

Maria Jose Moncada Senior Attorney Florida Power & Light Company 700 Universe Boulevard Juno Beach, FL 33408-0420 (561) 304-5795 (561) 691-7135 (Facsimile) E-mail: maria.moncada@fpl.com

August 29, 2019

### -VIA ELECTRONIC FILING -

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

Re: Docket No. 20190002-EG

**Energy Conservation Cost Recovery Clause** 

Dear Mr. Teitzman:

Attached for electronic filing is Florida Power & Light Company's Preliminary List of Issues and Positions.

Please contact me if you have or your Staff has any questions regarding this filing.

Sincerely,

s/ Maria Jose Moncada

Maria Jose Moncada

Attachments

cc: Counsel of record for parties (w/ attachments)

Florida Power & Light Company

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Energy Conservation Cost Recovery

Clause

Docket No. 20190002-EG Filed: August 29, 2019

# FLORIDA POWER & LIGHT COMPANY'S PRELIMINARY LIST OF ISSUES AND POSITIONS

**ISSUE 1:** What are the final conservation cost recovery adjustment true-up amounts for the period January 2018 through December 2018?

FPL: \$5,635,677 over-recovery. (Deaton)

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

FPL: \$7,934,200 over-recovery. (Deaton)

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

FPL: The total conservation cost recovery adjustment true-up amount to be refunded from January 2020 through December 2020 is \$13,569,877. (Deaton)

What are the total conservation cost recovery amounts to be collected during the period January 2020 through December 2020?

FPL: The total conservation cost recovery amount including prior true-up amounts and revenues taxes is \$145,840,085. (Sharma)

<u>ISSUE 5</u>: What are the conservation cost recovery factors for the period January 2020 through December 2020?

FPL:

RATE CLASS	Conservation Recovery Factor (\$/kw)	Conservation Recovery Factor (\$/kWh)	RDC (\$/KW)	SDD (\$/KW)
RS1/RTR1	-	0.00139	-	-
GS1/GST1	-	0.00137	-	-
GSD1/GSDT1/HLFT1	0.47	-		
OS2	-	0.00074	-	-
GSLD1/GSLDT1/CS1/CST1/HLFT2	0.53	-	-	-
GSLD2/GSLDT2/CS2/CST2/HLFT3	0.53	-	-	-
GSLD3/GSLDT3/CS3/CST3	0.54	-	-	-
SST1T	-	-	\$0.06	\$0.03
SST1D1/SST1D2/SST1D3	-	-	\$0.06	\$0.03
CILC D/CILC G	0.57	-	-	-
CILC T	0.56	-	-	-
MET	0.48	-	-	-
OL1/SL1/SL1M/PL1	-	0.00037	-	-
SL2/SL2M/GSCU1	-	0.00102	-	-

(Deaton)

# <u>ISSUE 6</u>: What should be the effective date of the new conservation cost recovery factors for billing purposes?

FPL: The factors shall be effective for meter readings that occur on or after January 1, 2020. These charges shall continue in effect until modified by subsequent order of this Commission. (Deaton)

# 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?

FPL: Yes. The Commission should approve revised tariffs reflecting the 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. (Deaton)

# **ISSUE 8:** Should this docket be closed?

FPL: This docket is an on-going docket and should remain open.

Respectfully submitted,

Maria Jose Moncada, Esq. Senior Attorney Joel Baker Principal Attorney Florida Power & Light Company 700 Universe Boulevard Juno Beach, FL 33408 Telephone: (561) 304-5795

Facsimile: (561) 691-7135

By: s/ Maria J. Moncada

Maria J. Moncada

Florida Bar No. 0773301

## **CERTIFICATE OF SERVICE**

Docket No. 20190002-EG

## I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished

by electronic service on this <u>29th</u> day of August 2019 to the following:

Margo DuVal

**Office of General Counsel** 

Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 mduval@psc.state.fl.us

Holly Henderson Senior Manager Regulatory Affairs **Gulf Power Company** 215 South Monroe Street, Suite 618 Tallahassee, FL 32301 (850) 505-5156 (850) 681-6654 holly.henderson@nexteraenergy.com

Russell Badders Vice President & General Counsel One Energy Place, Bin 100 Pensacola, FL 32520-0100 Russell.badders@nexteraenergy.com **Attorney for Gulf Power Company** 

Steven Griffin
Beggs & Lane Law Firm
P.O. Box 12950
Pensacola, FL 32591
srg@beggslane.com
Attorneys for Gulf Power Company

J.R. Kelly

Patricia Ann Christensen Charles Rehwinkel Thomas A. David

**Office of Public Counsel** 

c/o The Florida Legislature 111 West Madison St., Room 812 Tallahassee, FL 32399-1400 kelly.jr@leg.state.fl.us christensen.patty@leg.state.fl.us rehwinkel.charles@leg.state.fl.us david.tad@leg.state.fl.us

James D. Beasley
J. Jeffrey Wahlen
Ausley & McMullen
P.O. Box 391
Tallahassee, FL 32302
jbeasley@ausley.com
jwahlen@ausley.com
Attorneys for Tampa Electric Company

Paula K. Brown **Tampa Electric Company**Post Office Box 111

Tampa, FL 33601

regdept@tecoenergy.com

Dianne M. Triplett 299 First Avenue North St. Petersburg, FL 33701 dianne.triplett@duke-energy.com **Attorney for Duke Energy Florida** 

Matthew R. Bernier, Esq. 106 East College Avenue, Suite 800 Tallahassee, FL 32301 Matthew.bernier@duke-energy.com **Attorney for Duke Energy Florida** 

James W. Brew, Esq.
Laura A. Wynn, Esq.
Stone Mattheis Xenopoulos & Brew, PC
1025 Thomas Jefferson St., NW
Eighth Floor, West Tower
Washington, DC 20007
jbrew@smxblaw.com
law@smxblaw.com
Attorneys for PCS Phosphate –White

Springs Agricultural Chemicals, Inc.

Mike Cassel Regulatory Affairs 1750 SW 14 Street, Suite 200 Fernandina Beach, FL 32034-3052 mcassel@fpuc.com

Florida Public Utilities Company

Beth Keating, Esq.
Gunster Law Firm
215 South Monroe Street, Suite 601
Tallahassee, FL 32301
bkeating@gunster.com
Attorneys for Florida Public Utilities

Jon C. Moyle, Jr., Esq.
Moyle Law Firm, P.A.
Users Groups
118 North Gadsden Street
Tallahassee, FL 32301
jmoyle@moylelaw.com
Attorneys for Florida Industrial Power

**Users Group** 

By: s/ Maria Jose Moncada

Maria Jose Moncada Florida Bar No. 0773301