BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Energy Conservation Cost		Docket No. 20200002-EG
Recovery Clause		
	/	Filed: October 7, 2020

THE FLORIDA INDUSTRIAL POWER USERS GROUP'S PREHEARING STATEMENT

The Florida Industrial Power Users Group (FIPUG), pursuant to Order No. PSC-2020-0042-PCO-EG, files its Prehearing Statement.

A. **APPEARANCES:**

Jon C. Moyle, Jr. Karen Putnal Moyle Law Firm, P.A. 118 North Gadsden Street Tallahassee, FL 32312

Attorneys for the Florida Industrial Power Users Group

B. **WITNESSES AND EXHIBITS:**

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

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.

GENERIC CONSERVATION COST RECOVERY ISSUES

ISSUE 1: What are the final conservation cost recovery adjustment true-up amounts for the period January 2019 through December 2019?

FIPUG: Adopt position of OPC.

What are the appropriate conservation adjustment actual/estimated true-up **ISSUE 2:**

amounts for the period January 2020 through December 2020?

FIPUG: Adopt position of OPC. **ISSUE 3:** What are the appropriate total conservation adjustment true-up amounts to be

collected/refunded from January 2020 through December 2020?

FIPUG: Adopt position of OPC.

ISSUE 4: What are the total conservation cost recovery amounts to be collected during the

period January 2021 through December 2021?

FIPUG: Adopt position of OPC.

ISSUE 5: What are the conservation cost recovery factors for the period January 2021

through December 2021?

FIPUG: Adopt position of OPC.

ISSUE 6: What should be the effective date of the new conservation cost recovery factors

for billing purposes?

FIPUG: Adopt position of OPC.

ISSUE 7: Should the Commission approve revised tariffs reflecting the energy conservation

cost recovery amounts and energy conservation cost recovery factors determined

to be appropriate in this proceeding?

FIPUG: Adopt position of OPC.

COMPANY SPECIFIC CONSERVATION COST RECOVERY ISSUES

Tampa Electric Company

ISSUE 8: What is the Contracted Credit Value for the GSLM-2 and GSLM-3 rate riders for

Tampa Electric Company for the period January 2021 through December 2021?

FIPUG: Adopt position of OPC.

ISSUE 9: What are the residential Price Responsive Load Management (RSVP -1) rate tiers

for Tampa Electric Company for the period January 2021 through December

2021?

FIPUG: Adopt position of OPC.

ISSUE 10: Should this docket be closed?

FIPUG: Adopt position of OPC.

D. <u>STIPULATED ISSUES:</u>

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:

None.

H. <u>STATEMENT OF COMPLIANCE WITH ORDER ESTABLISHING</u> 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 7th day of October, 2020:

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