

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Energy Conservation Cost) Docket No.
20210002-EGRecovery Clause.)
_____) Filed: October 14, 2021

**SOUTHERN ALLIANCE FOR CLEAN
ENERGY'S AMENDED PREHEARING
STATEMENT**

Consistent with Order No. 2021-0075-PCO-EG, issued February 10, 2021, as subsequently modified¹, Southern Alliance for Clean Energy (“SACE”) hereby submits this Amended Prehearing Statement:

A. All Known Witnesses

SACE is not sponsoring any witnesses

B. All Known Exhibits

SACE does not plan to offer any exhibits at this time, but may introduce exhibits during the course of cross-examination.

C. SACE's Statement of Basic Position

SACE maintains that the utilities bear the burden of proof to justify the recovery of cost that they request in this docket and that the previously approved conservation goals that are implemented through the conservation programs for which the companies seek cost recovery in this docket, were proposed by the utilities and approved by the Commission

¹ Order Modifying Order Establishing Procedure No. PSC-2021-0208-PCO-EG, issued on June 7, 2021, PSC-2021-0344-PCO-EG, issued September 15, 2021.

using outdated cost-effectiveness and economic screening practices – primarily by the reliance on the Rate Impact Measure (RIM) test and the arbitrary 2-year payback screen – that depress energy efficiency potential results. The Commission should take the opportunity in its conservation goal setting rulemaking docket to modernize its conservation goal setting practices to reflect standard industry practice. Positions taken by SACE in this conservation programs cost recovery docket that do not contest cost recovery amounts, are not an endorsement of the Commission’s current goals setting practices.

D. SACE’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 2020 through 2020?

SACE: Agree with OPC.

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

SACE: Agree with OPC.

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

SACE: Agree with OPC.

ISSUE 4: What is the total conservation cost recovery amount to be collected during the period January 2022 through December 2022?

SACE: Agree with OPC.

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

SACE: Agree with OPC.

ISSUE 6: 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?

SACE: Agree with OPC.

ISSUE 7: What should be the effective date of the new conservation cost recovery factors for billing purposes?

SACE: No position.

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?

SACE: 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?

SACE: No position.

ISSUE 10: Should this docket be closed?

SACE: No position.

E. Stipulated Issues

None at this time.

F. Pending Motions

SACE has no pending motions.

G. Pending Confidentiality Claims or Requests.

SACE has no pending requests.

H. Objections to Witness Qualifications as an Expert

SACE has no objections to any witness qualifications at this time.

I. Compliance with Order No. 2021-0075-PCO-EG

SACE has complied with all requirements of the Orders Establishing Procedure entered in this docket.

RESPECTFULLY SUBMITTED this 14th day of October, 2021.

/s/ George Cavros

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy and correct copy of the foregoing was served on this 14th day of October, 2021 via electronic mail on:

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