

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for limited proceeding to
Approve first solar base rate adjustment
(SoBRA), by Duke Energy Florida, LLC.

DOCKET NO.: 20180149
FILED: March 7, 2019

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

The Florida Industrial Power Users Group (“FIPUG”), pursuant to the Order Establishing Procedure in this docket, Order No. PSC-2018-0505-PCO-EI, issued October 19, 2018, hereby submits its Prehearing Statement.

APPEARANCES:

Jon C. Moyle, Jr.
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Attorneys for the Florida Industrial Power Users Group

1. WITNESSES:

All witnesses listed by other parties

2. EXHIBITS:

All exhibits listed by other parties.

3. STATEMENT OF BASIC POSITION:

Duke Energy Florida, LLC seeks approval of certain solar projects for inclusion as a specific, discrete adjustment to base rates pursuant to the 2017 Settlement Agreement approved in Order No. PSC-2017-0451-AS-EI. The Settlement Agreement provides many criteria for eligibility under the streamlined, limited proceeding base rate freeze exception provided therein.

FIPUG reserves the right to conduct cross-examination at hearing intended to hold the Company to its burden to demonstrate compliance with the Settlement's terms and otherwise prove that base rates should be increased for the solar projects in question.

4. STATEMENT OF FACTUAL ISSUES AND POSITIONS

Issue 1: Are the projected installed costs of each of the Hamilton and Columbia projects proposed by DEF within the Installed Cost Cap of \$1,650 per kWac pursuant to subparagraph 15(a) of the 2017 Second RRSSA?

FIPUG: Adopt position of OPC.

Issue 2: Are the Hamilton and Columbia Solar Projects proposed by DEF cost effective pursuant to subparagraph 15(c) of the 2017 Second RRSSA?

FIPUG: Adopt position of OPC.

Issue 3: Are the Hamilton and Columbia Solar Projects proposed by DEF needed pursuant to subparagraph 15(c) of the 2017 Second RRSSA?

FIPUG: Adopt position of OPC.

Issue 4: Are the Hamilton and Columbia Solar Projects otherwise in compliance with the Terms of Paragraph 15 of the 2017 Second RRSSA?

FIPUG: Adopt position of OPC.

Issue 5: What is the annual revenue requirement associated with DEF's Hamilton Project?

FIPUG: Adopt position of OPC.

Issue 6: What is the annual revenue requirements associated with DEF's Columbia Project?

FIPUG: Adopt position of OPC.

Issue 7: What are the appropriate base rates needed to collect the estimated annual revenue requirement for the Columbia Project?

FIPUG: Adopt position of OPC.

Issue 8: Should the Commission modify the tariffs and associated base rates for the Hamilton Project approved in Order No. PSC-2018-0559-FOF-EI based on the Commission's decision in Issue 5?

FIPUG: Adopt position of OPC.

Issue 9: Should the Commission give staff administrative authority to approve tariffs and associated base rates reflecting the Commission's decision on the Columbia Project in Issue 6?

FIPUG: Adopt position of OPC.

Issue 10: What should be the effective date of the Columbia Project tariffs?

FIPUG: Adopt position of OPC.

Issue 11: Should the docket be closed?

FIPUG: Yes.

5. STIPULATED ISSUES:

None at this time.

6. PENDING MOTIONS:

None.

7. STATEMENT OF PARTY'S PENDING REQUESTS OR CLAIMS FOR CONFIDENTIALITY:

None.

8. OBJECTIONS TO QUALIFICATION OF WITNESSES AS AN EXPERT:

FIPUG objects to any expert witness not designated as an expert and expressly offered as an expert witness, with areas of expertise identified.

9. STATEMENT OF COMPLIANCE WITH ORDER ESTABLISHING PROCEDURE:

There are no requirements of the Order Establishing Procedure with which FIPUG cannot comply.

/s/ Jon C. Moyle

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CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic mail this 7th day of March, 2019, to the following:

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/s/ Jon C. Moyle

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