

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Environmental cost recovery clause.

DOCKET NO. 140007-EI

DATED: September 26, 2014

SACE'S PREHEARING STATEMENT

Pursuant to Order No. PSC-14-0087-PCO-EI, filed February 4, 2014, Southern Alliance for Clean Energy ("SACE") files its Prehearing Statement in the above-styled docket.

1. All Known Witnesses

SACE does not intend to call any witnesses.

2. All Known Exhibits

SACE does not intend to file any exhibits at this time.

3. SACE's Statement of Basic Position

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

4. List of Issues and Positions

ISSUE 1: What are the final environmental cost recovery true-up amounts for the period January 2013 through December 2013?

POSITION: No position at this time.

ISSUE 2: What are the estimated/actual environmental cost recovery true-up amounts for the period January 2014 through December 2014?

POSITION: No position at this time.

ISSUE 3: What are the projected environmental cost recovery amounts for the period January 2015 through December 2015?

POSITION: No position at this time.

ISSUE 4: What are the environmental cost recovery amounts, including true-up amounts, for the period January 2015 through December 2015?

POSITION: 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 2015 through December 2015?

POSITION: No position at this time.

ISSUE 6: What are the appropriate jurisdictional separation factors for the projected period January 2015 through December 2015?

POSITION: No position at this time.

ISSUE 7: What are the appropriate environmental cost recovery factors for the period January 2015 through December 2015 for each rate group?

POSITION: No position at this time.

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

POSITION: No position at this time.

Company Specific Issues

ISSUE 9: Should the Commission approve FPL's Waters of the United States Rulemaking Project such that the reasonable costs incurred by FPL in connection with the project may be recovered through the Environmental Cost Recovery Clause?

POSITION: No position at this time.

ISSUE 10: How should the costs associated with FPL's Waters of the United States Rulemaking Project be allocated to the rate classes?

POSITION: No position at this time.

ISSUE 11: Should the Commission approve FPL's Supplemental Clean Air Interstate Rule (CAIR), Mercury and Air Toxics Standards (MATS) and Clean Air Visibility Rule (CAVR)/ Best Available Retrofit Technology (BART) Filing as reasonable?

POSITION: No position at this time.

ISSUE 12: Should the Commission approve DEF's Review of Integrated Clean Air Compliance Plan as reasonable?

POSITION: No position at this time.

5. Stipulated Issues

There are no stipulated issues at this time.

6. Pending Motions

SACE has no pending motions.

7. Pending Confidentiality Claims or Requests

SACE has no pending confidentiality claims.

8. Objections to Witness Qualifications as an Expert

SACE has no objections to any utility witness's qualifications as an expert.

9. Compliance with Order No. PSC-14-0087-PCO-EI

SACE has complied with all requirements of the Order Establishing Procedure entered in this docket.

Respectfully submitted this 26th day of September, 2014 by:

/s/ George Cavros

George Cavros, Esq.

120 E. Oakland Park Blvd, Ste. 105

Fort Lauderdale, FL 33334

Telephone: 954.295.5714

Facsimile: 866.924.2824

Email: george@cavros-law.com

*Attorney for Southern Alliance for
Clean Energy*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by electronic mail this 26th day of September, 2014, to the following:

Ausley Law Firm
James D. Beasley
J. Jeffrey Wahlen
Post Office Box 391
Tallahassee FL 32302
jbeasley@ausley.com

Beggs & Lane
Jeffrey A. Stone/Russell A. Badders/ Steven R.
Griffin
Post Office Box 12950
Pensacola FL 32591-2950
jas@beggslane.com
rab@beggslane.com
srg@BeggsLane.com

Florida Power & Light Company
John T. Butler
700 Universe Boulevard
Juno Beach FL 33408-0420
john.butler@fpl.com

Gulf Power Company
Robert L. McGee, Jr.
One Energy Place
Pensacola FL 32520-0780
rlmcgee@southernco.com

Florida Industrial Power Users Group
Jon C. Moyle, Jr.
Moyle Law Firm, P.A.
The Perkins House
118 North Gadsden Street
Tallahassee, FL 32301
jmoyle@moylelaw.com

Tampa Electric Company
Ms. Paula K. Brown
Regulatory Affairs
Post Office Box 111
Tampa FL 33601-0111
regdept@tecoenergy.com

James W. Brew
F. Alvin Taylor
Brickfield, Burchette, Ritts & Stone, P.C.
1025 Thomas Jefferson Street, NW
Eighth Floor, West Tower
Washington, DC 20007-5201
jbrew@bbrslaw.com

Florida Power & Light Company
Kenneth Hoffman
215 South Monroe Street
Suite 810
Tallahassee FL 32301-1858
ken.hoffman@fpl.com

Hopping Law Firm
Gary V. Perko
Post Office Box 6526
Tallahassee FL 32314
gperko@hgslaw.com

Duke Energy Florida
John T. Burnett
Post Office Box 14042
St. Petersburg FL 33733
john.burnett@duke-energy.com

Office of Public Counsel
J.R. Kelly/ P. Christensen/ C. Rehwinkel
c/o The Florida Legislature
111 W. Madison Street
Room 812
Tallahassee FL 32399-1400
kelly.jr@leg.state.fl.us
christensen.patty@leg.state.fl.us
rehwinkel.charles@leg.state.fl.us

Duke Energy Florida
Paul Lewis, Jr.
106 East College Avenue
Suite 800
Tallahassee FL 32301
paul.lewisjr@duke-energy.com

/s/ George Cavros
George Cavros, Esq.