

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Review of 2020-2029 Storm Protection : DOCKET NO. 20200067-EI
Plan pursuant to Rule 25-6.030, F.A.C., Tampa :
Electric Company. :

In re: Review of 2020-2029 Storm Protection : DOCKET NO. 20200069-EI
Plan pursuant to Rule 25-6.030, F.A.C., Duke :
Energy Florida, LLC. :

In re: Review of 2020-2029 Storm Protection : DOCKET NO. 20200070-EI
Plan pursuant to Rule 25-6.030, F.A.C., Gulf :
Power Company. :

In re: Review of 2020-2029 Storm Protection : DOCKET NO. 20200071-EI
Plan pursuant to Rule 25-6.030, F.A.C., :
Florida Power & Light Company. : Filed: July 20, 2020

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

The Florida Industrial Power Users Group (FIPUG), pursuant to Order No. PSC-2020-0073-PCO-EI, files its Prehearing Statement.

A. APPEARANCES:

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B. WITNESSES AND EXHIBITS:

FIPUG reserves the right to call witnesses listed by other parties in this docket.

C. STATEMENT OF BASIC POSITION:

FIPUG: Each utility presenting a Storm Protection Plan for approval in this proceeding must demonstrate, in accordance with applicable law, that its storm protection / storm hardening efforts and activities are reasonable, prudent, and specifically authorized by section 366.96, Florida Statutes. Utilities must further demonstrate that programs and the costs associated with storm protection / storm hardening efforts and activities will not be subject to duplicate cost recovery under the utility's base rates and the Storm Protection Plan Cost Recovery Clause.

D. STATEMENT OF ISSUES AND POSITIONS:

E. LIST OF ISSUES

Issue 1A: Does TECO's 2020-2029 Storm Protection Plan contain all of the elements required by Rule 25-6.030, Florida Administrative Code?

FIPUG: FIPUG adopts the position of Office of Public Counsel.

Issue 1B: Does DEF's 2020-2029 Storm Protection Plan contain all of the elements required by Rule 25-6.030, Florida Administrative Code?

FIPUG: FIPUG adopts the position of Office of Public Counsel.

Issue 1C: Does Gulf's 2020-2029 Storm Protection Plan contain all of the elements required by Rule 25-6.030, Florida Administrative Code?

FIPUG: FIPUG adopts the position of Office of Public Counsel.

Issue 1D: Does FPL's 2020-2029 Storm Protection Plan contain all of the elements required by Rule 25-6.030, Florida Administrative Code?

FIPUG: FIPUG adopts the position of Office of Public Counsel.

Issue 2A: To what extent is TECO's 2020-2029 Storm Protection Plan expected to reduce restoration costs and outage times associated with extreme weather events and enhance reliability?

FIPUG: FIPUG adopts the position of Office of Public Counsel.

Issue 2B: To what extent is DEF's 2020-2029 Storm Protection Plan expected to reduce restoration costs and outage times associated with extreme weather events and enhance reliability?

FIPUG: FIPUG adopts the position of Office of Public Counsel.

Issue 2C: To what extent is Gulf’s 2020-2029 Storm Protection Plan expected to reduce restoration costs and outage times associated with extreme weather events and enhance reliability?

FIPUG: FIPUG adopts the position of Office of Public Counsel.

Issue 2D: To what extent is FPL’s 2020-2029 Storm Protection Plan expected to reduce restoration costs and outage times associated with extreme weather events and enhance reliability?

FIPUG: FIPUG adopts the position of Office of Public Counsel.

Issue 3A: To what extent does TECO’s 2020-2029 Storm Protection Plan prioritize areas of lower reliability performance?

FIPUG: FIPUG adopts the position of Office of Public Counsel.

Issue 3B: To what extent does DEF’s 2020-2029 Storm Protection Plan prioritize areas of lower reliability performance?

FIPUG: FIPUG adopts the position of Office of Public Counsel.

Issue 3C: To what extent does Gulf’s 2020-2029 Storm Protection Plan prioritize areas of lower reliability performance?

FIPUG: FIPUG adopts the position of Office of Public Counsel.

Issue 3D: To what extent does FPL’s 2020-2029 Storm Protection Plan prioritize areas of lower reliability performance?

FIPUG: FIPUG adopts the position of Office of Public Counsel.

Issue 4A: To what extent is TECO’s 2020-2029 Storm Protection Plan regarding transmission and distribution infrastructure feasible, reasonable, or practical in certain areas of TECO’s service territory, including, but not limited to, flood zones and rural areas?

FIPUG: FIPUG adopts the position of Office of Public Counsel.

Issue 4B: To what extent is DEF’s 2020-2029 Storm Protection Plan regarding transmission and distribution infrastructure feasible, reasonable, or practical in certain areas of DEF’s service territory, including, but not limited to, flood zones and rural areas?

FIPUG: FIPUG adopts the position of Office of Public Counsel.

Issue 4C: To what extent is Gulf’s 2020-2029 Storm Protection Plan regarding transmission and

distribution infrastructure feasible, reasonable, or practical in certain areas of Gulf's service territory, including, but not limited to, flood zones and rural areas?

FIPUG: FIPUG adopts the position of Office of Public Counsel.

Issue 4D: To what extent is FPL's 2020-2029 Storm Protection Plan regarding transmission and distribution infrastructure feasible, reasonable, or practical in certain areas of FPL's service territory, including, but not limited to, flood zones and rural areas?

FIPUG: FIPUG adopts the position of Office of Public Counsel.

Issue 5A: What are the estimated costs and benefits to TECO and its customers of making the improvements proposed in the 2020-2029 Storm Protection Plan?

FIPUG: FIPUG adopts the position of Office of Public Counsel.

Issue 5B: What are the estimated costs and benefits to DEF and its customers of making the improvements proposed in the 2020-2029 Storm Protection Plan?

FIPUG: FIPUG adopts the position of Office of Public Counsel.

Issue 5C: What are the estimated costs and benefits to Gulf and its customers of making the improvements proposed in the 2020-2029 Storm Protection Plan?

FIPUG: FIPUG adopts the position of Office of Public Counsel.

Issue 5D: What are the estimated costs and benefits to FPL and its customers of making the improvements proposed in the 2020-2029 Storm Protection Plan?

FIPUG: FIPUG adopts the position of Office of Public Counsel.

Issue 6A: What is the estimated annual rate impact resulting from implementation of TECO's 2020-2029 Storm Protection Plan during the first 3 years addressed in the plan?

FIPUG: FIPUG adopts the position of Office of Public Counsel.

Issue 6B: What is the estimated annual rate impact resulting from implementation of DEF's 2020-2029 Storm Protection Plan during the first 3 years addressed in the plan?

FIPUG: FIPUG adopts the position of Office of Public Counsel.

Issue 6C: What is the estimated annual rate impact resulting from implementation of Gulf's 2020-2029 Storm Protection Plan during the first 3 years addressed in the plan?

FIPUG: FIPUG adopts the position of Office of Public Counsel.

Issue 6D: What is the estimated annual rate impact resulting from implementation of FPL’s 2020-2029 Storm Protection Plan during the first 3 years addressed in the plan?

FIPUG: FIPUG adopts the position of Office of Public Counsel.

Issue 7A: Is it in the public interest to approve, approve with modification, or deny TECO’s 2020-2029 Storm Protection Plan?

FIPUG: FIPUG adopts the position of Office of Public Counsel.

Issue 7B: Is it in the public interest to approve, approve with modification, or deny DEF’s 2020-2029 Storm Protection Plan?

FIPUG: FIPUG adopts the position of Office of Public Counsel.

Issue 7C: Is it in the public interest to approve, approve with modification, or deny Gulf’s 2020-2029 Storm Protection Plan?

FIPUG: FIPUG adopts the position of Office of Public Counsel.

Issue 7D: Is it in the public interest to approve, approve with modification, or deny FPL’s 2020-2029 Storm Protection Plan?

FIPUG: FIPUG adopts the position of Office of Public Counsel.

Issue 8A: Should Docket No. 20200067-EI be closed?

FIPUG: Yes, after entry of a Final Order.

Issue 8B: Should Docket No. 20200069-EI be closed?

FIPUG: Yes, after entry of a Final Order.

Issue 8C: Should Docket No. 20200070-EI be closed?

FIPUG: Yes, after entry of a Final Order.

Issue 8D: Should Docket No. 20200071-EI be closed?

FIPUG: Yes, after entry of a Final Order.

OPC – CONTESTED ISSUES

Are any of the proposed SPP project or program related costs, if approved, and presumably to be requested for recovery by the Company through the SPPCRC, costs recovered through the Company’s base rates?

FIPUG: FIPUG supports inclusion of this issue in this docket. If included, FIPUG will provide a statement of position.

Should the Commission defer its determination of prudence for any of the Company's proposed programs and projects?

FIPUG: FIPUG supports inclusion of this issue in this docket. If included, FIPUG will provide a statement of position.

WALMART – (POTENTIAL) CONTESTED ISSUE

Should the Commission reject the proposed illustrative SPP rate designs of DEF and Gulf, which recover SPP costs from demand-metered customers through a \$/kWh energy charge or defer that issue to the SPP Clause Docket, 20200092-EI?

FIPUG: FIPUG takes no position.

F. STIPULATED ISSUES:

None at this time.

G. PENDING MOTIONS:

None at this time.

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

None.

I. OBJECTIONS TO QUALIFICATION OF WITNESSES AS AN EXPERT:

FIPUG does not object to the qualifications of expert witnesses in this proceeding.

J. 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

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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 20th day of July 2020 to the following:

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