



Matthew R. Bernier  
ASSOCIATE GENERAL COUNSEL

October 9, 2019

**VIA ELECTRONIC FILING**

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

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

Dear Mr. Teitzman:

Attached for filing on behalf of Duke Energy Florida, LLC (DEF), is its Revised Prehearing Statement in the above-referenced Docket. DEF's Revised Prehearing Statement contains corrections to the wording of Issues 2 and 4; the correction to Issue 2 also required a clarification to DEF's position on that Issue to indicate the amount shown in an under-recovery. DEF also corrected its position on Issue 3 and added previously omitted Issues 10 and 11, with subsequent renumbering.

Thank you for your assistance in this matter. Please feel free to call me at (850) 521-1428 should you have any questions concerning this filing.

Respectfully,

*/s/ Matthew R. Bernier*

Matthew R. Bernier

MRB/cmK  
Attachment

cc: Parties of Record

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Energy conservation cost )  
recovery clause )  
\_\_\_\_\_)

Docket No. 20190002-EG

Filed: October 9, 2019

**DUKE ENERGY FLORIDA, LLC'S  
REVISED PREHEARING STATEMENT**

Duke Energy Florida, LLC (“DEF”), pursuant to the Order Establishing Procedure in this proceeding, Order No. PSC-2019-0082-PCO-EG dated February 26, 2019, hereby submits its Prehearing Statement:

A. Known Witnesses – DEF intends to offer the direct testimony of:

<u>Witness</u>	<u>Subject Matter</u>	<u>Issues</u>
Lori J. Cross	Final True-up, January – December 2018	1
Lori J. Cross	Estimated/Actual True-up, January – December 2018 and ECCR Factors For January – December 2020	2-6
Lori J. Cross	Tariff Approval	7
Lori J. Cross	WACC Methodology Approval; Close the Docket	11-12

B. Known Exhibits – DEF intends to offer the following exhibits:

<u>Exhibit No.</u>	<u>Witness</u>	<u>Description</u>
LJC-1T	Cross	ECCR Adjusted Net True-Up for January - December 2018, Schedules CT1 – CT6
LJC-1P	Cross	Estimated/Actual True-Up, January – December 2019 and ECCR Factors for Billings in January – December 2020, Schedules C1 – C6

C. Statement of Basic Position

The Commission should determine that DEF has properly calculated its conservation cost recovery true-up and projection costs and should approve the conservation cost recovery factors

for the period January 2020 through December 2020 set forth in the testimony and exhibits of witness Lori J. Cross.

D. Issues and Positions - DEF's positions on the issues identified in this proceeding are as follows:

**Generic Conservation Cost Recovery Issues**

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

**DEF:** The adjusted net true-up for the period January 2018 through December 2018 is an under-recovery of \$2,335,393. (Cross)

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

**DEF:** The appropriate conservation adjustment actual/estimated true-up amount for the period January 2019 through December 2019 is an under-recovery of \$649,259. (Cross)

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

**DEF:** The total true-up amount to be collected from January 2020 through December 2020 is \$2,984,652. (Cross)

**ISSUE 4:** What are the total conservation cost recovery amounts to be collected during the period January 2020 through December 2020?

**DEF:** \$120,710,133. (Cross)

**ISSUE 5:** What are the conservation cost recovery factors for the period January 2020 through December 2020?

<b><u>DEF:</u></b>	<u>Customer Class</u>	<u>ECCR Factor</u>
	Residential	0.339 cents/kWh
	General-Service-Non-Demand	0.327 cents/kWh
	@Primary Voltage	0.324 cents/kWh
	@Transmission Voltage	0.320 cents/kWh
	General Service 100% Load Factor	0.226 cents/kWh
	General Service Demand	1.09 \$/kW
	@Primary Voltage	1.08 \$/kW
	@Transmission Voltage	1.07 \$/kW
	Curtaillable	0.46 \$/kW
	@Primary Voltage	0.46 \$/kW
	@Transmission Voltage	0.45 \$/kW

<u>Customer Class</u>	<u>ECCR Factor</u>
Interruptible	0.95 \$/kW
@Primary Voltage	0.94 \$/kW
@Transmission Voltage	0.93 \$/kW
Standby Monthly	0.106 \$/kW
@Primary Voltage	0.105 \$/kW
@Transmission Voltage	0.104 \$/kW
Standby Daily	0.050 \$/kW
@Primary Voltage	0.050 \$/kW
@Transmission Voltage	0.049 \$/kW
Lighting	0.103 cents/kWh

(Cross)

**ISSUE 6:** What should be the effective date of the new conservation cost recovery factors for billing purposes?

**DEF:** The new factors should be effective beginning with the first billing cycle for January 2020, and thereafter through the last billing cycle for December 2020. The first billing cycle may start before January 2020, and the last billing cycle may end after December 31, 2020, so long as each customer is billed for twelve months regardless of when the factors became effective. (Cross)

**ISSUE 7:** Should the Commission approve revised tariffs reflecting the energy conservation cost recovery amounts and establishing energy conservation cost recovery factors determined to be appropriate in this proceeding?

**DEF:** Yes. The Commission should approve DEF's 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. (Cross)

**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 Company for the period January 2020 through December 2020?

**DEF:** No Position.

**ISSUE 9:** What are the residential Price Responsive Load Management (RSVP -1) rate tiers for Tampa Electric Company for the period January 2020 through December 2020?

**DEF:** No Position.

**ISSUE 10:** What are the credit factors to be applied during the January 2020 billing cycles to refund the “Final Tax Savings Credit” amount of \$11,500,000?

**DEF:** No Position.

**Miscellaneous Issues**

**ISSUE 11:** Should the Joint Motion to Modify Order No. PSC-2012-0425-PAA-EU Regarding Weighted Average Cost of Capital Methodology be approved?

**DEF:** Yes. (Cross)

**ISSUE 12:** Should this docket be closed?

**DEF:** Yes. (Cross)

E. Stipulated Issues - None at this time.

F. Pending Motions - DEF has no pending motions at this time.

G. Requests for Confidentiality - DEF has no requests for confidentiality pending at this time.

H. Objections to Qualifications - At this time, DEF has no objection to the qualifications of any expert witnesses in this proceeding.

I. Requirements of Order - DEF believes that this prehearing statement complies with all the requirements of the Order Establishing Procedure.

Respectfully submitted this 9<sup>th</sup> day of October, 2019.

*s/Matthew R. Bernier*

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic mail this 9<sup>th</sup> day of October, 2019 to all parties of record as indicated below.

/s/ Matthew R. Bernier

Matthew R. Bernier

<p>Margo DuVal Office of General Counsel Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 <a href="mailto:mduval@psc.state.fl.us">mduval@psc.state.fl.us</a></p> <p>J. Beasley / J. Wahlen / M. Means P.O. Box 391 Tallahassee, FL 32302 <a href="mailto:jbeasley@ausley.com">jbeasley@ausley.com</a> <a href="mailto:jwahlen@ausley.com">jwahlen@ausley.com</a> <a href="mailto:mmeans@ausley.com">mmeans@ausley.com</a></p> <p>Russell A. Badders Gulf Power Company One Energy Place Pensacola, FL 32520-0780 <a href="mailto:russell.badders@nexteraenergy.com">russell.badders@nexteraenergy.com</a></p> <p>Holly Henderson Gulf Power Company 215 S. Monroe St., Ste. 618 Tallahassee, FL 32301 <a href="mailto:holly.henderson@nexteraenergy.com">holly.henderson@nexteraenergy.com</a></p> <p>Steven R. Griffin P.O. Box 12950 Pensacola, FL 32591 <a href="mailto:srg@beggslane.com">srg@beggslane.com</a></p> <p>Jon C. Moyle, Jr. 118 North Gadsden Street Tallahassee, FL 32301 <a href="mailto:jmoyle@moylelaw.com">jmoyle@moylelaw.com</a> <a href="mailto:mqualls@moylelaw.com">mqualls@moylelaw.com</a></p> <p>Maria Moncada Florida Power &amp; Light Company 700 Universe Boulevard (LAW/JB) Juno Beach, FL 33408-0420 <a href="mailto:maria.moncada@fpl.com">maria.moncada@fpl.com</a></p>	<p>James W. Brew / Laura A. Wynn 1025 Thomas Jefferson Street, N.W. Eighth Floor, West Tower Washington, D.C. 20007 <a href="mailto:jbrew@smxblaw.com">jbrew@smxblaw.com</a> <a href="mailto:law@smxblaw.com">law@smxblaw.com</a></p> <p>Beth Keating 215 South Monroe Street, Suite 601 Tallahassee, FL 32301 <a href="mailto:bkeating@gunster.com">bkeating@gunster.com</a></p> <p>Ms. Paula K. Brown Tampa Electric Company P.O. Box 111 Tampa, FL 33601 <a href="mailto:regdept@tecoenergy.com">regdept@tecoenergy.com</a></p> <p>Kenneth A. Hoffman Florida Power &amp; Light Company 215 S. Monroe Street, Suite 810 Tallahassee, FL 32301-1858 <a href="mailto:ken.hoffman@fpl.com">ken.hoffman@fpl.com</a></p> <p>C. Rehwinkel / J. R. Kelly / T. David / P. Christensen Office of Public Counsel c/o The Florida Legislature 111 West Madison Street, Room 812 Tallahassee, FL 32399 <a href="mailto:rehwinkel.charles@leg.state.fl.us">rehwinkel.charles@leg.state.fl.us</a> <a href="mailto:kelly.jr@leg.state.fl.us">kelly.jr@leg.state.fl.us</a> <a href="mailto:david.tad@leg.state.fl.us">david.tad@leg.state.fl.us</a> <a href="mailto:christensen.patty@leg.state.fl.us">christensen.patty@leg.state.fl.us</a></p> <p>Mike Cassel Florida Public Utilities Company 1750 S. 14<sup>th</sup> Street, Suite 200 Fernandina Beach, FL 32034 <a href="mailto:mcassel@fpuc.com">mcassel@fpuc.com</a></p>
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