

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Review of 2022-2031 Storm Protection  
Plan, pursuant to Rule 25-6.030, F.A.C.,  
Duke Energy Florida, LLC.

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DOCKET NO.: 20220050-EI  
FILED: July 13, 2022

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

The Florida Industrial Power Users Group (FIPUG), pursuant to Order Establishing Procedure (Order No. PSC-2022-0119-PCO-EI) issued March 17, 2022 and as modified by the First Order Modifying the Order Establishing Procedure (Order No. PSC-2022-0226-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, cost-effective, and prudent costs should be set forth in the company's transmission and distribution storm protection plan. The company must demonstrate and carry its burden of proof that each component of its plan is in the public interest. The company must prove that each component of its plan is expected to reduce restoration costs and outage times. The company must prove that each component of its plan will enhance electric system reliability. The company must meet its burden to satisfactorily establish the estimated annual rate impact of the plan for the first 3 years addressed in the plan.

**D. STATEMENT OF ISSUES AND POSITIONS:**

**ISSUE 1:** Does the Company's Storm Protection Plan contain all of the elements, including but not limited to, a comparison of the costs and dollar benefits, required by Rule 25-6.030, Florida Administrative Code?

**FIPUG:** Adopt position of OPC.

**ISSUE 2:** To what extent, and by how much, are each of the Company's Storm Protection Plan programs and projects expected to reduce restoration costs and outage times associated with extreme weather events?

**FIPUG:** Adopt position of OPC.

**ISSUE 3:** To what extent does the Company's Storm Protection Plan prioritize areas of lower reliability performance?

**FIPUG:** Adopt position of OPC.

**ISSUE 4:** To what extent is the Company's Storm Protection Plan regarding transmission and distribution infrastructure feasible, reasonable, or practical in certain areas of the Company's service territory, including, but not limited to, flood zones and rural areas?

**FIPUG:** Adopt position of OPC.

**ISSUE 5:** What are the estimated costs and dollar benefits to the Company and its customers of the Storm Protection Plan programs and projects?

**FIPUG:** Adopt position of OPC.

**ISSUE 6:** What are the estimated annual rate impacts resulting from implementation of the Company's Storm Protection Plan during the first 3 years addressed in the plan, and are those impacts properly calculated?

**FIPUG:** Adopt position of OPC.

**ISSUE 7:** Should the Commission approve, approve with modification, or deny FPL's new Distribution Winterization Program?

**FIPUG:** Issue Withdrawn.

**ISSUE 8:** Should the Commission approve, approve with modification, or deny FPL's new Transmission Winterization Program?

**FIPUG:** Issue Withdrawn.

**ISSUE 9:** Should the Commission approve, approve with modification, or deny FPL's new Transmission Access Enhancement Program?

**FIPUG:** Adopt position of OPC.

**ISSUE 10:** Is it in the public interest to approve, approve with modification, or deny the Company's Storm Protection Plan?

**FIPUG:** Adopt position of OPC.

**ISSUE 11:** Should this docket be closed?

**FIPUG:** Yes.

**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:**

None at this time.

**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 has been furnished by electronic mail this 13<sup>th</sup> day of July 2022 to the following:

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