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August 27, 2021

**-VIA ELECTRONIC FILING -**

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

**Re: Docket No. 20210002-EG**  
**Energy Conservation Cost Recovery Clause**

Dear Mr. Teitzman:

I attach for electronic filing in the above docket Florida Power & Light Company's Preliminary List of Issues and Positions.

Please contact me if you have or your Staff has any questions regarding this filing.

Sincerely,

*s/ Maria Jose Moncada*  
Maria Jose Moncada

Attachments

cc: Counsel of record for parties (w/ attachments)

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Energy Conservation Cost Recovery  
Clause

Docket No. 20210002-EG  
Filed: August 27, 2021

**FLORIDA POWER & LIGHT COMPANY'S  
PRELIMINARY LIST OF ISSUES AND POSITIONS**

Florida Power & Light Company (“FPL”), representing the merged and consolidated operations of FPL and the former Gulf Power Company (“Gulf”),<sup>1</sup> by and through its undersigned counsel, hereby submits this Preliminary List of Issues and Positions to Order Nos. PSC-2021-0075-PCO-EG and PSC-2021-0280-PCO-GU.

**ISSUE 1:     **What are the final conservation cost recovery adjustment true-up amounts for the period January 2020 through December 2020?****

FPL:     FPL’s final conservation cost recovery adjustment true-up amounts for the period of January 2020 through December 2020, is an over-recovery of \$2,529,096. Gulf’s final conservation cost recovery adjustment true-up amounts for the period of January 2020 through December 2020 is an under-recovery of \$226,949. (FPL witnesses Deaton and Floyd)

**ISSUE 2:     **What are the appropriate conservation adjustment actual/estimated true-up amounts for the period January 2021 through December 2021?****

FPL:     FPL’s conservation adjustment actual/estimated true-up amounts for the period of January 2021 through December 2021, including interest, is an over-recovery of \$9,673,286. Gulf’s conservation adjustment actual/estimated true-up amount for the period of January 2021 through December 2021, including interest, is an over-recovery of \$1,748,223. (FPL witnesses Deaton and Floyd)

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<sup>1</sup> Effective January 1, 2021, Gulf and FPL were legally merged with FPL being the surviving entity. On January 11, 2021, pursuant to Rule 25-9.044, F.A.C., FPL submitted a notice of the change in ownership of Gulf effective January 1, 2021, and FPL’s adoption and ratification of Gulf’s existing rates and tariff on file with the Commission. FPL is representing the merged and consolidated operations of FPL and the former Gulf. “Gulf,” as used in this Petition, has reference to the former Gulf Power Company and/or Gulf as the separate ratemaking entity for purposes of this Petition and the application of the ECCR rules and plan, as context would dictate.

**ISSUE 3: What are the appropriate total conservation adjustment true-up amounts to be collected/refunded from January 2022 through December 2022?**

FPL: FPL’s total conservation adjustment true-up amounts to be refunded from January 2022 through December 2022 is \$12,202,382. Gulf’s total conservation adjustment true-up amounts to be refunded from January 2022 through December 2022 is \$1,521,274. (FPL witnesses Deaton and Floyd)

**ISSUE 4: What are the total conservation cost recovery amounts to be collected during the period January 2022 through December 2022?**

FPL: Subject to and contingent upon the Commission’s approval of FPL’s pending request for unified rates in Docket No. 20210015-EI, the total costs associated with the consolidated ECCR programs projected to be incurred between January 1, 2022 and December 31, 2022, are \$156,246,950. (FPL witness Floyd)

In the event that the Commission declines to approve FPL’s pending request for unified rates in Docket No. 20210015-EI, the total costs associated with the consolidated ECCR programs projected to be incurred between January 1, 2022 and December 31, 2022, are \$148,581,164 for standalone FPL and \$9,437,988 for standalone Gulf. (FPL witness Floyd)

**ISSUE 5: What are the conservation cost recovery factors for the period January 2022 through December 2022?**

FPL: Subject to and contingent upon the Commission’s approval of FPL’s pending request for unified rates in Docket No. 20210015-EI, the appropriate FPL unified factors for the period January 2022 through December 2022 are:

Unified FPL 2022 ECCR Factors

RATE CLASS SUMMARY	Conservation Recovery Factor (\$/kw) <sup>(10)</sup>	Conservation Recovery Factor (\$/kwh) <sup>(11)</sup>	RDC (\$/KW) <sup>(12)</sup>	SDD (\$/KW) <sup>(13)</sup>
RS1/RTR1		0.00134		
GS1/GST1		0.00137		
GSD1/GSDT1/HLFT1/GSD1-EV	0.47			
OS2		0.00093		
GSLD1/GSLDT1/CS1/CST1/HLFT2/GSLD1-EV	0.52			
GSLD2/GSLDT2/CS2/CST2/HLFT3	0.54			
GSLD3/GSLDT3/CS3/CST3	0.50			
SST1T			0.06	0.03
SST1D1/SST1D2/SST1D3			0.06	0.03
CILC D/CILC G	0.56			
CILC T	0.56			
MET	0.45			
OL1/SL1/SL1M/PL1/OSI/II		0.00042		
SL2/SL2M/GSCU1		0.00101		

(FPL witnesses Deaton and Floyd)

In the event that the Commission declines to approve FPL's pending request for unified rates in Docket No. 20210015-EI, standalone FPL and standalone Gulf ECCR factors for the period January 2022 through December 2022 are:

Standalone FPL 2022 ECCR Factors

RATE CLASS SUMMARY	Conservation Recovery Factor (\$/kw) <sup>(10)</sup>	Conservation Recovery Factor (\$/kwh) <sup>(11)</sup>	RDC (\$/KW) <sup>(12)</sup>	SDD (\$/KW) <sup>(13)</sup>
RS1/RTR1		0.00140		
GS1/GST1		0.00141		
GSD1/GSDT1/HLFT1/GSD1-EV	0.48			
OS2		0.00077		
GSLD1/GSLDT1/CS1/CST1/HLFT2/GSLD1-EV	0.54			
GSLD2/GSLDT2/CS2/CST2/HLFT3	0.54			
GSLD3/GSLDT3/CS3/CST3	0.55			
SST1T			0.06	0.03
SST1D1/SST1D2/SST1D3			0.06	0.03
CILC D/CILC G	0.58			
CILC T	0.57			
MET	0.48			
OL1/SL1/SL1M/PL1		0.00041		
SL2/SL2M/GSCU1		0.00104		

(FPL witness Deaton)

Standalone Gulf 2022 ECCR Factors

RATE CLASS	CONSERVATION COST RECOVERY FACTORS ¢/kWh
RS,	0.090
RSVP Tier 1	(2.700)
RSVP Tier 2	(0.830)
RSVP Tier 3	6.757
RSVP Tier 4	51.020
GS	0.090
GSD, GSDT, GSTOU	0.086
LP, LPT	0.082
PX, PXT, RTP, SBS	0.081
OSI, OSII	0.068

(FPL witness Floyd)

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

FPL: The factors shall be effective for meter readings that occur on or after January 1, 2022. These charges shall continue in effect until modified by subsequent order of this Commission. (FPL witness Deaton)

**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?**

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. (FPL witness Deaton)

**ISSUE 8: Should this docket be closed?**

FPL: This docket is an on-going docket and should remain open. (FPL witness Deaton)

Respectfully submitted,

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By: s/ Maria Jose Moncada  
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**CERTIFICATE OF SERVICE**

Docket No. 20210002-EG

**I HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished

by electronic service on this 27th day of August 2021 to the following:

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