

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Energy Conservation Cost  
Recovery Clause

Docket No. 20190002-EG

Filed: October 8, 2019

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

The Florida Industrial Power Users Group (FIPUG), pursuant to Order No. PSC-2019-0082-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 adjustment true-up amounts for the period January 2018 through December 2018?

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

**ISSUE 2:** What are the appropriate conservation adjustment actual/estimated true-up amounts for the period January 2019 through December 2019?

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

**ISSUE 3:** What are the appropriate total conservation adjustment true-up amounts to be collected/refunded from January 2020 through December 2020?

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

**ISSUE 4:** What are the total conservation cost recovery amounts to be collected during the period January 2020 through December 2020?

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

**ISSUE 5:** What are the conservation cost recovery factors for the period January 2020 through December 2020?

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

**ISSUE 6:** What should be the effective date of the new conservation cost recovery factors for billing purposes?

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

**ISSUE 7:** Should the Commission approve revised tariffs reflecting the energy conservation cost recovery amounts and energy conservation cost recovery factors determined to be appropriate in this proceeding?

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

## 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 2020 through December 2020?

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

**ISSUE 9:** What are the residential Price Responsive Load Management (RSVP -1) rate tiers for Tampa Electric Company for the period January 2020 through December 2020?

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

**ISSUE 10:** What are the credit factors to be applied during the January 2020 billing cycles to refund the “Final Tax Savings Credit” amount of \$11,500,000.

**FIPUG:**

MISCELLANEOUS ISSUES

**ISSUE 11:** Should the Joint Motion to Modify Order No. PSC-2012-0425-PAA-EU Regarding Weighted Average Cost of Capital Methodology be approved?

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

**ISSUE 12:** 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:**

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 8th day of October, 2019:

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