

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Environmental Cost  
Recovery Clause

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DOCKET NO. 160007-EI  
FILED: October 4, 2016

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

The Florida Industrial Power Users Group (FIPUG), pursuant to Order No. PSC-16-0103-PCO-EI, files its Prehearing Statement.

**A. APPEARANCES:**

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**B. WITNESSES AND EXHIBITS:**

All witnesses and exhibits listed by other parties in this proceeding.

**C. STATEMENT OF BASIC POSITION:**

Only costs legally authorized should be recovered through the environmental cost recovery clause. FIPUG maintains that the respective utilities must satisfy their burden of proof for any and all monies or other relief sought in this proceeding.

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

**GENERIC ISSUES**

**ISSUE 1.** What are the final environmental cost recovery true-up amounts for the period January 2015 through December 2015?

**FIPUG:** The petitioner has the burden of proof and must carry its burden.

**ISSUE 2.** What are the actual/estimated environmental cost recovery true-up amounts for the period January 2016 through December 2016?

- FIPUG:** The petitioner has the burden of proof and must carry its burden.
- ISSUE 3.** What are the projected environmental cost recovery amounts for the period January 2017 through December 2017?
- FIPUG:** The petitioner has the burden of proof and must carry its burden.
- ISSUE 4.** What are the environmental cost recovery amounts, including true-up amounts and revenue taxes, for the period January 2017 through December 2017?
- FIPUG:** The petitioner has the burden of proof and must carry its burden.
- 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 2017 through December 2017?
- FIPUG:** The petitioner has the burden of proof and must carry its burden.
- ISSUE 6.** What are the appropriate jurisdictional separation factors for the projected period January 2017 through December 2017?
- FIPUG:** The petitioner has the burden of proof and must carry its burden.
- ISSUE 7.** What are the appropriate environmental cost recovery factors for the period January 2017 through December 2017 for each rate group?
- FIPUG:** The petitioner has the burden of proof and must carry its burden.
- ISSUE 8.** What should be the effective date of the new environmental cost recovery factors for billing purposes?
- FIPUG:** The petitioner has the burden of proof and must carry its burden.

#### **COMPANY-SPECIFIC ISSUES**

- FIPUG 9A.** Should all issues related to Gulf's recovery of its identified environmental compliance investment and expenses associated with Gulf's 25% ownership interest in Scherer Unit 3 be carved out and deferred for resolution in Gulf's rate case pending in Docket No. 160186-EI?
- FIPUG:** The matter should be deferred.
- FIPUG 9B.** Should Gulf be allowed to recover, through the ECRC, prudently incurred costs associated with its Plant Scholz CCR Unit Closure project?
- FIPUG:** The petitioner has the burden of proof and must carry its burden.

**FIPUG 9C.** How should costs associated with Gulf's Plant Scholz CCR Unit Closure project be allocated to the rate classes?

**FIPUG:** The petitioner has the burden of proof and must carry its burden.

**FIPUG 10.** Should issues related to FPL's recovery of its projected 2017 costs for the Turkey Point Cooling Canal Monitoring Plan project be deferred for resolution in the 2017 ECRC docket?

**FIPUG:** The matter should be deferred.

**FIPUG 11.** Should the Commission approve DEF's proposed treatment for Bartow-Anclote Pipeline and Turner CT projects, as proposed in DEF's 2016 Estimated Actual and 2017 Projection Filings?

**FIPUG:** The petitioner has the burden of proof and must carry its burden.

**FIPUG 12.** Should the Commission approve revised tariffs reflecting the environmental cost recovery amounts and environmental cost recovery factors determined to be appropriate in this proceeding?

**FIPUG:** The petitioner has the burden of proof and must carry its burden.

**E. STIPULATED ISSUES:**

None at this time.

**F. PENDING MOTIONS:**

None at this time.

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

None.

**H. 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.

**I. 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, Jr. \_\_\_\_\_

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## CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the foregoing was furnished to the following by Electronic Mail, on this 4th day of October, 2016:

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*/s/ Jon C. Moyle*

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