

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Re: Duke Energy Florida, LLC's Petition for a
Limited Proceeding to Approve Clean Energy
Connection Program and Tariff and Stipulation

DOCKET NO. 20200176-EI

FILED: December 9, 2020

FIPUG'S POST HEARING BRIEF

The Florida Industrial Power Users Group ("FIPUG"), pursuant to the Order Establishing Procedure in this docket, Order No. PSC-2020-0324-PCO-PU, issued September 22, 2020, hereby submits this Post Hearing Brief.

STATEMENT OF BASIC POSITION

FIPUG supports renewable energy provided it is cost-effective and needed. Duke Energy Florida, LLC ("Duke") must meet its burden of proof to establish that the additional resources it seeks to build are in the public interest.

STATEMENT OF FACTUAL ISSUES AND POSITIONS

GENERIC ISSUES

ISSUE 1: Should the Commission approve the Stipulation for approval of the Duke Energy Florida, LLC, Clean Energy Connection Program and Tariff, when taken as a whole, as in the public interest?

FIPUG: The Commission's decision should rest on whether Duke met its burden of proof to establish that the Clean Energy Connection Program and Tariff is in the public interest, and that renewable energy resulting from the Clean Energy Connection and Tariff is needed and cost-effective.

ISSUE 2: Is Duke Energy Florida, LLC's proposed Clean Energy Connection Program and Tariff an appropriate mechanism to seek approval for the construction of 749 MW of new solar generation facilities?

FIPUG: The Commission's decision should rest on whether Duke met its burden of proof to establish that the Clean Energy Connection Program and Tariff is in the public interest, and that renewable energy resulting from the Clean Energy Connection and Tariff is needed and cost-effective.

ISSUE 3: Does Duke Energy Florida LLC’s proposed Clean Energy Connection Program and 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: The Commission’s decision should rest on whether Duke met its burden of proof to establish that the Clean Energy Connection Program and Tariff is in the public interest, and that renewable energy resulting from the Clean Energy Connection and Tariff is needed and cost-effective.

ISSUE 4: Should the Commission allow recovery of all costs and expenses associated with Duke Energy Florida LLC’s proposed Clean Energy Connection Program and Tariff in the manner proposed by DEF?

FIPUG: The Commission’s decision should rest on whether Duke met its burden of proof to establish that the Clean Energy Connection Program and Tariff is in the public interest, and that renewable energy resulting from the Clean Energy Connection and Tariff is needed and cost-effective.

ISSUE 5: Should the Commission approve Duke Energy Florida LLC’s proposed Clean Energy Connection Program and Tariff?

FIPUG: The Commission’s decision should rest on whether Duke met its burden of proof to establish that the Clean Energy Connection Program and Tariff is in the public interest, and that renewable energy resulting from the Clean Energy Connection and Tariff is needed and cost-effective.

ISSUE 6: Should this docket be closed?

FIPUG: Yes.

Dated this 9th day of December, 2020

Respectfully submitted,

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CERTIFICATE OF SERVICE

Docket No. 20200176-EI

I **HEREBY CERTIFY** that a true and correct copy of the Office of Public Counsel's Prehearing Statement has been furnished by electronic mail on this 9th day of December 2020, to the following:

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