

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Conservation Cost Recovery)
Clause)
_____)

DOCKET NO. 140002-EG
FILED: September 26, 2014

PREHEARING STATEMENT OF THE OFFICE OF PUBLIC COUNSEL

The Citizens of the State of Florida, through the Office of Public Counsel, pursuant to the Order Establishing Procedure in this docket, Order No. PSC-14-0085-PCO-EG, issued February 4, 2014, submit this Prehearing Statement.

APPEARANCES:

PATRICIA A. CHRISTENSEN, Esquire
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Deputy Public Counsel
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street, Room 812
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On behalf of the Citizens of the State of Florida.

A. WITNESSES:

None.

B. EXHIBITS:

None.

C. STATEMENT OF BASIC POSITION

Intervenors' proposal should, at a minimum, be evaluated utilizing the Commission's approved cost-effectiveness test or tests to determine if the proposal(s) adequately safeguard the interests of the general body of ratepayers and various rate classes against undue rate impacts while

achieving the intent of Florida Energy Efficiency and Conservation Act (FEECA) and Section 366.82(2), F.S.

D. STATEMENT OF FACTUAL ISSUES AND POSITIONS

GENERIC LEGAL ISSUE

ISSUE A: For each utility, what is the appropriate end date for the Commission's approved solar pilot programs?

OPC: No position at this time.

GENERIC CONSERVATION COST RECOVERY ISSUES

ISSUE 1: What are the final conservation cost recovery true-up amounts for the period January 2013 through December 2013?

OPC: No position at this time.

ISSUE 2: What are the total conservation cost recovery amounts to be collected during the period January 2015 through December 2015?

OPC: No position at this time.

ISSUE 3: What are the conservation cost recovery factors for the period January 2015 through December 2015?

OPC: No position at this time.

ISSUE 4: What should be the effective date of the new conservation cost recovery factors for billing purposes?

OPC: No position at this time.

ISSUE 4A: Should the Commission require the utilities to separate their Energy Conservation Cost Recovery expenditures into two categories, one for Energy Efficiency programs and the other for Demand Side Management programs?

OPC: Intervenors' proposal should, at a minimum, be evaluated utilizing the Commission's approved cost-effectiveness test or tests to determine if the

proposal(s) adequately safeguard the interests of the general body of ratepayers and various rate classes against undue rate impacts while achieving the intent of Florida Energy Efficiency and Conservation Act (FEECA) and Section 366.82(2), F.S.

ISSUE 4B: Should the Commission allow pro-active non-residential customers who implement their own energy efficiency programs and meet certain other criteria to opt out of the utility's Energy Efficiency programs and not be required to pay the cost recovery charges for the utility's Energy Efficiency programs approved by the Commission pursuant to Section 366.82, Florida Statutes?

OPC: Intervenors' proposal should, at a minimum, be evaluated utilizing the Commission's approved cost-effectiveness test or tests to determine if the proposal(s) adequately safeguard the interests of the general body of ratepayers and various rate classes against undue rate impacts while achieving the intent of Florida Energy Efficiency and Conservation Act (FEECA) and Section 366.82(2), F.S.

ISSUE 4C: If the Commission allows pro-active customers to opt out of participating in, and paying for, a utility's Energy efficiency programs, what criteria should the Commission apply in determining whether customers who wish to opt out are eligible to do so?

OPC: Intervenors' proposal should, at a minimum, be evaluated utilizing the Commission's approved cost-effectiveness test or tests to determine if the proposal(s) adequately safeguard the interests of the general body of ratepayers and various rate classes against undue rate impacts while achieving the intent of Florida Energy Efficiency and Conservation Act (FEECA) and Section 366.82(2), F.S.

COMPANY SPECIFIC CONSERVATION COST RECOVERY ISSUES

Tampa Electric Company

ISSUE 5: What is the Contracted Credit Value for the GSLM-2 and GSLM-3 rate riders for Tampa Electric Company for the period January 2015 through December 2015?

OPC: No position at this time.

ISSUE 6: What are the residential Price Responsive Load Management (RSVP -1) rate tiers for Tampa Electric Company for the period January 2015 through December 2015?

OPC: No position at this time.

E. STIPULATED ISSUES:

None.

F. PENDING MOTIONS:

None.

G. REQUESTS FOR CONFIDENTIALITY

Citizens have no pending requests for claims for confidentiality.

H. OBJECTIONS TO WITNESS QUALIFICATIONS AS AN EXPERT

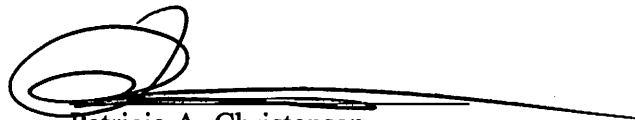
OPC has no objections to any witness' qualifications as an expert in this proceeding.

I. REQUIREMENTS OF ORDER

There are no requirements of the Order Establishing Procedure with which the Office of Public Counsel cannot comply.

Dated this 26th day of September, 2014.

Respectfully submitted,



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CERTIFICATE OF SERVICE
140002-EG

I **HEREBY CERTIFY** that a true and foregoing Notice of Service of Office of Public Counsel's Prehearing Statement has been furnished by US mail and electronic mail on this 26th day of September, 2014, to the following:

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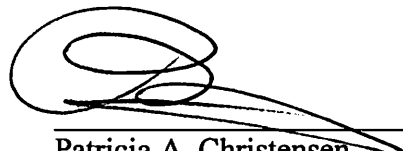
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