

October 14, 2024

Writer's E-Mail Address: bkeating@gunster.com

VIA E-PORTAL

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

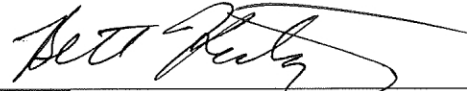
Re: Docket No. 20240002-EG – Energy Conservation Cost Recovery Clause

Dear Mr. Teitzman:

Attached for electronic filing on behalf of Florida Public Utilities Company, please find the Company's Prehearing Statement.

Should you have any questions whatsoever, please do not hesitate to contact me. Thank you for your assistance in this matter.

Sincerely,



Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
(850) 521-1706

MEK
Cc://(Parties of Record)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Energy Conservation Cost) Docket No. 20240002-EG
Recovery Clause.)
_____) Filed: October 14, 2024

**FLORIDA PUBLIC UTILITIES COMPANY'S
PREHEARING STATEMENT**

Consistent with Order No. 2024-0028-PCO-EG, issued February 6, 2024, as modified by Order No. 2024-0212-PCO-EG, issued June 20, 2024, Florida Public Utilities Company ("FPUC") hereby submits this Prehearing Statement:

a. All Known Witnesses

<u>Witness</u>	<u>Subject</u>	<u>Issue</u>
Derrick M. Craig	Final True Up 2023	1-10
	and	
	2024 Cost Recovery Amounts and Factors for 2025	

b. All Known Exhibits

<u>Witness</u>	<u>Exhibit</u>	<u>Title</u>	<u>Issue</u>
Derrick M. Craig	DMC-1(composite)	Schedules CT-1, CT-2, CT-3, CT-4, CT-5 and CT-6	1, 10
Derrick M. Craig	Revised DMC-2 ¹ (composite)	Schedules C-1, C-2, C-3, C-4, and C-5	2-7

¹ Revised Petition, Testimony, and Exhibit DMC-2 filed September 12, 2024.

c. FPUC's Statement of Basic Position

FPUC: The Commission should approve Florida Public Utilities Company's final net true-up for the period January through December 2023, the estimated true-up for the period January through December 2024, and the projected conservation program expenses for the period January through December 2025.

d. FPUC'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 2023 through 2023?

FPUC: The final end of period adjustment true-up amount is an under-recovery of \$49,567.

ISSUE 2: What are the appropriate conservation adjustment actual/estimated true-up amounts for the period January 2024 through December 2024?

FPUC: The estimated conservation true-up amount for the period January 2024 to December 2024 is an over-recovery of \$80,486.

ISSUE 3: What are the appropriate total conservation adjustment true-up amounts to be collected/refunded from January 2025 through December 2025?

FPUC: The estimated conservation true-up amount to be refunded during the period January 2025 to December 2025 is an over-recovery of \$30,919.

ISSUE 4: What are the total conservation cost recovery amounts to be collected during the period January 2025 through December 2025?

FPUC: FPUC seeks to recover \$731,931, over the period January 2025 through December 2025.

ISSUE 5: What are the conservation cost recovery factors for the period January 2025 through December 2025?

FPUC: The Company asks for approval of a consolidated levelized conservation cost recovery factor for this period of \$.00121 per KWH.

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

FPUC: The factor should be effective beginning with the specified conservation cost recovery cycle and thereafter for the period January 2025 through December 2025. Billing cycles may start before January 1, 2025 and the last cycle may be read after December 31, 2025, so that each customer is billed for twelve months regardless of when the adjustment factor became effective.

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?

FPUC: 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. The Commission should direct staff to verify that the revised tariffs are consistent with the Commission's decision.

ISSUES 8 AND 9: Company-specific Issues (TECO)

FPUC: No position.

ISSUE 10: Should this docket be closed?

POSITION: Recognizing that this is an ongoing cost recovery docket, this docket should remain open with a new docket number assigned for the following year.

e. Stipulated Issues

While not a party to any stipulations at this time, FPUC believes that it should be possible to reach a stipulation on each of the issues as they pertain to FPUC.

f. Pending Motions

FPUC has no pending motions.

g. Pending Confidentiality Claims or Requests

None.


h. Objections to Witness Qualifications as an Expert

FPUC has no objections to any witnesses' qualifications at this time.

i. Compliance with Order No. 2024-0028-PCO-EG

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

RESPECTFULLY SUBMITTED this 14th day of October, 2024.


Beth Keating
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Tallahassee, FL 32301
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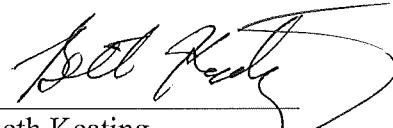
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Electronic Mail to the following parties of record this 14th day of October, 2024.

Florida Public Utilities Company Mike Cassel 208 Wildlight Ave Yulee, Florida 32097 mcassel@fpuc.com	Jon C. Moyle, Jr. Moyle Law Firm 118 North Gadsden St. Tallahassee, FL 32301 jmoyle@moylelaw.com
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Docket No. 20240002-EG
October 14, 2024

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