

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Storm Protection Plan Cost Recovery)
Clause) Docket No. 20210010-EI
) Filed: July 12, 2021
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**THE FLORIDA INDUSTRIAL POWER USERS GROUP'S
PREHEARING STATEMENT**

The Florida Industrial Power Users Group (FIPUG), pursuant to Order No. PSC-2021-0083-PCO-EI, files its Prehearing Statement.

A. APPEARANCES:

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B. WITNESSES AND EXHIBITS:

FIPUG reserves the right to call witnesses listed by other parties in this docket.

C. STATEMENT OF BASIC POSITION:

The respective petitioners must prove that amounts sought to be recovered through the Storm Protection Plan Cost Recovery Clause are reasonable, prudent and within the scope of the SPPCRC as authorized.

D. STATEMENT OF ISSUES AND POSITIONS:

I. ISSUES

ISSUE 1: What are the final Storm Protection Plan Cost Recovery Clause jurisdictional cost recovery true-up amounts for the period January 2020 through December 2020?

1A: TECO

FIPUG: Adopt position of OPC.

1B: DEF
FIPUG: Adopt position of OPC.

1C: Gulf
FIPUG: Adopt position of OPC.

1D: FPL
FIPUG: Adopt position of OPC.

ISSUE 2: What are the actual/estimated Storm Protection Plan Cost Recovery Clause jurisdictional cost recovery true-up amounts for the period January 2021 through December 2021?

1A: TECO
FIPUG: Adopt position of OPC.

1B: DEF
FIPUG: Adopt position of OPC.

1C: Gulf
FIPUG: Adopt position of OPC.

1D: FPL
FIPUG: Adopt position of OPC.

ISSUE 3: What are the projected Storm Protection Plan Cost Recovery Clause jurisdictional cost recovery amounts for the period January 2022 through December 2022?

1A: TECO
FIPUG: Adopt position of OPC.

1B: DEF
FIPUG: Adopt position of OPC.

1C: Gulf
FIPUG: Adopt position of OPC.

1D: FPL

FIPUG: Adopt position of OPC.

ISSUE 4: What are the Storm Protection Plan Cost Recovery Clause total jurisdictional cost recovery amounts, including true-ups, to be included in establishing Storm Protection Plan Cost Recovery factors for the period January 2022 through December 2022?

1A: TECO

FIPUG: Adopt position of OPC.

1B: DEF

FIPUG: Adopt position of OPC.

1C: Gulf

FIPUG: Adopt position of OPC.

1D: FPL

FIPUG: Adopt position of OPC.

ISSUE 5: What depreciation rates should be used to develop the depreciation expense included in the total Storm Protection Plan Cost Recovery Clause amounts for the period January 2022 through December 2022?

FIPUG: Adopt position of OPC.

ISSUE 6: What are the appropriate jurisdictional separation factors for the projected period January 2022 through December 2022?

FIPUG: Adopt position of OPC.

ISSUE 7: What are the appropriate Storm Protection Plan Cost Recovery Clause factors for the period January 2022 through December 2022 for each rate group?

FIPUG: Adopt position of OPC.

ISSUE 8: What should be the effective date of the new Storm Protection Plan Cost Recovery Clause factors for billing purposes?

FIPUG: Adopt position of OPC.

ISSUE 9: Should the Commission approve revised tariffs reflecting the new Storm Protection Plan Cost Recovery Clause factors determined to be appropriate in this proceeding?

FIPUG: Adopt position of OPC.

ISSUE 10: Should this docket be closed?

FIPUG: Adopt position of OPC.

COMPANY SPECIFIC STORM PROTECTION PLAN COST RECOVERY ISSUES

FPL SPECIFIC ISSUES

ISSUE A: In the event that the Commission declines to approve FPL's pending request for unified rates in Docket No. 20210015-EI, what are the appropriate Storm Protection Plan Cost Recovery Clause factors for the period January 2022 through December 2022?

FIPUG: Adopt position of OPC.

ISSUE B: How should the assumptions used to develop FPL's 2022 Storm Protection Plan Cost Recovery Clause factors approved in this proceeding be revised to reflect any changes or modifications adopted by the Commission in the 2021 Rate Case pending in Docket No. 20210015-EI?

FIPUG: Adopt position of OPC.

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:

None.

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 _____
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CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic mail this 12th day of July 2021 to the following:

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