

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Energy Conservation Cost
Recovery Clause

Docket No. 20200002-EG

Filed: October 7, 2020

**DUKE ENERGY FLORIDA, LLC'S
PREHEARING STATEMENT**

Duke Energy Florida, LLC (“DEF”), pursuant to the Order Establishing Procedure in this proceeding, Order No. PSC-2020-0042-PCO-EG dated January 31, 2020, hereby submits its Prehearing Statement:

A. Known Witnesses – DEF intends to offer the direct testimony of:

<u>Witness</u>	<u>Subject Matter</u>	<u>Issues</u>
Lori J. Cross	Final True-up, January – December 2019	1
Lori J. Cross	Estimated/Actual True-up, January – December 2020 and ECCR Factors For January – December 2021	2 - 6
Lori J. Cross	Tariff Approval	7
Lori J. Cross	Close the Docket	10

B. Known Exhibits – DEF intends to offer the following exhibits:

<u>Exhibit No.</u>	<u>Witness</u>	<u>Description</u>
LJC-1T	Cross	ECCR Adjusted Net True-Up for January - December 2019, Schedules CT1 – CT6
LJC-1P	Cross	Estimated/Actual True-Up, January – December 2020 and ECCR Factors for Billings in January – December 2021,

Schedules C1 – C6

C. Statement of Basic Position

The Commission should determine that DEF has properly calculated its conservation cost recovery true-up and projection costs and should approve the conservation cost recovery factors for the period January 2021 through December 2021 set forth in the testimony and exhibits of witness Lori J. Cross.

D. Issues and Positions - DEF's positions on the issues identified in this proceeding are as follows:

Generic Conservation Cost Recovery Issues

ISSUE 1: What are the final conservation cost recovery adjustment true-up amounts for the period January 2019 through December 2019?

DEF: The adjusted net true-up for the period January 2019 through December 2019 is an under-recovery of \$762,858. (Cross)

ISSUE 2: What are the appropriate conservation adjustment actual/estimated true-up amounts for the period January 2020 through December 2020?

DEF: \$725,880 Under-recovery (Cross)

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

DEF: \$1,488,738 Under-recovery (Cross)

ISSUE 4: What are the total conservation cost recovery amounts to be collected during the period January 2021 through December 2021?

DEF: \$120,561,022 (Cross)

ISSUE 5: What are the conservation cost recovery factors for the period January 2021 through December 2021?

<u>DEF:</u>	<u>Customer Class</u>	<u>ECCR Factor</u>
	Residential	0.338 cents/kWh
	General Service Non-Demand	0.326 cents/kWh
	@ Primary Voltage	0.323 cents/kWh
	@ Transmission Voltage	0.319 cents/kWh
	General Service 100% Load Factor	0.223 cents/kWh
	General Service Demand	1.08 \$/kW
	@ Primary Voltage	1.07 \$/kW
	@ Transmission Voltage	1.06 \$/kW
	Curtaillable	0.35 \$/kW
	@ Primary Voltage	0.35 \$/kW
	@ Transmission Voltage	0.34 \$/kW
	Interruptible	0.94 \$/kW
	@ Primary Voltage	0.93 \$/kW
	@ Transmission Voltage	0.92 \$/kW
	Standby Monthly	0.104 \$/kW
	@ Primary Voltage	0.103 \$/kW
	@ Transmission Voltage	0.102 \$/kW
	Standby Daily	0.050 \$/kW
	@ Primary Voltage	0.050 \$/kW
	@ Transmission Voltage	0.049 \$/kW
	Lighting	0.098 cents/kWh
		(Cross)

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

DEF: The factors shall be effective beginning with the specified conservation cost recovery cycle and thereafter for the period January 2021 through December 2021. Billing cycles may start before January 1, 2021 and the last cycle may be read after December 31, 2021, so that each customer is billed for twelve months regardless of when the adjustment factor became effective. These charges shall continue in effect until modified by subsequent order of this Commission. (Cross)

ISSUE 7: Should the Commission approve revised tariffs reflecting the energy conservation cost recovery amounts and establishing energy conservation cost recovery factors determined to be appropriate in this proceeding?

DEF: Yes. The Commission should approve DEF's 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. (Cross)

Company Specific Conservation Cost Recovery 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 2021 through December 2021?

DEF: No Position.

ISSUE 9: What are the residential Price Responsive Load Management (RSVP -1) rate tiers for Tampa Electric Company for the period January 2021 through December 2021?

DEF: No Position.

Close the docket issue

ISSUE 10: Should this docket be closed?

DEF: Yes. (Cross)

E. Stipulated Issues - None at this time.

F. Pending Motions - DEF has no pending motions at this time.

G. Requests for Confidentiality -DEF has no requests for confidentiality pending at this time.

H. Objections to Qualifications - At this time, DEF has no objection to the qualifications of any expert witnesses in this proceeding.

I. Requirements of Order- DEF believes that this prehearing statement complies with all the requirements of the Order Establishing Procedure.

Respectfully submitted this 7th day of October, 2020.

/s/ Matthew R. Bernier

DIANNE M. TRIPLETT

Deputy General Counsel
Duke Energy Florida, LLC
299 First Avenue North
St. Petersburg, FL 33701
T: 727.820.4692
F: 727.820.5041

E: Dianne.Triplett@duke-energy.com

MATTHEW R. BERNIER

Associate General Counsel
Duke Energy Florida, LLC
106 East College Avenue
Suite 800
Tallahassee, Florida 32301
T: 850.521.1428
F: 727.820.5041

E: Matthew.Bernier@duke-energy.com
FLRegulatoryLegal@duke-energy.com

CERTIFICATE OF SERVICE

Docket No. 20200002-EG

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic mail to the following this 7th day of October, 2020.

/s/ Matthew R. Bernier

Attorney

<p>Ashley Weisenfeld Office of General Counsel Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 aweisenf@psc.state.fl.us</p> <p>J. Beasley / J. Wahlen / M. Means P.O. Box 391 Tallahassee, FL 32302 jbeasley@ausley.com jwahlen@ausley.com mmeans@ausley.com</p> <p>Jon C. Moyle, Jr. 118 North Gadsden Street Tallahassee, FL 32301 jmoyle@moylslaw.com mqualls@moylslaw.com</p> <p>Maria Moncada / Joel Baker Florida Power & Light Company 700 Universe Boulevard Juno Beach, FL 33408-0420 maria.moncada@fpl.com joel.baker@fpl.com</p> <p>James W. Brew / Laura W. Baker 1025 Thomas Jefferson Street, N.W. Eighth Floor, West Tower Washington, D.C. 20007 jbrew@smxblaw.com lwb@smxblaw.com</p>	<p>Beth Keating 215 South Monroe Street, Suite 601 Tallahassee, FL 32301 bkeating@gunster.com</p> <p>Paula K. Brown Tampa Electric Company P.O. Box 111 Tampa, FL 33601 regdept@tecoenergy.com</p> <p>Kenneth A. Hoffman Florida Power & Light Company 134 W. Jefferson Street Tallahassee, FL 32301-1713 ken.hoffman@fpl.com</p> <p>C. Rehwinkel / J. R. Kelly / T. David / P. Christensen Office of Public Counsel c/o The Florida Legislature 111 West Madison Street, Room 812 Tallahassee, FL 32399 rehwinkel.charles@leg.state.fl.us kelly.jr@leg.state.fl.us david.tad@leg.state.fl.us christensen.patty@leg.state.fl.us</p> <p>Mike Cassel Florida Public Utilities Company 1750 S. 14th Street, Suite 200 Fernandina Beach, FL 32034 mcassel@fpuc.com</p>
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------