

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Energy Conservation Cost
Recovery Clause
_____ /

Docket No. 170002-EG

Filed: October 4, 2017

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

The Florida Industrial Power Users Group (FIPUG), pursuant to Order No. PSC-2017-0111-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 and any cost for which recovery is sought must be reasonable and prudent expenditures.

GENERIC CONSERVATION COST RECOVERY ISSUES

ISSUE 1: What are the final conservation cost recovery adjustment true-up amounts for the period January 2016 through 2016?

FIPUG: The petitioner has the burden of proof and must carry its burden.

ISSUE 2: What are the appropriate conservation adjustment actual/estimated true-up amounts for the period January 2017 through December 2017?

FIPUG: The petitioner has the burden of proof and must carry its burden.

ISSUE 3: **What are the appropriate total conservation adjustment true-up amounts to be collected/refunded from January 2018 through December 2018?**

FIPUG: The petitioner has the burden of proof and must carry its burden.

ISSUE 4: **What are the total conservation cost recovery amounts to be collected during the period January 2018 through December 2018??**

FIPUG: The petitioner has the burden of proof and must carry its burden.

ISSUE 5: **What are the conservation cost recovery factors for the period January 2018 through December 2018?**

FIPUG: The petitioner has the burden of proof and must carry its burden.

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

FIPUG: The petitioner has the burden of proof and must carry its burden.

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

FIPUG: The petitioner has the burden of proof and must carry its burden.

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 in prefiled testimony 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 4th day of October, 2017:

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