BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Energy Conservation Cost Recovery Clause Docket No. 20210002-EG

Filed: October 5, 2021

DUKE ENERGY FLORIDA, LLC'S PREHEARING STATEMENT

Duke Energy Florida, LLC ("DEF"), pursuant to the Order Establishing Procedure in this proceeding, Order No. PSC-2021-0075-PCO-EG dated February 10, 2021, and First Order PSC-2021-0208-PCO-EG modifying Order Establishing Procedure dated June 07, 2021, hereby submits its Prehearing Statement:

<u>Known Witnesses</u> – DEF filed a Notice of Adoption of Testimony of Lori J. Cross by Tim
Duff on August 27, 2021 (DN 09775-2021), and intends to offer the Direct Testimony of:

Witness	Subject Matter	<u>Issues</u>
Tim Duff	Final True-up, January – December 2020	1
Tim Duff	Estimated/Actual True-up, January – December 2021 and ECCR Factors For January – December 2022	2 - 6
Tim Duff	Tariff Approval	7
Tim Duff	Close the Docket	10

B. <u>Known Exhibits</u> – DEF intends to offer the following exhibits:

<u>Exhibit No.</u>	Witness	Description
LJC-1T	Duff	ECCR Adjusted Net True-Up for January - December 2020, Schedules CT1 – CT6

LJC-1P	Duff	Estimated/Actual True-Up, January – December 2021 and ECCR Factors for
		Billings in January – December 2022, 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 2022 through December 2022 set forth in the testimony and exhibits of witness Tim Duff.

D. <u>Issues and Positions</u> - 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 2020 through December 2020?
- **DEF:** The adjusted net true-up for the period January 2020 through December 2020 is an over-recovery of \$3,783,777. (Duff)
- ISSUE 2: What are the appropriate conservation adjustment actual/estimated true-up amounts for the period January 2021 through December 2021?
- **DEF:** \$4,970,444 adjusted net true-up over-recovery. (Duff)
- ISSUE 3: What are the appropriate total conservation adjustment true-up amounts to be collected/refunded in the period January 2022 through December 2022?
- **DEF:** \$8,754,221 adjusted net true-up over-recovery. (Duff)
- ISSUE 4: What are the total conservation cost recovery amounts to be collected during the period January 2022 through December 2022?

DEF: \$99,861,410. (Duff)

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

DEF:	<u>Customer Class</u>	ECCR Factor
	Residential	0.283 cents/kWh
	General Service Non-Demand	0.255 cents/kWh
	@ Primary Voltage	0.252 cents/kWh
	② Transmission Voltage	0.250 cents/kWh
	General Service 100% Load Factor	0.194 cents/kWh
	General Service Demand	0.77 \$/kW
	@ Primary Voltage	0.76 \$/kW
	@ Transmission Voltage	0.75 \$/kW
	Curtailable	0.35 \$/kW
	@ Primary Voltage	0.35 \$/kW
	@ Transmission Voltage	0.34 \$/kW
	Interruptible	0.64 \$/kW
	@ Primary Voltage	0.63 \$/kW
	@ Transmission Voltage	0.63 \$/kW
	Standby Monthly	0.074 \$/kW
	@ Primary Voltage	0.073 \$/kW
	@ Transmission Voltage	0.073 \$/kW
	Standby Daily	0.035 \$/kW
	@ Primary Voltage	0.035 \$/kW
	@ Transmission Voltage	0.034 \$/kW
	Lighting	0.108 cents/kWh (Duff)

- 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 2022, and thereafter, through the last billing cycle for December 2022. The first billing cycle may start before January 1, 2022, and the last billing cycle may end after December 31, 2022, so long as each customer is billed for twelve months regardless of when the factors became effective. (Duff)
- 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?
- **DEF:** Yes. The Commission should approve DEF's revised tariffs reflecting the energy conservation cost recovery amounts and 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 decision.

(Duff)

ISSUE 8: Should this docket be closed?

DEF: Yes. (Duff)

E. <u>Stipulated Issues</u> - None at this time.

- F. <u>Pending Motions</u> DEF has no pending motions at this time.
- G. <u>Requests for Confidentiality</u> -DEF has no requests for confidentiality pending at this time.
- H. <u>Objections to Qualifications</u> At this time, DEF has no objection to the qualifications of any expert witnesses in this proceeding.
- I. <u>Requirements of Order</u>- DEF believes that this prehearing statement complies with all the requirements of the Order Establishing Procedure.

Respectfully submitted this 5th day of October, 2021

/s/ Matthew R. Bernier

DIANNE M. TRIPLETT

Deputy General Counsel Duke Energy Florida, LLC 299 First Avenue North St. Petersburg, FL 33701 T: 727.820.4692 F: 727.820.5041 E: Dianne.Triplett@duke-energy.com

MATTHEW R. BERNIER

Associate General Counsel Duke Energy Florida, LLC 106 East College Avenue Suite 800 Tallahassee, Florida 32301 T: 850.521.1428 F: 727.820.5041 E: <u>Matthew.Bernier@duke-energy.com</u> FLRegulatoryLegal@duke-energy.com

CERTIFICATE OF SERVICE Docket No. 20210002-EG

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic mail to the following this 5th day of October, 2021.

/s/ Matthew R. Bernier Attorney

Walt Trierweiler	Beth Keating
Office of General Counsel	215 South Monroe Street, Suite 601
Florida Public Service Commission	Tallahassee, FL 32301
2540 Shumard Oak Blvd.	bkeating@gunster.com
Tallahassee, FL 32399-0850	<u>okeaning(a/gunster.com</u>
wtrierwe@psc.state.fl.us	Paula K. Brown
	Tampa Electric Company
J. Beasley / J. Wahlen / M. Means	P.O. Box 111
P.O. Box 391	Tampa, FL 33601
Tallahassee, FL 32302	regdept@tecoenergy.com
jbeasley@ausley.com	reguepi(w,tecoenergy.com
jwahlen@ausley.com	Konnath A. Haffman
mmeans@ausley.com	Kenneth A. Hoffman
	Florida Power & Light Company
Jon C. Moyle, Jr.	134 W. Jefferson Street
118 North Gadsden Street	Tallahassee, FL 32301-1713
Tallahassee, FL 32301	ken.hoffman@fpl.com
jmoyle@moylelaw.com	
mqualls@moylelaw.com	Richard Gentry / P. Christensen / A. Pirrello /
	C. Rehwinkel / M. Wessling
Maria Moncada / Joel T. Baker	Office of Public Counsel
Florida Power & Light Company	c/o The Florida Legislature
700 Universe Boulevard	111 West Madison Street, Room 812
Juno Beach, FL 33408-0420	Tallahassee, FL 32399
maria.moncada@fpl.com	gentry.richard@leg.state.fl.us
Joel.baker@fpl.com	christensen.patty@leg.state.fl.us
	pirrello.anastacia@leg.state.fl.us
James W. Brew / Laura W. Baker	rehwinkel.charles@leg.state.fl.us
1025 Thomas Jefferson Street, N.W.	wessling.mary@leg.state.fl.us
Eighth Floor, West Tower	
Washington, D.C. 20007	Mike Cassel
jbrew@smxblaw.com	Florida Public Utilities Company
lwb@smxblaw.com	1750 S. 14 th Street, Suite 200
	Fernandina Beach, FL 32034
	mcassel@fpuc.com
	George Cavros
	120 E. Oakland Park Blvd., Suite 105
	Fort Lauderdale, FL 33334
	george@cavros-law.com