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**Subject:** Docket No. 120001-EI  
**Attachments:** FIPUG Prehearing Statement 10.8.12.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. 120001-EI.
- c. The document is filed on behalf of Florida Industrial Power Users Group
- d. The total pages in the document are 9 pages.
- e. The attached document is FLORIDA INDUSTRIAL POWER USERS GROUP'S PREHEARING STATEMENT.

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DOCUMENT NUMBER-DATE

06844 OCT-8 2012

FPSC-COMMISSION CLERK

10/8/2012

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

Fuel and purchased power cost recovery  
Clause with generating performance  
Incentive factor.

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Docket No. 120001-EI

Filed: October 8, 2012

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

The Florida Industrial Power Users Group (FIPUG), pursuant to Order No. PSC-12-0061-PCO-EI files its Prehearing Statement.

**A. APPEARANCES:**

Jon C. Moyle, Jr.  
Vicki Gordon Kaufman  
Moyle Law Firm, P.A.  
118 North Gadsden Street  
Tallahassee, FL 32312

Attorneys for the Florida Industrial Power Users Group

**B. WITNESSES AND EXHIBITS:**

All witnesses and exhibits listed by other parties in this proceeding, as well as cross-examination exhibits, as necessary.

**C. STATEMENT OF BASIC POSITION:**

FIPUG maintains that the respective utilities must satisfy their burden of proof for any and all monies sought in this proceeding.

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

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

**I. FUEL ISSUES**

**COMPANY-SPECIFIC FUEL ADJUSTMENT ISSUES**

**Progress Energy Florida, Inc.**

**ISSUE 1A:** Should the Commission approve as prudent, PEF's actions to mitigate the volatility of natural gas, residual oil, and purchased power prices, as reported in PEF's April 2012 and August 2012 hedging reports?

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

**ISSUE 1B:** Should the Commission approve PEF's 2013 Risk Management Plan?

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

**ISSUE 1C:** Has PEF correctly reflected the \$129 million refund pursuant to the Settlement approved in Order No. PSC-12-0104-FOF-EI in the calculation of the 2013 fuel factor?

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

**Florida Power & Light Company**

**ISSUE 2A:** Should the Commission approve as prudent, FPL's actions to mitigate the volatility of natural gas, residual oil, and purchased power prices, as reported in FPL's April 2012 and August 2012 hedging reports?

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

**ISSUE 2B:** Should the Commission approve FPL's 2013 Risk Management Plan?

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

**ISSUE 2C:** Should FPL's fuel factors for the new RTR-1 rider be approved?

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

**Florida Public Utilities Company**

**ISSUE 3A:** Is FPUC's proposed method to allocate demand costs to the rate classes appropriate?

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

**ISSUE 3B:** Should FPUC be allowed to recover through the Fuel Clause the legal and consulting fees incurred in developing the Company's Time of Use and Interruptible Rates for its Northwest Division?

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

#### **Gulf Power Company**

**ISSUE 4A:** Should the Commission approve as prudent, GULF's actions to mitigate the volatility of natural gas, residual oil, and purchased power prices, as reported in GULF's April 2012 and August 2012 hedging reports?

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

**ISSUE 4B:** Should the Commission approve Gulf's 2013 Risk Management Plan?

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

#### **Tampa Electric Company**

**ISSUE 5A:** Should the Commission approve as prudent, TECO's actions to mitigate the volatility of natural gas, residual oil, and purchased power prices, as reported in TECO's April 2012 and August 2012 hedging reports?

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

**ISSUE 5B:** Should the Commission approve TECO's 2013 Risk Management Plan?

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

#### **GENERIC FUEL ADJUSTMENT ISSUES**

**ISSUE 6:** What are the appropriate actual benchmark levels for calendar year 2012 for gains on non-separated wholesale energy sales eligible for a shareholder incentive?

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

**ISSUE 7:** What are the appropriate estimated benchmark levels for calendar year 2013 for gains on non-separated wholesale energy sales eligible for a shareholder incentive?

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

**ISSUE 8:** What are the appropriate fuel adjustment true-up amounts for the period January 2011 through December 2011?

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

**ISSUE 9:** What are the appropriate fuel adjustment actual/estimated true-up amounts for the period January 2012 through December 2012?

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

**ISSUE 10:** What are the appropriate total fuel adjustment true-up amounts to be collected/refunded from January 2013 to December 2013?

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

**ISSUE 11:** What are the appropriate projected total fuel and purchased power cost recovery amounts for the period January 2013 through December 2013?

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

**COMPANY-SPECIFIC GENERATING PERFORMANCE INCENTIVE FACTOR ISSUES**

**Progress Energy Florida, Inc.**

No company-specific issues for Progress Energy Florida, Inc. have been identified at this time. If such issues are identified, they shall be numbered 12A, 12B, 12C, and so forth, as appropriate.

**Florida Power & Light Company**

No company-specific issues for Florida Power & Light Company have been identified at this time. If such issues are identified, they shall be numbered 13A, 13B, 13C, and so forth, as appropriate.

**Gulf Power Company**

No company-specific issues for Gulf Power Company have been identified at this time. If such issues are identified, they shall be numbered 14A, 14B, 14C, and so forth, as appropriate.

**Tampa Electric Company**

No company-specific issues for Tampa Electric Company have been identified at this time. If such issues are identified, they shall be numbered 15A, 15B, 15C, and so forth, as appropriate.

## **GENERIC GENERATING PERFORMANCE INCENTIVE FACTOR ISSUES**

**ISSUE 16:** What is the appropriate generation performance incentive factor (GPIF) reward or penalty for performance achieved during the period January 2011 through December 2011 for each investor-owned electric utility subject to the GPIF?

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

**ISSUE 17:** What should the GPIF targets/ranges be for the period January 2013 through December 2013 for each investor-owned electric utility subject to the GPIF?

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

## **FUEL FACTOR CALCULATION ISSUES**

**ISSUE 18:** What are the appropriate projected net fuel and purchased power cost recovery and Generating Performance Incentive amounts to be included in the recovery factor for the period January 2013 through December 2013?

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

**ISSUE 19:** What is the appropriate revenue tax factor to be applied in calculating each investor-owned electric utility's levelized fuel factor for the projection period January 2013 through December 2013?

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

**ISSUE 20:** What are the appropriate levelized fuel cost recovery factors for the period January 2013 through December 2013?

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

**ISSUE 21:** What are the appropriate fuel recovery line loss multipliers to be used in calculating the fuel cost recovery factors charged to each rate class/delivery voltage level class?

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

**ISSUE 22:** What are the appropriate fuel cost recovery factors for each rate class/delivery voltage level class adjusted for line losses?

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

## **II. CAPACITY ISSUES**

### **COMPANY-SPECIFIC CAPACITY COST RECOVERY FACTOR ISSUES**

#### **Progress Energy Florida, Inc.**

**ISSUE 23A:** What is the amount to be included in the Capacity Cost Recovery Clause, for PEF's 2013 nuclear cost recovery?

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

#### **Florida Power & Light Company**

**ISSUE 24A:** What is the amount to be included in the Capacity Cost Recovery Clause, for FPL's 2013 nuclear cost recovery?

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

**ISSUE 24B:** Should an adjustment be made to transfer incremental security costs from the Capacity Cost Recovery Clause to base rates?

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

**ISSUE 24C:** If the Commission approves the Proposed Settlement Agreement, what amount should be included in the capacity cost recovery clause for recovery of jurisdictional non-fuel revenue requirements associated with West County Energy Center Unit 3 (WCEC-3) for the period January 2013 through December 2013?

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

**ISSUE 24D:** Should FPL be permitted to recover incremental Fukushima compliance costs incurred after January 1, 2013 through the Capacity Cost Recovery Clause?

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

**ISSUE 24E:** If the Commission approves the Proposed FPL Rate Case Settlement Agreement that was filed in Docket No. 120015-EI on August 15, 2012 (the "Proposed Settlement Agreement"), should the Commission approve FPL's proposed GBRA factor of 3.527 percent for the Canaveral Modernization Project?

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

#### **Gulf Power Company**

No company-specific issues for Gulf Power Company have been identified at this time. If such issues are identified, they shall be numbered 25A, 25B, 25C, and so forth, as appropriate.

## **Tampa Electric Company**

No company-specific issues for Tampa Electric Company have been identified at this time. If such issues are identified, they shall be numbered 26A, 26B, 26C, and so forth, as appropriate.

### **GENERIC CAPACITY COST RECOVERY FACTOR ISSUES**

**ISSUE 27:** What are the appropriate capacity cost recovery true-up amounts for the period January 2011 through December 2011?

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

**ISSUE 28:** What are the appropriate capacity cost recovery actual/estimated true-up amounts for the period January 2012 through December 2012?

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

**ISSUE 29:** What are the appropriate total capacity cost recovery true-up amounts to be collected/refunded during the period January 2013 through December 2013?

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

**ISSUE 30:** What are the appropriate projected total capacity cost recovery amounts for the period January 2013 through December 2013?

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

**ISSUE 31:** What are the appropriate projected net purchased power capacity cost recovery amounts to be included in the recovery factor for the period January 2013 through December 2013?

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

**ISSUE 32:** What are the appropriate jurisdictional separation factors for capacity revenues and costs to be included in the recovery factor for the period January 2013 through December 2013?

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

**ISSUE 33:** What are the appropriate capacity cost recovery factors for the period January 2013 through December 2013?

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



**III. EFFECTIVE DATE**

**ISSUE 34:** What should be the effective date of the fuel adjustment factors and capacity cost recovery factors for billing purposes?

**FIPUG:** No position 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 Florida Industrial Power Users Group's Prehearing Statement has been furnished by Electronic Mail and United States

Mail this 8<sup>th</sup> day of October, 2012, to the following:

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