

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Environmental cost recovery clause.

DOCKET NO. 20240007-EI

FILED: October 11, 2024

THE FLORIDA INDUSTRIAL POWER USERS GROUP
PREHEARING STATEMENT

The Florida Industrial Power Users Group, (“FIPUG”), through counsel and pursuant to the Order Establishing Procedure in this docket, Order No. PSC-2024-0031-PCO-EI, issued February 6, 2024, and pursuant to the First Order Modifying Order Establishing Procedure, Order No. PSC-2024-0215-PCO-EI, hereby submit this Prehearing Statement.

APPEARANCES:

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Counsel for FIPUG

1. WITNESSES:

FIPUG does not intend, at this time, to call witnesses, but reserves the right to call and question witnesses identified by other parties as permitted.

2. EXHIBITS:

FIPUG does not intend, at this time, to introduce exhibits, but reserves the right to use and introduce exhibits at hearing as permitted.

3. STATEMENT OF BASIC POSITION

The utilities bear the burden of proof to justify the recovery of costs they request in this docket as reasonable and prudent. The utilities must carry this burden regardless of whether FIPUG

or other parties introduce evidence to the contrary. The utilities must also carry their burden of proof to support their proposal(s) asking the Commission's adoption of policy statements (whether new or changed) or other affirmative relief sought.

4. STATEMENT OF FACTUAL ISSUES AND POSITIONS

GENERIC ENVIRONMENTAL COST RECOVERY ISSUES

ISSUE 1: What are the final environmental cost recovery true-up amounts for the period January 2023 through December 2023?

FIPUG: Adopt position of OPC.

ISSUE 2: What are the actual/estimated environmental cost recovery true-up amounts for the period January 2024 through December 2024?

FIPUG: Adopt position of OPC.

ISSUE 3: What are the projected environmental cost recovery amounts for the period January 2025 through December 2025?

FIPUG: Adopt position of OPC.

ISSUE 4: What are the environmental cost recovery amounts, including true-up amounts, for the period January 2025 through December 2025?

FIPUG: Adopt position of OPC.

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 2025 through December 2025?

FIPUG: Adopt position of OPC.

ISSUE 6: What are the appropriate jurisdictional separation factors for the projected period January 2025 through December 2025?

FIPUG: Adopt position of OPC.

ISSUE 7: What are the appropriate environmental cost recovery factors for the period January 2025 through December 2025 for each rate group?

FIPUG: Adopt position of OPC.

ISSUE 8: What should be the effective date of the new environmental cost recovery factors for billing purposes?

FIPUG: Adopt position of OPC.

ISSUE 9: 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: Adopt position of OPC.

ISSUE 10: Should this docket be closed?

FIPUG: No.

COMPANY-SPECIFIC ENVIRONMENTAL COST RECOVERY ISSUES

Duke Energy Florida, LLC (DEF):

ISSUE 11: Should the Commission approve DEF's Citrus Combined Cycle (CCC) Water Treatment System Project for cost recovery through the ECRC?

FIPUG: Adopt position of OPC.

ISSUE 12: How should the approved costs related to DEF's CCC Water Treatment System Project be allocated to the rate classes?

FIPUG: Adopt position of OPC.

Tampa Electric Company (TECO):

ISSUE 13: Should the Commission approve TECO's Bayside 316 (a) Thermal Variance Study Project for cost recovery through the ECRC?

FIPUG: Adopt position of OPC.

ISSUE 14: How should the approved costs related to TECO's Bayside 316 (a) Thermal Variance Study Project ?

FIPUG: Adopt position of OPC.

E. STIPULATED ISSUES

None at this time.

F. PENDING MOTIONS

FIPUG has no pending motions at the time.

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

FIPUG has no pending requests for claims for confidentiality.

H. OBJECTIONS TO QUALIFICATION OF WITNESSES AS AN EXPERT

None at this time.

I. SEQUESTRATION OF WITNESSES

FIPUG does not intend to seek to sequester witnesses at this time.

J. STATEMENT OF COMPLIANCE WITH ORDER ESTABLISHING PROCEDURE

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

Dated this 11th day of October, 2024.

Respectfully submitted,

/s/ Jon C. Moyle

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CERTIFICATE OF SERVICE
DOCKET NO. 20240007-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing Prehearing Statement has been furnished by electronic mail on this 11th day of October, 2024, to the following:

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