

Ruth Nettles

090002-EG

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**Subject:** Docket No. 090002-EG  
**Attachments:** FIPUG Preliminary List of Issues and Positions 09.30.09.pdf

In accordance with the electronic filing procedures of the Florida Public Service Commission, the following filing is made:

a. The name, address, telephone number and email for the person responsible for the filing is:

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b. This filing is made in Docket No. 090002-EG, In re: Energy conservation cost recovery clause.

c. The document is filed on behalf of Florida Industrial Power Users Group.

d. The total pages in the document are 4 pages.

e. The attached document is FIPUG's Preliminary List of Issues and Positions.

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DOCUMENT NUMBER-DATE

10106 SEP 30 8

FPSC-COMMISSION CLERK

9/30/2009

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Energy Conservation Cost )  
Recovery Clause )  
\_\_\_\_\_ )

DOCKET NO. 090002-EG

FILED: SEPTEMBER 30, 2009

**FLORIDA INDUSTRIAL POWER USERS GROUP'S  
PRELIMINARY LIST OF ISSUES AND POSITIONS**

Pursuant to Order No. PSC-09-0184-PCO-EG, issued March 27, 2009, establishing the prehearing procedure in this docket, the Florida Industrial Power Users Group (FIPUG) hereby files its Preliminary List of Issues and Positions.

**GENERIC CONSERVATION COST RECOVERY ISSUES**

**ISSUE 1:** What are the final conservation cost recovery true-up amounts for the period January 2008 through December 2008?

**POSITION:** No position at this time.

**ISSUE 2:** What are the actual/estimated conservation cost recovery true-up amounts for the period January 2009 through December 2009?

**POSITION:** No position at this time.

**ISSUE 3:** What are total conservation cost recovery amounts to be collected during the period January 2010 through December 2010?

**POSITION:** No position at this time.

**ISSUE 4:** What are the conservation cost recovery factors for the period January 2010 through December 2010?

**POSITION:** No position at this time.

**ISSUE 5:** What should be the effective date of the new conservation cost recovery factors for billing purposes?

**POSITION:** No position at this time.

**ISSUE 6:** Should FPL's and PEF's conservation program costs be recovered on a demand basis?

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

**POSITION:** Yes. An increasing amount of conservation program costs are demand based and therefore costs should be recovered on that basis.

**COMPANY-SPECIFIC CONSERVATION COST RECOVERY ISSUES**

**PROGRESS ENERGY FLORIDA**

**ISSUE 7:** What is the Interruptible Demand Credit for PEF for the period January 2010 through December 2010?

**POSITION:** The credit should be at least \$7.13. per billing kW.

**ISSUE 8:** Should the Interruptible Demand Credit be load factor adjusted?

**POSITION:** No.

**ISSUE 9:** Should the value of interruptible power be reflected in the credits applicable to PEF stand-by customers?

**POSITION:** Yes.

**ISSUE 10:** Should PEF's IS credits be locked in for at least 3 years?

**POSITION:** Yes.

**FLORIDA POWER & LIGHT**

**ISSUE 11:** Has FPL appropriately reflected the cost of its CILC program?

**POSITION:** No. FPL has understated the cost of the CILC program by requiring CILC customers to absorb \$22.6 million (42.5%) of its cost.

**ISSUE 12:** What is the appropriate value for FPL's Commercial Industrial Demand Reduction Rider (CDR)?

**POSITION:** The CDR credit should be increased to at least \$5.50 per kW to reflect the current value of interruptible capacity.

**ISSUE 13:** Should the value of interruptible power be reflected in the credits applicable to FPL's stand-by customers?

**POSITION:** Yes.

**ISSUE 14:** Should FPL's CDR credits be locked in for at least 3 years?

**POSITION:** Yes.

s/ Vicki Gordon Kaufman

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the Florida Power Industrial Users Group's Preliminary List of Issues and Positions was served by electronic mail this 30th day of September, 2009 to the following:

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