

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for limited proceeding to  
approve second solar base rate adjustment,  
by Duke Energy Florida, LLC.

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DOCKET NO.: 20190072-EI  
FILED: June 14, 2019

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

The Florida Industrial Power Users Group ("FIPUG"), pursuant to the Order Establishing Procedure in this docket, Order No. PSC-2019-0161-PCO-EI, issued May 3, 2019, hereby submits its Prehearing Statement.

**1. APPEARANCES:**

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Attorneys for the Florida Industrial Power Users Group

**2. WITNESSES:**

All witnesses listed by other parties

**3. EXHIBITS:**

All exhibits listed by other parties.

**4. STATEMENT OF BASIC POSITION:**

Duke Energy Florida, LLC, ("Duke") seeks approval of certain solar projects for inclusion as a specific, discrete adjustment to base rates pursuant to the 2017 Settlement Agreement approved in Order No. PSC-2017-0451-AS-EI. The Settlement Agreement provides

many criteria for eligibility under the streamlined, limited proceeding base rate freeze exception provided therein. FIPUG reserves the right to conduct cross-examination at the hearing, intended to hold Duke to its burden to demonstrate compliance with the Settlement Agreement's terms and otherwise prove that base rates should be increased for the solar projects in question.

**5. STATEMENT OF FACTUAL ISSUES AND POSITIONS:**

**Issue 1:** Are the projected installed costs of the proposed Solar Projects (Trenton, Lake Placid, and DeBary) within the Installed Cost Cap of \$1,650 per kWac pursuant to subparagraph 15(a) of the 2017 Settlement?

FIPUG: Adopt position of OPC.

**Issue 2:** Are the proposed Solar Projects proposed by DEF cost effective pursuant to subparagraph 15(c) of the 2017 Settlement?

FIPUG: Adopt position of OPC.

**Issue 3:** Are the Trenton, Lake Placid, and DeBary Solar Projects proposed by DEF needed pursuant to subparagraph 15(c) of the 2017 Settlement?

FIPUG: Adopt position of OPC.

**Issue 4:** Are the Trenton, Lake Placid, and DeBary Solar Projects otherwise in compliance with the Terms of Paragraph 15 of the 2017 Settlement?

FIPUG: Adopt position of OPC.

**Issue 5:** What is the annual revenue requirement associated with each of the proposed Solar Projects?

FIPUG: Adopt position of OPC.

**Issue 6:** What are the appropriate base rates needed to collect the estimated annual revenue requirement for the proposed Trenton and Lake Placid Solar Projects, projected to be effective in the first billing cycle of January, 2020?

FIPUG: Adopt position of OPC.

**Issue 7:** What are the appropriate base rates needed to collect the estimated annual revenue requirement for the proposed DeBary Solar Project, projected to be effective in the first billing cycle of April, 2020?

FIPUG: Adopt position of OPC.

**Issue 8:** Should the Commission give staff administrative authority to approve revised tariffs reflecting the base rates increase for the Trenton and Lake Placid Solar Projects determined to be appropriate in this proceeding?

FIPUG: Adopt position of OPC.

**Issue 9:** Should the Commission give staff administrative authority to approve revised tariffs reflecting the base rates increase for the DeBary Solar Project determined to be appropriate in this proceeding?

FIPUG: Adopt position of OPC.

**Issue 10:** Should the docket be closed?

FIPUG: Yes.

**6. STIPULATED ISSUES:**

None at this time.

**7. PENDING MOTIONS:**

None.

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

None.

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

FIPUG objects to any expert witness not designated as an expert and expressly offered as an expert witness, with areas of expertise identified.

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

There are no requirements of the Order Establishing Procedure with which FIPUG cannot comply.

/s/ Ian E. Waldick

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**CERTIFICATE OF SERVICE**

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic mail this 14th day of June, 2019, to the following:

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