

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

Petition for determination of need for  
Okeechobee Clean Energy Center Unit 1  
By Florida Power & Light

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DOCKET NO.: 150196-EI

FILED: November 3, 2015

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

The Florida Industrial Power Users Group (FIPUG), pursuant to Order No. PSC-15-0394-PCO-EI, files its Prehearing Statement.

**A. APPEARANCES:**

Jon C. Moyle, Jr.  
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Attorneys for the Florida Industrial Power Users Group

**B. WITNESSES AND EXHIBITS:**

All witness and exhibits listed by other parties.

**C. STATEMENT OF BASIC POSITION:**

The need determination should not be granted.

**ISSUE 1:** Is there a need for the proposed Okeechobee Clean Energy Center Unit 1, taking into account the need for electric system reliability and integrity, as this criterion is used in Section 403.519(3), Florida Statutes?

**FIPUG:** No.

**ISSUE 2:** Are there any renewable energy sources and technologies or conservation measures taken by or reasonably available to Florida Power & Light, which might mitigate the need for the proposed Okeechobee Clean Energy Center Unit 1?

**FIPUG:** Yes.

**ISSUE 3:** Is there a need for the proposed Okeechobee Clean Energy Center Unit 1, taking into account the need for adequate electricity at a reasonable cost, as this criterion is used in Section 403.519(3), Florida Statutes?

**FIPUG:** No.

**ISSUE 4:** Is there a need for the proposed Okeechobee Clean Energy Center Unit 1, taking into account the need for fuel diversity, as this criterion is used in Section 403.519(3), Florida Statutes?

**FIPUG:** No.

**ISSUE 5:** Will the proposed Okeechobee Clean Energy Center Unit 1 provide the most cost-effective alternative, as this criterion is used in Section 403.519(3), Florida Statutes?

**FIPUG:** No.

**ISSUE 6:** Based on the resolution of the foregoing issues, should the Commission grant Florida Power & Light's petition to determine the need for the proposed Okeechobee Clean Energy Center Unit 1?

**FIPUG:** No.

**ISSUE 7:** Should this docket be closed?

**FIPUG:** Yes.

**D. STIPULATED ISSUES:**

None at this time.

**E. PENDING MOTIONS:**

None at this time.

**F. STATEMENT OF PARTY'S PENDING REQUESTS OR CLAIMS FOR CONFIDENTIALITY:**

None.

**G. OBJECTIONS TO QUALIFICATION OF WITNESSES AS AN EXPERT:**

Yes, unless the witness in question affirmatively states the subject matter area(s) in which he or she claims expertise.

**H. STATEMENT OF COMPLIANCE WITH ORDER ESTABLISHING PROCEDURE:**

There are no requirements of the Order Establishing Procedure with which the Florida Industrial Power Users Group cannot comply at this time.

*/s/ Jon C. Moyle*

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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of FIPUG's Prehearing Statement was furnished to the following by Electronic Mail, on this 3rd day of November, 2015:

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*/s/ Jon C. Moyle*

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