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August 31, 2018

**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. 20180002-EG – Energy Conservation Cost Recovery Clause**

Dear Ms. Stauffer:

Attached for electronic filing, please find Florida Public Utilities Company's Preliminary Statement of Issues and Positions.

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

Sincerely,

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

MEK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In Re: Energy Conservation Cost    )  
Recovery Clause.                    )

Docket No. 20180002-EG

Filed: August 31, 2018

**FLORIDA PUBLIC UTILITIES COMPANY**  
**PRELIMINARY STATEMENT OF ISSUES AND POSITIONS**

Florida Public Utilities Company ("FPUC") hereby submits this preliminary statement of issues and positions:

**GENERIC CONSERVATION COST RECOVERY ISSUES**

**ISSUE 1:**     What are the final conservation cost recovery adjustment true-up amounts for the January 2017 through 2017?

**FPUC:**       The Company over-recovered \$60,042, resulting in a final end of period adjustment true-up amount that is an under-recovery of \$5,141.

**ISSUE 2:**     What are the appropriate conservation adjustment actual/estimated true-up amounts for the period January 2018 through December 2018?

**FPUC:**       The estimated conservation true-up amount for the prior period January 2018 to December 2018 is an over-recovery of \$80,500.

**ISSUE 3:**     What are the appropriate total conservation adjustment true-up amounts to be collected/refunded from January 2019 through December 2019?

**FPUC:**       The estimated conservation true-up amount to be refunded during the period January 2019 to December 2019 is an over-recovery of \$75,359.

**ISSUE 4:** What are the total conservation cost recovery amounts to be collected during the period January 2019 through December 2019?

**FPUC:** FPUC seeks to recover \$653,441 over the period January 2019 through December 2019.

**ISSUE 5:** What are the conservation cost recovery factors for the period January 2019 through December 2019?

**FPUC:** The Company asks for approval of a consolidated levelized conservation cost recovery factor for this period of \$.0097 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 2019 through December 2019. Billing cycles may start before January 1, 2019 and the last cycle may be read after December 31, 2019, 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 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.

RESPECTFULLY SUBMITTED this 31<sup>st</sup> day of August, 2018.



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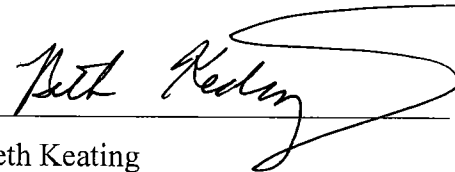
Beth Keating  
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**CERTIFICATE OF SERVICE**

**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 31<sup>st</sup> day of August, 2018:

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