

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Florida Power & Light
Company for Approval of FPL SolarTogether
Program and Tariff

DOCKET NO.: 20190061-EI
FILED: January 3, 2020

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

The Florida Industrial Power Users Group (FIPUG), pursuant to Order No. PSC-2019-0431-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:

FIPUG reserves the right to call witnesses listed by other parties in this docket.

C. STATEMENT OF BASIC POSITION:

Only reasonable and prudent costs should be recovered in this docket. FIPUG supports renewable energy, provided such energy is needed and cost-effective. FIPUG questions and demands strict proof that the proposed Community Solar projects are needed and cost-effective.

D. STATEMENT OF ISSUES AND POSITIONS:

I. ISSUES

ISSUE 1: Is FPL's proposed SolarTogether Rider tariff an appropriate mechanism to seek approval for the construction of 1,490 MW of new solar generation facilities?

FIPUG: Adopt position of OPC.

ISSUE 2: Does FPL's proposed SolarTogether Rider tariff give any undue or unreasonable preference or advantage to any person or locality or subject the same to any undue or unreasonable prejudice or disadvantage in any respect, contrary to Section 366.03, Florida Statutes?

FIPUG: Adopt position of OPC.

ISSUE 3: Should the Commission allow recovery of all costs and expenses associated with FPL's proposed SolarTogether Program in the manner proposed by FPL?

FIPUG: Adopt position of OPC.

ISSUE 4: Should the Commission approve FPL's proposed SolarTogether Program and associated tariff, Rate Schedule STR, which is the same tariff attached as Attachment I to the Settlement Agreement filed October 9, 2019?

FIPUG: Adopt position of OPC.

ISSUE 5: What adjustments, if any, should the Commission make to any affiliate transaction costs associated with FPL's Solar Together Rider tariff?

FIPUG: Adopt position of OPC.

ISSUE 6: Should this docket be closed?

FIPUG: Adopt position of OPC.

OPC PROPOSED ISSUE:

ISSUE A: Is FPL required to demonstrate a need for the solar generation facilities that will be constructed for SolarTogether and, if so, what need or needs are met by the SolarTogether Program?

FIPUG: Adopt position of OPC.

E. STIPULATED ISSUES:

None at this time.

F. PENDING MOTIONS:

None at this time.

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

None.

H. OBJECTIONS TO QUALIFICATION OF WITNESSES AS AN EXPERT:

FIPUG objects to a witness being considered an expert witness unless the witness affirmatively states the subject matter area(s) in which he or she claims expertise, and voir dire, if requested, is permitted.

I. 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

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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 Prehearing Statement has been furnished by electronic mail this 3rd day of January 2020 to the following:

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/s/ Jon C. Moyle _____
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