

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In Re: Energy Conservation Cost Recovery  
Clause.

DOCKET NO. 20240002-EG

FILED: October 14, 2024

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

The Florida Industrial Power Users Group, (“FIPUG”), through counsel and pursuant to the Order Establishing Procedure in this docket, Order No. PSC-2024-0028-PCO-EG, issued February 6, 2024, and pursuant to the First Order Modifying Order Establishing Procedure, Order No. PSC-2024-0212-PCO-EG, hereby submit this Prehearing Statement.

**APPEARANCES:**

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Counsel for FIPUG

**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, at this time, to introduce exhibits, but reserves the right to use and introduce exhibits at hearing as permitted.

**3. STATEMENT OF BASIC POSITION**

The utilities bear the burden of proof to justify the recovery of costs they request in this docket as reasonable and prudent. The utilities must carry this burden regardless of whether FIPUG or other parties introduce evidence to the contrary. The utilities must also carry their burden of proof to support their proposal(s) asking the Commission's adoption of policy statements (whether new or changed) or other affirmative relief sought.

#### **4. STATEMENT OF FACTUAL ISSUES AND POSITIONS**

##### Generic Conservation Cost Recovery Issues

**ISSUE 1:** What are the final conservation cost recovery adjustment true-up amounts for the period January 2023 through December 2023?

FIPUG: Adopt position of OPC.

**ISSUE 2:** What are the appropriate conservation adjustment actual/estimated true-up amounts for the period January 2024 through December 2024?

FIPUG: Adopt position of OPC.

**ISSUE 3:** What are the appropriate total conservation adjustment true-up amounts to be collected/refunded in the period January 2025 through December 2025?

FIPUG: Adopt position of OPC.

**ISSUE 4:** What are the total conservation cost recovery amounts to be collected during the period January 2025 through December 2025?

Adopt position of OPC.

**ISSUE 5:** What are the conservation cost recovery factors for the period January 2025 through December 2025?

FIPUG: Adopt position of OPC.

**ISSUE 6:** What should be the effective date of the new conservation cost recovery factors for billing purposes?

FIPUG: Adopt position of OPC.

**ISSUE 7:** Should the Commission approve revised tariffs reflecting the energy conservation cost recovery factors determined to be appropriate in this proceeding?

FIPUG: Adopt position of OPC.

Company Specific Conservation Cost Recovery Issues – Tampa Electric Company

**ISSUE 8:** What is the Contracted Credit Value for the GSLM-2 and GSLM-3 rate riders for Tampa Electric Company for the period January 2025 through December 2025?

FIPUG: No position at this time.

**ISSUE 9:** What are the residential Price Responsive Load Management (RSVP-1) rate tiers for Tampa Electric Company for the period January 2025 through December 2025?

FIPUG: No position at this time.

**ISSUE 10:** Should this docket be closed?

FIPUG: No position at this time.

**5. STIPULATED ISSUES**

None at this time.

**6. PENDING MOTIONS**

FIPUG has no pending motions at the time.

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

FIPUG has no pending requests for claims for confidentiality.

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

None at this time.

**9. SEQUESTRATION OF WITNESSES**

FIPUG does not intend to seek to sequester 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 14<sup>th</sup> day of October, 2024

Respectfully submitted,

/s/ Jon C. Moyle

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**CERTIFICATE OF SERVICE**  
**Docket No. 20240002-EG**

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic mail on this 14th day of October 2024, to the following:

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