

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Storm protection plan cost recovery
clause.

DOCKET NO. 20230010-EI

FILED: August 7, 2023

FIPUG'S PREHEARING STATEMENT

The Florida Industrial Power Users Group ("FIPUG"), pursuant to the Order Establishing Procedure in this docket, Order No. PSC-2023-0090-PCO-EI, issued February 15, 2023 and subsequently revised, hereby submits its Prehearing Statement.

APPEARANCES:

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1. WITNESSES:

FIPUG does not intend, at this time, to call witnesses, but reserves the right to call and question witnesses identified by other parties as permitted.

2. EXHIBITS:

FIPUG does not intend to introduce exhibits at this time, but reserves the right to use and introduce exhibits at hearing as permitted.

3. STATEMENT OF BASIC POSITION

The Petitioners must provide sufficient evidence of its expenditures for recovery of approved storm protection costs to carry its burden of proof and establish that its actions and expenditures were consistent with approved Storm Protection Plans, used and useful, and prudent.

4. **STATEMENT OF ISSUES AND POSITIONS**
GENERIC STORM PROTECTION PLAN COST RECOVERY ISSUES

ISSUE 1: What amounts should the Commission approve as the Utilities' final 2022 prudently incurred costs and final jurisdictional revenue requirement true-up amount for the Storm Protection Plan Cost Recovery Clause?

FIPUG: Upon Commission review and application of the legal standards of review for recovery of the costs sought by the Utilities' the Commission should approve less monetary sums than sought by the Utilities'.

ISSUE 2: What amounts should the Commission approve as the Utilities' reasonably estimated 2023 costs and estimated jurisdictional revenue requirement true-up amount for the Storm Protection Plan Cost Recovery Clause?

FIPUG: The Commission should approve less than the Utilities' requested reasonably estimated 2023 costs and estimated jurisdictional revenue requirement true-up amount for the Storm Protection Plan Cost Recovery Clause.

ISSUE 3: What amounts should the Commission approve as the Utilities' reasonably projected 2024 costs and projected jurisdictional revenue requirement amount for the Storm Protection Plan Cost Recovery Clause?

FIPUG: The Commission should approve less than the Utilities' reasonably projected 2024 costs and projected jurisdictional revenue requirement amount for the Storm Protection Plan Cost Recovery Clause

ISSUE 4: What are the Storm Protection Plan Cost Recovery Clause total jurisdictional revenue requirements, including true-ups, to be included in the Storm Protection Plan Cost Recovery factors for 2024?

FIPUG: The Storm Protection Plan Cost Recovery Clause total jurisdictional revenue requirements requested by the Utilities, including true-ups, to be included in the Storm Protection Plan Cost Recovery factors for 2024, should be less than as requested.

ISSUE 5: What depreciation rates should be used to develop the depreciation expense included in the total Storm Protection Plan Cost Recovery Clause amounts for 2024?

FIPUG: Adopt position of OPC.

ISSUE 6: What are the appropriate jurisdictional separation factors for 2024?

FIPUG: Adopt position of OPC as it relates to this issue for Utilities.

ISSUE 7: What are the appropriate Storm Protection Plan Cost Recovery Clause factors for 2024 for each rate class?

FIPUG: Adopt position of OPC as it relates to this issue for Utilities.

ISSUE 8: What should be the effective date of the new Storm Protection Plan Cost Recovery Clause factors for billing purposes?

FIPUG: The effective date of the new Storm Protection Plan Cost Recovery Clause factors should be January 1, 2024. (Witness: Roche, Sweat)

ISSUE 9: Should the Commission approve revised tariffs reflecting the new Storm Protection Plan Cost Recovery Clause factors determined to be appropriate in this proceeding?

FIPUG: Yes, after making downward adjustments as warranted.

ISSUE 10: Should this docket be closed?

FIPUG: Yes.

4. **COMPANY SPECIFIC ISSUES**

FPL

OPC Proposed Issue 1A: Has FPL demonstrated that the programs and projects contained in its current SPP plan and on which it is basing cost recovery, are prudent to undertake and prudent in amount?

FIPUG: Adopt position of OPC.

OPC Proposed Issue 1B: Has the Commission properly determined, pursuant to Section 366.06(1), Fla. Stat., that the projected expenditures proposed for cost recovery by FPL are prudent?

FIPUG: Adopt position of OPC.

DEF

OPC Proposed Issue 2A: Has DEF demonstrated that the programs and projects contained in its current SPP plan and on which it is basing cost recovery, are prudent to undertake and prudent in amount?

FIPUG: Adopt position of OPC.

OPC Proposed Issue 2B: Has the Commission properly determined, pursuant to Section 366.06(1), Fla. Stat., that the projected expenditures proposed for cost recovery by DEF are prudent?

FIPUG: Adopt position of OPC.

TECO

OPC Proposed Issue 3A: Has Tampa Electric demonstrated that the programs and projects contained in its current SPP plan and on which it is basing cost recovery are prudent to undertake and prudent in amount?

FIPUG: Adopt position of OPC. No.

OPC Proposed Issue 3B: Has the Commission properly determined, pursuant to Section 366.06(1), Fla. Stat., that the projected expenditures proposed for cost recovery by Tampa Electric are prudent?

FIPUG: Adopt position of OPC.

5. STIPULATED ISSUES

None at this time.

6. PENDING MOTIONS

None at this time.

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

FIPUG has no pending requests or claims for confidentiality.

8. **OBJECTIONS TO QUALIFICATION OF WITNESSES AS AN EXPERT**

FIPUG does not have objections to the expert qualifications of any witnesses at this time.

9. **SEQUESTRATION OF WITNESSES**

FIPUG does not request the sequestration of any witnesses at this time.

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

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

Dated this 7th of August, 2023.

Respectfully submitted,

s/ Jon C. Moyle, Jr.

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CERTIFICATE OF SERVICE

DOCKET NO. 20230010-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail on this 7th day of August 2023, to the following:

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