

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for limited proceeding to
Approve first solar base rate adjustment
(SoBRA), Effective September 1, 2018.

DOCKET NO.: 20170260
FILED: April 13, 2018

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

The Florida Industrial Power Users Group (FIPUG), pursuant to Order No. PSC-2018-0077-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:

None

C. STATEMENT OF BASIC POSITION:

Tampa Electric Company seeks approval of its first solar project for inclusion as a specific, discrete adjustment to base rates pursuant to the 2017 Settlement Agreement approved in Order No. PSC-2017-0456-S-EI. Paragraph 6 of the Settlement Agreement provides many criteria for eligibility under the streamlined, limited proceeding base rate freeze exception provided therein.

FIPUG intends to conduct limited cross-examination at hearing intended to hold the Company to its burden to demonstrate compliance with the Settlement's terms. At this point, it has not been conclusively demonstrated that the burden has been met by Tampa Electric.

GENERIC CONSERVATION COST RECOVERY ISSUES

ISSUE 1: Are the 2018 SoBRA projects eligible for treatment pursuant to paragraph 6 of the 2017 Agreement?

FIPUG: No. Tampa Electric has not met its burden of demonstrating compliance with all applicable terms of the 2017 Settlement Agreement.

ISSUE 2: **Are the 2018 SoBRA projects proposed by TECO cost effective pursuant to subparagraph 6(g)?**

FIPUG: No. Tampa Electric has not met its burden of demonstrating compliance with all applicable terms of the 2017 Settlement Agreement.

ISSUE 3: **Are the projected installed costs of each of TECO's 2018 SoBRA projects under the Installed Cost Cap pursuant to subparagraph 6(d) of the 2017 Agreement?**

FIPUG: No. Tampa Electric has not met its burden of demonstrating compliance with all applicable terms of the 2017 Settlement Agreement.

ISSUE 4: **Is the projected average capital cost of the 2018 SOBRA projects no more than \$1,475 kWac for the year 2018 pursuant to subparagraph 6(c), of the 2017 Agreement?**

FIPUG: No. Tampa Electric has not met its burden of demonstrating compliance with all applicable terms of the 2017 Settlement Agreement.

ISSUE 5: **What are the estimated annual revenue requirements associated with TECO's 2018 SoBRA projects?**

FIPUG: At this time Tampa Electric has not met its burden of demonstrating compliance with all applicable terms of the 2017 Settlement Agreement, so the actual revenue requirements cannot be determined for certain.

ISSUE 6: **What are the appropriate base rates needed to collect the estimated annual revenue requirement for the two solar projects in the First SoBRA?**

FIPUG: At this time Tampa Electric has not met its burden of demonstrating compliance with all applicable terms of the 2017 Settlement Agreement, so the actual base rates needed to collect an uncertain revenue requirement cannot be determined for certain.

ISSUE 7: **Should the Commission approve the revised tariffs for TECO reflecting the base rate increases for the 2018 projects determined to be appropriate in these proceedings?**

FIPUG: Not at this time. Tampa Electric has not met its burden of demonstrating compliance with all applicable terms of the 2017 Settlement Agreement.

ISSUE 8: **Should the docket be closed?**

FIPUG: No. Tampa Electric has not met its burden of demonstrating compliance with all applicable terms of the 2017 Settlement Agreement. The docket should remain open until a final true-up based on actual costs is determined by the Commission.

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:

To the extent that any expert witness has not identified his or her area(s) of expertise, FIPUG objects.

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, Jr. _____

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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 13th day of April, 2018:

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