FILED 10/7/2020 DOCUMENT NO. 10941-2020 FPSC - COMMISSION CLERK

AUSLEY MCMULLEN

ATTORNEYS AND COUNSELORS AT LAW

123 SOUTH CALHOUN STREET P.O. BOX 391 (ZIP 32302) TALLAHASSEE, FLORIDA 32301 (850) 224-9115 FAX (850) 222-7560

October 7, 2020

VIA: ELECTRONIC FILING

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

Re: Energy Conservation Cost Recovery Clause <u>FPSC Docket No. 20200002-EG</u>

Dear Mr. Teitzman:

Attached for filing in the above-styled docket is Tampa Electric Company's Prehearing Statement.

Thank you for your assistance in connection with this matter.

Sincerely,

Mululin n. Means

Malcolm N. Means

MNM/bmp Attachment

cc: All parties of record (w/attachment)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

)

)

In re: Energy Conservation Cost Recovery Clause. DOCKET NO. 20200002-EG FILED: October 7, 2020

PREHEARING STATEMENT OF TAMPA ELECTRIC COMPANY

<u>A.</u> <u>APPEARANCES</u>:

JAMES D. BEASLEY J. JEFFRY WAHLEN MALCOLM N. MEANS Ausley McMullen Post Office Box 391 Tallahassee, Florida 32302 On behalf of Tampa Electric Company

<u>B.</u> <u>WITNESSES</u>:

Witness	Subject Matter	Issues #
Direct		
Mark R. Roche	Conservation Cost Recovery True-Up and Projection; Tampa Electric's company specific issues	1,2,3,4,5,6,7,8,9,10

<u>C.</u> <u>EXHIBITS</u>:

Witness	Proffered By	Exhibit #	Description
Direct			
Mark R. Roche	Tampa Electric Company	MRR-1, filed May 4, 2020	Schedules supporting cost recovery factor, actual January 2019 – December 2019
Mark R. Roche	Tampa Electric Company	MRR-2, filed May 4, 2020. Updated on August 7, 2020	Reporting and final update of refund "Final Tax Savings Credit".

Mark R. Roche	Tampa Electric Company	MRR-3, filed August 7, 2020. Revised on September 11, 2020.	11 0
			December 2021

D. STATEMENT OF BASIC POSITION

Tampa Electric's Statement of Basic Position:

The Commission should determine that Tampa Electric has properly calculated its conservation cost recovery true-up and projections and the conservation cost recovery factors set forth in the testimony and exhibits of witness Mark R. Roche during the period January 2021 through December 2021.

The Commission should approve the Contracted Credit Value in accordance with Order No. PSC-2017-0456-FOF-EI, issued November 27, 2017 in Docket No. 20170210 for the GSLM-2 and GSLM-3 rate riders for use during the period January 2021 through December 2021.

The Commission should also approve the Residential Price Responsive Load Management (RSVP-1) rate tiers for Tampa Electric Company for the period January 2021 through December 2021 as set forth in witness Roche's testimony and exhibits.

E. STATEMENT OF ISSUES AND POSITIONS GENERIC CONSERVATION COST RECOVERY ISSUES

ISSUE 1:What are the final conservation cost recovery true-up amounts for the period
January 2019 through December 2019?**TECO**:An adjusted net true-up over-recovery of \$8,189,031 including interest.
(Witness: Roche)

<u>ISSUE 2</u> :	What are the appropriate total conserva-	tion adjustment actual/estimated true-up
	amounts for the period January 2020 through	gh December 2020?
TECO:	An over-recovery of \$9,103,069 including	interest. (Witness: Roche)
<u>ISSUE 3</u> :	What are the appropriate total conserva collected/refunded from the period January	v i
TECO:	A refund of \$17,292,100 including interest	. (Witness: Roche)
ISSUE 4 :	What are the total conservation cost reco period January 2021 through December 2	
TECO:	\$29,497,711 (including current period est	imated true-up). (Witness: Roche)
<u>ISSUE 5</u> :	What are the conservation cost recover	ry factors for the period January 2021
	through December 2021?	
TECO:	For the period January 2021 through Dec	ember 2021 the cost recovery factors are
	as follows:	
		Cost Recovery Factors
	Rate Schedule	<u>(cents per kWh)</u>
	RS	0.166
	GS and CS	0.161
	GSD Optional – Secondary	0.138
	GSD Optional – Primary	0.137
	GSD Optional – Subtransmission	0.135
	LS-1, LS-2	0.081
		Cost Recovery Factors

Rate Schedule	<u>(dollars per kW)</u>
GSD – Secondary	0.60
GSD – Primary	0.59
GSD – Subtransmission	0.58
SBF – Secondary	0.60
SBF – Primary	0.59

SBF – Subtransmission	0.58
IS - Primary	0.47
IS - Subtransmission	0.47
(Witness: Roche)	

- **<u>ISSUE 6</u>**: What should be the effective date of the new conservation cost recovery factors for billing purposes?
- <u>TECO</u>: The factors should be effective beginning with the specified conservation cost recovery cycle and thereafter for the period January 2021 through December 2021. Billing cycles may start before January 1, 2021, and the last cycle may be read after December 31, 2021, so long as each customer is billed for 12 months regardless of when the factors became effective. (Witness: Roche)
- **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?
- <u>TECO</u>: 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. (Witness: Roche)

COMPANY-SPECIFIC CONSERVATION COST RECOVERY ISSUES

Tampa Electric Company:

- **ISSUE 8**: What is the Contracted Credit Value for the GSLM-2 and GSLM-3 rate riders for Tampa Electric for the period January 2021 through December 2021?
- <u>TECO:</u> In accordance with Order No. PSC-2017-0456-FOF-EI, issued November 27,2017 in Docket No. 20170210, the Contracted Credit Value by Voltage Level for the forthcoming cost recovery period, January 2021 through December 2021, for the GSLM-2 and GSLM-3 rate riders will be:

Voltage Level	Contracted Credit Value (dollars per kW)
Secondary	10.23
Primary	10.13
Subtransmission	10.03
(Witness: Roche)	

- **ISSUE 9**: What are the Residential Price Responsive Load Management (RSVP-1) rate tiers for Tampa Electric Company for the period January 2021 through December 2021?
- <u>TECO</u>: For the period January 2021 through December 2021 the Residential Price Responsive Load Management (RSVP-1) rates are as follows:

<u>Rate Tier</u>	<u>Cents per kWh</u>
P4	43.914
P3	7.564
P2	(0.882)
P1	(3.026)
(Witness: Roche)	

- **ISSUE 10**: Should this docket be closed.
- <u>TECO</u>: Yes, Docket No. 20200002-EG should be closed once the Commission's decisions on all of the issues in the docket have become final and the Commission has concluded that the docket has otherwise met the requirements for closure. (Witness: Roche)

<u>F.</u> <u>STIPULATED ISSUES</u>

Tampa Electric is not aware of any stipulated issues as of this date.

G. PENDING MOTIONS

Tampa Electric is not aware of any pending motions as of this date.

H. PENDING CONFIDENTIALITY CLAIMS OR REQUESTS

Tampa Electric has no pending confidentiality claims or requests at this time.

I. OBJECTIONS TO WITNESS QUALIFICATIONS AS AN EXPERT

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

J. COMPLIANCE WITH ORDER NO. PSC-2019-0082-PCO-EG

Tampa Electric has complied with all requirements of the Order Establishing Procedure entered in this docket.

DATED this 7th day of October 2020.

Respectfully submitted,

Molida n. Means

JAMES D. BEASLEY jbeasely@ausley.com J. JEFFRY WAHLEN jwahlen@ausley.com MALCOLM N. MEANS <u>mmeans@ausley.com</u> Ausley McMullen Post Office Box 391 Tallahassee, Florida 32302 (850) 224-9115

ATTORNEYS FOR TAMPA ELECTRIC COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Prehearing Statement, filed on behalf of Tampa Electric Company, has been furnished by electronic mail on this 7th day of October 2020 to the following:

Ms. Ashley Weisenfeld Attorney Office of General Counsel Florida Public Service Commission Room 390L – Gerald L. Gunter Building 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 AWeisenf@psc.state.fl.us

Ms. Patricia A. Christensen Mr. J. R. Kelly Thomas A. (Tad) David Mireille Fall-Fry Stephanie A. Morse Charles J. Rehwinkel **Office of Public Counsel** 111 West Madison Street – Room 812 Tallahassee, FL 32399-1400 christensen.patty@leg.state.fl.us kelly.jr@leg.state.fl.us david.tad@leg.state.fl.us fall-fry.mireille@leg.state.fl.us morse.stephanie@leg.state.fl.us rehwinkel.charles@leg.state.fl.us

Mr. Matthew R. Bernier **Duke Energy Florida, LLC** 106 E. College Avenue, Suite 800 Tallahassee, FL 32301-7740 matthew.bernier@duke-energy.com

Ms. Dianne M. Triplett **Duke Energy Florida, LLC** 299 First Avenue North St. Petersburg, FL 33701 <u>dianne.triplett@duke-energy.com</u> <u>FLRegulatoryLegal@duke-energy.com</u> Ms. Maria J. Moncada **Florida Power & Light Company** 700 Universe Boulevard (LAW/JB) Juno Beach, FL 33408-0420 <u>maria.moncada@fpl.com</u>

Mr. Jon C. Moyle, Jr. **Moyle Law Firm** 118 N. Gadsden Street Tallahassee, FL 32301 jmoyle@moylelaw.com mqualls@moylelaw.com

Ms. Beth Keating Gunster, Yoakley & Stewart, P.A. 215 South Monroe Street, Suite 601 Tallahassee, FL 32301-1839 <u>bkeating@gunster.com</u>

Mr. Mike Cassel Regulatory and Governmental Affairs **Florida Public Utilities Company** Florida Division of Chesapeake Utilities Corp. 1750 SW 14th Street, Suite 200 Fernandina Beach, FL 32034 <u>mcassel@fpuc.com</u>

Mr. Russell A. Badders Vice President & Associate General Counsel **Gulf Power Company** One Energy Place Pensacola, FL 32520-0100 <u>Russell.Badders@nexteraenergy.com</u> Mr. Kenneth Hoffman Vice President, Regulatory Relations **Florida Power & Light Company** 215 South Monroe Street, Suite 810 Tallahassee, FL 32301-1858 Ken.Hoffman@fpl.com

Mr. Steven R. Griffin Beggs & Lane Post Office Box 12950 Pensacola, FL 32591 srg@beggslane.com Mr. James W. Brew Ms. Laura W. Baker **Stone Mattheis Xenopoulos & Brew, PC** 1025 Thomas Jefferson Street, NW Eighth Floor, West Tower Washington, D.C. 20007-5201 jbrew@smxblaw.com lwb@smxblaw.com

Molulin n. Means

ATTORNEY