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090079-EI

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Subject: Docket No. 090079-EI
Attachments: FIPUG Preliminary Issue List 08.13.09.pdf

In accordance with the electronic filing procedures of the Florida Public Service Commission, the following filing is made:

- a. The name, address, telephone number and email for the person responsible for the filing is:

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- b. This filing is made in Docket No. 090079-EI, In re: Petition for increase in rates by Progress Energy Florida, Inc.
- c. The document is filed on behalf of Florida Industrial Power Users Group.
- d. The total pages in the document are 4 pages.
- e. The attached documents are FIPUG's Preliminary Issue List.

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8/13/2009

DOCUMENT NUMBER-DATE
08425 AUG 13 8
FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for increase in rates by Progress Energy Florida, Inc.

DOCKET NO. 090079-EI

Filed: August 13, 2009

**THE FLORIDA INDUSTRIAL POWER USERS GROUP'S
PRELIMINARY ISSUE LIST**

The Florida Industrial Power Users Group (FIPUG), by and through its undersigned attorneys, hereby files its Preliminary List of Issues.¹

NET OPERATING INCOME

1. What is the appropriate level of Distribution Overhead Line maintenance expense for setting rates?
2. What is the appropriate level of Transmission Overhead Line maintenance expense for setting rates?
3. What is the appropriate level of Steam and Other Generation maintenance expense for setting rates?
4. Should incentive compensation that is specifically tied to achieving financial goals be disallowed in setting rates?
5. Should PEF cease contributions to the storm damage reserve?
6. Should PEF be required to revise its storm analysis in its next rate case?

DEPRECIATION

7. Is PEF's requested level of depreciation expense appropriate?
8. What life spans should be used for PEF's coal plants?
9. What life spans should be used for PEF's combined cycle plants?

¹ FIPUG has not included all the rate case issues that are appropriate for consideration in this case and assumes that Staff's preliminary issue list will include additional rate case issues.

10. How should PEF's \$789 million depreciation reserve surplus be treated?
11. What steps should the Commission take to restore generational equity?

12. What are the appropriate guidelines for the pension fund regulatory asset?

COST OF CAPITAL

13. Should PEF's proposed imputation of debt for its purchase power agreements be rejected?
14. What is the appropriate equity ratio for PEF?

COST OF SERVICE AND RATE DESIGN

15. What is the appropriate Cost of Service Methodology to be used to allocate base rate and cost recovery costs to the rate classes?
16. How should any change in revenue requirements be allocated among the customer classes?
17. What are the appropriate energy charges?
18. What are the appropriate demand charges?
19. Should the Commission continue to apply the principle of gradualism in allocating any revenue increase among customer classes?
20. What is the appropriate level of the interruptible credit?
21. Should the interruptible credit be load factor adjusted?

s/ Vicki Gordon Kaufman

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CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the foregoing Florida Industrial Power Users Group's Preliminary List of Issues, was served via Electronic Mail and First Class United States Mail this 13th day of August, 2009, to the following:

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