

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Conservation Cost) DOCKET NO. 990002-EG
Recovery Clause)
) FILED: October 25, 1999

STAFF'S PREHEARING STATEMENT

Pursuant to Order No. PSC-99-0699-PCO-EG, issued April 12, 1999, establishing the prehearing procedure in this docket, the Staff of the Florida Public Service Commission hereby files its Preliminary List of Issues and Positions.

a. All Known Witnesses

None.

b. All Known Exhibits

None at this time.

c. Staff's Statement of Basic Position

Staff's positions are preliminary and based on materials filed by the parties and on discovery. The preliminary positions are offered to assist the parties in preparing for the hearing. Staff's final positions will be based upon all the evidence in the record and may differ from the preliminary positions stated herein.

d. Staff's Position on the Issues

Generic Energy Conservation Cost Recovery Issues

ISSUE 1: What is the actual end-of-the-period true-up amount for the period April 1, 1998, through December 31, 1998?

POSITION:

Staff:

Electric:

Table with 3 columns: Position, Amount, and Status. Rows include FPC (\$1,359,603 Underrecovery), FPL (\$3,068,461 Overrecovery), and FPUC (MARIANNA) (\$88,996 Overrecovery).

- Vertical list of initials: AFA, APP, CAF, CMU, CTR, EAG, LEG, MAS (with handwritten 3), OPC, PAI, SEC (with handwritten 1), WAW, OTH.

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| | | |
|-------------------------|-------------|--------------|
| FPUC (FERANDINA BEACH): | \$122,660 | Overrecovery |
| GPC: | \$370,678 | Overrecovery |
| TECO: | \$2,485,639 | Overrecovery |

ISSUE 2: What are the appropriate conservation cost recovery factors for the period January 1, 2000, through December 31, 2000?

POSITION:

Staff:

Electric:

FPC:

| <u>Rate Class</u> | <u>ECCR Factor</u> |
|-------------------------------|--------------------|
| Residential | 0.239 cents/Kwh |
| General Svc. Non-Demand | 0.172 cents/Kwh |
| @ Primary Voltage | 0.170 cents/Kwh |
| @ Transmission Voltage | 0.169 cents/Kwh |
| General Svc. 100% Load Factor | 0.121 cents/Kwh |
| General Svc. Demand | 0.141 cents/Kwh |
| @ Primary Voltage | 0.140 cents/Kwh |
| @ Transmission Voltage | 0.138 cents/Kwh |
| Curtaillable | 0.122 cents/Kwh |
| @ Primary Voltage | 0.121 cents/Kwh |
| @ Transmission Voltage | 0.120 cents/Kwh |
| Interruptible | 0.116 cents/Kwh |
| @ Primary Voltage | 0.115 cents/Kwh |
| @ Transmission Voltage | 0.114 cents/Kwh |
| Lighting | 0.059 cents/Kwh |

FPL:

| <u>Rate Class</u> | <u>ECCR Factor</u> |
|-------------------------------------|--------------------|
| Residential | 0.189 cents/Kwh |
| General Svc. | 0.184 cents/Kwh |
| General Svc. Demand | 0.168 cents/Kwh |
| Sports Service 2 | 0.118 cents/Kwh |
| General Svc. Large 1/Curtaillable 1 | 0.168 cents/Kwh |
| General Svc. Large 2/Curtaillable 2 | 0.159 cents/Kwh |
| General Svc. Large 3/Curtaillable 3 | 0.150 cents/Kwh |
| Interruptible Standby 1D | 0.176 cents/Kwh |
| Standby Supplemental 1T | 0.129 cents/Kwh |
| Standby Supplemental 1D | 0.166 cents/Kwh |
| Commercial Load Control D & G | 0.155 cents/Kwh |

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| | |
|---------------------------|-----------------|
| Commercial Load Control T | 0.141 cents/Kwh |
| Metropolitan Transit | 0.180 cents/Kwh |
| Outdoor/Street Lighting 1 | 0.112 cents/Kwh |
| Street Lighting 2 | 0.147 cents/Kwh |

| | | |
|------|-------------------|--------------------|
| GPC: | <u>Rate Class</u> | <u>ECCR Factor</u> |
| | RS, RST | 0.038 cents/Kwh |
| | GS, GST | 0.038 cents/Kwh |
| | GSD, GSdT | 0.037 cents/Kwh |
| | LP, LPT | 0.035 cents/Kwh |
| | PX, PXT, RTP, SBS | 0.033 cents/Kwh |
| | OS-I, O-SII | 0.033 cents/Kwh |
| | OS-III | 0.035 cents/Kwh |
| | OS-IV | 0.042 cents/Kwh |

TECO:

| | | |
|--|---------------------------|--------------------|
| | <u>Rate Class</u> | <u>ECCR Factor</u> |
| | Residential | 0.125 cents/Kwh |
| | General Svc. Non-Demand | 0.110 cents/Kwh |
| | General Svc. Demand | 0.096 cents/Kwh |
| | @ Primary Voltage | 0.095 cents/Kwh |
| | General Svc. Large Demand | 0.089 cents/Kwh |
| | @ Primary Voltage | 0.088 cents/Kwh |
| | @ Subtransmission Voltage | 0.087 cents/Kwh |
| | Lighting | 0.049 cents/Kwh |
| | Interruptible | 0.018 cents/Kwh |

FPUC (MARIANNA):

| | | |
|--|-------------------|--------------------|
| | <u>Rate Class</u> | <u>ECCR Factor</u> |
| | Residential | 0.043 cents/Kwh |

FPUC (FERNANDINA BEACH):

| | | |
|--|-------------------|--------------------|
| | <u>Rate Class</u> | <u>ECCR Factor</u> |
| | Residential | 0.027 cents/Kwh |

Gas:

| | | |
|------|-------------------|--------------------|
| CUC: | <u>Rate Class</u> | <u>ECCR Factor</u> |
| | Residential | 7.132 cents/therm |
| | Commercial | 2.248 cents/therm |

| | |
|----------------------------|-------------------|
| Commercial/Large Volume I | 1.363 cents/therm |
| Commercial/Large Volume II | .753 cents/therm |
| Firm Transportation | .726 cents/therm |

| CGC: <u>Rate Class</u> | <u>ECCR Factor</u> |
|---------------------------------|--------------------|
| Residential (RS, ED & GL) | 7.188 cents/therm |
| Commercial (CS, ED, CTS & SCTS) | 1.793 cents/therm |
| Commerical-Large Volume (LCS) | 1.354 cents/therm |

| PGS: <u>Rate Class</u> | <u>ECCR Factor</u> |
|-----------------------------|--------------------|
| Residential | 8.099 cents/therm |
| Small Commerical | 6.811 cents/therm |
| Commercial | 2.835 cents/therm |
| Commercial-Large Volume I | 2.299 cents/therm |
| Commercial-Large Volume II | 1.672 cents/therm |
| Commercial Street Lighting | .966 cents/therm |
| Natural Gas Vehicle Service | .759 cents/therm |

| PGS-WFD: <u>Rate Class</u> | <u>ECCR Factor</u> |
|----------------------------|--------------------|
| Residential | 9.005 cents/therm |
| Commercial | 3.118 cents/therm |
| Commercial-Large Volume I | 2.315 cents/therm |
| Industrial | 2.291 cnets/therm |
| Firm Transportation | .804 cents/therm |
| Special Contract | .706 cents/therm |

| SJNG <u>Rate Class</u> | <u>ECCR Factor</u> |
|-------------------------|--------------------|
| Residential | 2.326 cents/therm |
| Commercial | 2.883 cents/therm |
| Commercial-Large Volume | .872 cents/therm |

ISSUE 3: What is the final end-of-period true-up amount for the period April 1, 1998, through March 31, 1999?

POSITION:

Staff:

Gas

| | |
|------|-------------------------|
| CUC: | \$ 64,701 Underrecovery |
| CGC: | \$195,877 Overrecovery |
| PGS: | \$446,455 Overrecovery |

PGS-WFD \$204,737 Overrecovery
SJNG: \$ 10,555 Overrecovery

Company Specific Issues

FPL:

ISSUE 4: Should Florida Power & Light be allowed to recover \$2,423,945 of litigation expenses that were charged to the Cogeneration and Small Power Production Program through the Energy Conservation Cost Recovery Clause for the period ending December 31, 1998?

POSITION:

Staff: No position pending the evidence adduced at hearing.

GULF:

ISSUE 5: What is GPC's appropriate end of period over(under) recovery for the previous Conservation filing for October 1997 to March 1998?

POSITION:

Staff: No position pending the evidence adduced at hearing.

ISSUE 6: What adjustments should be made to GPC's April 1998 to December 1998 over(under) recovery and 1999 actual/estimated true-up period in the 2000 projections for errors GPC made in the 1999 Projections Filing (Docket No. 990002-EG)?

POSITION:

Staff: No position pending the evidence adduced at hearing.

ISSUE 7: Should GPC be allowed to recover fees paid for the conversion of gas to electric hot water heaters through the ECCR?

POSITION:

Staff: No position pending the evidence adduced at hearing.

ISSUE 8: What are the appropriate legal fees that GPC should be allowed to charge to ECCR?

POSITION:

Staff: No position pending the evidence adduced at hearing.

FPC:

ISSUE 9: What is the final Revenue Decoupling true-up amount for 1997?

POSITION:

Staff: No position pending the evidence adduced at hearing.

Issues Raised by the Parties but not Addressed in Staff's Preliminary List of Issues and Positions

ISSUE 10: What should the final conservation cost recovery amount be for the twelve month period ending December 31, 2000?

POSITION:

SJNG: \$27,657.00 underrecovery

Staff: No position pending the evidence adduced at hearing.

POSITION:

GULF: Underrecovery \$912,032

TECO: An overrecovery of \$2,068,849, including interest.

Staff: No position pending the evidence adduced at hearing.

ISSUE 11: What should be the effective date of the new conservation cost recovery factors for billing purposes?

POSITION:

PGS: The factors should be effective beginning with the specified conservation cost recovery cycle and thereafter for the period January 1, 2000, through December 31, 2000. Billing cycles may start before January 1, 2000, and the last cycle may be read after December 31, 2000, so that each customer is billed for twelve months regardless of when such adjustment factor becomes effective.

Staff: No position pending the evidence adduced at hearing.

ISSUE 12: Has FPC properly calculated its final Residential Revenue Decoupling true-up amount for calendar year 1997?

POSITION:

FPC: Yes. FPC's final Residential Revenue Decoupling true-up amount for calendar year 1997 has been calculated based on the final revision of 1997 Florida total personal income in accordance with the methodology approved by the Commission in Order No. PSC-95-0097-FOF-EI.

Staff: No position pending the evidence adduced at hearing.

e. Pending Stipulations

None at this time

f. Pending Motions

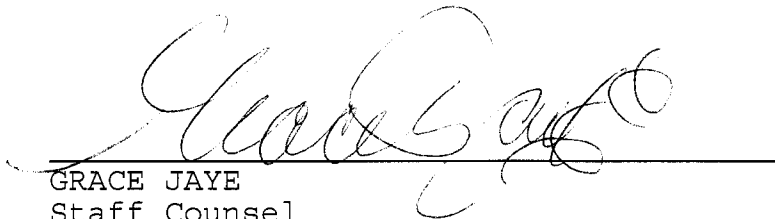
None at this time

g. Compliance with Order No. PSC-99-0699-PCO-EG, issued April 12, 1999

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

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Respectfully submitted this 25th day of October, 1998.

A handwritten signature in cursive script, appearing to read "Grace Jaye", is written over a horizontal line.

GRACE JAYE
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In re: Energy Conservation Cost
Recovery Clause

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that one true and correct copy of Staff's Prehearing Statement has been furnished by U.S. Mail this 25th day of October, 1999, to the following:

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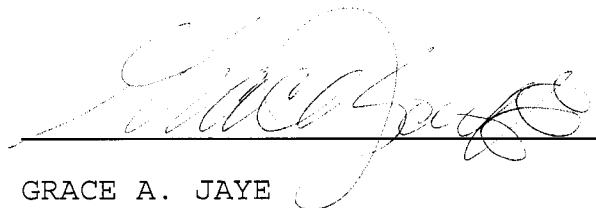
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A handwritten signature in cursive script, appearing to read "Grace A. Jaye", is written over a horizontal line.

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