

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for limited proceeding to approve second solar base rate adjustment (SoBRA), effective January 1, 2019, by Tampa Electric Company.

DOCKET NO.: 20180133-EI

FILED: September 17, 2018

PREHEARING STATEMENT OF THE OFFICE OF PUBLIC COUNSEL

The Citizens of the State of Florida, through the Office of Public Counsel, pursuant to the Order Establishing Procedure in this docket, Order No. PSC-2018-0388-PCO-EI issued August 02, 2018, submit this Prehearing Statement.

APPEARANCES:

CHARLES J. REHWINKEL, Esquire
Deputy Public Counsel
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street, Room 812
Tallahassee, Florida 32399-1400
On behalf of the Citizens of the State of Florida.

A. **WITNESSES:**

None

B. **EXHIBITS:**

None

C. STATEMENT OF BASIC POSITION

Tampa Electric Company seeks approval of its first solar project for inclusion as a specific, discrete adjustment to base rates pursuant to the 2017 Settlement Agreement approved in Order No. PSC-

2017-0456-S-EI. Paragraph 6 of the Settlement Agreement provides many criteria for eligibility under the streamlined, limited proceeding base rate freeze exception provided therein. While the 2019 (or second SoBRA installment) appears to be consistent with the 2017 Settlement Agreement, there are aspects related to 5.3mW of the Lake Hancock Project that do not appear to meet the letter or intent of paragraph 6(b) of the agreement.

Citizens intend to conduct limited cross-examination at hearing intended to hold the Company to its burden to demonstrate compliance with the Settlement's terms. At this point it has not been conclusively demonstrated that the burden has been met for all aspects of the 2019 SoBRA.

D. STATEMENT OF FACTUAL ISSUES AND POSITIONS

ISSUE 1: Are the 2019 SoBRA projects proposed by TECO each eligible in their entirety for treatment pursuant to paragraph 6 of the 2017 Agreement?

OPC: No. At this point, TECO has not demonstrated that the 5.3 mW associated with 2% of the Lake Hancock Project meets the letter and intent of the 2017 Settlement Agreement. The Commission should disallow the costs related to that increment of the requested cost recovery for that project.

ISSUE 2: Are the 2019 SoBRA projects proposed by TECO cost effective pursuant to subparagraph 6(g) of the 2017 Agreement?

OPC: No position at this time.

ISSUE 3: Are the projected installed costs of each of the 2019 SoBRA projects proposed by TECO less than or equal to the Installed Cost Cap of \$1,500 per kWac pursuant to subparagraph 6(d) of the 2017 Agreement?

OPC: Yes, they appear to be less than or equal to the Installed Cost Cap of \$1,500 per kWac pursuant to subparagraph 6(d) of the 2017 Agreement.

ISSUE 4: Is the projected average capital cost of the 2018 & 2019 SoBRA projects less than or equal to \$1,475 per kWac pursuant to subparagraph 6(c) of the 2017 Agreement?

OPC: Yes, they appear to be projects less than or equal to \$1,475 per kWac pursuant to subparagraph 6(c) of the 2017 Agreement.

ISSUE 5: What are the estimated annual revenue requirements associated with TECO's 2019 SoBRA projects?

OPC: No position at this time. The Commission should not allow the incremental costs and associated revenue requirement attributable to the 5.3mW/2% variance of the Lake Hancock Project.

ISSUE 6: What are the appropriate base rates needed to collect the estimated annual revenue requirements for the solar projects in the 2019 SoBRA?

OPC: No position at this time. The Commission should not allow the incremental costs and associated revenue requirement attributable to the 5.3mW/2% variance of the Lake Hancock Project.

ISSUE 7: Should the Commission approve the tariffs for TECO reflecting the base rate increases for the 2019 SoBRA projects determined to be appropriate in these proceedings?

OPC: No position at this time. The Commission should not allow the incremental costs and associated revenue requirement attributable to the 5.3mW/2% variance of the Lake Hancock Project.

ISSUE 8: Should the docket be closed?

OPC: No.

E. STIPULATED ISSUES:

None.

F. PENDING MOTIONS:

None.

G. REQUESTS FOR CONFIDENTIALITY

Citizens have no pending requests for claims for confidentiality.

H. OBJECTIONS TO WITNESS QUALIFICATIONS AS AN EXPERT

OPC has no objections to any witness' qualifications as an expert in this proceeding.

I. REQUIREMENTS OF ORDER

There are no requirements of the Order Establishing Procedure with which the Office of Public Counsel cannot comply.

Dated this 17th day of September, 2018.

Respectfully submitted,

JR Kelly
Public Counsel

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CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the Office of Public Counsel's Prehearing Statement has been furnished by electronic mail on this 17th day of September, 2018, to the following:

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