



# GUNSTER

ATTORNEYS AT LAW

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August 27, 2021

## E-PORTAL/ELECTRONIC FILING

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

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

Dear Mr. Teitzman:

Attached for electronic filing, Florida Public Utilities Company Preliminary Statement of Issues and Positions.

Thank you for your assistance with this filing. As always, please don't hesitate to let me know if you have any questions whatsoever.

Sincerely,

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

MEK  
cc: Parties of Record



FPUC: The estimated conservation true-up amount to be refunded during the period January 2022 to December 2022 is an under-recovery of \$30,268.

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

FPUC: FPUC seeks to recover \$877,618, over the period January 2022 through December 2022.

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

FPUC: The Company asks for approval of a consolidated levelized conservation cost recovery factor for this period of \$.00134 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 2022 through December 2022. Billing cycles may start before January 1, 2022 and the last cycle may be read after December 31, 2022, 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 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 2022 through December 2022?

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 2022 through December 2022?

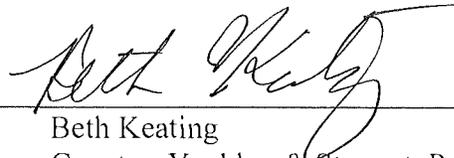
FPUC: No position.

**ISSUE 10:** Should this docket be closed?

Docket No. 20210002-EG  
August 27, 2021

**POSITION:** This is an ongoing proceeding; however, upon the conclusion of this year's proceeding, this docket should be closed, and a new docket should be opened to address cost recovery for 2022.

RESPECTFULLY SUBMITTED this 27<sup>th</sup> day of August, 2021.



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Beth Keating  
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**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 27<sup>th</sup> day of August, 2021:

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