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October 9, 2018

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

RE: Docket No. 20180002-EG

Dear Ms. Stauffer:

Attached is the Prehearing Statement of Gulf Power Company to be filed in the above-referenced docket. Pursuant to the Order Establishing Procedure, a copy of this Prehearing Statement prepared using Microsoft Word is being provided to Commission staff and all parties.

Sincerely,

A handwritten signature in blue ink that reads "C. Shane Boyett".

C. Shane Boyett
Regulatory and Cost Recovery

md

Attachments

cc: Gulf Power Company
Jeffrey A. Stone, Esq., General Counsel
Beggs & Lane
Russell Badders, Esq.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Conservation Cost Recovery)
Clause)
)

Docket No. 20180002-EG
Date Filed: October 9, 2018

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-2018-0094-PCO-EG, issued February 20, 2018 (as amended), establishing the prehearing procedure in this docket, files this prehearing statement, saying:

A. APPEARANCES

JEFFREY A. STONE, Esquire
General Counsel
Gulf Power Company
One Energy Place
Pensacola, FL 32520-0100

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>	<u>Subject Matter</u>	<u>Issues #</u>
John N. Floyd	True-up; components of Gulf's conservation plan and associated costs; projections and program results	1, 2, 3, 4, 5, 6, 7, 10

C. EXHIBITS

<u>Witness</u> Direct	<u>Proffered by</u>	<u>Exhibit #</u>	<u>Description</u>
Floyd	Gulf Power Company	JNF-1	Schedules CT-1 through CT-6
Floyd	Gulf Power Company	JNF-2	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 2019 through December 2019, 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 adjustment true-up amounts for the period January 2017 through December 2017?

GULF: \$43,106 over-recovery. (Floyd)

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

GULF: \$1,968,828 over-recovery. (Floyd)

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

GULF: \$2,011,934 over-recovery. (Floyd)

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

GULF: \$12,776,473 (including prior true-up amounts and revenue taxes). (Floyd)

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

GULF: The Company's proposed conservation cost recovery factors by customer class for the period January 2019 through December 2019 are as follows: (Floyd)

RATE CLASS	CONSERVATION COST RECOVERY FACTORS
RS	0.125 cents/kWh
RSVP Tier 1	(3.000) cents/kWh
RSVP Tier 2	(0.926) cents/kWh
RSVP Tier 3	7.591 cents/kWh
RSVP Tier 4	66.400 cents/kWh
RSTOU On-peak	17.100 cents/kWh
RSTOU Off-peak	(3.194) cents/kWh
RSTOU Critical Peak Credit	\$5.00 per event
GS	0.121 cents/kWh
GSD, GSDT, GSTOU	0.116 cents/kWh
LP, LPT	0.111 cents/kWh
LPT-CPO On-Peak	(\$4.89) per kW
LPT-CPO Critical	\$58.68 per kW
PX, PXT, RTP, SBS	0.109 cents/kWh
OSI, OSII	0.092 cents/kWh
OSIII	0.108 cents/kWh
CL Credit	(\$5.57) per kW

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

GULF: The new conservation cost recovery factors should be effective beginning with the first billing cycle for January 2019 and thereafter through the last billing cycle for December 2019. The first billing cycle 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. (Floyd)

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?

GULF: Yes. The Commission should approve revised tariffs reflecting the energy conservation cost recovery amounts and 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. (Floyd)

CLOSE THE DOCKET ISSUE

ISSUE 10: Should this docket be closed?

GULF: No position at this time. (Floyd)

F. STIPULATED ISSUES

GULF: 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

GULF: 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 5-7, 2018, Gulf respectfully requests an opportunity to submit additional statements of position and, if necessary, file additional testimony.

Dated this 9th day of October, 2018.

Respectfully submitted,



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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Energy Conservation Cost)
Recovery Clause)

Docket No.: 20180002-EG

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by electronic mail this 9th day of October, 2018 to the following:

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