Diamond Williams

From:

Suzanne Brownless [suzannebrownless@comcast.net]

Sent:

Tuesday, October 11, 2011 9:08 PM

To:

Filings@psc.state.fl.us

Cc:

jon moyle; ken rubin; vicki kaufman; patty christensen; karen white; jwahlen@ausley.com; john

burnett; jeffrey stone; jbeasley@ausley.com; russell badders; randy miller; Lee Eng Tan

Subject:

FlaSEIA Prehearing Statement, Docket 110002-EG

Attachments: 7341.doc

In accordance with the electronic filing procedures of the Florida Public Service Commission, the following filing is made:

The name, address, telephone number and email for the person responsible for this filing is: 1.

Suzanne Brownless Suzanne Brownless, PA 433 N. Magnolia Drive Tallahassee, FL 32308 (850) 877-5200 (850) 224-7662

suzannebrownless@comcast.net

- 2. This filing is made in Docket No. 110002-EG.
- 3. The document is filed on behalf of the Florida Solar Energy Industries Association.
- The total pages in this document is 4 pages. 4.
- 5. The attached document is FlaSEIA's Prehearing Statement.

Suzanne Brownless suzannebrownless@comcast.net

DOCUMENT NUMBER DATE

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Energy Conservation Cost Recovery Clause.		DOCKET NO. 110002-EG
	/	

FLORIDA SOLAR ENERGY INDUSTRY ASSOCIATION'S PREHEARING STATEMENT

Florida Solar Energy Industry Association (FlaSEIA), pursuant to Order No. PSC11-0136-PCO-

EG, issued on February 28, 2011, files its Prehearing Statement and states as follows:

A. Appearances:

SUZANNE BROWNLESS, Esq., Suzanne Brownless, PA, 433 North Magnolia Drive, Tallahassee, Florida 32308.

B. Witnesses:

None.

C. Exhibits:

Fla SEIA has not prefiled any exhibits. However, FlaSEIA reserves the right to introduce exhibits into the record during cross-examination.

D. Statement of Basic Position:

Order PSC-09-0855-FOF-EG, issued on December 30, 2009, approved funding of \$24.5 million annually for the five years from 2010 to 2014 to develop and implement solar pilot programs for all of the investor-owned utilities subject to the Florida Energy Efficiency and Conservation Act (FEECA): Florida Power & Light Company (FPL), Progress Energy Florida, Inc. (PEF), Tampa Electric Company (TECO), Gulf Power Company (Gulf Power) and Florida Public Utilities Company (FPUC). The Commission subsequently approved specific solar pilot programs for each FEECA utility.

In order to ensure that each FEECA utility's ratepayers receive the maximum benefit from the approved solar pilot programs, each FEECA utility must fully commit, correctly allocate and timely distribute the approved solar pilot program funds.

E. Statement of Issues and Positions:

GENERIC CONSERVATION COST RECOVERY ISSUES

ISSUE 1: What are the final conservation cost recovery true-up amounts for the period January 2010 through December 2010?

DOCUMENT NUMBER-DATE

0.7458 OCT 12 =

POSITION: No position at this time pending completion of discovery.

ISSUE 2: What are the total conservation cost recovery amounts to be collected during the period

January 2012 through December 2012?

POSITION: No position at this time pending completion of discovery.

ISSUE 3: What are the conservation cost recovery factors for the period January 2012 through

December 2012?

POSITION: No position at this time pending completion of discovery.

ISSUE 4: What should be the effective date of the new conservation cost recovery factors for

billing purposes?

POSITION: No position at this time pending completion of discovery.

FLASEIA GENERIC CONSERVATION COST RECOVERY ISSUE

ISSUE: What is the appropriate amount of costs associated with the solar pilot programs

approved for each investor-owned utility to be included in their respective cost recovery

factors for the period January 2012 through December 2012?

POSITION: No position at this time pending completion of discovery.

COMPANY SPECIFIC CONSERVATION COST RECOVERY ISSUES

Tampa Electric Company

ISSUE 5: What is the Contracted Credit Value for the GSLM-2 and GSLM-3 rate riders for Tampa

Electric Company for the period January 2012 through December 2012?

POSITION: No position at this time pending completion of discovery.

ISSUE 6: What are the residential Price Responsive Load Management (RSVP-1) rate tiers for

Tampa Electric Company for the period January 2012 through December 2012?

POSITION: No position at this time pending completion of discovery.

Gulf Power Company

ISSUE 7: Should the Commission approve Gulf Power Company's proposed modified

methodology for apportioning conservation costs among customer classes?

POSITION: No position at this time pending completion of discovery.

ISSUE 8: Should the Commission approve the rates associated with the two Price Responsive Load

Management (RSVP) rate proposals, one of which would only become effective

contingent upon a Commission decision in Gulf Power Company's currently pending rate case (Docket No. 110138-EI)?

POSITION: No position at this time pending completion of discovery.

F. Stipulated Issues:

None at this time.

G. Pending Motions

None at this time.

H. Pending Confidentiality Requests:

None at this time.

I. Objections to Witnesses' Qualifications:

None at this time.

J. Requirements that cannot be complied with:

FlaSEIA is not aware of any requirements with which it cannot comply at this time.

Respectfully submitted this 12th day of October, 2011 by:

______/s/ Suzanne Brownless Suzanne Brownless, Esq. Fla. Bar No. 309591 Suzanne Brownless, P.A. 433 North Magnolia Drive Tallahassee, FL 32308

Phone: (850) 877-5200; FAX: (850) 224-7662

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been provided by electronic mail this 12th day of October, 2011 to:

Lee Eng Tan, Office of the General Counsel Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 ltmm@psc.state.fl.us	Beth Keating Gunster, Yoakley & Stewart, P.A. 215 S. Monroe Street, Suite 618 Tallahassee, FL 32301 bkeating@gunster.com
James D. Beasley J. Jeffry Wahlen Ausley & McMullen Law Firm P.O. Box 391 Tallahassee, FL 32302 jbeasley@ausley.com jwahlen@ausley.com	Kenneth M. Rubin Florida Power & Light 700 Universe Blvd. Juno Beach, FL 33408-00420 ken.rubin@fpl.com
John T. Burnett Associate General Counsel Progress Energy Service Company, LLC 299 First Avenue North St. Petersburg, FL 33701 john.burnett@pgnmail.com	Vicki Gordon Kaufman Jon C. Moyle, Jr. Keefe Anchors Gordon & Moyle, PA 118 North Gadsden Street Tallahassee, FL 32301 vkaufman@kagmlaw.com jmoyle@kagmlaw.com
Patricia Christensen Office of Public Counsel c/o Florida Legislature 111 West Madison Street, # 812 Tallahassee, FL 32399 christensen.patty@leg.state.fl.us	Jeffrey A. Stone Russell A. Badders Beggs & Lane Law Firm P.O. Box 12950 Pensacola, FL 32591 jas@beggslane.com rab@beggslane.com
Karen S. White, Staff Attorney c/o AFCESA-ULFSC 139 Barnes Drive, Suite 1 Tyndall Air Force Base, Florida 32403-5319 karen.white@tyndall.af.mil	Randy B. Miller 15843 Southeast 78 th Street P.O. Box 300 White Springs, FL 32096 RMiller@pcsphosphate.com

/s/ Suzanne Brownless Suzanne Brownless Fla. Bar No. 309591

c:cert/CCRC