

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Energy Conservation Cost) Docket No. 20210002-EG
Recovery Clause.)
_____) Filed: October 5, 2021

**SOUTHERN ALLIANCE FOR CLEAN
ENERGY'S PREHEARING STATEMENT**

Consistent with Order No. 2021-0075-PCO-EG, issued February 10, 2021, as subsequently modified¹, Southern Alliance for Clean Energy ("SACE") hereby submits its Prehearing Statement:

A. All Known Witnesses

SACE is not sponsoring any witnesses.

B. All Known Exhibits

SACE does not plan to offer any exhibits at this time, but may introduce exhibits during the course of cross-examination.

C. SACE's Statement of Basic Position

SACE maintains that the utilities bear the burden of proof to justify the recovery of cost that they request in this docket or other relief sought in this proceeding.

¹ Order Modifying Order Establishing Procedure No. PSC-2021-0208-PCO-EG, issued on June 7, 2021, PSC-2021-0344-PCO-EG, issued September 15, 2021.

D. SACE's Position on the Issues

GENERIC CONSERVATION COST RECOVERY ISSUES

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

SACE: SACE maintains that the respective utilities must satisfy their burden of proof for all monies sought in this proceeding.

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

SACE: SACE maintains that the respective utilities must satisfy their burden of proof for all monies sought in this proceeding.

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

SACE: SACE maintains that the respective utilities must satisfy their burden of proof for all monies in this proceeding.

ISSUE 4: What is the total conservation cost recovery amount to be collected during the period January 2022 through December 2022?

SACE: SACE maintains that the respective utilities must satisfy their burden of proof for all monies sought in this proceeding.

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

SACE: SACE maintains that the respective utilities must satisfy their burden of proof for all monies and cost recovery factors sought in this proceeding.

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?

SACE: SACE maintains that the respective utilities must satisfy their burden of proof for all monies and cost recovery factors sought in this proceeding.

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

SACE: No position.

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 2022 through December 2022?

SACE: No position.

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?

SACE: No position.

ISSUE 10: Should this docket be closed?

SACE: This is an ongoing proceeding; however, upon the conclusion of this year's proceeding, this docket should be closed, and a new docket should be opened to address cost recovery for 2022.

E. Stipulated Issues

None at this time.

F. Pending Motions

SACE has no pending motions.

G. Pending Confidentiality Claims or Requests.

SACE has no pending requests.

H. Objections to Witness Qualifications as an Expert

SACE has no objections to any witness qualifications at this time.

I. Compliance with Order No. 2021-0075-PCO-EG

SACE has complied with all requirements of the Orders Establishing Procedure entered in this docket.

RESPECTFULLY SUBMITTED this 5th day of October, 2021.

/s/ George Cavros

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy and correct copy of the foregoing was served on this 5th day of October, 2021 via electronic mail on:

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