

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Energy conservation cost recovery clause.

DOCKET NO. 110002-EG

DATED: October 12, 2011

COMMISSION CLERK

COMMISSION STAFF'S PREHEARING STATEMENT

Pursuant to Order No. PSC-11-0136-PCO-EG, filed February 28, 2011, the Staff of the Florida Public Service Commission files its Prehearing Statement.

a. All Known Witnesses

There are no known witnesses at this time.

b. All Known Exhibits

There are no known exhibits at this time.

c. Staff's Statement of Basic Position

Staff's positions are preliminary and based on materials filed by the parties and on discovery. The preliminary positions are offered to assist the parties in preparing for the hearing. Staff's final positions will be based upon all the evidence in the record and may differ from the preliminary positions stated herein.

d. Staff's Position on the Issues

GENERIC CONSERVATION COST RECOVERY ISSUES

ISSUE 1: What are the final conservation cost recovery true-up amounts for the period January 2010 – through December 2010?

POSITION: Staff recommends that the appropriate final conservation cost recovery true-up amounts for the period January 2010 through December 2010 are as follows:

Florida Power & Light (FPL)	\$9,183,523	Overrecovery
Florida Public Utilities (FPUC)	\$90,657	Underrecovery
Gulf Power Company (GPC)	\$287,164	Underrecovery
Progress Energy Florida, Inc. (PEF)	\$9,058,508	Overrecovery
Tampa Electric Company (TECO)	\$1,053,754	Underrecovery

ISSUE 2: What are the total conservation cost recovery amounts to be collected during the period January 2012 through December 2012?

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FPSC-COMMISSION CLERK

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FPUC	Rate Class (Consolidated)	ECCR Factor 0.115 cents/Kwh
GULF	Staff has no position at this time.	
PEF	Rate Class	ECCR Factor
	Residential	0.288 cents/Kwh
	General Svc. Non-Demand	0.238 cents/Kwh
	@ Primary Voltage	0.236 cents/Kwh
	@ Transmission Voltage	0.233 cents/Kwh
	General Svc. 100% Load Factor	0.201 cents/Kwh
	General Svc. Demand	0.84 \$/KW
	@ Primary Voltage	0.83 \$/KW
	@ Transmission Voltage	0.82 \$/KW
	Curtaillable	0.90 \$/KW
	@ Primary Voltage	0.89 \$/KW
	@ Transmission Voltage	0.88 \$/KW
	Interruptible	0.77 \$/KW
	@ Primary Voltage	0.76 \$/KW
	@ Transmission Voltage	0.75 \$/KW
	Standby Monthly	0.084 \$/KW
	@ Primary Voltage	0.083 \$/KW
	@ Transmission Voltage	0.082 \$/KW
	Standby Daily	0.040 \$/KW
	@ Primary Voltage	0.040 \$/KW
	@ Transmission Voltage	0.039 \$/KW
	Lighting	0.132 cents/Kwh
TECO	Rate Class	ECCR Factor
	Residential	0.302 cents/Kwh
	General Svc., TS	0.288 cents/Kwh
	General Svc. Demand - Secondary	1.05 \$/KW
	@ Primary Voltage	1.04 \$/KW
	@ Subtransmission Voltage	1.03 \$/KW
	Standby Firm - Secondary	1.05 \$/KW
	@ Primary Voltage	1.04 \$/KW
	@ Subtransmission Voltage	1.03 \$/KW
	Interruptible – Secondary	0.92 \$/KW
	@ Primary Voltage	0.91 \$/KW
	@ Subtransmission Voltage	0.90 \$/KW
	General Svc. Demand Optional - Secondary	0.250 cents/Kwh
	@ Primary Voltage	0.248 cents/Kwh
	@ Subtransmission Voltage	0.245 cents/Kwh
	Lighting	0.151 cents/Kwh

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

POSITION: The factors should be effective beginning with the specified conservation cost recovery cycle and thereafter for the period January 2011 through December 2011. Billing cycles may start before January 1, 2011, and the last cycle may be read after December 31, 2011, so that each customer is billed for twelve months regardless of when the adjustment factor became effective.

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 2012 through December 2012?

POSITION: In accordance with the program requirement and methodology established by Order No. PSC-99-1778-FOF-EI, issued September 10, 1999, in Docket No. 990037-EI, the Contracted Credit Value for the GSLM-2 and GSLM-3 rate riders should be \$9.82 per KW for the period January 2012 through December 2012.

ISSUE 6: What are the residential Price Responsive Load Management (RSVP -1) rate tiers for Tampa Electric Company for the period January 2012 through December 2012?

POSITION: In accordance with the program requirement and methodology established by Order No. PSC-07-0740-TRF-EG, issued September 17, 2007, in Docket No. 070056-EG, the rate tiers for RSVP-1 should be as follows:

Rate Tier	Cents/kWh
P4	31.376
P3	5.591
P2	(0.746)
P1	(1.088)

Gulf Power Company

ISSUE 7: Should Gulf's proposal to change the method used to apportion recoverable conservation costs among the Company's customer classes be approved?

POSITION: No. Gulf's proposal represents a major shift away from longstanding Commission policy applicable to all Florida investor-owned utilities, which should be dealt within a company-specific proceeding.

ISSUE 8: What conservation cost recovery factors should the Commission approve for Gulf's Residential Service Variable Pricing (RSVP) rate?

POSITION: 1. No position at this time.
2. No position at this time.

Southern Alliance for Clean Energy

ISSUE 9: Has the utility documented a levelized cost, or used another methodology, to determine the DSM plan program cost per unit of energy savings?

POSITION: Staff believes this issue is beyond the scope of the Conservation Cost Recovery Docket. This issue is more appropriately addressed in the Conservation Goals (DSM) Setting dockets.

ISSUE 10: Would a different mix of complaint DSM Plan programs result in a lower conservation cost recovery factor?

POSITION: Staff believes this issue is beyond the scope of the Conservation Cost Recovery Docket. This issue is more appropriately addressed in the Conservation Goals (DSM) Setting dockets.

ISSUE 11: Would modifying the design of existing compliant DSM Plan programs result in a lower cost recovery factor?

POSITION: Staff believes this issue is beyond the scope of the Conservation Cost Recovery Docket. This issue is more appropriately addressed in the Conservation Goals (DSM) Setting dockets.

ISSUE 12: Would an increased reliance on lower cost compliant DSM Plan programs result in a lower cost recovery factor?

POSITION: Staff believes this issue is beyond the scope of the Conservation Cost Recovery Docket. This issue is more appropriately addressed in the Conservation Goals (DSM) Setting dockets.

ISSUE 13: Are the costs of the DSM Plan programs prudent?

POSITION: Staff believes this issue is beyond the scope of the Conservation Cost Recovery Docket. This issue is more appropriately addressed in the Conservation Goals (DSM) Setting dockets.

e. Stipulated Issues

Staff is not aware of any stipulated issues at this time.

f. Pending Motions

There is one pending motion.

- 1) Southern Alliance for Clean Energy's Petition to Intervene.

g. Pending Confidentiality Claims or Requests

There is one pending confidentiality request.

- 1) FPL's Request for Confidential Classification of Materials Provided Pursuant to Audit No. 11-005-4-4 (Document No. 04575-11).

h. Objections to Witness Qualifications as an Expert

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

i. Compliance with Order No. PSC-11-0136-PCO-EG

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

Respectfully submitted this 12th day of October, 2011.



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In re: Energy conservation cost recovery
clause.

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DATED: October 12, 2011

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original of STAFF'S PREHEARING STATEMENT has been filed with Office of Commission Clerk and one copy has been furnished to the following by electronic and U.S. Mail, on this 12th day of October, 2011:

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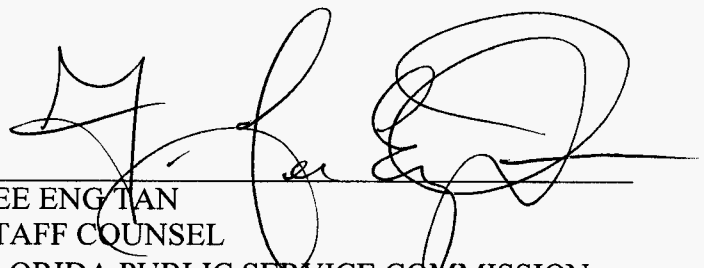
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