

**Diamond Williams**

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**Sent:** Wednesday, October 12, 2011 3:02 PM  
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**Subject:** Electronic Filing / Dkt 110002-EI / FPL's Prehearing Statement  
**Attachments:** 10.12.11 FPL's Prehearing Statement.pdf

Electronic Filing

a. Person responsible for this electronic filing:

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b. Docket No. 110002 - EI  
In RE: Energy Conservation Cost Recovery Clause

c. The Document is being filed on behalf of Florida Power & Light Company.

d. There are a total of 7 pages

e. The document attached for electronic filing is Florida Power & Light Company's Prehearing Statement

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10/12/2011

DOCUMENT NUMBER-DATE  
07484 OCT 12 =  
FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Energy Conservation Cost )  
Recovery Clause )  
\_\_\_\_\_ )

Docket No. 110002-EG  
Filed: October 12, 2011

FLORIDA POWER & LIGHT COMPANY'S  
PREHEARING STATEMENT

Florida Power & Light Company ("FPL"), pursuant to Order No. PSC-11-0136-PCO-EG, hereby files its prehearing Statement in Docket No. 110002-EG.

I. FPL WITNESSES

<u>Witness</u>	<u>Subject Matter</u>
Terry J. Keith	Issue 1, 3 & 4
Anita Sharma	Issue 2

II. EXHIBITS

<u>Exhibit</u>	<u>Content</u>	<u>Sponsoring Witness</u>
AS-1	Schedules CT-1	T.J. Keith
AS-1	Schedules CT-2 and CT-3	T.J.Keith/A. Sharma
AS-1	Schedule CT-4	T.J. Keith
AS-1	Schedules CT-5 and CT-6, Appendix A	A. Sharma
AS-2	Schedule C-1 and C-4	T.J. Keith
AS-2	Schedule C-2 and C-3	T.J. Keith/A. Sharma
AS-3	Schedule C-5	A. Sharma

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**III. STATEMENT OF BASIC POSITION**

FPL's proposed Conservation Cost Recovery Factors for the January 2012 through December 2012 recovery period and true-up amounts for the prior periods should be approved.

**IV. ISSUES AND POSITIONS**

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

FPL: \$9,183,523 over recovery. (KEITH)

**ISSUE 2:** What are the total conservation cost recovery amounts to be collected during the period January 2012 through December 2012?

FPL: \$ 274,020,944, including prior period true-up amounts and revenue taxes. (SHARMA)

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

FPL:

Rate Class	Conservation Recovery Factor (\$/KW)	Conservation Recovery Factor (\$/kwh)
RS1/RST1/RSDPR1*	-	0.00287
GS1/GST1	-	0.00253
GSD1/GSDT1/HLFT(21-499 kW)	0.88	-
OS2		0.00191
GSLD1/GSLDT1/CS1/CST1/HLFT(500-1,999 kW)	1.01	-
GSLD2/GSLDT2/CS2/CST2/HLFT(2,000+ kW)	1.09	-
GSLD3/GSLDT3/CS3/CST3	1.30	-
ISST1D	**	-
ISST1T	**	-
SST1T	**	-
SST1D1/SST1D2/SST1D3	**	-
CILC D/CILC G	1.17	-
CILC T	1.16	-
MET	1.07	-
OL1/SL1/PL1	-	0.00149
SL2, GSCU1	-	0.00227

\* For RSDPR-1 ECCR charge, see Tariff Sheet No. 8.30.2

Rate Class	Reservation Demand Charge ** (\$/kw)	Sum of Daily Demand Charge ** (\$/kw)
ISST1D	\$0.12	\$0.06
ISST1T	\$0.12	\$0.06
SST1T	\$0.12	\$0.06
SST1D1/SST1D2/SST1D3	\$0.12	\$0.06

(KEITH)

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

FPL: Cycle Day 1 of the January, 2012 billing period through the end of the December, 2012 billing period or thereafter until modified by the Commission. (KEITH)

Florida Solar Energy Industry Association's Proposed Issue

**ISSUE 5:** 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?

FPL: No position at this time.

Southern Alliance for Clean Energy Proposed Issues

**ISSUE 7:** Has the utility documented a levelized cost, or used another methodology, to determine the DSM plan program cost per unit of energy savings?

FPL: FPL objects to the inclusion of Issue 7 as it attempts to raise an issue well beyond the scope of the proceedings and which, if an appropriate subject of litigation, should be raised in other proceedings.

**ISSUE 8:** Would a different mix of compliant DSM Plan programs result in a lower conservation cost recovery factor?

FPL: FPL objects to the inclusion of Issue 8 as it attempts to raise an issue well beyond the scope of the proceedings and which, if an appropriate subject of litigation, should be raised in other proceedings.

**ISSUE 9:** Would modifying the design of existing compliant DSM Plan programs result in a lower cost recovery factor?

**FPL:** FPL objects to the inclusion of Issue 9 as it attempts to raise an issue well beyond the scope of the proceedings and which, if an appropriate subject of litigation, should be raised in other proceedings.

**ISSUE 10:** Would an increased reliance on lower cost compliant DSM Plan programs result in a lower cost recovery factor?

**FPL:** FPL objects to the inclusion of Issue 10 as it attempts to raise an issue well beyond the scope of the proceedings and which, if an appropriate subject of litigation, should be raised in other proceedings.

**ISSUE 11:** Are the costs of the DSM Plan programs prudent?

**FPL:** FPL objects to the inclusion of Issue 11 as it attempts to raise an issue well beyond the scope of the proceedings and which, if an appropriate subject of litigation, should be raised in other proceedings.

## **V. STIPULATED ISSUES**

None at this time.

## **VI. PENDING MOTIONS**

1. Florida Power & Light Company's Petition for Approval of Energy Conservation Cost Recovery True-Up for the Period Ending December 2010, filed May 3, 2011.
2. Petition of Florida Power & Light Company for Approval of its Conservation Cost Recovery Factors for the Period January 2012 through December 2012, filed September 13, 2011.
3. Florida Power & Light Company's Response to Petition to Intervene of the Southern Alliance for Clean Energy, filed October 10, 2011.
4. Florida Power & Light Company's Objections to the Florida Solar Energy Industries Association's First Set of Interrogatories (Nos. 1-5), filed October 10, 2011.

## **VII. PENDING REQUEST FOR CONFIDENTIALITY**

Florida Power & Light Company's request for confidential classification of information provided in Schedule CT-6 to Exhibit AS -1 of true-up testimony of Anita Sharma and Terry Keith. DN 03047-11, dated May 3, 2011.

Florida Power & Light Company's request for confidential classification of materials provided pursuant to Audit No. 11-005-4-4, DN 04575-11, dated July 1, 2011.

**VIII. OBJECTIONS TO A WITNESS' QUALIFICATION AS AN EXPERT**

None at this time.

**IX. REQUIREMENTS OF THE PREHEARING ORDER THAT CANNOT BE MET**

FPL believes it has complied with all the requirements set forth in the Order Establishing Procedure.

Respectfully submitted this 12<sup>th</sup> day of October, 2011.

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By: /s/Kenneth M. Rubin  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of Florida Power & Light Company's Prehearing Statement was served by electronic mail this 12<sup>th</sup> day of October, 2011 to the following:

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