

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Energy Conservation Cost  
Recovery Clause

Docket No. 20210002-EG

Filed: October 5, 2021

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

The Florida Industrial Power Users Group (FIPUG), pursuant to Order No. PSC-2021-0344-PCO-EG, 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 and to introduce exhibits during cross examination or otherwise as may be warranted. At this time, however, FIPUG does not intend to call witnesses or introduce exhibits.

**C. STATEMENT OF BASIC POSITION:**

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 monies or other relief sought in this proceeding.

**GENERIC CONSERVATION COST RECOVERY ISSUES**

**ISSUE 1:** What are the final conservation cost recovery adjustment true-up amounts for the January 2020 through December 2020?

**FIPUG:** Adopt the position of the Office of Public Counsel.

**ISSUE 2:** What are the appropriate conservation adjustment actual/estimated true-up amounts for the period January 2021 through December 2021?

**FIPUG:** Adopt the position of the Office of Public Counsel.

**ISSUE 3:** What are the appropriate total conservation adjustment true-up amounts to be collected/refunded from January 2022 through December 2022?

**FIPUG:** Adopt the position of the Office of Public Counsel.

**ISSUE 4:** What is the total conservation cost recovery amounts to be collected during the period January 2022 through December 2022?

**FIPUG:** Adopt the position of the Office of Public Counsel.

**ISSUE 5:** What are the conservation cost recovery factors for the period January 2022 through December 2022?

**FIPUG:** Adopt the position of the Office of Public Counsel.

**ISSUE 6:** Should the Commission approve revised tariffs reflecting the conservation cost recovery amounts and establishing conservation cost recovery factors determined to be appropriate in this proceeding?

**FIPUG:** Adopt the position of the Office of Public Counsel.

**ISSUE 7:** What should be the effective date of the new conservation cost recovery factors for billing purposes?

**FIPUG:** Adopt the position of the Office of Public Counsel.

## COMPANY SPECIFIC CONSERVATION COST RECOVERY ISSUES

### Tampa Electric Company

**ISSUE 8:** What is the Contracted Credit Value for the GSLM-2 and GSLM-3 rate riders for Tampa Electric Company for the period January 2022 through December 2022?

**FIPUG:** Adopt the position of the Office of Public Counsel.

**ISSUE 9:** What are the residential Price Responsive Load Management (RSVP -1) rate tiers for Tampa Electric Company for the period January 2022 through December 2022?

**FIPUG:** Adopt the position of the Office of Public Counsel.

**ISSUE 10:** Should this docket be closed?

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

**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:**

None at this time.

**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 5th day of October, 2021:

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