

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Energy Conservation Cost
Recovery Clause

Docket No. 20180002-EG

Filed: October 15, 2018

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

The Florida Industrial Power Users Group (FIPUG), pursuant to Order No. PSC-2018-0094-PCO-EG, 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:

Only costs legally authorized should be recovered through the energy conservation 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.

C. STATEMENT OF BASIC POSITION:

FIPUG maintains that the respective utilities must satisfy their burden of proof for any and all monies or other relief sought in this proceeding.

GENERIC CONSERVATION COST RECOVERY ISSUES

ISSUE 1: What are the final conservation cost recovery adjustment true-up amounts for the period January 2017 through 2017?

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

ISSUE 2: What are the appropriate conservation adjustment actual/estimated true-up amounts for the period January 2018 through December 2018?

- FIPUG:** The petitioner has the burden of proof and must carry its burden.
- ISSUE 3:** **What are the appropriate total conservation adjustment true-up amounts to be collected/refunded from January 2019 through December 2019?**
- FIPUG:** The petitioner has the burden of proof and must carry its burden.
- ISSUE 4:** **What are the total conservation cost recovery amounts to be collected during the period January 2019 through December 2019??**
- FIPUG:** The petitioner has the burden of proof and must carry its burden.
- ISSUE 5:** **What are the conservation cost recovery factors for the period January 2019 through December 2019?**
- FIPUG:** The petitioner has the burden of proof and must carry its burden.
- ISSUE 6:** **What should be the effective date of the new conservation cost recovery factors for billing purposes?**
- FIPUG:** No position at this time.
- ISSUE 7:** **Should the Commission approve revised tariffs reflecting the energy conservation cost recovery amounts and establishing energy conservation cost recovery factors determined to be appropriate in this proceeding?**
- FIPUG:** No position at this time.
- ISSUE 8:** **What is the Contracted Credit Value for the GSLM-2 and GSLM-3 rate riders for Tampa Electric Company for the period January 2019 through December 2019?**
- FIPUG:** No position at this time..
- ISSUE 9:** **What are the residential Price Responsive Load Management (RSVP -1) rate tiers for Tampa Electric Company for the period January 2019 through December 2019?**
- FIPUG:** No position at this time.
- ISSUE 10:** **Should this docket be closed?**

FIPUG: No position at this time.

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, Jr. _____
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

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 15th day of October, 2018:

Margo DuVal
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
mduval@psc.state.fl.us

Ms. Maria J. Moncada
Mr. Joel Baker
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408-0420
maria.moncada@fpl.com
joel.baker@fpl.com

Beth Keating, Esq.
Gunster Law Firm
215 South Monroe Street, Suite 601
Tallahassee, FL 32301
bkeating@gunster.com

Dianne M. Triplett, Esq.
Duke Energy
299 First Avenue North
St. Petersburg, FL 33701
Dianne.triplett@duke-energy.com

Russell Badders, Esq.
Steven Griffin, Esq.
Beggs & Lane Law Firm
Attorneys for Gulf Power Company
P.O. Box 12950
Pensacola, FL 32591
rab@beggslane.com
srg@beggslane.com

Mr. Kenneth A. Hoffman
Florida Power & Light Company
215 S. Monroe Street, Suite 810
Tallahassee, FL 32301-1858
Ken.Hoffman@fpl.com

Mr. Mike Cassel, Regulatory Affairs
Florida Public Utilities Company
1750 SW 14 Street, Suite 200
Fernandina Beach, FL 32034-3052
mcassel@fpuc.com

Paula K. Brown
Tampa Electric Company
Post Office Box 111
Tampa, FL 33601
regdept@tecoenergy.com

Jeffrey A. Stone, General Counsel
Gulf Power Company
One Energy Place, Bin 100
Pensacola, FL 32520-0100
jastone@southernco.com

James W. Brew, Esq.
Laura A. Wynn, Esq.
Attorneys for PCS Phosphate - White
Springs Agricultural Chemicals, Inc.
Stone Mattheis Xenopoulos & Brew, PC
1025 Thomas Jefferson St., NW
Eighth Floor, West Tower
Washington, DC 20007
jbrew@smxblaw.com
law@smxblaw.com

Matthew R. Bernier, Esq.
Duke Energy
106 East College Avenue, Suite 800
Tallahassee, FL 32301
Matthew.bernier@duke-energy.com

Patricia Ann Christensen, Esq.
Charles Rehwinkel, Esq.
Office of Public Counsel
c/o The Florida Legislature
111 West Madison St., Room 812
Tallahassee, FL 32399-1400
christensen.patty@leg.state.fl.us
rehwinkel.charles@leg.state.fl.us

Mr. James D. Beasley
Mr. J. Jeffry Wahlen
Ausley McMullen
Post Office Box 391
Tallahassee, FL 32302
jbeasley@ausley.com
jwahlen@ausley.com

Mr. C. Shane Boyett
Gulf Power Company
One Energy Place
Pensacola, FL 32520
csboyett@southernco.com

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