

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Commission review of numeric conservation goals (Florida Power & Light Company). : **DOCKET NO. 20190015-EG**
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In re: Commission review of numeric conservation goals (Gulf Power Company). : **DOCKET NO. 20190016-EG**
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In re: Commission review of numeric conservation goals (Florida Public Utilities Company). : **DOCKET NO. 20190017-EG**
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In re: Commission review of numeric conservation goals (Duke Energy Florida, LLC). : **DOCKET NO. 20190018-EG**
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In re: Commission review of numeric conservation goals (Orlando Utilities Commission). : **DOCKET NO. 20190019-EG**
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In re: Commission review of numeric conservation goals (JEA). : **DOCKET NO. 20190020-EG**
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In re: Commission review of numeric conservation goals (Tampa Electric Company). : **DOCKET NO. 20190021-EG**
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: **Filed: July 22, 2019**

**PREHEARING STATEMENT OF
WALMART INC.**

Pursuant to Florida Public Service Commission's ("Commission") Order No. PSC-2019-0062-PCO-EG, filed February 18, 2019, Walmart Inc. ("Walmart") files its Prehearing Statement.

I. WITNESSES

Walmart has not presented and does not intend to call any witnesses.

II. EXHIBITS

Walmart does not intend to sponsor any direct exhibits.

III. WALMART'S STATEMENT OF BASIC POSITION

The Commission should determine whether the goals proposed by the Companies and Intervenors achieves the legislative intent of the Florida Energy Efficiency and Conservation Act ("FEECA") which is to utilize renewable energy systems and conservation systems in order to protect the health, prosperity, and general welfare of the state and its citizens, while reducing and controlling the growth rates of electric consumption and of weather-sensitive peak demand, and Section 366.82(2), F.S., to increase conservation of expensive resources, to reduce and control the growth rates of electric consumption, to reduce the growth rates of weather-sensitive peak demand, and to encourage development of demand-side renewable energy resources.

Walmart opted not to submit testimony in these consolidated cases and takes no position at this time whether the goals proposed by the Companies and Intervenors achieve the intent of FEECA.

IV. ISSUES

Issue 1: Are the Company's proposed goals based on an adequate assessment of the full technical potential of all available demand-side and supply-side conservation and efficiency measures, including demand-side renewable energy systems, pursuant to Section 366.82(3), F.S.?

Position: Walmart takes no position at this time.

Issue 2: Do the Company's proposed goals adequately reflect the costs and benefits to customers participating in the measure, pursuant to Section 366.82(3)(a), F.S.?

Position: Walmart takes no position at this time.

Issue 3: Do the Company's proposed goals adequately reflect the costs and benefits to the general body of ratepayers as a whole, including utility incentives and participant contributions, pursuant to Section 366.82(3)(b), F.S.?

Position: Walmart takes no position at this time.

Issue 4: Do the Company's proposed goals adequately reflect the need for incentives to promote both customer-owned and utility-owned energy efficiency and demand-side renewable energy systems, pursuant to Section 366.82(3)(b), F.S.?

Position: Walmart takes no position at this time.

Issue 5: Do the Company's proposed goals adequately reflect the costs imposed by state and federal regulations on the emission of greenhouse gases, pursuant to Section 366.82(3)(d), F.S.?

Position: Walmart takes no position at this time.

Issue 6: What cost-effectiveness test or tests should the Commission use to set goals, pursuant to Section 366.82, F.S.?

Position: Walmart takes no position at this time.

Issue 7: Do the Company's proposed goals appropriately reflect consideration of free riders?

Position: Walmart takes no position at this time.

Issue 8: What residential summer and winter megawatt (MW) and annual Gigawatt-hour (GWh) goals should be established for the period 2020-2029?

Position: Walmart takes no position at this time.

Issue 9: What commercial/industrial summer and winter megawatt (MW) and annual Gigawatt-hour (GWh) goals should be established for the period 2020-2029?

Position: Walmart takes no position at this time.

Issue 10: What goals, if any, should be established for increasing the development of demand-side renewable energy systems, pursuant to Section 366.82(2), F.S.?

Position: Walmart takes no position at this time.

V. STIPULATED ISSUES

There are currently no stipulated issues.

VI. PENDING MOTIONS OR OTHER ACTIONABLE MATTERS

Walmart has no pending Motions at this time.

VII. PENDING CONFIDENTIALITY REQUESTS OR CLAIMS

Walmart has no pending confidentiality requests or claims.

VIII. OBJECTIONS TO WITNESS QUALIFICATIONS AS AN EXPERT

Walmart does not object to any witness's qualifications as an expert.

IX. COMPLIANCE WITH ORDER NO. PSC-2019-0062-PCO-EG

There are no requirements of Order No. PSC-2019-0062-PCO-EG with which Walmart cannot comply.¹

¹ Walmart may seek to be excused from attendance at the Prehearing and/or Hearing given that it has opted not to submit testimony or advance a substantive position.

Respectfully submitted,

By /s/ Stephanie U. Eaton

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Dated: July 22, 2019

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 this 22nd day of July, 2019.

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