation between FPL and OPC, FIPUG reserves the right to subsequently take a position on the two issues.

**6. PENDING MOTIONS**

FIPUG has no pending motions at this time.

**7. STATEMENT OF PARTY’S PENDING REQUESTS OR CLAIMS FOR CONFIDENTIALITY**

FIPUG has no pending requests or claims for confidentiality at this time.

**8. OBJECTIONS TO QUALIFICATION OF WITNESSES AS AN EXPERT**

FIPUG does not object to the qualification of any witnesses as an expert in the field which they pre-filed testimony as of the present date.

**9. SEQUESTRATION OF WITNESSES**

FIPUG does not intend to seek the sequestration of any witness at this time.

**10. STATEMENT OF COMPLIANCE WITH ORDER ESTABLISHING  
PROCEDURE**

There are no requirements of the Order Establishing Procedure with which FIPUG cannot comply.

Respectfully submitted,

/s/ Jon C. Moyle

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**CERTIFICATE OF SERVICE**  
**DOCKET NO. 20240001-EI**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail on this 12<sup>th</sup> day of March 2024, to the following:

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