

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Storm Protection Plan Cost Recovery)
Clause) Docket No. 20250010-EI
) Filed: October 10, 2025

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

The Florida Industrial Power Users Group, ("FIPUG"), through counsel and pursuant to the Order Establishing Procedure in this docket, Order No. PSC-2025-0048-PCO-EI, issued February 10, 2025, hereby submit this Prehearing Statement.

APPEARANCES:

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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 petitioners have the burden of proof to establish that expenditures for which cost recovery is sought are prudent. The Commission should reduce the monies sought by the utilities by the amounts for which it finds insufficient proof or for costs not properly within the scope of the state's storm protection plan statute, section 366.96, Florida Statutes, or the Commission's rule, Rule 25-6.030, Florida Administrative Code.

4. STATEMENT OF FACTUAL ISSUES AND POSITIONS

STORM PROTECTION PLAN COST RECOVERY ISSUES

ISSUE 1A: What jurisdictional amounts should the Commission approve as FPL’s final 2024 prudently incurred costs and final true-up revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

FIPUG: Adopt the position of OPC.

ISSUE 1B: What jurisdictional amounts should the Commission approve as TECO’s final 2024 prudently incurred costs and final true-up revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

FIPUG: Adopt the position of OPC.

ISSUE 1C: What jurisdictional amounts should the Commission approve as the FPUC’s final 2024 prudently incurred costs and final true-up revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

FIPUG: Adopt the position of OPC.

ISSUE 1D: What jurisdictional amounts should the Commission approve as the DEF’s final 2024 prudently incurred costs and final true-up revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

FIPUG: Adopt the position of OPC.

ISSUE 2A: What jurisdictional amounts should the Commission approve as the FPL’s reasonably estimated 2025 costs and estimated true-up revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

FIPUG: Adopt the position of OPC.

ISSUE 2B: What jurisdictional amounts should the Commission approve as TECO’s reasonably estimated 2025 costs and estimated true-up revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

FIPUG: Adopt the position of OPC.

ISSUE 2C: What jurisdictional amounts should the Commission approve as FPUC’s reasonably estimated 2025 costs and estimated true-up revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

FIPUG: Adopt the position of OPC.

ISSUE 2D: What jurisdictional amounts should the Commission approve as DEF’s reasonably estimated 2025 costs and estimated true-up revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

FIPUG: Adopt the position of OPC.

ISSUE 3A: What jurisdictional amounts should the Commission approve as FPL’s reasonably projected 2026 costs and projected revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

FIPUG: Adopt the position of OPC.

ISSUE 3B: What jurisdictional amounts should the Commission approve as TECO’s reasonably projected 2026 costs and projected revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

FIPUG: Adopt the position of OPC.

ISSUE 3C: What jurisdictional amounts should the Commission approve as FPUC’s reasonably projected 2026 costs and projected revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

FIPUG: Adopt the position of OPC.

ISSUE 3D: What jurisdictional amounts should the Commission approve as DEF’s reasonably projected 2026 costs and projected revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

FIPUG: Adopt the position of OPC.

ISSUE 4A: What are the Storm Protection Plan Cost Recovery Clause total jurisdictional cost recovery amounts, including true-ups, to be included in establishing 2026 Storm Protection Plan Cost Recovery factors for FPL?

FIPUG: Adopt the position of OPC.

ISSUE 4B: What are the Storm Protection Plan Cost Recovery Clause total jurisdictional cost recovery amounts, including true-ups, to be included in establishing 2026 Storm Protection Plan Cost Recovery factors for TECO?

FIPUG: Adopt the position of OPC.

ISSUE 4C: What are the Storm Protection Plan Cost Recovery Clause total jurisdictional cost recovery amounts, including true-ups, to be included in establishing 2026 Storm Protection Plan Cost Recovery factors for FPUC?

FIPUG: Adopt the position of OPC.

ISSUE 4D: What are the Storm Protection Plan Cost Recovery Clause total jurisdictional cost recovery amounts, including true-ups, to be included in establishing 2026 Storm Protection Plan Cost Recovery factors for DEF?

FIPUG: Adopt the position of OPC.

ISSUE 5A: What depreciation rates should be used to develop the depreciation expense included in the total 2026 Storm Protection Plan Cost Recovery Clause amounts for FPL?

FIPUG: Adopt the position of OPC.

ISSUE 5B: What depreciation rates should be used to develop the depreciation expense included in the total 2026 Storm Protection Plan Cost Recovery Clause amounts for TECO?

FIPUG: Adopt the position of OPC.

ISSUE 5C: What depreciation rates should be used to develop the depreciation expense included in the total 2026 Storm Protection Plan Cost Recovery Clause amounts for FPUC?

FIPUG: Adopt the position of OPC.

ISSUE 5D: What depreciation rates should be used to develop the depreciation expense included in the total 2026 Storm Protection Plan Cost Recovery Clause amounts for DEF?

FIPUG: Adopt the position of OPC.

ISSUE 6A: What are the appropriate 2026 jurisdictional separation factors for FPL?

FIPUG: Adopt the position of OPC.

ISSUE 6B: What are the appropriate 2026 jurisdictional separation factors for TECO?

FIPUG: Adopt the position of OPC.

ISSUE 6C: What are the appropriate 2026 jurisdictional separation factors for FPUC?

FIPUG: Adopt the position of OPC.

ISSUE 6D: What are the appropriate 2026 jurisdictional separation factors for DEF?

FIPUG: Adopt the position of OPC.

ISSUE 7A: What are the appropriate 2026 Storm Protection Plan Cost Recovery Clause factors for each rate class for FPL?

FIPUG: Adopt the position of OPC.

ISSUE 7B: What are the appropriate 2026 Storm Protection Plan Cost Recovery Clause factors for each rate class for TECO?

FIPUG: Adopt the position of OPC.

ISSUE 7C: What are the appropriate 2026 Storm Protection Plan Cost Recovery Clause factors for each rate class for FPUC?

FIPUG: Adopt the position of OPC.

ISSUE 7D: What are the appropriate 2026 Storm Protection Plan Cost Recovery Clause factors for each rate class for DEF?

FIPUG: Adopt the position of OPC.

ISSUE 8A: What should be the effective date of the 2026 Storm Protection Plan Cost Recovery Clause factors for billing purposes for FPL?

FIPUG: Adopt the position of OPC.

ISSUE 8B: What should be the effective date of the 2026 Storm Protection Plan Cost Recovery Clause factors for billing purposes for TECO?

FIPUG: Adopt the position of OPC.

ISSUE 8C: What should be the effective date of the 2026 Storm Protection Plan Cost Recovery Clause factors for billing purposes for FPUC?

FIPUG: Adopt the position of OPC.

ISSUE 8D: What should be the effective date of the 2026 Storm Protection Plan Cost Recovery Clause factors for billing purposes for DEF?

FIPUG: Adopt the position of OPC.

ISSUE 9A: Should the Commission approve revised tariffs reflecting the 2026 Storm Protection Plan Cost Recovery Clause factors determined to be appropriate in this proceeding for FPL?

FIPUG: Adopt the position of OPC.

ISSUE 9B: Should the Commission approve revised tariffs reflecting the 2026 Storm Protection Plan Cost Recovery Clause factors determined to be appropriate in this proceeding for TECO?

FIPUG: Adopt the position of OPC.

ISSUE 9C: Should the Commission approve revised tariffs reflecting the 2026 Storm Protection Plan Cost Recovery Clause factors determined to be appropriate in this proceeding for FPUC?

FIPUG: Adopt the position of OPC.

ISSUE 9D: Should the Commission approve revised tariffs reflecting the 2026 Storm Protection Plan Cost Recovery Clause factors determined to be appropriate in this proceeding for DEF?

FIPUG: Adopt the position of OPC.

ISSUE 10: Should this docket be closed?

FIPUG: Adopt the position of OPC.

5. STIPULATED ISSUES

FIPUG has not stipulated to any matters in this matter.

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.

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CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic mail this 10th of October 2025 to the following:

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