

**Dorothy Menasco**

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**Sent:** Friday, October 03, 2008 4:59 PM  
**To:** Filings@psc.state.fl.us  
**Subject:** FW: Dkt 08007-EI Prehearing Statement  
**Attachments:** FIPUG prehearing statement.doc

1. John W. McWhirter, Jr., PO Box 3350 ,FI 33601-3350, [jmcwhirter@mac-law.com](mailto:jmcwhirter@mac-law.com) is the person responsible for this electronic filing;
2. The filing is to be made in Docket 080007-EI, In re: ECRC The filing is made on behalf of the Florida Industrial Power Users Group;
3. The total number of pages is 7; and
4. The attached document is The Florida Industrial Power User Group's Prehearing Statement

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10/3/2008

DOCUMENT NUMBER-DATE  
09385 OCT-3 8  
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Environmental cost recovery clause.

DOCKET NO. 080007-EI

FILED: October 3, 2008

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

The Florida Industrial Power Users Group (FIPUG) hereby files its Prehearing Statement, in compliance with Pursuant to Order No. PSC-08-0149-PCO-EI, issued March 11, 2008, establishing the prehearing procedure in this docket.

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**A. APPEARANCES:**

**JOHN W. MCWHIRTER, JR.,** PO Box 3350, Tampa, Florida 33601-3350,

**On Behalf of the Florida Industrial Power Users Group.**

**B. WITNESSES:**

None.

**C. EXHIBITS:**

None at this time. However, FIPUG reserves the right to utilize appropriate exhibits during cross-examination.

**D. STATEMENT OF BASIC POSITION:**

FIPUG thinks it would be in the interest of energy efficiency for the Commission to direct those utilities that have filed or contemplate filing a base rate case in the near term to roll all fixed environmental costs into base rates.

**E. STATEMENT OF ISSUES AND POSITIONS**

**1. What are the final environmental cost recovery true-up amounts for the period ending December 31, 2007?**

FIPUG: No position at this time.

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2. **What are the estimated environmental cost recovery true-up amounts for the period January 2008 through December 2008?**

FIPUG: No position at this time.

3. **What are the projected environmental cost recovery amounts for the period January 2009 through December 2009?**

FIPUG: No position at this time.

4. **What are the environmental cost recovery amounts, including true-up amounts, for the period January 2009 through December 2009?**

FIPUG: No position at this time.

5. **What depreciation rates should be used to develop the depreciation expense included in the total environmental cost recovery amounts for the period January 2009 through December 2009?**

FIPUG: No position at this time.

6. **What are the appropriate jurisdictional separation factors for the projected period January 2009 through December 2009?**

FIPUG: No position at this time.

7. **What are the appropriate environmental cost recovery factors for the period January 2009 through December 2009 for each rate group?**

FIPUG: No position at this time.

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

FIPUG: No position at this time.

**COMPANY-SPECIFIC ISSUES**

**Florida Power & Light (FPL)**

1. Should the Commission grant FPL's petition to modify the scope of its CWA 316(b)

Phase II Rule Project?

FIPUG: No position at this time.

2. What are the environmental cost recovery amounts of FPL's three Next Generation Solar Energy Centers for the period January 2008 through December 31, 2008?

FIPUG: No position at this time.

3. What are the environmental cost recovery amounts of FPL's three Next Generation Solar Energy Centers for the period January 2009 through December, 2009?

FIPUG: No position at this time.

4. How should the costs associated with the three Next Generation Solar Energy Centers be allocated to the rate classes?

FIPUG: No position at this time.

5. Should FPL be allowed to recover the costs associated with its proposed Greenhouse Gas Reduction Program?

FIPUG: No position at this time.

6. How should the costs associated with the Greenhouse Gas Reduction Program be allocated to the rate classes?

FIPUG: No position at this time.

7. Should the Commission approve FPL's proposed Updated Integrated Clean Air Compliance Plan to address the vacated Clean Air Interstate Rule (CAIR)?

FIPUG: No position at this time.

**Progress Energy Florida (PEF)**

1. Should PEF be allowed to recover the costs associated with its proposed Crystal River Thermal Discharge Compliance Project?

FIPUG: No position at this time.

2. How should the newly proposed environmental costs for the Crystal River Thermal Discharge Compliance Project be allocated to the rate classes?

FIPUG: No position at this time.

3. Should PEF be allowed to recover costs associated with its proposed Greenhouse Gas Inventory and Reporting Project?

FIPUG: No position at this time.

4. How should the costs associated with the Greenhouse Gas Inventory and Reporting Project be allocated to the rate classes?

FIPUG: No position at this time.

5. Should the Commission approve PEF's proposed Updated Integrated Clean Air Compliance Plan to address the vacated Clean Air Interstate Rule (CAIR)?

FIPUG: No position at this time.

**Gulf Power Company (Gulf)**

1. Should Gulf be allowed to recover the costs associated with its proposed Plan Smith SPCC Compliance Project?

FIPUG: No position at this time.

2. How should the costs associated with the Plant Smith SPCC Compliance Project be allocated to the rate classes?

FIPUG: No position at this time.

3. Should Gulf be allowed to recover the costs associated with its proposed Plant Crist Water Conservation Project?

FIPUG: No position at this time.

4. How should the costs associated with the Plant Crist Water Conservation Project be allocated to the rate classes?

FIPUG: No position at this time.

5. Should Gulf be allowed to recover the costs associated with its proposed Impaired Waters Rule (IWR) Project?

FIPUG: No position at this time.

6. How should the costs associated with the IWR Project be allocated to the rate classes?

FIPUG: No position at this time.

7. Should Gulf be allowed to recover the costs associated with its proposed Annual Climate Registry Project?

FIPUG: No position at this time.

8. How should the costs associated with the Annual Climate Registry Project be allocated to the rate classes?

FIPUG: No position at this time.

9. Should the Commission approve Gulf's proposed Updated Integrated Clean Air Compliance Plan to address the vacated Clean Air Interstate Rule (CAIR)?

FIPUG: No position at this time.

**Tampa Electric Company (TECO)**

1. Should TECO be allowed to recover the costs associated with its proposed Greenhouse Gas Reduction Program?

FIPUG: No position at this time.

2. How should the costs associated with the Greenhouse Gas Reduction Program be allocated to the rate classes?

FIPUG: No position at this time.

3. Should the Commission approve TECO's proposed Updated Integrated Clean Air Compliance Plan to address the vacated Clean Air Interstate Rule (CAIR)?

FIPUG: No position at this time.

**F. EXHIBITS**

None.

**G. PENDING MOTIONS OR OTHER MATTERS:**

None.

**H. PENDING CLAIMS OF CONFIDENTIALITY:**

None.

**I. OBJECTIONS TO WITNESS' QUALIFICATIONS AS AN EXPERT**

None.

**J. COMPLIANCE WITH PROCEDURAL ORDERS:**

FIPUG has not at this time identified any portion of the procedural orders that it cannot obey.

Respectfully submitted,

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing pleading was furnished to the following, by electronic mail, on this 3rd day of October, 2008:

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