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 5, 2021

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

FPSC Docket No. 20210002-EG

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,

Malcolm N. Means

Moldon 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: October 5, 2021
)	

PREHEARING STATEMENT OF TAMPA ELECTRIC COMPANY

A. APPEARANCES:

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

B. 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
Direct			
Mark R. Roche	Tampa Electric	MRR-1, filed May 3,	Schedules supporting
	Company	2021	cost recovery factor,
			actual January 2020 -
			December 2020
Mark R. Roche	Tampa Electric	MRR-2, filed August	Schedules supporting
	Company	6, 2021.	conservation costs
			projected for the
			period January 2022 –
			December 2022

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 2022 through December 2022.

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 2022 through December 2022.

The Commission should also approve the Residential Price Responsive Load Management (RSVP-1) rate tiers for Tampa Electric Company for the period January 2022 through December 2022 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 2020 through December 2020?

<u>TECO</u>: An adjusted net true-up over-recovery of \$3,615,981 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?

TECO: An over-recovery of \$1,050,651 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>TECO</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>TECO</u>: \$41,964,339 (including current period estimated true-up). (Witness: Roche)

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

<u>TECO</u>: For the period January 2022 through December 2022 the cost recovery factors are as follows:

Cost Recovery Factors

Rate Schedule	(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

Cost Recovery Factors

Rate Schedule	(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
(Witness: Roche)	

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:

Cost Recovery Factors

Rate Schedule	(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

Cost Recovery Factors

Rate Schedule	(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
(Witness: Roche)	

Tampa Electric has certain proposals pending in Docket No. 20210034-EI that may

this proceeding is known, the company shall submit revised 2022 energy

affect the proposed energy conservation cost recovery charges. Once the outcome of

conservation cost recovery factors for review and approval.

(Witness: Roche)

ISSUE 6: 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 establishing energy conservation cost recovery factors determined to be appropriate in this proceeding. (Witness: Roche)

ISSUE 7: What should be the effective date of the new conservation cost recovery factors for billing purposes?

TECO: 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 long as each customer is billed for 12 months regardless of when the factors became effective. (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 2022 through December 2022?

TECO: 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 2021 through December 2021?

TECO: For the period January 2021 through December 2021 the Residential Price Responsive Load Management (RSVP-1) rates are as follows:

Rate Tier	<u>Cents per kWh</u>
P4	39.360
Р3	5.875
P2	(0.959)
P1	(2.517)

Tampa Electric has certain proposals pending in Docket No. 20210034-EI that may affect the proposed 2022 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>TECO</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. (Witness: Roche)

F. STIPULATED ISSUES

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-2021-0075-PCO-EG

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

DATED this 5th day of October 2021.

Respectfully submitted,

JAMES D. BEASLEY

MALCOLM N. MEANS

J. JEFFRY WAHLEN

Ausley McMullen

Post Office Box 391

Tallahassee, Florida 32302

(850) 224-9115

ATTORNEYS FOR TAMPA ELECTRIC COMPANY

Means

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 5th day of October 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

<u>matthew.bernier@duke-energy.com</u> <u>Robert.pickels@duke-energy.com</u>

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

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

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
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

Iron N. Mears

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

ATTORNEY