## FILED 10/7/2022 DOCUMENT NO. 08925-2022 FPSC - COMMISSION CLERK

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Energy Conservation Cost	)
Recovery Clause.	)

DOCKET NO. 20220002-EG FILED: October 7, 2022

## PREHEARING STATEMENT OF TAMPA ELECTRIC COMPANY

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

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

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

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	Issues #
Direct				
Mark R. Roche	Tampa Electric Company	MRR-1, filed May 2, 2021	Schedules supporting cost recovery factor, actual January 2021 – December 2021	1
Mark R. Roche	Tampa Electric Company	MRR-2, filed August 5, 2022. Supplement filed September 13, 2022	Schedules supporting conservation costs projected for the period January 2023 – December 2023	2,3,4,5,6,7,8,9,10

#### **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 for the period January 2023 through December 2023.

The Commission should approve the Contracted Credit Value in accordance with Order No. PSC-2021-0423-S-EI, issued November 10, 2021, in Docket No. 20210034 for the GSLM-2 and GSLM-3 rate riders for use during the period January 2023 through December 2023.

The Commission should also approve the Residential Price Responsive Load Management (RSVP-1) rate tiers for Tampa Electric Company for the period January 2023 through December 2023 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<br/>January 2021 through December 2021?**TECO**:An adjusted net true-up over-recovery of \$6,151,655 including interest.

(Witness: Roche)

**ISSUE 2**: What are the appropriate total conservation adjustment actual/estimated true-up amounts for the period January 2022 through December 2022?

TECO: An under-recovery of \$5,789,732 including interest. (Witness: Roche)

<b>ISSUE 3</b> :	What are the appropriate total conservation adjustment true-up amounts to be
	collected/refunded from the period January 2023 through December 2023?
TECO:	A refund of \$361,923 including interest.
	(Witness: Roche)
ISSUE 4:	What are the total conservation cost recovery amounts to be collected during the
	period January 2023 through December 2023?
TECO:	\$48,727,656 (including current period estimated true-up).

(Witness: Roche)

- **ISSUE 5**: What are the conservation cost recovery factors for the period January 2023 through December 2023?
- <u>TECO</u>: For the period January 2023 through December 2023 the cost recovery factors are as follows:

Rate Schedule	Cost Recovery Factors (cents per kWh)
RS	0.281
GS and CS	0.275
GSD Optional – Secondary	0.211
GSD Optional – Primary	0.209
GSD Optional – Subtransmissio	n 0.207
LS-1, LS-2	0.253
Rate Schedule	Cost Recovery Factors (dollars per kW)
GSD – Secondary	0.88
GSD – Primary	0.87
GSD – Subtransmission	0.86
SBD – Secondary	0.88
SBD – Primary	0.87
SBD – Subtransmission	0.86
GSLD - Primary	0.84
GSLD - Subtransmission	0.74

(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 2023 through December 2023. Billing cycles may start before January 1, 2023, and the last cycle may be read after December 31, 2023, 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<br/>Tampa Electric for the period January 2023 through December 2023?
- <u>TECO:</u> In accordance with Order No. PSC-2021-0423-S-EI, issued November 10, 2021, in Docket No. 20210034, the Contracted Credit Value by Voltage Level for the forthcoming cost recovery period, January 2023 through December 2023, for the GSLM-2 and GSLM-3 rate riders will be:

Voltage Level	Contracted Credit Value (dollars per kW)
Secondary	11.75
Primary	11.63

Subtransmission	11.52
(Witness: Roche)	

- **ISSUE 9**: What are the Residential Price Responsive Load Management (RSVP-1) rate tiers for Tampa Electric Company for the period January 2023 through December 2023?
- <u>TECO</u>: For the period January 2023 through December 2023 the Residential Price Responsive Load Management (RSVP-1) rates are as follows:

<u>Rate Tier</u>	<u>Cents per kWh</u>
P4	38.004
P3	6.167
P2	(1.030)
P1	(2.552)
(Witness: Roche)	

**<u>ISSUE 10</u>**: Should this docket be closed.

TECO: Yes, Docket No. 20220002-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.

#### **<u>G.</u> <u>PENDING MOTIONS</u>**

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. STATEMENT OF SEQUESTRATION OF WITNESSES

Tampa Electric does not request the sequestration of any witnesses at this time.

# K. COMPLIANCE WITH ORDER NO. PSC-2022-0053-PCO-EG

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

DATED this 7<sup>th</sup> day of October 2022.

Respectfully submitted,

whilm n. Means

MALCOLM N. MEANS VIRGINIA PONDER J. JEFFRY WAHLEN 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 7<sup>th</sup> day of October 2022 to the following:

Jacob Imig Walter Trierweiler Office of General Counsel **Florida Public Service Commission** Room 390L – Gerald L. Gunter Building 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 jimig@psc.state.fl.us wtrierwe@psc.state.fl.us

Mr. Richard Gentry Ms. Patricia A. Christensen Stephanie Morse Anastacia Pirello Mary Wessling **Office of Public Counsel** 111 West Madison Street – Room 812

Tallahassee, FL 32399-1400 gentry.richard@leg.state.fl.us christensen.patty@leg.state.fl.us morse.stephanie@leg.state.fl.us pirello.anastacia@leg.state.fl.us wessling.mary@leg.state.fl.us

Mr. Matthew R. Bernier Robert Pickels Stephanie Cuello **Duke Energy Florida, LLC** 106 E. College Avenue, Suite 800 Tallahassee, FL 32301-7740 <u>matthew.bernier@duke-energy.com</u> <u>Robert.pickels@duke-energy.com</u> Stephanie.cuello@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> FLRegulatoryLegal@duke-energy.com Ms. Maria J. Moncada Joel T. Baker William Cox Florida Power & Light Company 700 Universe Boulevard (LAW/JB) Juno Beach, FL 33408-0420 <u>maria.moncada@fpl.com</u> joel.baker@fpl.com will.p.cox@fpl.com

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

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 mcassel@fpuc.com

Corey Allain Nucor Steel Florida, Inc. 22 Nucor Drive Frostproof, FL 33843 corey.allain@nucor.com 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. George Cavros Southern Alliance for Clean Energy 120 E. Oakland Park Blvd., Suite 105 Ft. Lauderdale, FL 33334 george@cavros-law.com

Michelle D. Napier **Florida Public Utilities Company** 1635 Meathe Drive West Palm Beach, FL 33411 <u>mnapier@fpuc.com</u> 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

Mr. Peter J. Mattheis Mr. Michael K. Lavanga Joseph Briscar **Stone Law Firm** 1025 Thomas Jefferson St., NW Suite 800 West Washington, DC 20007-5201 <u>mkl@smxblaw.com</u> <u>jrb@smxblaw.com</u>

Mululin n. Means

ATTORNEY