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October 3, 2014

**VIA: ELECTRONIC FILING** 

Ms. Carlotta S. Stauffer Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

Re: Conservation Cost Recovery Clause

FPSC Docket No. 140002-EG

Dear Ms. Stauffer:

Attached for filing in the above docket is Tampa Electric Company's Supplement to Prehearing Statement.

Thank you for your assistance in connection with this matter.

Sincerely,

James D. Beasley

JDB/pp Attachment

cc: All Parties of Record (w/attachment)

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Energy Conservation Cost	)	DOCKET NO. 140002-EG
Recovery Clause.	)	
	)	FILED: October 3, 2014

# TAMPA ELECTRIC COMPANY'S SUPPLEMENT TO PREHEARING STATEMENT

Tampa Electric Company offers the following as its supplement to its Prehearing Statement filed on September 26, 2014. Note this supplement only addresses Issues A, 2, 3, 4A, 4B, 4C and 6. The company's positions on the remaining issues are as stated in its Prehearing Statement:

ISSUE A: For each utility, what is the appropriate end date for the Commission's approved solar pilot programs?

Tampa Electric Company (TECO):

Tampa Electric should continue offering its solar pilot programs during calendar year 2015 at the Commission approved annual expense levels prescribed in Order No. PSC-09-0855-FOF-EG, issued December 30, 2009. The issue of what goals, if any, should be established for demand-side renewable energy systems beyond 2015 is to be decided in the pending consolidated dockets to set conservation goals for the FEECA utilities, as opposed to this ECCR cost recovery proceeding. See Issue 11 in Order No. PSC-14-0356-PHO-EU (prehearing order for conservation goals dockets). (legal position; no witness needed)

ISSUE 2: What are the total conservation cost recovery amounts to be collected during the period January 2015 through December 2015?

Tampa Electric Company (TECO):

Assuming its solar pilot programs continue during calendar year 2015, Tampa Electric's total conservation cost recovery amounts to be collected during the period January through December 2015 with continuing to offer the solar pilot programs during the calendar year 2015 would be \$42,526,658 (including current period estimated true-up). (Witness: Roche)

ISSUE 3: What are the conservation cost recovery factors for the period January 2015 through December 2015?

#### Tampa Electric Company (TECO):

Assuming its solar pilot programs continue during calendar year 2015, Tampa Electric's cost recovery factors allocated on a 12 CP and 1/13 CP basis for the forthcoming January through December cost recovery period for firm retail rate classes with continuing to offer the solar pilot programs during the calendar year 2015 are as follows:

	Cost Recovery Factors
Rate Schedule	(cents per kWh)
RS	0.255
GS and TS	0.238
GSD Optional – Secondary	0.208
GSD Optional – Primary	0.206
GSD Optional – Subtransmission	0.204
LSI	0.109

	Cost Recovery Factors
Rate Schedule	<u>(dollars per kW)</u>
GSD – Secondary	0.89
GSD – Primary	0.88
GSD – Subtransmission	0.87
SBF – Secondary	0.89
SBF – Primary	0.88
SBF – Subtransmission	0.87
IS - Secondary	0.69
IS - Primary	0.69
IS - Subtransmission	0.68
(Witness: Roche)	

ISSUE 4A: Should the Commission require the utilities to separate their Energy Conservation Cost Recovery expenditures into two categories, one for Energy Efficiency programs and the other for Demand Side Management programs?

Tampa Electric Company (TECO):

No. Separating their expenditures in the manner described would represent an erroneous and unwarranted departure from the manner in which ECCR has been administered for the last 30 plus years. All of Tampa Electric's approved DSM measures provide demand and energy savings. Energy efficiency programs clearly provide both energy savings and demand reductions. (Witnesses: Roche; Deason)

ISSUE 4B: Should the Commission allow pro-active non-residential customers who implement their own energy efficiency programs and meet certain other criteria to opt out of the utility's Energy Efficiency programs and not be

required to pay the cost recovery charges for the utility's Energy Efficiency programs approved by the Commission pursuant to Section 366.82, Florida Statutes?

Tampa Electric Company (TECO):

No. This proposal is as inappropriate now as it was in 1981 when the Commission first rejected a similar proposal, and should be rejected for the many reasons put forth by Tampa Electric's rebuttal witnesses and those for the other IOUs. (Witnesses: Roche, Deason)

ISSUE 4C: If the Commission allows pro-active customers to opt out of participating in, and paying for, a utility's Energy Efficiency's programs, what criteria should the Commission applying determining whether customers who wish to opt out are eligible to do so?

Tampa Electric Company (TECO):

The Commission should not need to reach this issue, as the Commission should reject the very generally described "opt out" proposals of Intervenors, FIPUG and Wal-Mart/Sam's. If the Commission did have to decide this issue, it is very clear from the testimony submitted in this proceeding that the tests and criteria would be very difficult and costly to devise and administer and would lead to continuing controversy in areas where none has arisen over the life of the ECCR programs, particularly in the form of claims of favoritism and/or undue disadvantage by those customers who do not qualify to opt out. (Witnesses: Roche, Deason)

# ISSUE 6: What are the Residential Price Responsive Load Management (RSVP-1) rate tiers for Tampa Electric Company for the period January 2015 through December 2015?

Tampa Electric Company (TECO):

Assuming its solar pilot programs continue during calendar year 2015, Tampa Electric's Price Responsive Load Management rates ("RSVP-1") for customers who elect to take this service during the January through December 2015 will be as follows:

Rate Tier	(Cents per kWh)
	32.255
P3	7.526
P2	(0.671)
P1	(2.339)
(Witness: Roche)	

### DATED this 3rd day of October 2014.

Respectfully submitted,

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#### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Supplement to Prehearing Statement, filed on behalf of Tampa Electric Company, has been furnished by electronic mail on this 3<sup>rd</sup> day of October 2014 to the following:

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