# 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

August 27, 2021

## **VIA: ELECTRONIC FILING**

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

Re: Conservation Cost Recovery Clause

FPSC Docket No. 20210002-EG

11 SC DOCKET NO. 20210002-EX

Dear Mr. Teitzman:

Attached for filing in the above docket is Tampa Electric Company's Preliminary List of Issues and Positions.

Thank you for your assistance in connection with this matter.

Sincerely,

Malcolm N. Means

MNM/bmp Attachment

cc: All parties of record (w/attachment)

### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

| In re: Energy Conservation Cost | )   | DOCKET NO. 20210002-EG |
|---------------------------------|-----|------------------------|
| Recovery Clause.                | )   |                        |
|                                 | _ ) | FILED: August 27, 2021 |

# TAMPA ELECTRIC COMPANY'S PRELIMINARY LIST OF ISSUES AND POSITIONS

Tampa Electric Company ("Tampa Electric" or "the company"), hereby submits its Preliminary List of the Issues and Positions to be taken up at the hearing scheduled to commence on November 2, 2021, in the above docket.

#### GENERIC CONSERVATION COST RECOVERY ISSUES

**ISSUE 1**: What are the final conservation cost recovery adjustment true-up amounts for the period January 2020 through December 2020?

<u>Tampa Electric's Position</u>: An over-recovery of \$20,908,081, including interest. (Witness: Roche)

**ISSUE 2**: What are the appropriate total conservation adjustment actual/estimated true-up amounts for the period January 2021 through December 2021?

<u>Tampa Electric's Position</u>: An under-recovery of \$16,241,450, including interest. (Witness: Roche)

**ISSUE 3**: What are the appropriate total conservation adjustment true-up amounts to be collected/refunded from the period January 2022 through December 2022?

<u>Tampa Electric's Position</u>: A refund of \$4,666,631, including interest. (Witness: Roche)

**ISSUE 4**: What are the total conservation cost recovery amounts to be collected during the period January 2022 through December 2022?

<u>Tampa Electric's Position</u>: \$41,964,339. (Witness: Roche)

**ISSUE 5**: What are the conservation cost recovery factors for the period January 2022 through December 2022?

<u>Tampa Electric's Position</u>: For the period January 2022 through December 2022 the cost recovery factors for the rate design and cost allocation as put forth in Docket No. 20130040-EI are as follows:

| Rate Schedule                  | Cost Recovery Factors (cents per kWh) |
|--------------------------------|---------------------------------------|
| RS                             | 0.236                                 |
| GS and CS                      | 0.218                                 |
| GSD Optional – Secondary       | 0.190                                 |
| GSD Optional – Primary         | 0.188                                 |
| GSD Optional – Subtransmission | 0.186                                 |
| LS-1, LS-2                     | 0.108                                 |

| Rate Schedule         | Cost Recovery Factors (dollars per kW) |
|-----------------------|--|
| GSD – Secondary       | 0.82                                   |
| GSD – Primary         | 0.81                                   |
| GSD – Subtransmission | 0.80                                   |
| SBF – Secondary       | 0.82                                   |
| SBF – Primary         | 0.81                                   |
| SBF – Subtransmission | 0.80                                   |
| IS - Primary          | 0.73                                   |
| IS - Subtransmission  | 0.72                                   |

For the period January 2022 through December 2022 the cost recovery factors for the rate design and cost allocation as put forth in Docket No. 20210034-EI are as follows:

| Rate Schedule                  | Cost Recovery Factors (cents per kWh) |
|--------------------------------|---------------------------------------|
| RS                             | 0.236                                 |
| GS and CS                      | 0.218                                 |
| GSD Optional – Secondary       | 0.193                                 |
| GSD Optional – Primary         | 0.191                                 |
| GSD Optional – Subtransmission | 0.189                                 |
| LS-1, LS-2                     | 0.108                                 |

| Rate Schedule          | Cost Recovery Factors (dollars per kW) |
|------------------------|--|
| GSD – Secondary        | 0.81                                   |
| GSD – Primary          | 0.80                                   |
| GSD – Subtransmission  | 0.80                                   |
| SBD – Secondary        | 0.81                                   |
| SBD – Primary          | 0.80                                   |
| SBD – Subtransmission  | 0.80                                   |
| GSLD - Primary         | 0.77                                   |
| GSLD - Subtransmission | 0.10                                   |

Tampa Electric has certain proposals pending in Docket No. 20210034-EI that may affect the proposed energy conservation cost recovery charges. Once the outcome of this proceeding is known, the company shall submit revised 2022 energy conservation cost recovery factors for review and approval.

(Witness: Roche)

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

<u>Tampa Electric's Position</u>: The factors should be effective beginning with the specified conservation cost recovery cycle and thereafter for the period January 2022 through December 2022. Billing cycles may start before January 1, 2022, and the last cycle may be read after December 31, 2022, so that each customer is billed for 12 months regardless of when the factor 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>Tampa Electric's Position</u>: Yes. The Commission should approve revised tariffs reflecting the energy conservation cost recovery factors determined to be appropriate in this proceeding. (Witness: Roche)

### **COMPANY SPECIFIC CONSERVATION COST RECOVERY ISSUES**

**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 2022 through December 2022?

<u>Tampa Electric's Position</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 2022 through December 2022, 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                                    |

Tampa Electric has certain proposals pending in Docket No. 20210034-EI that may affect the proposed Contracted Credit Values. Once the outcome of this proceeding is known, the company shall submit revised 2022 Contracted Credit Values for review and approval.

(Witness: Roche)

**ISSUE 9**: What are the residential Price Responsive Load Management (RSVP-1) rate tiers for Tampa Electric Company for the period January 2022 through December 2022?

<u>Tampa Electric's Position</u>: For the period January 2022 through December 2022, the Residential Price Responsive Load Management (RSVP-1) rates are as follows:

| Rate Tier | Cents per kWh |
|-----------|---------------|
| P4        | Note 1        |
| Р3        | Note 1        |
| P2        | Note 1        |
| P1        | Note 1        |

Note 1: At the time required for this preliminary issues and positions filing, the company has not completed the analysis to determine all of the other clause factors that are utilized to calculate and establish the RSVP-1 rates for the January through December 2022 period. The company will file with the Commission the proposed RSVP-1 rates for Tampa Electric's Price Responsive Load Management program based upon the company's 2022 residential base rates and the 2022 projected clause amounts for ECCR, Fuel and Purchased Power Cost Recovery, Capacity Cost Recovery and the Environmental Cost Recovery as soon as the remaining clause factors are finalized. In addition, Tampa Electric has certain proposals pending in Docket No. 20210034-EI that may affect the proposed RSVP-1 rates. Once the outcome of this proceeding is known, the company shall submit revised 2022 RSVP-1 rates for review and approval.

(Witness: Roche)

**ISSUE 10**: Should this docket be closed.

<u>Tampa Electric's Position</u>: Yes, Docket No. 20210002-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.

DATED this 27<sup>th</sup> day of August 2021.

Respectfully submitted,

JAMES D. BEASLEY

J. JEFFRY WAHLEN

MALCOLM N. MEANS

Ausley McMullen

123 S. Calhoun Street (32301)

Post Office Box 391

Tallahassee, FL 32302

(850) 224-9115

ATTORNEYS FOR TAMPA ELECTRIC COMPANY

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true copy of the foregoing Preliminary List of Issues and Positions, filed on behalf of Tampa Electric Company, has been furnished by electronic mail on this 27<sup>th</sup> day of August 2021 to the following:

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

Mr. Richard Gentry Ms. Patricia A. Christensen Ms. Anastacia Pirrello Charles J. Rehwinkel 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 pirrello.anastacia@leg.state.fl.us rehwinkel.charles@leg.state.fl.us wessling.mary@leg.state.fl.us

Mr. Matthew R. Bernier
Robert Pickels **Duke Energy Florida, LLC**106 E. College Avenue, Suite 800
Tallahassee, FL 32301-7740

matthew.bernier@duke-energy.com

Robert.pickels@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

Joel T. Baker **Florida Power & Light Company** 700 Universe Boulevard (LAW/JB) Juno Beach, FL 33408-0420 maria.moncada@fpl.com

Mr. Jon C. Moyle, Jr.

Moyle Law Firm

118 N. Gadsden Street
Tallahassee, FL 32301
jmoyle@moylelaw.com
mqualls@moylelaw.com

Ms. Maria J. Moncada

Joel.baker@fpl.com

Ms. Beth Keating

Gunster, Yoakley & Stewart, P.A.
215 South Monroe Street, Suite 601

Tallahassee, FL 32301-1839

bkeating@gunster.com

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

Mr. Russell A. Badders
Vice President & Associate General Counsel
Gulf Power Company
One Energy Place
Pensacola, FL 32520-0100
Russell.Badders@nexteraenergy.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

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

lunn n. Means

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

ATTODNEY