

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for limited proceeding for  
Recovery of incremental storm restoration costs  
Related to Hurricane Matthew by Florida Power  
& Light Company.

DOCKET NO.: 160251-EI  
FILED: May 2, 2018

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

The Florida Industrial Power Users Group (FIPUG), pursuant to Order No. PSC-2017-0471-PCO-EI, files its Prehearing Statement.

**A. APPEARANCES:**

Jon C. Moyle, Jr.  
Karen Putnal  
Moyle Law Firm, P.A.  
118 North Gadsden Street  
Tallahassee, FL 32312

Attorneys for the Florida Industrial Power Users Group

**B. WITNESSES AND EXHIBITS:**

None

**C. STATEMENT OF BASIC POSITION:**

Florida Power and Light Company ("FPL") must carry its burden of proof to establish that Hurricane Matthew expenditures, for which it seeks Commission approval to recover such expenditures from rate payers, are reasonable and prudent.

**ISSUE LIST**

**ISSUE 1: What is the appropriate baseline from which incremental costs are derived?**

**FIPUG:** Adopt position of Office of Public Counsel.

**ISSUE 2: What is the appropriate amount of FPL regular payroll expense to be included in storm recovery?**

**FIPUG:** Adopt position of Office of Public Counsel.

**ISSUE 3: What is the appropriate amount of FPL overtime payroll expense to be**

**included in storm recovery?**

**FIPUG:** Adopt position of Office of Public Counsel.

**ISSUE 4:** **What is the appropriate amount of contractor costs to be included in storm recovery?**

**FIPUG:** Adopt position of Office of Public Counsel.

**ISSUE 5:** **What is the appropriate amount of logistic costs that should be included in storm recovery?**

**FIPUG:** Adopt position of Office of Public Counsel.

**ISSUE 6:** **Are the standby and mobilization/demobilization costs that are included in FPL's storm recovery appropriate? If not, what adjustments, if any, should be made?**

**FIPUG:** Adopt position of Office of Public Counsel.

**ISSUE 7:** **What is the appropriate amount to include in storm recovery to replenish the level of FPL's storm reserve?**

**FIPUG:** Adopt position of Office of Public Counsel.

**ISSUE 8:** **What is the appropriate amount of storm-related costs and storm reserve replenishment FPL is entitled to recover for Hurricane Matthew?**

**FIPUG:** Adopt position of Office of Public Counsel.

**ISSUE 9:** **What is the total amount of storm-related revenues that FPL collected for Hurricane Matthew through their approved interim storm restoration recovery charge?**

**FIPUG:** Adopt position of Office of Public Counsel.

**ISSUE 10:** **If applicable, how should any under-recovery or over-recovery be handled?**

**FIPUG:** Adopt position of Office of Public Counsel.

**ISSUE 11:** **Should this docket be closed?**

**FIPUG:** Yes.

**CONTESTED ISSUES**

**OPC**

**ISSUE A:**     **Should FPL be required to separately track and account for costs associated with standby time, mobilization and demobilization work?**

**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:**

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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Jon C. Moyle, Jr.  
Moyle Law Firm, P.A.  
118 North Gadsden Street  
Tallahassee, Florida 32301  
Telephone:   (850) 681-3828  
Facsimile:   (850) 681-8788  
[jmoyle@moylelaw.com](mailto:jmoyle@moylelaw.com)

Attorneys for Florida Industrial Power Users Group

**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 2nd day of May, 2018:

Suzanne S. Brownless  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850  
[sbrownle@psc.state.fl.us](mailto:sbrownle@psc.state.fl.us)

J.R. Kelly, Esq.  
Charles J. Rehwinkel  
Erik Sayler  
Patty Christensen  
Tarik Noriega  
Office of Public Counsel  
111 West Madison Street, room 812  
Tallahassee, FL 32301  
[kelly.jr@leg.state.fl.us](mailto:kelly.jr@leg.state.fl.us)  
[rehwinkel.charles@leg.state.fl.us](mailto:rehwinkel.charles@leg.state.fl.us)  
[sayler.erik@leg.state.fl.us](mailto:sayler.erik@leg.state.fl.us)  
[christensen.patty@leg.state.fl.us](mailto:christensen.patty@leg.state.fl.us)  
[noriega.tarik@leg.state.fl.us](mailto:noriega.tarik@leg.state.fl.us)

John t. Butler  
Florida Power & Light Company  
700 Universe Boulevard  
Juno Beach, FL 33408  
[John.butler@fpl.com](mailto:John.butler@fpl.com)  
[Wade.litchfield@fpl.com](mailto:Wade.litchfield@fpl.com)

Robert Scheffel Wright/John T. La Via  
Gardner Law Firm  
1300 Thomaswood Drive  
Tallahassee FL 32308  
[jlavia@gbwlegal.com](mailto:jlavia@gbwlegal.com)  
[schef@gbwlegal.com](mailto:schef@gbwlegal.com)

Ken Hoffman  
Florida Power & Light Company  
215 South Monroe Street, Suite 810  
Tallahassee, FL 32301-1858  
[ken.hoffman@fpl.com](mailto:ken.hoffman@fpl.com)

/s/ Jon C. Moyle  
Jon C. Moyle, Jr.