

Matthew R. Bernier ASSOCIATE GENERAL COUNSEL Duke Energy Florida, LLC

VIA ELECTRONIC FILING

August 31, 2018

Ms. Carlotta Stauffer, Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

> RE: Docket No. 20180002-EG Energy Conservation Cost Recovery

Dear Ms. Stauffer:

On behalf of Duke Energy Florida ("DEF"), please find attached for electronic filing in the above-referenced docket:

• DEF's Preliminary List of Issues and Positions

Thank you for your assistance in this matter. Please feel free to call me at (850) 521-1428 should you have any questions concerning this filing.

Sincerely,

/s/ Matthew R. Bernier

Matthew R. Bernier

MRB/at Enclosure cc: parties of record

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

)

)

In re: Energy conservation cost	
recovery clause.	

Docket No. 20180002-EG Filed: August 31, 2018

DUKE ENERGY FLORIDA, LLC'S PRELIMINARY LIST OF ISSUES AND POSITIONS

Duke Energy Florida, LLC ("DEF") hereby submits its Preliminary List of Issues and Positions with respect to its Energy Conservation Cost Recovery factors for the period of January through December 2019 pursuant to Order No. PSC-2018-0094-PCO-EG issued February 20, 2018.¹

GENERIC ECCR ISSUES

<u>ISSUE 1</u> :	What are the final conservation cost recovery adjustment true-up amounts for the period January 2017 through December 2017?
<u>DEF</u> :	The adjusted net true-up for the period January 2017 through December 2017 is an over-recovery of \$2,815,663. (Cross)
<u>ISSUE 2</u> :	What are the appropriate conservation adjustment actual/estimated true-up amounts for the period January 2018 through December 2018?
<u>DEF</u> :	\$5,499,116 adjusted net true-up over-recovery. (Cross)
ISSUE 3:	What are the appropriate total conservation adjustment true-up amounts to be collected/refunded from January 2019 through December 2019?
<u>DEF</u> :	\$8,314,779 adjusted net true-up over-recovery. (Cross)
<u>ISSUE 4</u> :	What are the total conservation cost recovery amounts to be collected

¹ DEF retains its right to challenge the wording and/or inclusion of any additional issues that may subsequently be raised by other parties.

during the period January 2019 through December 2019?

<u>DEF</u>: \$104,853,136. (Cross)

<u>ISSUE 5</u>: What are the conservation cost recovery factors for the period January 2019 through December 2019?

<u>DEF</u> :	<u>Customer Class</u> Residential General Service Non-Demand @ Primary Voltage @ Transmission Voltage General Service 100% Load Factor	ECCR Factor 0.297 cents/kWh 0.286 cents/kWh 0.283 cents/kWh 0.280 cents/kWh 0.194 cents/kWh
	General Service Demand @ Primary Voltage @ Transmission Voltage @ Primary Voltage @ Transmission Voltage Interruptible @ Primary Voltage @ Transmission Voltage Standby Monthly @ Primary Voltage @ Transmission Voltage Standby Daily @ Primary Voltage @ Transmission Voltage Standby Daily @ Primary Voltage @ Transmission Voltage % Standby Daily % Primary Voltage % Transmission Voltage % Transmission Voltage % Standby Daily % Primary Voltage % Transmission Voltage % Transmission Voltage % Standby Daily	0.94 \$/kW 0.93 \$/kW 0.92 \$/kW 0.41 \$/kW 0.41 \$/kW 0.40 \$/kW 0.79 \$/kW 0.79 \$/kW 0.77 \$/kW 0.091 \$/kW 0.090 \$/kW 0.089 \$/kW 0.043 \$/kW 0.043 \$/kW
	Lighting	0.081 cents/kWh (Cross)

- **<u>ISSUE 6</u>**: What should be the effective date of the new conservation cost recovery factors for billing purposes?
- **DEF:** The new factors should be effective beginning with the first billing cycle for January 2019, and thereafter through the last billing cycle for December 2019. The first billing cycle may start before January 2019, and the last billing cycle may end after December 31, 2019, so long as each customer is billed for twelve months regardless of when the factors became effective. (Cross)

- **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?
- **DEF:** Yes. The Commission should approve revised tariffs reflecting the energy conservation cost recovery amounts and 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 decision. (Cross)

Respectfully submitted this 31st day of August, 2018.

/s/ Matthew R. Bernier

MATTHEW R. BERNIER Associate General Counsel Duke Energy Florida, LLC 106 East College Avenue Suite 800 Tallahassee, FL 32301 Telephone: (850) 521-1428 DIANNE M. TRIPLETT Deputy General Counsel Duke Energy Florida, LLC 299 First Avenue North St. Petersburg, FL 33701 Telephone: (727) 820-4692

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic mail this 31st day of August, 2018 to all parties of record as indicated below.

/s/ Matthew R. Bernier

Matthew R. Bernier

Margo DuVal Office of General Counsel Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 <u>mduval@psc.state.fl.us</u>

James Beasley / J. Jeffry Wahlen Ausley McMullen P.O. Box 391 Tallahassee, FL 32302 jbeasley@ausley.com jwahlen@ausley.com

Russell A. Badders / Steven R. Griffin Beggs & Lane P.O. Box 12950 Pensacola, FL 32591 <u>rab@beggslane.com</u> <u>srg@beggslane.com</u>

Jon C. Moyle, Jr. Moyle Law Firm, P.A. 118 North Gadsden Street Tallahassee, FL 32301 jmoyle@moylelaw.com

Kenneth Rubin / Joel Baker Florida Power & Light Company 700 Universe Boulevard (LAW/JB) Juno Beach, FL 33408-0420 <u>ken.rubin@fpl.com</u> joel.baker@fpl.com

James W. Brew / Laura A. Wynn Stone Law Firm 1025 Thomas Jefferson Street, N.W. Eighth Floor, West Tower Washington, D.C. 20007 jbrew@smxblaw.com law@smxblaw.com Beth Keating Gunster, Yoakley & Stewart, P.A. 215 South Monroe Street, Suite 601 Tallahassee, FL 32301 <u>bkeating@gunster.com</u>

Rhonda J. Alexander / Jeffrey A. Stone Gulf Power Company One Energy Place Pensacola, FL 32520-0780 <u>rjalexad@southernco.com</u> jastone@southernco.com

Ms. Paula K. Brown Tampa Electric Company P.O. Box 111 Tampa, FL 33601 regdept@tecoenergy.com

Kenneth A. Hoffman Florida Power & Light Company 215 S. Monroe Street, Suite 810 Tallahassee, FL 32301-1858 ken.hoffman@fpl.com

Charles J. Rehwinkel / J. R. Kelly / Patricia A. Christensen Office of Public Counsel c/o The Florida Legislature 111 West Madison Street, Room 812 Tallahassee, FL 32399 <u>rehwinkel.charles@leg.state.fl.us</u> <u>kelly.jr@leg.state.fl.us</u> christensen.patty@leg.state.fl.us

Mike Cassel Florida Public Utilities Company 1750 S. 14th Street, Suite 200 Fernandina Beach, FL 32034 <u>mcassel@fpuc.com</u>