

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Environmental
Cost Recovery Clause

Docket No. 140007-EI

Filed: September 26, 2014

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

The Florida Industrial Power Users Group (FIPUG), pursuant to Order No. PSC-14-0087-PCO-EI, files its Prehearing Statement.

A. APPEARANCES:

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Attorneys for the Florida Industrial Power Users Group

B. WITNESSES AND EXHIBITS:

All witnesses and exhibits listed by other parties in this proceeding.

C. STATEMENT OF BASIC POSITION:

FIPUG maintains that the respective utilities must satisfy their burden of proof for any and all monies or other relief sought in this proceeding.

D. STATEMENT OF ISSUES AND POSITIONS:

GENERIC ISSUES

ISSUE 1. What are the final environmental cost recovery true-up amounts for the period January 2013 through December 2013?

FIPUG: The respective utilities must meet their burden of proof.

ISSUE 2. What are the estimated/actual environmental cost recovery true-up amounts for the period January 2014 through December 2014?

FIPUG: The respective utilities must meet their burden of proof.

ISSUE 3. What are the projected environmental cost recovery amounts for the period January 2015 through December 2015?

FIPUG: The respective utilities must meet their burden of proof.

ISSUE 4. What are the environmental cost recovery amounts, including true-up amounts, for the period January 2015 through December 2015?

FIPUG: The respective utilities must meet their burden of proof.

ISSUE 5. What depreciation rates should be used to develop the depreciation expense included in the total environmental cost recovery amounts for the period January 2015 through December 2015?

FIPUG: The respective utilities must meet their burden of proof.

ISSUE 6. What are the appropriate jurisdictional separation factors for the projected period January 2015 through December 2015?

FIPUG: The respective utilities must meet their burden of proof.

ISSUE 7. What are the appropriate environmental cost recovery factors for the period January 2015 through December 2015 for each rate group?

FIPUG: The respective utilities must meet their burden of proof.

ISSUE 8. What should be the effective date of the new environmental cost recovery factors for billing purposes?

FIPUG: The respective utilities must meet their burden of proof.

COMPANY-SPECIFIC ISSUES

Florida Power and Light (FPL)

ISSUE 9. Should the Commission approve FPL's Waters of the United States Rulemaking Project such that the reasonable costs incurred by FPL in connection with the project may be recovered through the Environmental Cost Recovery Clause?

FIPUG: No. These costs should not be recovered through the Environmental Cost Recovery Clause.

ISSUE 10. How should the costs associated with FPL's Waters of the United States Rulemaking Project be allocated to the rate classes?

FIPUG: These costs should not be recovered through the Environmental Cost Recovery Clause.

ISSUE 11. Should the Commission approve FPL's Supplemental Clean Air Interstate Rule (CAIR), Mercury and Air Toxics Standards (MATS) and Clean Air Visibility Rule (CAVR)/ Best Available Retrofit Technology (BART) Filing as reasonable?

FIPUG: No, unless FPL meets its burden of proof.

Duke Energy Florida (DEF)

ISSUE 12. Should the Commission approve DEF's Review of Integrated Clean Air Compliance Plan as reasonable?

FIPUG: No, unless DEF meets its burden of proof.

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:

Yes, unless the witness in question affirmatively states the subject matter area(s) in which he or she claims expertise.

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, Jr.

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CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the foregoing was furnished to the following by Electronic Mail, on this 26th day of September, 2014:

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