

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

October 8, 2019

VIA E-PORTAL – ELECTRONIC FILING

Mr. Adam Teitzman
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

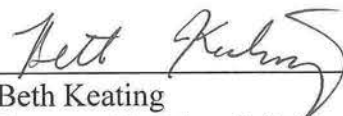
Re: Docket No. 20190002-EG – Energy Conservation Cost Recovery Clause

Dear Mr. Teitzman:

Attached for electronic filing, please find Florida Public Utilities Company's Prehearing Statement for the above-referenced docket.

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

Sincerely,



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

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c. FPUC's Statement of Basic Position

FPUC: The Commission should approve Florida Public Utilities Company's final net true-up for the period January through December 2018, the estimated true-up for the period January through December, 2019, and the projected conservation program expenses for the period January through December, 2020.

d. FPUC's Position on the Issues

GENERIC CONSERVATION COST RECOVERY ISSUES

ISSUE 1: What are the final conservation cost recovery adjustment true-up amounts for the January 2018 through 2018?

FPUC: The final end of period adjustment true-up amount is an under-recovery of \$23,726.

ISSUE 2: What are the appropriate conservation adjustment actual/estimated true-up amounts for the period January 2019 through December 2019?

FPUC: The estimated conservation true-up amount for the period January 2019 to December 2019 is an under-recovery of \$61,122.

ISSUE 3: What are the appropriate total conservation adjustment true-up amounts to be collected/refunded from January 2020 through December 2020?

FPUC: The estimated conservation true-up amount to be refunded during the period January 2020 to December 2020 is an under-recovery of \$84,848.

ISSUE 4: What are the total conservation cost recovery amounts to be collected during the period January 2020 through December 2020?

FPUC: FPUC seeks to recover \$834,848 over the period January 2020 through December 2020.

ISSUE 5: What are the conservation cost recovery factors for the period January 2020 through December 2020?

FPUC: The Company asks for approval of a consolidated levelized conservation cost recovery factor for this period of \$.00132 per KWH.

ISSUE 6: What should be the effective date of the new conservation cost recovery factors for billing purposes?

FPUC: The factor should be effective beginning with the specified conservation cost recovery cycle and thereafter for the period January 2020 through December 2020. Billing cycles may start before January 1, 2020 and the last cycle may be read after December 31, 2020, 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?

FPUC: Yes. The Commission should approve revised tariffs reflecting the energy conservation cost recovery amounts and establishing 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.

Company Specific 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 2020 through December 2020?

FPUC: No position.

ISSUE 9: What are the residential Price Responsive Load Management (RSVP -1) rate tiers for Tampa Electric Company for the period January 2020 through December 2020?

FPUC: No position.

ISSUE 9A: What are the credit factors to be applied during the January 2020 billing cycles to refund the "Final Tax Savings Credit" amount of \$11,500,000.

FPUC: No position.

ISSUE 10: Should this docket be closed?

FPUC: Yes.

e. Stipulated Issues

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. Pending Motions

FPUC has no pending motions.

g. Pending Confidentiality Claims or Requests

None.

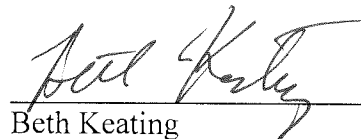
h. Objections to Witness Qualifications as an Expert

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

i. Compliance with Order No. 2019-0082-PCO-EG

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

RESPECTFULLY SUBMITTED this 8th day of October, 2019.



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

CERTIFICATE OF SERVICE

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 8th day of October, 2019.

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

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|---|---|
| Tallahassee, FL 32301-1858 ken.hoffman@fpl.com | 1300 Thomaswood Drive Tallahassee, FL 32308 schef@gbwlegal.com jlavia@gbwlegal.com |
| Russell Badders Shane Boyett Gulf Power Company One Energy Place Pensacola, FL 32520-0780 Russell.badders@nexteraenergy.com Charles.boyett@nexteraenergy.com | 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 |



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