#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Energy Conservation Cost Recovery Clause Docket No. 150002-EG Filed: October 9, 2015

# FLORIDA POWER & LIGHT COMPANY'S PREHEARING STATEMENT

Pursuant to Order No. PSC-15-0100-PCO-EG, issued February 10, 2015 and Order No. PSC-15-0204-PCO-PU, issued May 21, 2015 establishing the procedure in this docket, Florida Power & Light Company ("FPL") hereby submits its Prehearing Statement.

#### I. FPL WITNESSES

Witness	Subject Matter		
Terry J. Keith	Issues 1, 3 & 4		
Anita Sharma	Issue 2		

#### II. EXHIBITS

<u>Exhibit</u>	Content	Sponsoring Witness
AS-1	Schedules CT-1 and CT-4	T.J. Keith
AS-1	Schedules CT-2 and CT-3	T.J.Keith/A. Sharma
AS-1	Schedules CT-5 and CT-6, Appendix A	A. Sharma
AS-2	Schedule C-1 and C-4	T.J. Keith
AS-2	Schedule C-2 and C-3	T.J. Keith/A. Sharma
AS-2	Schedule C-5	A. Sharma

## III. STATEMENT OF BASIC POSITION

FPL's proposed Conservation Cost Recovery Factors for the January 2016 through December 2016 recovery period and true-up amounts for the prior periods should be approved.

## IV. ISSUES AND POSITIONS

**ISSUE 1:** What are the final conservation cost recovery true-up amounts for the period January 2014 through December 2014?

**FPL:** \$8,356,646 under-recovery. (Keith)

<u>ISSUE 2</u>: What are the total conservation cost recovery amounts to be collected during the period January 2016 through December 2016?

**FPL:** \$191,276,638 including prior true-up amounts and revenue taxes. (Sharma)

<u>ISSUE 3</u>: What are the conservation cost recovery factors for the period January 2016 through December 2016?

**FPL:** 

RATE CLASS	Conservation Recovery Factor (\$/kw) <sup>(j)</sup>	Conservation Recovery Factor (\$/kwh)	RDC (\$/KW) (1)	SDD (\$/KW) (m)
RS1/RTR1	-	0.00186	-	-
GS1/GST1/WIES1	-	0.00177	-	-
GSD1/GSDT1/HLFT1	0.61	-	-	-
OS2	-	0.00142	-	-
GSLD1/GSLDT1/CS1/CST1/HLFT2	0.68	-	-	-
GSLD2/GSLDT2/CS2/CST2/HLFT3	0.70	-	-	-
GSLD3/GSLDT3/CS3/CST3	0.72	-	-	-
SST1T	-	-	\$0.08	\$0.04
SST1D1/SST1D2/SST1D3	-	-	\$0.08	\$0.04
CILC D/CILC G	0.79	-	-	-
CILC T	0.77	-	-	-
MET	0.77	-	-	-
OL1/SL1/PL1	-	0.00073	-	-
SL2, GSCU1	-	0.00137	-	-

(Keith)

# <u>ISSUE 4</u>: What should be the effective date of the new conservation cost recovery factors for billing purposes?

FPL: The factors should be effective beginning with the specified conservation cost recovery cycle and thereafter for the period January 2016 through December 2016. Billing cycles may start before January 1, 2016 and the last cycle may be read after December 31, 2016, so that each customer is billed for twelve months regardless of when the adjustment factor became effective. These charges should continue in effect until modified by subsequent order of this Commission. (Keith)

**ISSUE 5:** Should the Commission approve revised tariffs reflecting the energy conservation cost recovery factors determined to be appropriate in this proceeding?

**FPL:** Yes. The Commission should approve revised tariffs reflecting the energy conservation cost recovery factors determined to be appropriate in this proceeding. The Commission should direct staff to verify that the revised tariffs are consistent with the Commission's decision. (Keith)

#### V. STIPULATED ISSUES

None at this time.

#### VI. PENDING MOTIONS

FPL has no pending motions or other matters upon which it seeks action other than its pending petitions for approval.

## VII. PENDING REQUEST FOR CONFIDENTIALITY

- 1. Florida Power and Light Company's Request for Confidential Classification of Materials Provided Pursuant to Audit No. 15-013-4-1, DN 04140-15 dated July 6, 2015.
- Florida Power and Light Company's Request for Confidential Classification of Information Contained in Schedule CT-6 of True-Up Filing, DN 02589-15 dated May 5, 2015.
- 3. Florida Power and Light Company's Fifth Request for Extension of Confidential Classification of Materials Provided Pursuant to Audit No. 04-070-4-1, DN 03138-15, dated April 8, 2015.
- 4. Florida Power and Light Company's First Request for Extension of Confidential Classification of Materials Provided Pursuant to Audit No. 13-004-4-3, dated April 1, 2015.

- 5. Florida Power and Light Company's Second Request for Extension of Confidential Classification of Materials Provided Pursuant to Audit No. 11-005-4-4, DNs 04114-11 and 02568-13, dated March 11, 2015.
- 6. Florida Power and Light Company's Second Request for Extension of Confidential Classification of Materials Provided Pursuant Audit No. 09-028-4-1, DN 07900-09 and DN 07900-09 and DN 00516-13, dated March 11, 2015.
- 7. Florida Power and Light Company's Third Request for Extension of Confidential Classification of Materials Provided Pursuant Audit No. 08-037-4-2, DN 00531-13 and DN 06439-08, dated March 10, 2015.
- 8. Florida Power and Light Company's Fourth Request for Extension of Confidential Classification of Materials Provided Pursuant Audit No. 06-040-4-1, DN 00494-13, x-ref DN 05832-06, dated February 24, 2015.
- 9. Florida Power and Light Company's Second Request for Extension of Confidential Classification of Materials Provided Pursuant Audit No. 05-042-4-1, DN 00499-13; x-ref DN 06625-05, dated February 24, 2015.

# VIII. OBJECTIONS TO A WITNESS' QUALIFICATION AS AN EXPERT

None at this time.

### IX. REQUIREMENTS OF THE PREHEARING ORDER THAT CANNOT BE MET

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

Respectfully submitted this 9th day of October 2015.

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# CERTIFICATE OF SERVICE Docket No. 150002-EG

**I HEREBY CERTIFY** that a true and correct copy of the foregoing Prehearing Statement has been served by electronic mail this <u>9th</u> day of October 2015, to the following:

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