

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Environmental Cost
Recovery Clause

DOCKET NO. 20180007-EI
FILED: October 15, 2018

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

The Florida Industrial Power Users Group (FIPUG), pursuant to Order No. PSC-2018-0090-PCO-EI and Order No. PSC-2018-0248-PCO-PU, 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:

Only costs legally authorized should be recovered through the environmental 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.

D. STATEMENT OF ISSUES AND POSITIONS:

GENERIC ISSUES

ISSUE 1. What are the final environmental cost recovery true-up amounts for the period January 2017 through December 2017?

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

ISSUE 2. What are the estimated/actual environmental cost recovery true-up amounts for the period January 2018 through December 2018?

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

ISSUE 3. What are the projected environmental cost recovery amounts for the period January 2019 through December 2019?

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

ISSUE 4. What are the environmental cost recovery amounts, including true-up amounts, for the period January 2019 through December 2019?

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

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 2019 through December 2019?

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

ISSUE 6. What are the appropriate jurisdictional separation factors for the projected period January 2019 through December 2019?

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

ISSUE 7. What are the appropriate environmental cost recovery factors for the period January 2019 through December 2019 for each rate group?

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

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

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

ISSUE 9A: Should DEF be allowed to recover, through the ECRC, prudently incurred costs associated with its proposed Crystal River Flue Gas Desulfurization (FGD) Blowdown Pond Closure project?

FIPUG: No position at this time.

ISSUE 9B: How should costs associated with DEF's proposed Crystal River FGD Blowdown Pond Closure project be allocated to rate classes?

FIPUG: No position at this time.

COMPANY-SPECIFIC ISSUES

ISSUE 10A. Should FPL be allowed to recover, through the ECRC, prudently incurred costs associated with its proposed modifications to its Manatee Temporary Heating System project?

FIPUG: No position at this time.

ISSUE 10B. Should FPL be allowed to recover, through the ECRC, prudently incurred costs associated with its proposed modifications to its National Pollution Discharge Elimination System Permit Renewal Requirements project?

FIPUG: No position at this time.

ISSUE 10C. Should FPL be allowed to recover, through the ECRC, prudently incurred costs associated with its proposed Solar Site Avian Monitoring and Reporting project?

FIPUG: No position at this time.

ISSUE 10D: How should costs associated with FPL's proposed Solar Site Avian Monitoring and Reporting project be allocated to rate classes?

FIPUG: No position at this time.

ISSUE 10E: Is FPL meeting remediation objectives in the Florida Department of Environmental Protection Consent Order and the Miami -Dade County DERM Consent Agreement in a timely manner? If not, what jurisdictional amounts, if any, should the Commission approve as reasonably projected?

FIPUG: No position at this time.

ISSUE 11A: Should Gulf be allowed to recover, through the ECRC, prudently incurred costs associated with its proposed 316(b) Cooling Water Intake Structure Regulation project?

FIPUG: No position at this time.

ISSUE 11B: How should costs associated with Gulf's proposed 316(b) Cooling Water Intake Structure Regulation project be allocated to rate classes?

FIPUG: No position at this time.

ISSUE 12A: Should TECO be allowed to recover, through the ECRC, prudently incurred costs associated with its proposed Big Bend Unit 1 Section 316(b) Impingement Mortality project?

FIPUG: No position at this time.

ISSUE 12B: How should costs associated with TECO’s proposed Big Bend Unit 1 Section 316(b) Impingement Mortality project be allocated to rate classes?

FIPUG: No position at this time.

ISSUE 12C: Should TECO be allowed to recover, through the ECRC, prudently incurred costs associated with its proposed Big Bend Station Effluent Limitations Guidelines (ELG) Rule Compliance project?

FIPUG: No position at this time.

ISSUE 12D: How should costs associated with TECO’s proposed Big Bend Station ELG Rule Compliance project be allocated to rate classes?

FIPUG: No position at this time.

ISSUE 13: Should the Commission approve revised tariffs reflecting the environmental cost recovery amounts and environmental cost recovery factors determined to be appropriate in this proceeding?

FIPUG: No position at this time.

ISSUE 14: Should this docket be closed?

FIPUG: No position at this time.

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 15th day of October, 2018:

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