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August 28, 2019

VIA E-PORTAL – ELECTRONIC FILING

Mr. Adam Teitzman Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Re: Docket No. 20190002-EG - Energy Conservation Cost Recovery Clause

Dear Mr. Teitzman:

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

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Energy Conservation Cost)	Docket No. 20190002-EG
Recovery Clause.)	
		Filed: August 28, 2019

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 2018 through 2018?

FPUC: The final end of period adjustment true-up amount is an under-recovery of \$23,726.

ISSUE 2: What are the appropriate conservation adjustment actual/estimated true-up amounts for the period January 2019 through December 2019?

FPUC: The estimated conservation true-up amount for the period January 2019 to December 2019 is an under-recovery of \$61,122.

ISSUE 3: What are the appropriate total conservation adjustment true-up amounts to be collected/refunded from January 2020 through December 2020?

FPUC: The estimated conservation true-up amount to be refunded during the period January 2020 to December 2020 is an under-recovery of \$84,848.

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ISSUE 4: What are the total conservation cost recovery amounts to be collected during the

period January 2020 through December 2020?

FPUC: FPUC seeks to recover \$834,848 over the period January 2020 through December

2020.

ISSUE 5: What are the conservation cost recovery factors for the period January 2020

through December 2020?

FPUC: The Company asks for approval of a consolidated levelized conservation cost

recovery factor for this period of \$.00132 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 2020 through December

2020. Billing cycles may start before January 1, 2020 and the last cycle may be

read after December 31, 2020, 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?

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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 28th day of August, 2019.

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 28th day of August, 2019:

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