

**Ruth Nettles**

090007-EI

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**Sent:** Friday, October 02, 2009 11:16 AM  
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**Subject:** Docket No. 090007-EI  
**Attachments:** FIPUG Prehearing Statement 10.02.09.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. 090007-EI, In re: Environmental cost recovery clause.
- c. The document is filed on behalf of Florida Industrial Power Users Group.
- d. The total pages in the document are 7 pages.
- e. The attached document is FIPUG's Prehearing Statement.

Lynette Tenace

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DOCUMENT NUMBER-DATE

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10/2/2009

FPSC-COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Environmental cost recovery clause.

DOCKET NO. 090007-EI

Filed: October 2, 2009

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

The Florida Industrial Power Users Group (FIPUG), by and through its undersigned attorneys, pursuant to Order No. PSC-09-0138-PCO-EI, files its Prehearing Statement.

**A. APPEARANCES:**

JON MOYLE, JR.  
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**On Behalf of the Florida Industrial Power Users Group**

**B. WITNESSES:**

None

**C. EXHIBITS**

None

**D. STATEMENT OF BASIC POSITION**

**FIPUG's Statement of Basic Position:**

No position at this time.

**E. STATEMENT OF ISSUES AND POSITIONS:**

**GENERIC ISSUES**

**Issue 1**      What are the final environmental cost recovery true-up amounts for the period ending December 31, 2008?

**FIPUG:**      No position at this time.

**Issue 2**      What are the estimated environmental cost recovery true-up amounts for the period January 2009 through December 2009?

**FIPUG:**      No position at this time.

**Issue 3**      What are the projected environmental cost recovery amounts for the period January 2010 through December 2010?

**FIPUG:**      No position at this time.

**Issue 4**      What are the environmental cost recovery amounts, including true-up amounts, for the period January 2010 through December 2010?

**FIPUG:**      No position at this time.

**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 2010 through December 2010?

**FIPUG:**      No position at this time.

**Issue 6**      What are the appropriate jurisdictional separation factors for the projected period January 2010 through December 2010?

**FIPUG:**      No position at this time.

**Issue 7**      What are the appropriate environmental cost recovery factors for the period January 2010 through December 2010 for each rate group?

**FIPUG:**      No position at this time.

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

**FIPUG:**      No position at this time.

**COMPANY-SPECIFIC ISSUES**

**Florida Power & Light (FPL)**

**Issue 1**      Should the Commission grant FPL's Petition for Approval of Plant Riviera Manatee Temporary Heating System (MTHS) Project for environmental cost recovery?

**FIPUG:**      No position at this time.

**Issue 2**      How should the costs associated with the MTHS – Riviera Project be allocated to the rate classes?

**FIPUG:**      No position at this time.

**Issue 3**      Should FPL be allowed to recover the costs associated with its proposed Manatee Temporary Heating System (MTHS) – Cape Canaveral Project?

**FIPUG:**      No position at this time.

**Issue 4**      How should the costs associated with the MTHS – Cape Canaveral Project be allocated to the rate classes?

**FIPUG:**      No position at this time.

**Issue 5**      Should FPL be allowed to recover the costs associated with its proposed Turkey Point Cooling Canal Monitoring Plan (TP-CCMP) Project through the ECRC?

**FIPUG:**      No position at this time.

**Issue 6**      How should the costs associated with the TP-CCMP Project be allocated to the rate classes?

**FIPUG:**      No position at this time.

**Issue 7**      Should FPL be allowed to recover the costs associated with its proposed NESHAP Information Collection Request Project through the ECRC?

**FIPUG:**      No position at this time.

**Issue 8**      How should the costs associated with the NESHAP Information Collection Request Project be allocated to the rate classes?

**FIPUG:**      No position at this time.

**Issue 9** What are the reasonable environmental cost recovery amounts for FPL's three Next Generation Solar Energy Center for the final true-up period January 2008 through December 2008?

**FIPUG:** No position at this time.

**Issue 10** Should the Commission approve FPL's updated Clean Air Interstate Rule, Clean Air Mercury Rule and Clean Air Visibility Rule Compliance Projects that are reflected in FPL's April 1, 2009, supplemental filing as reasonable and prudent?

**FIPUG:** No position at this time.

**Issue 11** Should FPL be allowed to recover the increased costs associated with the St. Lucie Cooling Water System Inspection and Maintenance Project?

**FIPUG:** No position at this time.

**Progress Energy Florida (PEF)**

**Issue 1** Should the Commission grant PEF's petition for approval of cost recovery for the Total Maximum Daily Loads Hg Emissions (TMDLs-Hg emission) Program?

**FIPUG:** No position at this time.

**Issue 2** How should the costs associated with the TMDLs-Hg Emission Program be allocated to the rate classes?

**FIPUG:** No position at this time.

**Issue 3** Should the Commission approve PEF's 2009 Review of Integrated Clean Air Compliance Plan as reasonable and prudent?

**FIPUG:** No position at this time.

**Gulf Power Company (Gulf)**

**Issue 1** Should Gulf be allowed to recover the costs associated with its proposed Plant Smith Reclaimed Water Project?

**FIPUG:** No position at this time.

**Issue 2** How should the costs associated with the Plant Smith Reclaimed Water Project be allocated to the rate classes?

**FIPUG:** No position at this time.

**Issue 3** Should Gulf be allowed to recover the costs associated with its proposed Plant Crist Unit 6 Precipitator Project?

**FIPUG:** No position at this time.

**Issue 4** How should the costs associated with the Plant Crist Unit 6 Precipitator Project be allocated to the rate classes?

**FIPUG:** No position at this time.

**Issue 5** Should the Commission approve Gulf's Environmental Compliance Program Update for the Clean Air Interstate Rule and Clean Air Visibility Rule as reasonable and prudent?

**FIPUG:** No position at this time.

**F. STIPULATED ISSUES:**

**FIPUG:** None at this time.

**G. PENDING MOTIONS:**

**FIPUG:** None at this time.

**H. PENDING REQUEST OR CLAIMS FOR CONFIDENTIALITY:**

**FIPUG:** None at this time.

**I. OBJECTIONS TO A WITNESS' QUALIFICATION AS AN EXPERT:**

**FIPUG:** None at this time.

**J. REQUIREMENTS THAT CANNOT BE COMPLIED WITH:**

**FIPUG:** None at this time.

**K. OTHER:**

**FIPUG:** None at this time.

s/ Jon C. Moyle, Jr.  
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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 Prehearing Statement has been served by Electronic Mail and First Class United States Mail this 2<sup>nd</sup> day of October, 2009, to the following:

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