

Eric Fryson

From: George Cavros [george@cavros-law.com]
Sent: Monday, October 08, 2012 4:05 PM
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Subject: SACE's Prehearing Stmt - Docket No. 120002
Attachments: SACE Prehearing Stmt-ECCR2012.pdf

Dear Commission Clerk,

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

- A.
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George Cavros, Esq., P.A.
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- B. This filing is made in Docket No. 120002-EG.
- C. This document is filed on behalf of Southern Alliance for Clean Energy (SACE).
- D. The document is 5 total pages.
- E. The attached document is the Prehearing Statement of SACE in Docket No. 120002-EG.

Sincerely,

George Cavros

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DOCUMENT NUMBER-DATE

06860 OCT-8 02

FPSC-COMMISSION CLERK

10/8/2012

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Energy conservation cost recovery clause. | **DOCKET NO. 120002-EG**

Date: October 8, 2012

SACE'S PREHEARING STATEMENT

Pursuant to Order No. PSC-12-0062-PCO-EG, issued February 10, 2012, Southern Alliance for Clean Energy (SACE) hereby files its Prehearing Statement in the above-styled docket.

1. **All Known Witnesses**

SACE does not intend to call any witnesses at this time.

2. **All Known Exhibits**

SACE does not intend to file any exhibits at this time.

3. **SACE's Statement of Basic Position**

SACE's positions are preliminary and based on materials filed by the parties and discovery received thus far by SACE. SACE's final positions will be based upon all the evidence in the record and may differ from the preliminary positions stated herein.

4. **Generic Conservation Cost Recovery Issues**

ISSUE 1: What are the final conservation cost recovery true-up amounts for the period January 2011 through December 2011?

SACE: No position at this time.

ISSUE 2: What are the total conservation cost recovery amounts to be collected during the period January 2013 through December 2013?

SACE: No position at this time.

ISSUE 3: What are the conservation cost recovery factors for the period January 2013 through December 2013?

DOCUMENT NUMBER-DATE

06860 OCT-8 2012

FPSC-COMMISSION CLERK

SACE: No position at this time.

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

SACE: No position at this time.

Company Specific Conservation Cost Recovery Issues

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 2013 through December 2013?

SACE: No position at this time.

ISSUE 6: What are the Residential Price Responsive Load Management (RSVP-1) rate tiers for Tampa Electric Company for the period January 2013 through December 2013?

SACE: No position at this time.

ISSUE 7: What are the Residential Service Variable Pricing (RSVP) rate tiers for Gulf Power for the period January 2013 through December 2013?

SACE: No position at this time.

SACE's Additional Generic Issues

ISSUE 8: Does the utility have a measurement plan in place to ensure that energy savings associated with its ECCR factors are accurate?

SACE: No position at this time.

ISSUE 9: Does the utility have a verification plan in place to ensure that energy savings associated with its ECCR factors are accurate?

SACE: No position at this time.

ISSUE 10: Does the utility have an evaluation plan in place to ensure optimal program impacts and performance?

SACE: No position at this time.

5. Stipulated Issues
There are no stipulated issues at this time.
6. Pending Motions
SACE has no pending motions.
7. Pending Confidentiality Claims or Requests
SACE has no pending confidentiality claims.
8. Objections to Witness Qualifications as an Expert
SACE has no objections to any witness's qualifications as an expert.
9. Compliance with Order No. PSC-12-0062-PCO-EG
SACE has complied with all requirements of the Order Establishing Procedure in this docket.

Respectfully submitted this 8th day of October, 2012 by:

/s/ George Cavros
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Attorney for Southern Alliance for
Clean Energy

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by electronic mail and / or US Mail this 8th day of October 2012, to the following:

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