

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Environmental cost recovery clause.

DOCKET NO. 20250007-EI

FILED: October 20, 2025

THE FLORIDA INDUSTRIAL POWER USERS GROUP
AMENDED PREHEARING STATEMENT

The Florida Industrial Power Users Group, (“FIPUG”), through counsel and pursuant to the Order Establishing Procedure in this docket, Order No. PSC-2025-0049-PCO-EI, issued February 10, 2025, hereby submit this Amended Prehearing Statement.

APPEARANCES:

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Counsel for FIPUG

1. WITNESSES:

FIPUG does not intend, at this time, to call witnesses, but reserves the right to call and question witnesses identified by other parties as permitted.

2. EXHIBITS:

FIPUG does not intend, at this time, to introduce exhibits, but reserves the right to use and introduce exhibits at hearing as permitted.

3. STATEMENT OF BASIC POSITION

The utilities bear the burden of proof to justify the recovery of costs they request in this docket as reasonable and prudent. The utilities must carry this burden regardless of whether FIPUG or other parties introduce evidence to the contrary. The utilities must also carry their burden of

proof to support their proposal(s) asking the Commission's adoption of policy statements (whether new or changed) or other affirmative relief sought. The amounts approved in this docket should reflect the sums set forth by FPL as filed in this docket, consistent with the terms of the settlement agreement in docket 20250011-EI, should such settlement agreement be approved.

4. STATEMENT OF FACTUAL ISSUES AND POSITIONS

GENERIC ENVIRONMENTAL COST RECOVERY ISSUES

ISSUE 1: What are the final environmental cost recovery true-up amounts for the period January 2024 through December 2025?

FIPUG: Adopt position of OPC.

ISSUE 2: What are the actual/estimated environmental cost recovery true-up amounts for the period January 2025 through December 2025?

FIPUG: Adopt position of OPC.

ISSUE 3: What are the projected environmental cost recovery amounts for the period January 2026 through December 2026?

FIPUG: Adopt position of OPC.

ISSUE 4: What are the environmental cost recovery amounts, including true-up amounts, for the period January 2026 through December 2026?

FIPUG: Adopt position of OPC.

ISSUE 5: What depreciation rates should be used to develop the depreciation expense included in the total environmental cost recovery amounts for the period January 2026 through December 2026?

FIPUG: Adopt position of OPC.

ISSUE 6: What are the appropriate jurisdictional separation factors for the projected period January 2026 through December 2026?

FIPUG: Adopt position of OPC.

ISSUE 7: What are the appropriate environmental cost recovery factors for the period January 2026 through December 2026 for each rate group?

FIPUG: Adopt position of OPC.

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

FIPUG: Adopt position of OPC.

ISSUE 9: **Should the Commission approve revised tariffs reflecting the environmental cost recovery amounts and environmental cost recovery factors determined to be appropriate in this proceeding?**

FIPUG: Adopt position of OPC.

ISSUE 10: **Should this docket be closed?**

FIPUG: No.

E. STIPULATED ISSUES

FIPUG has not stipulated to any matters in this matter.

F. PENDING MOTIONS

FIPUG has no pending motions at the time.

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

FIPUG has no pending requests for claims for confidentiality.

H. OBJECTIONS TO QUALIFICATION OF WITNESSES AS AN EXPERT

None at this time.

I. SEQUESTRATION OF WITNESSES

FIPUG does not intend to seek to sequester witnesses at this time.

J. STATEMENT OF COMPLIANCE WITH ORDER ESTABLISHING PROCEDURE

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

Dated this 20th day of October, 2025.

Respectfully submitted,

/s/ Jon C. Moyle

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CERTIFICATE OF SERVICE
DOCKET NO. 20250007-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing Prehearing Statement has been furnished by electronic mail on this 20th day of October, 2025, to the following:

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