

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Determination of Cost
Effective Generation Alternative to Meet Need
Prior to 2018 for Duke Energy Florida, Inc.

DOCKET NO.: 140111-EI

FILED: September 10, 2014

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**THE FLORIDA INDUSTRIAL POWER USERS GROUP'S
POST-HEARING STATEMENT OF ISSUES AND BRIEF**

The Florida Industrial Power Users Group (FIPUG), by and through its undersigned counsel, files this Post-Hearing Statement of Issues and Positions and Post-Hearing Brief.

BASIC POSITION AND SUMMARY

FIPUG supports the development of cost effective, reasonable, prudent energy sources to serve Florida consumers. Given that Duke withdrew a significant portion of its case (all issues related to the Suwannee peaking units), leaving only issues related to the Hines chiller units, FIPUG would simply state that Duke must meet its burden of proof to demonstrate that the Hines chiller units are needed. FIPUG reserves all of its rights related to the tentative agreement announced at trial between Duke and Calpine that was announced just after the consolidated hearing commenced.

ISSUES

ISSUE A: Does the Commission have jurisdiction in this docket to grant Duke's request for a determination that the proposed Suwannee Simple Cycle Project and Hines Chillers Power Uprate Project are the most cost-effective generation alternatives to meet Duke's needs prior to 2018?

FIPUG: **No Position.**

ISSUE 9: Are the proposed Suwannee Simple Cycle Project and Hines Chillers Power Uprate Project needed, taking into account the need for electric system reliability

and integrity?

FIPUG: Duke must meet its burden of proof on this point.

ISSUE 10: Are the proposed Suwannee Simple Cycle Project and Hines Chillers Power Uprate Project needed, taking into account the need for adequate electricity at a reasonable cost?

FIPUG: Duke must meet its burden of proof on this point.

ISSUE 11: Are the proposed Suwannee Simple Cycle Project and Hines Chillers Power Uprate Project needed, taking into account the need for fuel diversity and supply reliability?

FIPUG: Duke must meet its burden of proof on this point.

ISSUE 12: Are there any renewable energy sources and technologies or conservation measures taken by or reasonably available to Duke Energy Florida, Inc. that might mitigate the need for the proposed Suwannee Simple Cycle Project and Hines Chillers Power Uprate Project?

FIPUG: Duke must meet its burden of proof on this point.

ISSUE 13: Are the proposed Suwannee Simple Cycle Project in 2016 and Hines Chillers Power Uprate Project in 2017 the most cost-effective alternatives available to meet the needs of Duke Energy Florida, Inc. and its customers?

FIPUG: Duke must meet its burden of proof on this point.

ISSUE 14: Did Duke Energy Florida, Inc. reasonably evaluate all alternative scenarios for cost effectively meeting the needs of its customers over the relevant planning horizon?

FIPUG: Duke must meet its burden of proof on this point.

ISSUE 15: Based on the resolution of the foregoing issues, should the Commission grant the requested determination that the proposed Suwannee Simple Cycle Project and Hines Chillers Power Uprate Project are the most cost-effective generation alternatives to meet Duke's needs prior to 2018?

FIPUG: Duke must meet its burden of proof on this point.

ISSUE 16: Should this docket be closed?

FIPUG: Yes.

Discussion of Issues 9 Through 16

Given that Duke withdrew a significant portion of its case (all issues related to the Suwannee peaking units), leaving only issues related to the Hines chiller units, FIPUG would simply state that Duke must meet its burden of proof to demonstrate that the Hines chiller units are needed. FIPUG reserves all of its rights related to the tentative agreement between Duke and Calpine that was announced just after the consolidated hearing commenced.

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CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the foregoing The Florida Industrial Power Users Group's Consolidated Brief has been furnished by electronic mail on this 10th day of September, 2014 to the following:

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