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October 3, 2017

VIA E-PORTAL – ELECTRONIC FILING

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

Re: Docket No. 20170002-EG – Energy Conservation Cost Recovery Clause

Dear Ms. Stauffer:

Attached for electronic filing, please find Florida Public Utilities Company's Prehearing Statement.

Should you have any questions whatsoever, please do not hesitate to contact me. Thank you for your assistance in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Beth Keating', is written over a horizontal line.

Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 618
Tallahassee, FL 32301
(850) 521-1706

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c. FPUC's Statement of Basic Position

FPUC: The Commission should approve Florida Public Utilities Company's final net true-up for the period January through December 2016, the estimated true-up for the period January through December, 2017, and the projected conservation program expenses for the period January through December, 2018.

d. FPUC's Position on the Issues

GENERIC CONSERVATION COST RECOVERY ISSUES

ISSUE 1: What are the final conservation cost recovery adjustment true-up amounts for the January 2016 through 2016?

FPUC: The Company experienced a final end of period adjustment true-up amount that is an under-recovery of \$2,555.

ISSUE 2: What are the appropriate conservation adjustment actual/estimated true-up amounts for the period January 2017 through December 2017?

FPUC: The estimated conservation true-up amount for the prior period January 2017 to December 2017 is an over-recovery of \$67,738.

ISSUE 3: What are the appropriate total conservation adjustment true-up amounts to be collected/refunded from January 2018 through December 2018?

FPUC: The estimated conservation true-up amount to be refunded during the period January 2018 to December 2018 is an over-recovery of \$65,183.

ISSUE 4: What are the total conservation cost recovery amounts to be collected during the period January 2018 through December 2018?

FPUC: FPUC seeks to recover \$657,667 over the period January 2018 through December 2018.

ISSUE 5: What are the conservation cost recovery factors for the period January 2018 through December 2018?

FPUC: The Company asks for approval of a consolidated levelized conservation cost recovery factor for this period of \$.00102 per KWH.

ISSUE 6: What should be the effective date of the new conservation cost recovery factors for billing purposes?

FPUC: The factor should be effective beginning with the specified conservation cost recovery cycle and thereafter for the period January 2018 through December 2018. Billing cycles may start before January 1, 2018 and the last cycle may be read after December 31, 2018, so that each customer is billed for twelve months regardless of when the adjustment factor became effective.

ISSUE 7: Should the Commission approve revised tariffs reflecting the energy conservation cost recovery amounts and establishing energy conservation cost recovery factors determined to be appropriate in this proceeding?

FPUC: Yes. The Commission should approve revised tariffs reflecting the energy conservation cost recovery amounts and establishing energy conservation cost recovery factors determined to be appropriate in this proceeding. The Commission should direct staff to verify that the revised tariffs are consistent with the Commission's decision

ISSUE 8: What is the Contracted Credit Value for the GSLM-2 and GSLM-3 rate riders for Tampa Electric Company for the period January 2018 through December 2018?

FPUC: No position.

ISSUE 9: What are the residential Price Responsive Load Management (RSVP -1) rate tiers for Tampa Electric Company for the period January 2018 through December 2018?

FPUC: No position.

ISSUE 10: Should Gulf's proposed On Peak Demand credits and Critical Peak Demand charges for its Critical Peak Option under Gulf's Large Power Time of Use program be approved?

FPUC: No position.

ISSUE 11: Should the Commission approve Gulf's proposed modifications to its Residential Time of Use Pilot Program?

FPUC: No position.

e. Stipulated Issues

While not a party to any stipulations at this time, FPUC believes that it should be possible to reach a stipulation on each of the issues as they pertain to FPUC.

f. Pending Motions

FPUC has no pending motions.

g. Pending Confidentiality Claims or Requests

None.

h. Objections to Witness Qualifications as an Expert

FPUC has no objections to any witnesses' qualifications at this time.

i. Compliance with Order No. 2017-0111-PCO-EG

FPUC has complied with all requirements of the Order Establishing Procedure entered in this docket.

RESPECTFULLY SUBMITTED this 3rd day of October, 2017.



Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
(850) 521-1706

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Electronic Mail to the following parties of record this 3rd day of October, 2017.

<p>Florida Public Utilities Company Mike Cassel 1750 S 14th Street, Suite 200 Fernandina Beach, FL 32034 mcassel@fpuc.com</p>	<p>Jon C. Moyle, Jr. Moyle Law Firm 118 North Gadsden St. Tallahassee, FL 32301 jmoyle@moylelaw.com</p>
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<p>Mr. Ken Hoffman</p>	<p>Robert Scheffel Wright, Esq//John T. LaVia,</p>

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