

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Environmental Cost
Recovery Clause

DOCKET NO. 20220007-EI
FILED: October 7, 2022

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

The Florida Industrial Power Users Group (FIPUG), pursuant to Order No. PSC-2022-0055-PCO-EI, files its Prehearing Statement.

A. APPEARANCES:

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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 2021 through December 2021?

FIPUG: Adopt the position of OPC.

ISSUE 2: What are the actual/estimated environmental cost recovery true-up amounts for the period January 2022 through December 2022?

FIPUG: Adopt the position of OPC.

ISSUE 3: What are the projected environmental cost recovery amounts for the period January 2023 through December 2023?

FIPUG: Adopt the position of OPC.

ISSUE 4: What are the environmental cost recovery amounts, including true-up amounts, for the period January 2023 through December 2023?

FIPUG: Adopt the position of OPC.

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 2023 through December 2023?

FIPUG: Adopt the position of OPC.

ISSUE 6: What are the appropriate jurisdictional separation factors for the projected period January 2023 through December 2023?

FIPUG: Adopt the position of OPC.

ISSUE 7: What are the appropriate environmental cost recovery factors for the period January 2023 through December 2023 for each rate group?

FIPUG: Adopt the position of OPC.

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

FIPUG: Adopt the position of OPC.

ISSUE 9: 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: Adopt the position of OPC.

ISSUE 10: Should this docket be closed?

FIPUG: Yes.

COMPANY-SPECIFIC ENVIRONMENTAL COST RECOVERY ISSUES

Florida Power & Light Company:

ISSUE 11: Should the Commission approve FPL's Combustion Turbine National Emission Standards for Hazardous Air Pollutants Project for cost recovery through the Environmental Cost Recovery Clause?

FIPUG: Adopt the position of OPC.

ISSUE 12: How should any approved Environmental Cost Recovery Clause costs associated with FPL's Combustion Turbine National Emission Standards for Hazardous Air Pollutants Project be allocated to the rate classes?

FIPUG: Adopt the position of OPC.

ISSUE 13: Should FPL be allowed to recover, through the Environmental Cost Recovery Clause, prudently incurred costs associated with its proposed modification to its National Pollutant Discharge Elimination System Permit Requirements Project?

FIPUG: Adopt the position of OPC.

ISSUE 14: Should the Commission approve FPL's proposed treatment for the Environmental Cost Recovery Clause assets associated with the retirement of Martin Thermal Solar, as proposed in FPL's 2022 Actual/Estimated Filing?

FIPUG: Adopt the position of OPC.

Duke Energy Florida, LLC (DEF):

ISSUE 15: Should the Commission approve DEF's National Emission Standards for Hazardous Air Pollutants Project for cost recovery through the Environmental Cost Recovery Clause?

FIPUG: Adopt the position of OPC.

ISSUE 16: How should any approved Environmental Cost Recovery Clause costs associated with DEF's National Emission Standards for Hazardous Air Pollutants Project be allocated to the rate classes?

FIPUG: Adopt the 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 at this time.

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 7th day of October, 2022:

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