FILED OCT 09, 2013 DOCUMENT NO. 06023-13 FPSC - COMMISSION CLERK

Robert L. McGee, Jr. Regulatory & Pricing Manager One Energy Place Pensacola, Florida 32520 0780

Tel 850 444 6530 Fax 850 444 6026 RLMCGEE@southernco.com RECEIVED-FPSC

13 OCT -9 AM 9: 39

COMMISSION CLERK



October 8, 2013

Ms. Ann Cole, Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

RE: Docket No. 130002-EG

Dear Ms. Cole:

Enclosed is the Prehearing Statement of Gulf Power Company to be filed in the above referenced docket. Also enclosed is a CD containing the Prehearing Statement in Microsoft Word.

Sincerely,

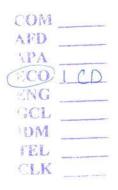
Me Sof.

Robert L. McGee, Jr. Regulatory and Pricing Manager

md

Enclosures

cc: Beggs & Lane Jeffrey A. Stone, Esq.



# BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

)

)

)

IN RE: Conservation Cost Recovery Clause Docket No. 130002-EG Date Filed: October 9, 2013

### PREHEARING STATEMENT OF GULF POWER COMPANY

Gulf Power Company, ("Gulf Power", "Gulf", or "the Company"), by and through its

undersigned attorneys, and pursuant to Order No. PSC-13-0089-PCO-EG, issued February 18,

2013, establishing the prehearing procedure in this docket, files this prehearing statement,

saying:

### A. APPEARANCES:

JEFFREY A. STONE, Esquire, RUSSELL A. BADDERS, Esquire and STEVEN R. GRIFFIN, Esquire, of Beggs & Lane, P.O. Box 12950, Pensacola, FL 32591-2950 On behalf of Gulf Power Company.

B. WITNESSES: All witnesses known at this time, who may be called by Gulf Power

Company, along with the subject matter and issue numbers which will be covered by the witness'

testimony, are as follows:

<u>Witness</u> ( <u>Direct</u> )	Subject Matter	Issues
1. Jennifer L. Todd	True-up; components of Gulf's conservation plan and associated costs; projections and program results	1, 2, 3, 4

# C. EXHIBITS:

Exhibit Number	Witness	Description
(JLT-1)	Todd	Schedules CT - 1 through CT - 6
(JLT-2)	Todd	Schedules C - 1 through C - 6

# D. STATEMENT OF BASIC POSITION

# Gulf Power Company's Statement of Basic Position:

It is the basic position of Gulf Power Company that the proposed ECCR factors present the best estimate of Gulf's Conservation expense at this time for the period January 2014 through December 2014, including the true-up calculations and other adjustments allowed by the Commission.

# E. STATEMENT OF ISSUES AND POSITIONS

# **Generic Energy Conservation Cost Recovery Issues**

- **ISSUE 1:** What are the final conservation cost recovery true-up amounts for the period January 2012 through December 2012?
- GULF: Under recovery of \$1,293,261. (Todd)
- **ISSUE 2:** What are the total conservation cost recovery amounts to be collected during the period January 2014 through December 2014?
- **<u>GULF:</u>** Recovery of \$24,374,604 (excluding revenue taxes). (Todd)

- **ISSUE 3:** What are the conservation cost recovery factors for the period January 2014 through December 2014?
- **<u>GULF:</u>** The Company's proposed conservation cost recovery factors by customer class for the period January 2014 through December 2014 are as follows: (Todd)<sup>1</sup>

RATE CLASS	CONSERVATION COST RECOVERY FACTORS ¢/kWh
RS	0.226
RSVP, Tier 1	(2.900)
RSVP, Tier 2	(1.608)
RSVP, Tier 3	6.064
RSVP, Tier 4	58.761
GS	0.222
GSD, GSDT, GSTOU	0.217
LP, LPT	0.209
PX, PXT, RTP, SBS	0.204
OSI, OSII	0.192
OSIII	0.210

<sup>&</sup>lt;sup>1</sup> The RSVP rate tiers for Gulf Power shown here are the proper amounts after making a correction for an error identified in the amounts shown in Schedule C-6 of Gulf's Witness Todd's testimony and exhibits filed on September 10, 2013.

- **<u>ISSUE 4</u>**: What should be the effective date of the new conservation cost recovery factors for billing purposes?
- **<u>GULF:</u>** The new conservation cost recovery factors should be effective beginning with the first billing cycle for January 2014 and thereafter through the last billing cycle for December 2014. The first billing cycle may start before January 1, 2014, and the last cycle may be read after December 31, 2014, so that each customer is billed for twelve months regardless of when the adjustment factor became effective. (Todd)

### F. STIPULATED ISSUES

**<u>GULF:</u>** Yet to be determined. Gulf is willing to stipulate that the testimony of all witnesses whom no one wishes to cross examine be inserted into the record as though read, cross examination be waived, and the witness's attendance at the hearing be excused.

### G. PENDING MOTIONS:

GULF: None.

# H. PENDING CONFIDENTIALITY REQUEST:

GULF: None.

#### I. OTHER MATTERS:

**<u>GULF:</u>** To the best knowledge of counsel, Gulf has complied, or is able to comply, with all requirements set forth in the orders on procedure and/or the Commission rules governing this prehearing statement. If other issues are raised for determination at the hearings set for November 4-6, 2013, Gulf respectfully requests an opportunity to submit additional statements of position and, if necessary, file additional testimony.

Dated this 8<sup>th</sup> day of October, 2013.

Respectfully submitted,

annes

JEFFREY A. STONE jas@beggslane.com Florida Bar No. 0325953 RUSSELL A. BADDERS rab@beggslane.com Florida Bar No. 0007455 STEVEN R. GRIFFIN srg@beggslane.com Florida Bar No. 0627569 Beggs & Lane P. O. Box 12950 Pensacola, FL 32591-2950 (850) 432-2451 Attorneys for Gulf Power Company

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Energy Conservation Cost ) Recovery Clause

Docket No.: 130002-EG

#### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by U.S. mail this 8th day of October, 2013 to the following:

Ausley Law Firm James D. Beasley J. Jeffry Wahlen Ashley M. Daniels Post Office Box 391 Tallahassee, FL 32302 jbeasley@ausley.com

Florida Power & Light Company Kenneth M. Rubin John T. Butler 700 Universe Boulevard (LAW/JB) Juno Beach, FL 33408-0420 ken.rubin@fpl.com

Gunster Law Firm Beth Keating 215 South Monroe Street, Suite 601 Tallahassee, FL 32301-1839 <u>bkeating@gunster.com</u>

Duke Energy Florida John T. Burnett Dianne M. Triplett Post Office Box 14042 St. Petersburg, FL 33733 <u>Dianne.triplett@duke-energy.com</u> Matthew.Bernier@duke-energy.com

Office of the General Counsel Theresa Tan 2540 Shumard Oak Blvd Tallahassee, FL 32399-0850 Itan@psc.state.fl.us PCS Phosphate – White Springs c/o Brickfield Law Firm James W. Brew/F. Alvin Taylor Eighth Floor, West Tower 1025 Thomas Jefferson St, NW Washington, DC 20007 jbrew@bbrslaw.com

Florida Power & Light Company Kenneth Hoffman 215 South Monroe Street, Suite 810 Tallahassee, FL 32301-1858 Ken.Hoffman@fpl.com

Office of Public Counsel J. Kelly P. Christensen C. Rehwinkel c/o The Florida Legislature 111 W. Madison Street, Room 812 Tallahassee, FL 32399-1400 Christensen.patty@leg.state.fl.us

Southern Alliance for Clean Energy c/o George Cavros, Esq. 120 East Oakland Park Blvd. Suite 105 Fort Lauderdale, FL 33334 george@cavros-law.com Florida Industrial Power Users Group c/o Moyle Law Firm Jon C. Moyle, Jr. 118 North Gadsden Street Tallahassee, FL 32301 jmoyle@moylelaw.com

Florida Public Utilities Company Cheryl M. Martin Aleida Socarras 1641 Worthington Road Suite 220 West Palm Beach, FL 33409-6703 Cyoung@fpuc.com

Duke Energy Florida, Inc. John T. Burnett 106 East College Avenue, Suite 800 Tallahassee, FL 32301-7740 john.burnett@duke-energy.com

Tampa Electric Company Ms. Paula K. Brown Regulatory Affairs P. O. Box 111 Tampa, FL 33601-0111 Regdept@tecoenergy.com

mak

JEFFREY A. STONE Florida Bar No. 325953 RUSSELL A. BADDERS Florida Bar No. 007455 STEVEN R. GRIFFIN Florida Bar No. 0627569 BEGGS & LANE P. O. Box 12950 Pensacola FL 32591-2950 (850) 432-2451 Attorneys for Gulf Power