

FILED 10/15/2018 DOCUMENT NO. 06542-2018 FPSC - COMMISSION CLERK

Writer's E-Mail Address: bkeating@gunster.com

October 12, 2018

### VIA E-PORTAL – ELECTRONIC FILING

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

### Re: Docket No. 20180002-EG – Energy Conservation Cost Recovery Clause

Dear Ms. Stauffer:

Attached for electronic filing, please find Florida Public Utilities Company's Prehearing Statement.

Should you have any questions whatsoever, please do not hesitate to contact me. Thank you for your assistance in this matter.

Sincerely,

K1A

Beth Keating Gunster, Yoakley & Stewart, P.A. 215 South Monroe St., Suite 618 Tallahassee, FL 32301 (850) 521-1706

MEK

# BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

)

)

)

In Re: Energy Conservation Cost Recovery Clause.

Docket No. 20180002-EG

Filed: October 12, 2018

### FLORIDA PUBLIC UTILITIES COMPANY'S PREHEARING STATEMENT

Consistent with Order No. 2018-0094-PCO-EG, issued February 20, 2018, as subsequently modified, Florida Public Utilities Company ("FPUC") hereby submits this Prehearing Statement:

### a. All Known Witnesses

<u>Witness</u>	<u>Subject</u>	Issue
Curtis Young	Final True Up 2017	1
Danielle N.B. Mulligan	2018 Cost Recovery Amounts and Factors for 2019	2 - 4

### b. <u>All Known Exhibits</u>

Witness	<u>Exhibit</u>	<u>Title</u>
Curtis D. Young	CDY-1(composite)	Schedules CT-1, CT-2, CT-3, CT-4, CT-5 and CT-6
Danielle Mulligan	DNBM-1 (composite)	Schedules C-1, C-2, C-3, C-4, and C-5

### c. <u>FPUC's Statement of Basic Position</u>

<u>FPUC:</u> The Commission should approve Florida Public Utilities Company's final net true-up for the period January through December 2017, the estimated true-up for the period January through December, 2018, and the projected conservation program expenses for the period January through December, 2019.

d. <u>FPUC's Position on the Issues</u>

# GENERIC CONSERVATION COST RECOVERY ISSUES GENERIC CONSERVATION COST RECOVERY ISSUES

- **ISSUE 1:** What are the final conservation cost recovery <u>adjustment</u> true-up amounts for the January 2017 through 2017?
- <u>FPUC:</u> The Company over-recovered \$60,042, resulting in a final end of period adjustment true-up amount that is an under-recovery of \$5,141.
- **<u>ISSUE 2</u>**: What are the appropriate conservation adjustment actual/estimated true-up amounts for the period January 2018 through December 2018?
- FPUC: The estimated conservation true-up amount for the prior period January 2018 to December 2018 is an over-recovery of \$80,500.
- **<u>ISSUE 3</u>**: What are the appropriate total conservation adjustment true-up amounts to be collected/refunded from January 2019 through December 2019?
- <u>FPUC:</u> The estimated conservation true-up amount to be refunded during the period January 2019 to December 2019 is an over-recovery of \$75,359.

2

- **ISSUE 4:** What are the total conservation cost recovery amounts to be collected during the period January 2019 through December 2019?
- FPUC:FPUC seeks to recover \$653,441 over the period January 2019 through December2019.
- **ISSUE 5**: What are the conservation cost recovery factors for the period January 2019 through December 2019?
- <u>FPUC:</u> The Company asks for approval of a consolidated levelized conservation cost recovery factor for this period of \$.0097 per KWH.
- **ISSUE 6**: What should be the effective date of the new conservation cost recovery factors for billing purposes?
- <u>FPUC:</u> The factor should be effective beginning with the specified conservation cost recovery cycle and thereafter for the period January 2019 through December 2019. Billing cycles may start before January 1, 2019 and the last cycle may be read after December 31, 2019, so that each customer is billed for twelve months regardless of when the adjustment factor became effective.
- **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?
- <u>FPUC:</u> Yes. The Commission should approve revised tariffs reflecting the energy conservation cost recovery amounts and establishing energy conservation cost

3

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.

### e. <u>Stipulated Issues</u>

While not a party to any stipulations at this time, FPUC believes that it should be possible to reach a stipulation on each of the issues as they pertain to FPUC.

### f. <u>Pending Motions</u>

FPUC has no pending motions.

g. <u>Pending Confidentiality Claims or Requests</u> None.

# h. <u>Objections to Witness Qualifications as an Expert</u>

FPUC has no objections to any witnesses' qualifications at this time.

### i. <u>Compliance with Order No. 2018-0094-PCO-EG</u>

FPUC has complied with all requirements of the Order Establishing Procedure entered in this docket.

RESPECTFULLY SUBMITTED this 12th day of October, 2018.

Beth Keating

Gunster, Yoakley & Stewart, P.A. 215 South Monroe St., Suite 601 Tallahassee, FL 32301 (850) 521-1706

## **<u>CERTIFICATE OF SERVICE</u>**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by Electronic Mail to the following parties of record this 12th day of October, 2018.

Florida Public Utilities Company	Jon C. Moyle, Jr.
Mike Cassel	Moyle Law Firm
1750 S 14th Street, Suite 200	118 North Gadsden St.
Fernandina Beach, FL 32034	Tallahassee, FL 32301
<u>mcassel@fpuc.com</u>	jmoyle@moylelaw.com
Margo DuVal Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399 <u>mduval@psc.state.fl.us</u>	Office of Public Counsel Charles Rehwinkel/Patricia Christensen, Esq. c/o The Florida Legislature 111 West Madison Street, Room 812 Tallahassee, FL 32399-1400 <u>christensen.patty@leg.state.fl.us</u> <u>Rehwinkel.Charles@leg.state.fl.us</u>
Paula K. Brown	Dianne M. Triplett
Tampa Electric Company	Duke Energy, Inc.
P.O. Box 111	P.O. Box 14042
Tampa, FL 33601-0111	St. Petersburg, FL 33733-4042
regdept@tecoenergy.com	<u>dtriplett@duke-energy.com</u>
Matthew Bernier Duke Energy, Inc. 106 E. College Ave., Suite 800 Tallahassee, FL 32301 <u>Matthew.Bernier@duke-energy.com</u>	James D. Beasley J. Jeffry Wahlen Ausley & McMullen P.O. Box 391 Tallahassee, FL 32302 <u>jbeasley@ausley.com</u> <u>jwahlen@ausley.com</u>
Russell A. Badders	Maria Moncada
Steven R. Griffin	Joel Baker
Beggs & Lane	Florida Power & Light Company
P.O. Box 12950	700 Universe Boulevard
Pensacola, FL 32591-2950	Juno Beach, FL 33408-0420
<u>srg@beggslane.com</u>	<u>Maria.Moncada@fpl.com</u>
<u>rab@beggslane.com</u>	Joel.baker@fpl.com
Mr. Ken Hoffman 215 South Monroe Street, Suite 810 Tallahassee, FL 32301-1858 <u>ken.hoffman@fpl.com</u>	Robert Scheffel Wright, Esq//John T. LaVia, c/o Gardner Law Firm 1300 Thomaswood Drive Tallahassee, FL 32308 <u>schef@gbwlegal.com</u>

Docket No. 20180002-EG October 12, 2018

	jlavia@gbwlegal.com
Shane Boyett Gulf Power Company One Energy Place Pensacola, FL 32520-0780 <u>csboyett@southernco.com</u>	James W. Brew Laura Wynn Stone Mattheis Xenopoulos & Brew, PC Eighth Floor, West Tower 1025 Thomas Jefferson Street, NW Washington, DC 20007 jbrew@smxblaw.com lwynn@smxblaw.com
Jeffrey A. Stone General Counsel Gulf Power Company One Energy Place Pensacola, FL 32520-0780 jastone@southernco.com	

Dect Z. In

۰

Beth Keating Gunster, Yoakley & Stewart, P.A. 215 South Monroe St., Suite 601 · Tallahassee, FL 32301 (850) 521-1706