

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Energy Conservation Cost  
Recovery Clause

Docket No. 160002-EG

Filed: October 4, 2016

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

The Florida Industrial Power Users Group (FIPUG), pursuant to Order No. PSC-16-0102-PCO-EG, files its Prehearing Statement.

**A. APPEARANCES:**

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**B. WITNESSES AND EXHIBITS:**

Only costs legally authorized should be recovered through the energy conservation cost recovery clause. FIPUG maintains that the respective utilities must satisfy their burden of proof for any and all monies or other relief sought 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.

**GENERIC CONSERVATION COST RECOVERY ISSUES**

**ISSUE 1:** What are the final conservation cost recovery true-up amounts for the period January 2015 through December 2015?

**FIPUG:** The petitioner has the burden of proof and must carry its burden.

**ISSUE 2:** What are the total conservation cost recovery amounts to be collected during the period January 2017 through December 2017?

**FIPUG:** The petitioner has the burden of proof and must carry its burden.

**ISSUE 3:** What are the conservation cost recovery factors for the period January 2017 through December 2017?

**FIPUG:** The petitioner has the burden of proof and must carry its burden.

**ISSUE 4:** What should be the effective date of the new conservation cost recovery factors for billing purposes?

**FIPUG:** The petitioner has the burden of proof and must carry its burden.

**COMPANY SPECIFIC CONSERVATION COST RECOVERY ISSUE**

**Tampa Electric Company**

**ISSUE 5:** What is the Contracted Credit Value for the GSLM-2 and GSLM-3 rate riders for Tampa Electric Company for the period January 2017 through December 2017?

**FIPUG:** The petitioner has the burden of proof and must carry its burden.

**ISSUE 6:** What are the residential Price Responsive Load Management (RSVP -1) rate tiers for Tampa Electric Company for the period January 2017 through December 2017?

**FIPUG:** The petitioner has the burden of proof and must carry its burden.

**D. STIPULATED ISSUES:**

None at this time.

**E. PENDING MOTIONS:**

None at this time.

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

None.

**G. 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.

**H. 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 FIPUG's Prehearing Statement was furnished to the following by Electronic Mail, on this 4th day of October, 2016:

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