

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Determination of Need for
Citrus County Combined Cycle Power Plant

DOCKET NO.: 140110-EI

In re: Petition for Determination of Cost
Effective Generation Alternative to Meet Need
Prior to 2018 for Duke Energy Florida, Inc.

DOCKET NO.: 140111-EI

FILED: August 1, 2014

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

The Florida Industrial Power Users Group (FIPUG), pursuant to Order No. PSC-14-0274-PCO-EI, as modified by Order No. PSC-14-0341-PCO-EI in Docket No. 140110-EI and pursuant to Order No. PSC-14-0275-PCO-EI, as modified by Order No. PSC-14-0341-PCO-EI in Docket No. 140111-EI, files its Consolidated Prehearing Statement.

A. APPEARANCES:

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Representing the Florida Industrial Power Users Group (FIPUG)

B. WITNESSES:

<u>Witness</u>	<u>Subject Matter</u>	<u>Issues</u>
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FIPUG is not presenting its own witnesses, but reserves the right to question witnesses presented by other parties.

C. EXHIBITS

<u>Exhibit</u>	<u>Witness</u>	<u>Description</u>
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FIPUG reserves the right to present exhibits during questioning of witnesses presented by others.

D. STATEMENT OF BASIC POSITION

FIPUG's Statement of Basic Position:

For FIPUG members, the costs of electrical service is a significant variable cost that impacts the business operations of its members. Thus, FIPUG advocates for and seeks reliable electricity and associated electrical services at the lowest possible cost for its members and similarly situated ratepayers.

In these consolidated cases, to the extent the Commission determines that a need exists for additional generating capacity for Duke customers, FIPUG supports the selection of the most cost-effective resources available. Duke must meet its burden of proof in this regard, a position that FIPUG will take on many issues in these consolidated proceedings.

E. STATEMENT OF ISSUES AND POSITIONS:

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ISSUE 1: Is the proposed Citrus County combined cycle plant needed, taking into account the need for electric system reliability and integrity?

FIPUG: **The in-service date of the plant may be deferred based on the evidence presented.**

ISSUE 2: Is the proposed Citrus County combined cycle plant needed, taking into account the need for adequate electricity at a reasonable cost?

FIPUG: **The in-service date of the plant may be deferred based on the evidence presented.**

ISSUE 3: Is the proposed Citrus County combined cycle plant needed, taking into account the need for fuel diversity and supply reliability?

FIPUG: **The in-service date of the plant may be deferred based on the evidence presented.**

ISSUE 4: Are there any renewable energy sources and technologies or conservation measures taken by or reasonably available to Duke Energy Florida that might mitigate the need for the proposed Citrus County combined cycle plant?

FIPUG: **The in-service date of the plant may be deferred based on the evidence presented.**

ISSUE 5: Is the proposed Citrus County combined cycle plant the most cost-effective alternative available to meet the needs of Duke Energy Florida and its customers?

FIPUG: **The in-service date of the plant may be deferred based on the evidence presented.**

ISSUE 6: Did Duke Energy Florida reasonably evaluate all alternative scenarios for cost effectively meeting the needs of its customers over the relevant planning horizon?

FIPUG: **The in-service date of the plant may be deferred based on the evidence presented.**

ISSUE 7: Based on the resolution of the foregoing issues, should the Commission grant the requested determination of need for the proposed Citrus County combined cycle plant?

FIPUG: **The determination of need should not be granted as requested as the in service date of the plant may be deferred based on the evidence presented.**

ISSUE 8: Should this docket be closed?

FIPUG: **Yes.**

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ISSUE 9: Are the proposed Suwannee Simple Cycle Project and Hines Chillers Power Uprate Project needed, taking into account the need for electric system reliability and integrity?

FIPUG: **Duke must meet its burden of proof on this point.**

ISSUE 10: Are the proposed Suwannee Simple Cycle Project and Hines Chillers Power Uprate Project needed, taking into account the need for adequate electricity at a reasonable cost?

FIPUG: **Duke must meet its burden of proof on this point.**

ISSUE 11: Are the proposed Suwannee Simple Cycle Project and Hines Chillers Power Uprate Project needed, taking into account the need for fuel diversity and supply

reliability?

FIPUG: Duke must meet its burden of proof on this point.

ISSUE 12: Are there any renewable energy sources and technologies or conservation measures taken by or reasonably available to Duke Energy Florida, Inc. that might mitigate the need for the proposed Suwannee Simple Cycle Project and Hines Chillers Power Uprate Project?

FIPUG: Duke must meet its burden of proof on this point.

ISSUE 13: Are the proposed Suwannee Simple Cycle Project in 2016 and Hines Chillers Power Uprate Project in 2017 the most cost-effective alternatives available to meet the needs of Duke Energy Florida, Inc. and its customers?

FIPUG: Duke must meet its burden of proof on this point.

ISSUE 14: Did Duke Energy Florida, Inc. reasonably evaluate all alternative scenarios for cost effectively meeting the needs of its customers over the relevant planning horizon?

FIPUG: Duke must meet its burden of proof on this point.

ISSUE 15: Based on the resolution of the foregoing issues, should the Commission grant the requested determination that the proposed Suwannee Simple Cycle Project and Hines Chillers Power Uprate Project are the most cost-effective generation alternatives to meet Duke's needs prior to 2018?

FIPUG: Duke must meet its burden of proof on this point.

ISSUE 16: Should this docket be closed?

FIPUG: Yes.

F. STIPULATED ISSUES

Duke Energy Florida, Inc. provides electrical service to FIPUG members; this proceeding affects the substantial interests of FIPUG members who receive electrical service from Duke Energy Florida, Inc.; FIPUG has standing in this matter for trial and appellate purposes.

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: FIPUG does not object to the witness being deemed an expert able to offer opinion testimony if such witness is clearly designated as an expert witness in pre-filed testimony. To the extent that no such expert witness designation was made, FIPUG reserves the right to object to expert testimony or an undesignated expert witness' qualifications.

K. REQUIREMENTS THAT CANNOT BE COMPLIED WITH.

FIPUG: None at this time.

L. OTHER

FIPUG:

None

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CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the foregoing The Florida Industrial Power Users Group's Consolidated Prehearing Statement has been furnished by electronic mail on this 1st day of August, 2014 to the following:

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