

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition by Tampa Electric Company  
for a limited proceeding to approve Third  
SoBRA effective January 1, 2020.

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DOCKET NO.: 20190136-EI  
FILED: September 24, 2019

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

The Florida Industrial Power Users Group (FIPUG) files its Prehearing Statement in the above-styled matter.

**A. APPEARANCES:**

Jon C. Moyle, Jr.  
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Attorneys for the Florida Industrial Power Users Group

**B. WITNESSES AND EXHIBITS:**

All witnesses listed by other parties.

**C. STATEMENT OF BASIC POSITION:**

Tampa Electric Company seeks approval of its third 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 criteria for eligibility under the streamlined, limited proceeding base rate freeze exception provided therein.

FIPUG reserves to conduct cross-examination at hearing intended to hold the Company to its burden to demonstrate compliance with the Settlement's terms and otherwise prove that base rates should be increased for the solar projects in question.

**GENERIC CONSERVATION COST RECOVERY ISSUES**

**ISSUE 1: Are the 2020 SoBRA projects eligible for treatment pursuant to paragraph 6 of the 2017 Agreement?**

**FIPUG:** No position at this time.

**ISSUE 2:** Are the 2020 SoBRA projects proposed by TECO cost effective pursuant to subparagraph 6(g) of the 2017 Agreement?

**FIPUG:** No position at this time.

**ISSUE 3:** Are the projected installed costs of each of TECO's 2020 SoBRA projects under the Installed Cost Cap pursuant to subparagraph 6(d) of the 2017 Agreement?

**FIPUG:** No position at this time.

**ISSUE 4:** What are the estimated annual revenue requirements associated with TECO's 2020 SoBRA projects?

**FIPUG:** No position at this time.

**ISSUE 5:** What are the appropriate base rates needed to collect the estimated annual revenue requirement for the solar projects in the third SoBRA?

**FIPUG:** No position at this time.

**ISSUE 6:** Should the Commission approve the tariffs for TECO reflecting the base rate increases for the 2020 projects determined to be appropriate in these proceedings?

**FIPUG:** No position at this time.

**ISSUE 7:** Should the docket be closed?

**FIPUG:** No position at this time.

**D. STIPULATED ISSUES:**

None at this time, though FIPUG's position and reservation of rights to conduct cross examination may possibly change.

**E. PENDING MOTIONS:**

None at this time.

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

None filed or otherwise sought by FIPUG at this time.

**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 the foregoing Florida Industrial Power Users Group's Petition to Intervene has been furnished by electronic mail this 24th day of September 2019 to the following:

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*/s/ Jon C. Moyle, Jr.* \_\_\_\_\_  
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