

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

In the Matter of:

DOCKET NO. 130002-EG

ENERGY CONSERVATION COST
RECOVERY CLAUSE.
_____ /

PROCEEDINGS: HEARING

COMMISSIONERS
PARTICIPATING: CHAIRMAN RONALD A. BRISÉ
COMMISSIONER LISA POLAK EDGAR
COMMISSIONER ART GRAHAM
COMMISSIONER EDUARDO E. BALBIS
COMMISSIONER JULIE I. BROWN

DATE: Monday, November 4, 2013

TIME: Commenced at 9:40 a.m.
Concluded at 9:43 a.m.

PLACE: Betty Easley Conference Center
Room 148
4075 Esplanade Way
Tallahassee, Florida

REPORTED BY: JANE FAUROT, RPR
Official FPSC Reporter
(850) 413-6732

1 APPEARANCES:

2 ASHLEY M. DANIELS, JAMES D. BEASLEY and
3 J. JEFFRY WAHLEN, ESQUIRES, Ausley Law Firm, Post Office
4 Box 391, Tallahassee, Florida 32302, appearing on behalf
5 of Tampa Electric Company.

6 JEFFREY A. STONE, ESQUIRES, Beggs & Lane, Post
7 Office Box 12950, Pensacola, Florida 32591, appearing
8 on behalf of Gulf Power Company.

9 JOHN T. BURNETT, and DIANNE M. TRIPLETT,
10 ESQUIRES, 106 E. College Ave., Suite 800, Tallahassee,
11 Florida 32301, appearing on behalf of Duke Energy
12 Florida, Inc.

13 KAREN PUTNAL, ESQUIRE, c/o Moyle Law Firm,
14 P.A., 118 North Gadsden Street, Tallahassee, Florida
15 32301, appearing on behalf of Florida Industrial Power
16 Users Group.

17 JOHN T. BUTLER and KENNETH M. RUBIN, ESQUIRES,
18 Florida Power & Light Company, 700 Universe Boulevard,
19 Juno Beach, Florida 33408, appearing on behalf of
20 Florida Power & Light Company.

21 BETH KEATING, ESQUIRE, Gunster Law Firm, 215
22 South Monroe Street, Suite 601, Tallahassee, Florida
23 32301-1839, appearing on behalf of Florida Public
24 Utilities Company.

25

1 APPEARANCES (Continued):

2 J.R. KELLY, PUBLIC COUNSEL, CHARLES REHWINKEL
3 and PATRICIA A. CHRISTENSEN, ESQUIRES, Office of Public
4 Counsel, c/o The Florida Legislature, 111 West Madison
5 Street, Room 812, Tallahassee, Florida 32399-1400,
6 appearing on behalf of the Citizens of Florida.

7 JAMES W. BREW and F. ALVIN TAYLOR, ESQUIRES,
8 PCS Phosphate - White Springs, c/o Brickfield Law Firm,
9 1025 Thomas Jefferson St., NW, Eighth Floor, West Tower,
10 Washington, DC 20007, appearing on behalf of PCS
11 Phosphate - White Springs.

12 JULIA GILCHER, and LEE ENG TAN, ESQUIRES, FPSC
13 General Counsel's Office, 2540 Shumard Oak Boulevard,
14 Tallahassee, Florida 32399-0850, appearing on behalf of
15 the Florida Public Service Commission Staff.

16 MARY ANNE HELTON, Deputy General Counsel, and
17 CURT KISER, General Counsel, Florida Public Service
18 Commission, 2540 Shumard Oak Boulevard, Tallahassee,
19 Florida 32399-0850, Advisor to the Florida Public
20 Service Commission.

21
22
23
24
25

I N D E X

WITNESSES

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

NAME:	PAGE NO.
Terry J. Keith Prefiled Testimony Inserted	12
Anita Sharma Prefiled Testimony Inserted	20
Curtis D. Young Prefiled Testimony Inserted	25
Jennifer L. Todd Prefiled Testimony Inserted	30
Helena T. Guthrie Prefiled Testimony Inserted	41
Howard T. Bryant Prefiled Testimony Inserted	52

EXHIBITS

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

NUMBER:

1-13

ID.

68

ADMTD.

68

P R O C E E D I N G S

1
2 **CHAIRMAN BRISÉ:** Good morning. We'll go ahead
3 and call this hearing to order. It's our annual clause
4 hearings. And, Staff, would you read the notice,
5 please.

6 **MS. GILCHER:** By notice issued September 27,
7 2013, this time and place is set for a hearing
8 conference in the following dockets: 130001-EI,
9 130002-EG, 130003-GU, 130004-GU, and 130007-EI. The
10 purpose of the hearing conference is set out in the
11 notice.

12 **CHAIRMAN BRISÉ:** All right. Thank you. At
13 this time we will take appearances. And, staff, do we
14 have any specific instructions that we want to give with
15 respect to that?

16 **MS. GILCHER:** Staff suggests that all parties
17 give their appearances at the same time. There are five
18 dockets to address this morning. All parties should
19 enter their appearances and declare the dockets that
20 they are entering their appearance for.

21 **CHAIRMAN BRISÉ:** Okay. Thank you. All right.
22 At this time we'll take appearances.

23 **MR. BUTLER:** Good morning, Mr. Chairman. John
24 Butler and Ken Rubin. We're appearing in the 01, the
25 02, and the 07 dockets.

1 **MS. DANIELS:** Good morning, Commissioners. I
2 am Ashley Daniels appearing with Jim Beasley and Jeff
3 Wahlen of Ausley McMullen on behalf of Tampa Electric in
4 the 01, 02, and 07 dockets.

5 **CHAIRMAN BRISÉ:** Okay. Thank you.

6 **MR. STONE:** Good morning, Commissioners. I'm
7 Jeffrey A. Stone of the law firm Beggs and Lane and I'm
8 appearing on behalf of Gulf Power Company in the 01, 02,
9 and 07 dockets.

10 **CHAIRMAN BRISÉ:** Thank you.

11 **MR. REHWINKEL:** Good morning, Commissioners.
12 Charles Rehwinkel and Patricia Christensen in all
13 dockets; Joseph McGlothlin in 01 and 07. And J.R.
14 Kelly, the Public Counsel, is here.

15 **CHAIRMAN BRISÉ:** Thank you.

16 **MR. WRIGHT:** Good morning, Mr. Chairman and
17 Commissioners. Robert Scheffel Wright and John T.
18 LaVia, III, appearing on behalf of the Florida Retail
19 Federation in the fuel docket, 130001. The same
20 attorneys also appearing on behalf of DeSoto County
21 Generating Company in the ECRC docket, 130007.

22 Thank you.

23 **CHAIRMAN BRISÉ:** Thank you.

24 **MR. KEATING:** Good morning, Commissioners.
25 Beth Keating with the Gunster law firm. I'm here today

1 on behalf of FPUC in the 01 and 02 dockets; on behalf of
2 FPUC and Florida City Gas in the 03 docket; and on
3 behalf of FPUC, FPUC Indiantown, Chesapeake, and Florida
4 City Gas in the 04 docket.

5 **CHAIRMAN BRISÉ:** Thank you.

6 **MS. PUTNAL:** Good morning. I am Karen Putnal
7 with the Moyle Law Firm and appearing today on behalf of
8 Florida Industrial Power Users Group in the 01, 02, and
9 07 dockets.

10 **CHAIRMAN BRISÉ:** Thank you.

11 **MR. BREW:** Good morning, Mr. Chairman. I'm
12 James Brew. I'm appearing for White Springs
13 Agricultural Chemicals, PCS Phosphate in the 01, 02, and
14 07 dockets. And I'd like to make an appearance for
15 F. Alvin Taylor, as well.

16 **CHAIRMAN BRISÉ:** Thank you.

17 **MR. HORTON:** Mr. Chairman, Norman H. Horton,
18 Jr., appearing on behalf of Sebring Gas System in the 04
19 docket.

20 **CHAIRMAN BRISÉ:** Thank you.

21 **MS. TRIPLETT:** Good morning. Diane Triplett,
22 John Burnett, and Matt Bernier, appearing on behalf of
23 Duke Energy Florida in the 01, 02, and 07 dockets. And
24 also appearing in the 07 docket is Gary Perko. Thank
25 you.

1 **CHAIRMAN BRISÉ:** Thank you.

2 **MS. CORBARI:** Kelly Corbari appearing in the
3 04 docket.

4 **CHAIRMAN BRISÉ:** Okay.

5 **MS. GILCHER:** Julia Gilcher appearing in the
6 02 and 01 docket. I'd also like to make an appearance
7 in the 02 docket for Lee Eng Tan and in the 01 docket
8 for Martha Barrera.

9 **CHAIRMAN BRISÉ:** Thank you.

10 **MR. LAWSON:** Michael Lawson for the 03 docket.

11 **MR. MURPHY:** Charles Murphy in the 07 docket.

12 **MS. HELTON:** And, Mary Anne Helton, advisor to
13 the Commission in all of the dockets. And also here
14 today is the General Counsel, Curt Kiser.

15 **CHAIRMAN BRISÉ:** Thank you.

16 Are we missing anyone? Okay.

17 Are there any parties that have been excused
18 from the hearing?

19 **MS. GILCHER:** Yes, Chairman. There's been
20 three parties excused from the hearing today; St. Joe
21 Natural Gas Company, Peoples Gas System, and Southern
22 Alliance for Clean Energy.

23 **CHAIRMAN BRISÉ:** Okay. And it's my
24 understanding that St. Joe Natural Gas Company had an
25 interest in Docket 03 and 04?

1 **MS. GILCHER:** Correct.

2 **CHAIRMAN BRISÉ:** And Peoples Gas, 03 and 04,
3 as well.

4 **MS. GILCHER:** Correct.

5 **CHAIRMAN BRISÉ:** And Southern Alliance for
6 Clean Energy in the 02 docket.

7 **MS. GILCHER:** Correct.

8 **CHAIRMAN BRISÉ:** Okay. The order that we plan
9 to take up the dockets today is 02, 03, 04, 07, and then
10 01.

11 * * * * *

12
13 **CHAIRMAN BRISÉ:** At this time we're going to
14 go ahead and move to the individual dockets. We are
15 going to go ahead and open Docket 130002-EG.

16 Are there any preliminary matters that we need
17 to take care of at this time?

18 **MS. GILCHER:** Yes, Chairman. At this time
19 staff notes that the Southern Alliance for Clean Energy
20 has been excused from the hearing this morning. There
21 are proposed stipulations on all issues. We note that
22 OPC, FIPUG, SACE, PCS are taking no positions on the
23 issues.

24 In addition, all witnesses have been excused
25 and the parties have waived their opening statements.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

CHAIRMAN BRISÉ: Okay. Thank you.

Staff, let's address the prefiled testimony.

MS. GILCHER: At this time, staff asks that the prefiled testimony of all witnesses identified in Section VI, Page 4, of the prehearing order be inserted into the record as though read.

CHAIRMAN BRISÉ: Okay. We will insert the testimony into the record as though read.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
FLORIDA POWER & LIGHT COMPANY
TESTIMONY OF TERRY J. KEITH
DOCKET NO. 130002-EG
MAY 2, 2013

Q. Please state your name, business address, employer and position.

A. My name is Terry J. Keith and my business address is 9250 West Flagler Street, Miami, Florida, 33174. I am employed by Florida Power & Light Company (“FPL” or “the Company”) as Director, Cost Recovery Clauses, in the Regulatory Affairs Department.

Q. Have you previously testified in this or predecessor dockets?

A. Yes.

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to present for Commission review and approval the schedules supporting the calculation of the actual Energy Conservation Cost Recovery (“ECCR”) Clause net true-up amounts for the period January 2012 through December 2012.

Q. Have you prepared or caused to be prepared under your direction, supervision or control an exhibit in this proceeding?

A. Yes, I am sponsoring Schedules CT-1 and CT-4, and co-sponsoring Schedules CT-2 and CT-3, in Exhibit AS-1. The specific sections of Schedules CT-2 and

1 CT-3 that I am co-sponsoring are identified in the Table of Contents, which is
2 found on Exhibit AS-1.

3 **Q. What is the source of the data used in calculating the actual true-up amount**
4 **for the January 2012 through December 2012 period?**

5 A. Unless otherwise indicated, the data used in calculating the actual true-up amount
6 were taken from the books and records of FPL. The books and records are kept in
7 the regular course of the Company's business in accordance with generally accepted
8 accounting principles and practices, and in accordance with the applicable
9 provisions of the Uniform System of Accounts as prescribed by this Commission
10 and directed in Rule 25-17.015, Florida Administrative Code. Schedule CT-2,
11 pages 4 through 6, provides a complete list of all account numbers used for ECCR
12 recovery during the period January 2012 through December 2012.

13 **Q. What is the actual end of period true-up amount that FPL is requesting the**
14 **Commission to approve for the January 2012 through December 2012 period?**

15 A. FPL has calculated and is requesting approval of an under-recovery of \$5,803,057
16 including interest, as the actual end of period true-up amount for the period January
17 2012 through December 2012. The calculation of this \$5,803,057 under-recovery is
18 shown on Exhibit AS-1, Schedule CT-3, page 2, line 7 plus line 8.

19 **Q. What is the net true-up amount for the January 2012 through December 2012**
20 **period that FPL is requesting be carried over and included in the January**
21 **2014 through December 2014 ECCR factor?**

- 1 A. FPL has calculated and is requesting approval of an over-recovery of \$189,597 as
2 the net true-up amount for the period January 2012 through December 2012. This
3 net true-up over-recovery of \$189,597 is the difference between the actual end of
4 period true-up under-recovery of \$5,803,057 and the actual/estimated true-up under-
5 recovery of \$5,992,654 approved by the Commission in Order No. PSC-12-0611-
6 FOF-EG, issued November 15, 2012. The calculation of the \$189,597 over-
7 recovery is shown on Exhibit AS-1, Schedule CT-1, page 1.
- 8 **Q. Was the calculation of the net true-up amount for the period January 2012**
9 **through December 2012 performed consistently with the prior true-up**
10 **calculations in this and the predecessor ECCR dockets?**
- 11 A. Yes. FPL's net true-up was calculated consistent with the methodology set forth
12 in Schedule 1, page 2 of 2, attached to Order No. 10093, dated June 19, 1981.
- 13 **Q. Have you provided a schedule showing the variances between actual and**
14 **actual/estimated program costs and revenues for the period January 2012**
15 **through December 2012?**
- 16 A. Yes. Exhibit AS-1, Schedule CT-2, page 1 compares actual to actual/estimated
17 program costs, and revenues and interest resulting in the variance of \$189,597.
- 18 **Q. Please explain the calculation of the \$ 189,597 variance.**
- 19 A. The difference between actual and actual/estimated total program costs of
20 \$2,841,895 (CT-2, Page 1, line 13) minus the difference between the actual and
21 actual/estimated ECCR revenues, net of revenue taxes of \$2,653,027 (CT-2, page
22 1 , line 16) results in a variance of \$ 188,868 (CT-2, page 1, line 17). This

1 \$188,868 over-recovery, plus the variance of \$730 in interest (CT-2, page 1, line
2 18), results in a total net over-recovery of \$189,597 (CT-2, page 1, line 22).

3 **Q. Does this conclude your testimony?**

4 **A. Yes.**

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
FLORIDA POWER & LIGHT COMPANY
TESTIMONY OF TERRY J. KEITH
DOCKET NO. 130002-EG
SEPTEMBER 10, 2013

Q. Please state your name, business address, employer and position.

A. My name is Terry J. Keith and my business address is 9250 West Flagler Street, Miami, Florida, 33174. I am employed by Florida Power & Light Company (“FPL” or “the Company”) as Director, Cost Recovery Clauses in the Regulatory Affairs Department.

Q. Have you previously filed testimony in this docket?

A. Yes, I have.

Q. What is the purpose of your testimony in this proceeding?

A. The purpose of my testimony is to present the schedules necessary to support the actual/estimated Energy Conservation Cost Recovery (“ECCR”) clause true-up for the period January 2013 through December 2013 and the calculation of the ECCR factors based on the projected ECCR costs for FPL’s Demand Side Management (“DSM”) programs to be incurred during the months of January 2014 through December 2014.

Q. Have you prepared or caused to be prepared under your direction, supervision or control any exhibits in this proceeding?

1 A. Yes, I am sponsoring Schedules C-1 and C-4, and co-sponsoring Schedules C-2
2 and C-3 in Exhibit AS-2. The specific sections of Schedules C-2 and C-3 which I
3 am co-sponsoring are identified in the Table of Contents, which is found on
4 Exhibit AS-2, page 1.

5 **Q. What is the source of the data used in calculating the 2013 actual/estimated**
6 **true-up amount?**

7 A. Unless otherwise indicated, the data used in calculating the 2013 actual/estimated
8 true-up amount was taken from the books and records of FPL. The books and
9 records are kept in the regular course of the Company's business in accordance with
10 generally accepted accounting principles and practices, and with the applicable
11 provisions of the Uniform System of Accounts as prescribed by this Commission
12 and directed in Rule 25-17.015, Florida Administrative Code.

13 **Q. Please explain the calculation of the ECCR end of period net true-up and**
14 **actual/estimated true-up amounts for 2013.**

15 A. Schedule C-3, pages 11 and 12, provide the calculation of the 2013 ECCR end of
16 period net true-up and actual/estimated true-up amounts. The end of period net true-
17 up amount to be carried forward to the 2014 ECCR factor is an under-recovery of
18 \$15,859,578 (Schedule C-3, page 11, line 11). This \$15,859,578 under-recovery
19 includes the 2012 final true-up over-recovery of \$189,597 (Schedule C-3, page 11,
20 line 9a) filed with the Commission on May 2, 2013, and the 2013 actual/estimated
21 true-up under-recovery, including interest, of \$16,049,176, (Schedule C-3, page 11,
22 lines 7 plus 8) for the period January 2013 through December 2013. The 2013

1 actual/estimated true-up under-recovery amount is based on actual data for the
2 period January 2013 through June 2013 and estimates for the period July 2013
3 through December 2013.

4 **Q. Were these calculations made in accordance with the procedures previously**
5 **approved in the predecessors to this Docket?**

6 A. Yes, they were.

7 **Q. Is FPL requesting recovery of any new costs through the ECCR in 2014?**

8 A. Yes. FPL is requesting recovery of the retail jurisdictional portion of the one-time
9 advanced capacity payment it will make to the Palm Beach Solid Waste
10 Authority, plus reasonable and prudent carrying costs, in the ECCR Clause for
11 2014. The recovery of the advanced payment was authorized by the Commission
12 in Order No. PSC-11-0293-FOF-EU, Docket No. 110018-EU, issued on July 6,
13 2011, and is to be recovered in the year in which the payment is made. As such,
14 FPL has included the retail jurisdictional advanced capacity payment of \$53.9
15 million (system amount is \$56.6 million) and \$2.4 million of carrying costs, for a
16 total of \$56.3 million, in its projected ECCR costs for 2014. The calculation of
17 this \$56.3 million is provided in Schedule C-2, page 8.

18 **Q. Have you prepared a calculation of the allocation factors for demand and**
19 **energy?**

20 A. Yes. Schedule C-1, page 2 included in AS-2 provides this calculation. The
21 demand allocation factors are calculated by determining the percentage each rate
22 class contributes to the monthly system peaks. The energy allocation factors are

1 calculated by determining the percentage each rate class contributes to total kWh
2 sales, as adjusted for losses.

3 **Q. Have you prepared a calculation of the 2014 ECCR factors by rate class?**

4 A. Yes. Schedule C-1, page 3 in Exhibit AS-2 provides the calculation of FPL's 2014
5 ECCR factors being requested.

6 **Q. Does this conclude your testimony?**

7 A. Yes.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

FLORIDA POWER & LIGHT COMPANY

TESTIMONY OF ANITA SHARMA

DOCKET NO. 130002-EG

MAY 2, 2013

1 **Q. Please state your name and business address.**

2 A. My name is Anita Sharma and my business address is 9250 West Flagler Street, Miami,
3 Florida 33174. I am employed by Florida Power and Light Company (“FPL” or “the
4 Company”) as Manager of Cost & Performance for Demand Side Management (DSM)
5 Programs.

6 **Q. Have you previously testified in this or predecessor dockets?**

7 A. Yes.

8 **Q. What is the purpose of your testimony?**

9 A. The purpose of my testimony is to present the actual ECCR program related costs and
10 revenues associated with FPL’s energy conservation programs for the period January
11 through December 2012.

12 **Q. Have you prepared or had prepared under your supervision and control an exhibit?**

13 A. Yes. I am sponsoring Schedules CT-5, CT-6 and Appendix A, and co-sponsoring
14 Schedules CT-2 and CT-3, in Exhibit AS-1. The specific sections of Schedules CT-2 and
15 CT-3 that I am co-sponsoring are identified in the Table of Contents, which is found on
16 Exhibit AS-1.

DOCUMENT NUMBER-DATE
02445 MAY-2 2013
FPSC-COMMISSION CLERK

1 **Q. For the January through December 2012 period, did FPL seek recovery of any costs**
2 **for advertising which makes a specific claim of potential energy savings or states**
3 **appliance efficiency ratings or savings?**

4 A. Yes.

5 **Q. Has FPL complied with Rule 25-17.015(5), Florida Administrative Code, which**
6 **requires the Company to file all data sources and calculations used to substantiate**
7 **claims of potential energy savings or which state appliance efficiency ratings or**
8 **savings that are included in advertisement?**

9 Yes. As required by Rule 25-17.015(5), Florida Administrative Code, a copy of the
10 advertising, data sources and calculations used to substantiate the claims of savings or
11 appliance efficiency ratings are included in Appendix A, Pages 1A – 3D.

12 **Q. Are all costs listed in Schedule CT-2 attributable to Commission-approved**
13 **programs?**

14 A. Yes.

15 **Q. How did FPL's actual program costs for the January through December 2012 period**
16 **compare to the actual/estimated costs presented in Docket No. 120002-EG, and**
17 **approved in Order No. PSC-12-0611-FOF-EG?**

18 A. Actual total program costs for the January through December 2012 period were
19 \$224,033,738. The actual/estimated total program costs were \$226,875,633. Therefore,
20 actual costs were \$2,841,895, or approximately one percent, less than the actual/estimated
21 (see Schedule CT-2, Page 1, Line 13). Each program's contribution to the variance is
22 shown on Schedule CT-2, Page 3.

23 **Q. Does that conclude your testimony?**

24 A. Yes.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

FLORIDA POWER & LIGHT COMPANY

TESTIMONY OF ANITA SHARMA

DOCKET NO. 130002-EG

SEPTEMBER 10, 2013

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

Q. Please state your name, business address, employer and position.

A. My name is Anita Sharma and my business address is 9250 West Flagler Street, Miami, Florida 33174. I am employed by Florida Power and Light Company (“FPL” or “the Company”) as Manager of Cost & Performance for Demand Side Management (“DSM”) Programs.

Q. Have you previously filed testimony in this docket?

A. Yes.

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to submit for Commission review and approval the projected Energy Conservation Cost Recovery (“ECCR”) costs for FPL’s DSM programs to be incurred by FPL during January 2014 through December 2014 and the actual/estimated ECCR costs for January 2013 through December 2013.

Q. Are you sponsoring an exhibit in this proceeding?

A. Yes. I am sponsoring Exhibit AS-2, Schedule C-5 and co-sponsoring Schedules C-2 and C-3. The specific sections of Schedules C-2 and C-3 that I am co-sponsoring are shown in Exhibit AS-2, Page 1, Table of Contents.

Q. Are all of the costs listed in these exhibits reasonable, prudent and attributable to programs approved by the Commission?

1 A. Yes.

2 **Q. Please describe the methods used to derive the program costs for which FPL**
3 **seeks recovery.**

4 A. The actual costs for the months of January 2013 through June 2013 came from the
5 books and records of FPL. The books and records are kept in the regular course of the
6 Company's business in accordance with generally accepted accounting principles and
7 practices, and with the applicable provisions of the Uniform System of Accounts as
8 prescribed by this Commission and directed in Rule 25-17.015, Florida Administrative
9 Code. Costs for the months of July 2013 through December 2013, as well as January
10 2014 through December 2014 are projections compiled from detailed month-by-month
11 analyses for each program which were prepared by the relevant departments within
12 FPL. The projections have been created in accordance with FPL's standard budgeting
13 and on-going cost justification processes.

14 **Q. What are the 2013 actual/estimated costs FPL is requesting the Commission to**
15 **approve?**

16 A. FPL is requesting approval of \$246,248,982 as the actual/estimated amount for the
17 period January through December 2013, as shown on Exhibit AS-2, Schedule C-3,
18 Page 4, Line 31.

19 **Q. What is the estimated variance of the 2013 actual/estimated cost from the original**
20 **2013 cost projection?**

21 A. The 2013 year-end estimated variance in cost is \$16,936,290 above the 2013
22 projection of \$229,312,692 that was approved in Order No. PSC-12-0611-FOF-EG
23 issued November 15, 2012.

1 **Q. Please explain the reason for the year-end estimated variance from the 2013**
2 **projection.**

3 A. The variance is primarily due to the increase in the credits for the
4 Commercial/Industrial Load Control (“CILC”) and Commercial/Industrial Demand
5 Reduction (“CDR”) programs which were approved in Docket No. 120015-EI, Order
6 No. PSC13-0023-S-EI, issued January 14, 2013.

7 **Q. What are the 2014 costs FPL is requesting the Commission to approve?**

8 A. FPL is requesting approval of \$332,563,100 for recovery during the period of January
9 through December 2014, as shown on Exhibit AS-2, Schedule C-1, Page 1, Line 8.
10 This includes projected costs for January through December 2014 of \$260,247,107,
11 Palm Beach Solid Waste Authority costs, as well as prior and current period under
12 recoveries, interest and applicable revenue taxes.

13 **Q. Does this conclude your testimony?**

14 A. Yes.

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 130002-EG
DETERMINATION OF CONSERVATION COSTS RECOVERY FACTOR

Direct Testimony of
CURTIS D. YOUNG
(Final True-Up)
On Behalf of
FLORIDA PUBLIC UTILITIES COMPANY

1 Q. Please state your name and business address.

2 A. Curtis D. Young: my business address is 1641 Worthington
3 Road, Suite 220 West Palm Beach, Florida 33409.

4 Q. By whom are you employed and in what capacity?

5 A. I am employed by Florida Public Utilities Company as a
6 Senior Regulatory Analyst.

7 Q. What is the purpose of your testimony at this time?

8 A. To advise the Commission of the actual over/under recovery
9 of the Conservation Program costs for the period January 1,
10 2012 through December 31, 2012 as compared to the true-up
11 amounts previously reported for that period which were based
12 on seven months actual and five months estimated data.

13 Q. Please state the actual amount of over/under recovery of
14 Conservation Program costs for the Consolidated Electric
Divisions of Florida Public Utilities Company for January 1,
2012 through December 31, 2012.

COM 5
AFD 15 1
APA 1
ECO 16 6
ENG
GCL 1
EDM
TEL
CRK F-G Prep

- 1 A. The Company under-recovered \$102,386.00 during that period.
2 This amount is substantiated on Schedule CT-3, page 2 of 3,
3 Energy Conservation Adjustment.
- 4 Q. How does this amount compare with the estimated true-up
5 amount which was allowed by the Commission during the
6 November 2012 hearing?
- 7 A. We had estimated that we would under-recover \$249,561.00 as
8 of December 31, 2012.
- 9 Q. Have you prepared any exhibits at this time?
- 10 A. We have prepared and pre-filled Schedules CT-1, CT-2, CT-3,
11 CT-4, CT-5 and CT-6 (Composite Exhibit CDY-1).
- 12 Q. Does this conclude your testimony?
- 13 A. Yes.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Determination of Conservation Adjustment Factor

DIRECT TESTIMONY OF CURTIS D. YOUNG

On behalf ofFlorida Public Utilities CompanyDOCKET NO. 130002-EG

1 Q. **Please state your name, occupation and business address.**

2 A. My name is Curtis Young. I am the Senior Regulatory Analyst for Florida Public
3 Utilities Company. My business address is 1641 Worthington Road, West Palm
4 Beach, Florida 33409.

5 Q. **Describe briefly your background and business experience?**

6 A. I graduated from Pace University in 1982 with a BBA in Accounting. I have been
7 employed by FPUC since 2001. During my employment at FPUC, I have
8 performed various accounting and analytical functions including regulatory
9 filings, revenue reporting, account analysis, recovery rate reconciliations and
10 earnings surveillance. I am also involved in the preparation of special reports
11 and schedules used internally by division managers for decision making
12 projects. Additionally, I coordinate the gathering of data for the FPSC audits.

13 Q. **Are you familiar with the electric conservation programs of the Company and
14 costs which have been, and are projected to be, incurred in their
15 implementation?**

16 A. Yes.

17 Q. **What is the purpose of your testimony in this docket?**

18 A. To describe generally the expenditures made and projected to be made in
19 implementing, promoting, and operating the Company's electric conservation

1 programs. This will include recoverable costs incurred in January through
2 June 2013 and projections of program costs to be incurred from July through
3 December 2013. It will also include projected electric conservation costs for
4 the period January through December 2014, with a calculation of the
5 Conservation Adjustment Factor to be applied to the Company's consolidated
6 electric customers' bills during the collection period of January 1, 2014
7 through December 31, 2014.

8 **Q. Are there any exhibits that you wish to sponsor in this proceeding?**

9 A. Yes. I wish to sponsor as exhibits Schedules C-1, C-2, C-3, C-4, and C-5, which
10 have been filed with this testimony.

11 **Q. Have you prepared summaries of the Company's electric conservation
12 programs and the costs associated with these programs?**

13 A. Yes. Summaries of the twelve electric conservation programs are contained in
14 Schedule C-5 of Exhibit CDY-2. Included are the Residential Energy Survey
15 Program, the Commercial Energy Survey Program, the Commercial Heating and
16 Cooling Upgrade, the Residential Heating and Cooling Program, the Commercial
17 Indoor Efficient Lighting Rebate Program, the Commercial Window Film
18 Installation Program, the Commercial Chiller Upgrade Program, the Solar Water
19 Heating Program, the Solar Photovoltaic Program, the Electric Conservation
20 Demonstration and Development Program, the Low Income Program and the
21 Affordable Housing Builders and Providers Program.

22 **Q. Have you prepared schedules that show the expenditures associated with the
23 Company's electric conservation programs for the periods you have
24 mentioned?**

25 A. Yes, Schedule C-3, Pages 1 and 1A of 5, Exhibit CDY-2 shows actual expenses for

1 the months January through June 2013. Projections for July through December 2013
2 are also shown on Schedule C-3, Pages 1 and 1A. Projected expenses for the
3 January through December 2014 period are shown on Schedule C-2, Page 1 of 3 of
4 Exhibit CDY-2.

5 **Q. Have you prepared schedules that show revenues for the period January**
6 **through December 2013?**

7 A. Yes. Schedule C-4 shows actual revenues for the months January through June 2013
8 and projected revenues for July through December 2013 and January through
9 December 2014.

10 **Q. Have you prepared a schedule that shows the calculation of the Company's**
11 **proposed Conservation Adjustment Factor to be applied during billing periods**
12 **from January 1, 2014 through December 31, 2014?**

13 A. Yes. Schedule C-1 of Exhibit CDY-2 shows these calculations. Net program cost
14 estimates for the period January 1, 2014 through December 31, 2014 are used. The
15 estimated true-up amount from Schedule C-3 (Page 4 of 5, Line 11) of Exhibit CDY-
16 2, being an over-recovery, was added to the total of the projected costs for the
17 twelve-month period. The total projected recovery amount, including estimated true-
18 up, was then divided by the projected Retail KWH Sales for the twelve-month period
19 ending December 31, 2014. The resulting Conservation Adjustment Factor is shown
20 on Schedule C-1 (Page 1 of 1) of Exhibit CDY-2.

21 **Q. What is the Conservation Adjustment Factor necessary to recover these**
22 **projected net total costs?**

23 A. The Conservation Adjustment Factor is \$.00100 per KWH.

24 **Q. Does this conclude your testimony?**

25 A. Yes.

1 GULF POWER COMPANY

2 Before the Florida Public Service Commission
3 Prepared Direct Testimony and Exhibit of
4 Jennifer L. Todd
5 Docket No. 130002-EG
6 Date of Filing: May 2, 2013

7 Q. Please state your name, business address employer and position.

8 A. My name is Jennifer L. Todd and my business address is One Energy
9 Place, Pensacola, Florida 32520. I am employed by Gulf Power Company
10 (Gulf or the Company) as the Market Analytics Supervisor.

11 Q. Ms. Todd, please describe your educational background and business
12 experience.

13 A. I received a Bachelor's Degree in Management Information Systems from
14 the University of West Florida in 1994. I began my career in the electric
15 utility industry at Gulf in 1992 and have held various positions of
16 increasing responsibility within the Company in Information Technology,
17 Accounting, and Marketing. In my current position, I am responsible for
18 Energy Conservation Cost Recovery (ECCR) filings, economic
19 evaluations, end-use load research, market research, and other marketing
20 services activities.

21
22 Q. Have you previously testified before this Commission in connection with
23 the Energy Conservation Cost Recovery Clause?

24 A. Yes.
25

DOCUMENT NUMBER-DATE

02472 MAY-3 2013

FPSC-COMMISSION CLERK

1 Q. Ms. Todd, what is the purpose of your testimony?

2 A. The purpose of my testimony is to present the results of the approved
3 Energy Conservation Cost Recovery Clause programs and related
4 expenses for January, 2012 through December, 2012.

5

6 Q. Are you sponsoring any exhibits to your testimony?

7 A. Yes, I sponsor Exhibit JLT-1, Schedules CT-1 through CT-6.

8

9 Q. Have you verified that the information contained in Exhibit JLT-1 is
10 correct?

11 A. Yes, I have. This exhibit was prepared under my direction and control,
12 and the information contained therein is true and correct to the best of my
13 knowledge.

14 Counsel: We ask that Ms. Todd's exhibit consisting of 6 Schedules, CT-
15 1 through CT-6, be marked for identification as:

16 Exhibit No. ____ (JLT-1)

17

18 Q. Please summarize for this Commission the deviations between the actual
19 expenses for this recovery period and the amount of estimated/actual
20 expenses previously filed with this Commission.

21 A. The estimated/actual true-up net expenses for the entire recovery period
22 January 2012 through December 2012, previously filed were \$23,649,673
23 while the actual expenses incurred in 2012 were \$22,885,826 resulting in
24 a variance of \$763,847 or 3% under the projection. See Schedule CT-2,
25 Line 10.

1 Q. Ms. Todd, would you explain the January 2012 through December 2012
2 variance?

3 A. Yes. The variance was a result of actual expenses being less than
4 estimated in all of Gulf's programs except the Residential HVAC
5 Efficiency, Residential Heat Pump Water Heater, Residential Variable
6 Speed Pool Pump, Residential Self-install Appliances, Commercial HVAC
7 Occupancy Sensors, Commercial High Efficiency Motors and Commercial
8 Food Services. Overall, these variances mean that actual program
9 expenses for the 12 month period through December 2012 were \$763,847
10 less than the level of estimated/actual program expenses filed in
11 September 2012. A more detailed description of the deviations is
12 contained in Schedule CT-6.

13

14 Q. Mrs. Todd, what was Gulf's adjusted net true-up for the period January
15 2012 through December 2012?

16 A. There was a \$1,293,261 under-recovery as shown on Schedule CT-1.

17

18 Q. Please describe your program participation levels during the recovery
19 period.

20 A. A more detailed review of each of the programs is included in my
21 Schedule CT-6. The following is a synopsis of program participation
22 levels during this recovery period.

23

24

25

- 1 (A) Residential Energy Surveys - During the 2012 recovery period, the
2 Company completed 8,863 surveys compared to the projection of
3 8,762.
- 4 (B) Home Energy Reporting – During the 2012 recovery period a total
5 of 39,213 home energy report participants received home energy
6 reports from the Company compared to a projection of 39,247.
- 7 (C) Community Energy Saver – During the 2012 recovery period the
8 Company implemented a total of 3,327 efficiency measures for
9 eligible participants. This compared to a projection of 2,500.
- 10 (D) Landlord-Renter Custom Incentive – During the 2012 recovery
11 period no participants enrolled in this program compared to a
12 projection of 750 participants.
- 13 (E) HVAC Efficiency – During the 2012 recovery period, there were a
14 total of 14,330 participants in this program compared to a projection
15 of 13,909.
- 16 (F) Heat Pump Water Heater – During the 2012 recovery period, a total
17 of 873 heat pump water heaters were installed compared to a
18 projection of 670.
- 19 (G) Ceiling Insulation – During the 2012 recovery period a total of 780
20 participants installed high efficiency ceiling insulation compared to a
21 projection of 775.
- 22 (H) High Performance Window – During the 2012 recovery period a
23 total of 658 customers installed high efficiency windows and 178
24 customers installed window film. This compared to projections of
25 350 and 200 respectively.

- 1 (I) Reflective Roof – During the 2012 recovery period, a total of 229
2 participants installed a qualified reflective roof compared to a
3 projection of 240.
- 4 (J) Variable Speed Pool Pump – During the 2012 recovery period a
5 total of 3,491 participants installed a high-efficiency variable speed
6 pool pump compared to a projection of 3,200.
- 7 (K) Energy Select/Energy Select LITE - During the 2012 recovery
8 period there was a net increase of 1,799 customers (*Energy Select*
9 and *Energy Select LITE* combined) with a total of 10,478 customers
10 on-line at December 31, 2012. Gulf projected 1,600 net new
11 customer additions during 2012.
- 12 (L) Self-Install Efficiency – During the 2012 recovery period this
13 program has achieved the following participation: 2,327 ENERGY
14 STAR Refrigerators, 199 ENERGY STAR Freezers, 204 ENERGY
15 STAR Window A/Cs, 2,198 ENERGY STAR Clothes Washers and
16 77,646 CFLs. The projection for 2012 was 4,500 ENERGY STAR
17 appliances and 60,000 CFLs.
- 18 (M) Refrigerator Recycling – During the 2012 recovery period, the
19 Company had 1,064 customers participate in the Refrigerator
20 Recycling program. This is compared to a projection of 1,000
21 participants.
- 22 (N) Commercial/Industrial (C/I) Energy Analysis - During the 2012
23 recovery period, a total of 420 C/I Energy Analyses were completed
24 compared to a projection of 600.
- 25

- 1 (O) Commercial HVAC Retrocommissioning – During the 2012
2 recovery period, there were 307 participants in this program
3 compared to a projection of 490.
- 4 (P) Commercial Building Efficiency - During the 2012 recovery period,
5 1,608 tons of HVAC retrocommissioning were completed, 290 tons
6 of geothermal were installed, one heat pump water heater was
7 installed, 80,704 sq. ft. of ceiling insulation and 21,863 sq. ft. of
8 window film were installed, 876 kW of interior lighting and 342 kW
9 of LED lighting were installed, 1,171 occupancy sensors were
10 installed and 424,855 sq. ft. of reflective roof installed. All of these
11 measures met or exceeded projections as outlined in Schedule CT-
12 6.
- 13 (Q) HVAC Occupancy Sensor – During the 2012 recovery period a total
14 of 330 HVAC occupancy sensors were installed. This compared to
15 a projection of 270 sensors.
- 16 (R) High Efficiency Motors – During the 2012 recovery period, 2,243
17 HP of high-efficiency motors were installed compared to a
18 projection of 4,325 HP.
- 19 (S) Food Service Efficiency - During the 2012 recovery period, there
20 were 44 participants in this program compared to a projection of 45.
- 21 (T) Commercial/Industrial Custom Incentive – During the 2012
22 recovery period, there were 5 participants in this program resulting
23 in at the meter reductions of 1,118,968 kWh, winter kW of 150 and
24 summer kW of 375.
25

1 (U) Renewable Energy – Costs associated with the Renewable Energy
2 program are provided in Schedule CT-3. Further description of
3 these activities can be found in Schedule CT-6.

4 (V) Conservation Demonstration and Development – Costs associated
5 with the Conservation Demonstration and Development program
6 are provided in Schedule CT-3. Further description of these
7 activities can be found in Schedule CT-6, pages

8

9 Q. Should Gulf's recoverable energy conservation cost for the period be
10 accepted as reasonable and prudent?

11 A. Yes.

12

13 Q. Ms. Todd, does this conclude your testimony?

14 A. Yes, it does.

15

16

17

18

19

20

21

22

23

24

25

1 GULF POWER COMPANY

2 Before the Florida Public Service Commission
3 Prepared Direct Testimony and Exhibit of
4 Jennifer L. Todd
5 Docket No. 130002-EG
6 Energy Conservation Cost Recovery Clause
7 Date of Filing: September 10, 2013

8 Q. Will you please state your name, business address, employer and position?

9 A. My name is Jennifer L. Todd and my business address is One Energy Place,
10 Pensacola, Florida 32520. I am employed by Gulf Power Company as the Market
11 Analytics Supervisor.

12 Q. Mrs. Todd, please describe your educational background and business
13 experience.

14 A. I received a Bachelor Degree in Management Information Systems from the
15 University of West Florida in 1994. I began my career in the electric utility
16 industry at Gulf Power in 1992 and have held various positions within the
17 Company in Information Technology, Accounting, and Marketing. In my present
18 position, I am responsible for Energy Conservation Cost Recovery filings,
19 economic evaluations, market research, and other marketing services activities.

20 Q. Mrs. Todd, for what purpose are you appearing before this Commission today?

21 A. I am testifying before this Commission on behalf of Gulf Power regarding matters
22 related to the Energy Conservation Cost Recovery Clause and to answer any
23 questions concerning the accounting treatment of recoverable conservation costs
24 in this filing. Specifically, I will address projections for approved programs during
25 the January 2014 through December 2014 recovery period and the anticipated

1 results of those programs during the current recovery period, January 2013
2 through December 2013 (7 months actual, 5 months estimated).

3
4 Q. Have you prepared an exhibit that contains information to which you will refer in
5 your testimony?

6 A. Yes. My exhibit consists of 6 schedules, each of which was prepared under my
7 direction, supervision, or review.

8 Counsel: We ask that Mrs. Todd's exhibit
9 consisting of six schedules be marked as
10 Exhibit No. ____ (JLT-2).

11
12 Q. Would you summarize for this Commission the deviations resulting from the
13 actual costs for January 2013 through July 2013 of the current recovery period?

14 A. Projected expenses for the first seven months of the current period were
15 \$14,470,690 compared to actual expenses of \$16,736,095 for a difference of
16 \$2,265,405 or 16% over budget. A detailed summary of all program expenses
17 is contained in my Schedule C-3, pages 1 and 2 and my Schedule C-5.

18
19 Q. Did you project expenses for the period August 2013 through December 2013?

20 A. Yes. A detailed summary of those projections can be found in my Schedule C-3.
21
22
23
24
25

1 Q. How do the estimated actual expenses compare to projected expenses included
2 in the 2013 Projection filing for the period August – December 2013?

3 A. Estimated actual expenses for the period August – December 2013 of
4 \$10,371,363 are 4% lower than projected expenses for that same period of
5 \$10,778,115.

6

7 Q. Have you provided a description of the program results achieved during the
8 period, January 2013 through July 2013?

9 A. Yes. A detailed summary of year-to-date results for each program is contained in
10 my Schedule C-5.

11

12 Q. Would you summarize the conservation program cost projections for the January
13 2014 through December 2014 recovery period?

14 A. Yes. Program costs for the projection period are estimated to be \$18,987,316.
15 These costs are broken down as follows: depreciation, return on investment and
16 property taxes, \$2,218,401; payroll/benefits, \$5,429,197; materials/expenses,
17 \$6,444,249; advertising, \$325,000; and incentives, \$4,570,469. More detail
18 concerning these projections is contained in my Schedule C-2.

19

20 Q. Would you describe the expected results for your programs during the January
21 2014 through December 2014 recovery period?

22 A. Program details, including expected results, for the period January 2014 through
23 December 2014 can be found in my Schedule C-5.

24

25

1 Q. What is the proposed 2014 factor for Rate Schedule RS and what will be the
2 charge for a 1,000 kWh monthly bill on Gulf Power's rate schedule RS?

3 A. The proposed Energy Conservation Cost Recovery factor for Rate Schedule RS
4 is .226 which results in a charge of \$2.26 on a 1,000 kWh monthly bill on Gulf
5 Power's rate schedule RS.

6

7 Q. When does Gulf propose to collect these Energy Conservation Cost Recovery
8 charges?

9 A. The factors will be effective beginning with the first bill group for January 2014
10 and continue through the last bill group for December 2014.

11

12 Q. Mrs. Todd, does this conclude your testimony?

13 A. Yes, it does.

14

15

16

17

18

19

20

21

22

23

24

25

DUKE ENERGY FLORIDA
DOCKET No. 130002-EG

**Energy Conservation and Cost Recovery Final True-up
for the Period January through December 2012**

**DIRECT TESTIMONY OF
HELENA (LEE) GUTHRIE**

MAY 2, 2013

1 **Q. State your name and business address.**

2 A. My name is Lee Guthrie. My business address is 299 First Avenue North,
3 St. Petersburg, Fl 33701.

4
5 **Q. By whom are you employed and in what capacity?**

6 A. I am employed by Duke Energy Florida, Inc. (Duke Energy Florida, DEF, or
7 the Company), as Manager of Florida Regulatory Strategy in the Customer
8 Planning and Analytics department.

9
10 **Q. What are your current duties and responsibilities at Duke Energy?**

11 A. My responsibilities include the regulatory planning, support and compliance
12 of the Company's Demand-Side Management (DSM) programs. This
13 includes support for development, implementation and training, budgeting,
14 and accounting functions related to these programs. By DSM, I mean direct
15 load control (DLC) and energy efficiency programs or dispatchable (demand
16 response) and non dispatchable programs.

1 -Q. **What is the purpose of your testimony?**

2 A. The purpose of my testimony is to compare DEF's actual costs of
3 implementing conservation programs with the actual revenues collected
4 through the Company's Energy Conservation Cost Recovery Clause
5 (ECCR) during the period January 2012 through December 2012.

6
7 **Q. For what programs does Duke Energy Florida seek recovery?**

8 A. Duke Energy Florida seeks recovery through the ECCR clause for the
9 following conservation programs approved by the Commission as part of the
10 Company's DSM Plan, as well as for Conservation Program Administration
11 (i.e., those common administration expenses not specifically linked to an
12 individual program). Notably, DEF seeks recovery of costs for conservation
13 programs approved by the Commission on August 16, 2011 (see Order No.
14 PSC-11-0347-PAA-EG) modifying and approving DEF's Demand Side
15 Management (DSM) Programs. In Order No. PSC-11-0347-PAA-EG, the
16 FPSC modified DEF's DSM Plan to consist of those existing programs in effect
17 as of the date of the Order. Therefore, DEF seeks recovery for actual
18 conservation program costs and program administrative costs for its Demand
19 Side Management Programs approved as follows:

- 20 • Home Energy Check
21 • Home Energy Improvement
22 • Residential New Construction
23 • Neighborhood Energy Saver

- 1 • Low-Income Weatherization Assistance Program
- 2 • Energy Management (Residential and Commercial)
- 3 • Business Energy Check
- 4 • Better Business
- 5 • Commercial/Industrial New Construction
- 6 • Innovation Incentive
- 7 • Standby Generation
- 8 • Interruptible Service
- 9 • Curtailable Service
- 10 • Solar Water Heating with Energy Management
- 11 • Solar Water Heating Low Income Residential Pilot
- 12 • Residential Solar Photovoltaic Pilot
- 13 • Commercial Solar Photovoltaic Pilot
- 14 • Photovoltaic for Schools Pilot
- 15 • Research and Demonstration Pilot
- 16 • Technology Development
- 17 • Qualifying Facility

18

19 **Q. Do you have any exhibits to your testimony?**

20 A. Yes, Exhibit No. (HTG-1T) entitled, "Duke Energy Florida Energy
21 Conservation Adjusted Net True-Up for the Period January 2012 through
22 December 2012." There are five (5) schedules to this exhibit.

23

1 **Q. Will you please explain your exhibit?**

2 A. Yes. Exhibit No. (HTG-1T) presents Schedules CT-1 through CT-5.
3 Schedules CT-1 to CT-4 set out the actual costs incurred for all programs
4 during the period from January 2012 through December 2012. They also
5 describe the variance between actual costs and previously projected values for
6 the same time period. Schedule CT-5 provides a brief summary report for
7 each program that includes a program description, annual program
8 expenditures and program accomplishments over the twelve-month period
9 ending December 2012.

10

11 **Q. Would you please discuss Schedule CT-1?**

12 A. Yes. Schedule CT-1 shows that Duke Energy Florida's actual net ECCR true-
13 up for the twelve months ending December 31, 2012 was an over-recovery of
14 \$17,511,145 including principal and interest. This amount is \$3,141,584 more
15 than the previous estimate in the Company's September 12, 2012 ECCR
16 Projection Filing.

17

18 **Q. Can you please explain the major drivers of the variance?**

19 A. Yes. The majority of the variance was a result of less expense incurred than
20 estimated in the following programs. Home Energy Check customer
21 participation was less than expected during the latter part of 2012 and resulted
22 in a projection variance of \$578,505. Conservation Program Administration
23 was impacted by the unexpected deferral in contract execution for vendor and

1 IT supported systems by \$788,602 as projects impacted by merger integration
2 were delayed to ensure efficient implementation of new systems. The
3 Interruptible Load Management variance from the projection of \$1,803,173
4 was related to economic conditions that resulted in unexpected business cycle
5 fluctuations and reduced consumption across participants. Additionally, other
6 programs experienced lesser variances related to external influences such as
7 building code changes and economic conditions. In particular, the Business
8 New Construction Program experienced higher than expected participation by
9 builders while customers participated in retrofit programs/measures in lower
10 numbers than expected.

11
12 **Q. What does Schedule CT-2 show?**

13 A. The four pages of Schedule CT-2 provide an annual summary of
14 conservation program costs as well as itemized conservation program costs
15 for the period January 2012 through December 2012 detailing actual,
16 estimated and variance calculations. These costs are directly attributable to
17 DEF's commission approved programs.

18
19 **Q. Would you please discuss Schedule CT-3?**

20 A. Yes. Page one of Schedule CT-3 provides the actual conservation program
21 costs by month for the period January 2012 through December 2012. Page
22 two of Schedule CT-3 presents the program revenues by month and the
23 calculations for the next true-up per month, including adjustments. Page

1 three provides the monthly interest calculation. Pages four and five of
2 Schedule CT-3 provide conservation account numbers for the 2012 calendar
3 year.

4
5 **Q. What is the purpose of Schedule CT-4?**

6 A. The five pages of Schedule CT-4 report the monthly capital investment,
7 depreciation and return for DEF's program classifications.

8
9 **Q. Would you please discuss Schedule CT-5?**

10 A. Yes. Schedule CT-5 provides a brief summary report for each program that
11 includes a program description, annual program expenditures and program
12 accomplishments for the 2012 calendar year.

13
14 **Q. Please explain the source of data used to calculate the true-up amount.**

15 A. The data used in calculating the actual true-up amounts was taken from
16 DEF records unless otherwise indicated. These records are kept in the
17 regular course of business in accordance with general accounting principles
18 and practices and provisions of the Uniform System of Accounts as
19 prescribed by the Commission. Pursuant to Rule 25-17.015(3), Florida
20 Administrative Code, in Schedule CT-3, pages 4 and 5, DEF provides a list
21 of all account numbers used for conservation cost recovery during the
22 period January 2012 through December 2012.

23

1 Q. Does this conclude your direct testimony?

2 A. Yes.

DUKE ENERGY FLORIDA
DOCKET No. 130002-EG
DIRECT TESTIMONY OF
HELENA T. (LEE) GUTHRIE
WITH RESPECT TO PROJECTED COSTS

September 10, 2013

1 **Q. State your name and business address.**

2 A. My name is Helena (“Lee”) Guthrie. My business address is 299 First Avenue
3 North, St. Petersburg, FL 33701.

4

5 **Q. By whom are you employed and in what capacity?**

6 A. I am employed by Duke Energy Florida, Inc. (“DEF” or the “Company”), as
7 Manager of Florida Regulatory Strategy in the Customer Planning and Analytics
8 department.

9

10 **Q. Have your duties and responsibilities remained the same since you last testified**
11 **in this proceeding?**

12 A. Yes.

13

14 **Q. What is the purpose of your testimony?**

15 A. The purpose of my testimony is to describe the components and costs of the
16 Company's Demand-Side Management (“DSM”) Plan. I will detail the projected
17 costs for implementing each program in that plan, explain how these costs are
18 presented in my attached exhibit, and show the resulting Energy Conservation Cost
19 Recovery (“ECCR”) factors for customer billings in 2014.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

Q. Do you have any Exhibits to your testimony?

A. Yes, Exhibit No. _____ (HTG-1P) consists of Schedules C-1 through C-5, which support DEF’s ECCR calculations for the 2013 actual/estimated period and the 2014 projection period.

Q. For what currently approved programs does DEF seek recovery?

A. DEF is seeking to recover those costs allowed pursuant to Rule 25-17.015, F.A.C., for each of the following Commission-approved conservation programs, as well as for Conservation Program Administration (those common administration expenses not specifically linked to an individual program). These programs are currently approved and include the Demand-Side Renewable Portfolio of solar programs which were approved by the Commission vote on September 14, 2010.

- Home Energy Check
- Home Energy Improvement
- Residential New Construction
- Neighborhood Energy Saver
- Low-Income Weatherization Assistance
- Energy Management (Residential & Commercial)
- Business Energy Check
- Better Business
- Commercial/Industrial New Construction
- Innovation Incentive
- Standby Generation
- Interruptible Service

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

- Curtailable Service
- Solar Water Heating For Low Income Residential Customers
- Solar Water Heating With Energy Management
- Residential Solar Photovoltaic
- Commercial Solar Photovoltaic
- Photovoltaic for Schools
- Research and Demonstration
- Technology Development
- Qualifying Facility

Q. What is included in your Exhibit?

A. Exhibit No. __ (HTG-1P) consists of Schedules C-1 through C-5. Schedule C-1 provides a summary of cost recovery clause calculations and information by retail rate schedule. Schedule C-2 provides annual and monthly conservation program cost estimates for the 2014 projection period for each conservation program, as well as for common administration expenses. Additionally, Schedule C-2 presents program costs by specific category (i.e., payroll, materials, incentives, etc.) and includes a schedule of estimated capital investments, depreciation and return for the projection period.

Schedule C-3 contains a detailed breakdown of conservation program costs by specific category and by month for the actual/estimated period of January through July 2013 (actual) and August through December 2013 (estimated). In addition, Schedule C-3 presents a schedule of capital investment, depreciation and return, an energy conservation adjustment calculation of true-up, and a calculation of interest provision for the 2013 actual/estimated period.

1 Schedule C-4 projects ECCR revenues during the 2014 projection period.
2 Schedule C-5 presents a brief description of each program, as well as a summary of
3 progress and projected expenditures for each program for which DEF seeks cost
4 recovery through the ECCR clause.

5

6 **Q. Would you please summarize the results presented in your Exhibit?**

7 A. Yes. Schedule C-2, Page 1 of 9, Line 27, shows total net program costs of
8 \$137,702,413 for the 2014 projection period. The following table presents DEF's
9 proposed ECCR billing factors, by retail rate class and voltage level for calendar year
10 2014, as contained in Schedule C-1, Page 2 of 2.

11

12

2014 ECCR Billing Factors

13

14

15

16

17

18

19

20

21

22

23

24

25 **Q. Does this conclude your testimony?**

26 A. Yes.

1 **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

2 **PREPARED DIRECT TESTIMONY**

3 **OF**

4 **HOWARD T. BRYANT**

5
6 **Q.** Please state your name, address, occupation and employer.

7
8 **A.** My name is Howard T. Bryant. My business address is 702
9 North Franklin Street, Tampa, Florida 33602. I am
10 employed by Tampa Electric Company ("Tampa Electric" or
11 "the company") as Manager, Rates in the Regulatory
12 Affairs Department.

13
14 **Q.** Please provide a brief outline of your educational
15 background and business experience.

16
17 **A.** I graduated from the University of Florida in June 1973
18 with a Bachelor of Science degree in Business
19 Administration. I have been employed at Tampa Electric
20 since 1981. My work has included various positions in
21 Customer Service, Energy Conservation Services, Demand
22 Side Management ("DSM") Planning, Energy Management and
23 Forecasting, and Regulatory Affairs. In my current
24 position I am responsible for the company's Energy
25 Conservation Cost Recovery ("ECCR") Clause, Environmental

1 Cost Recovery Clause ("ECRC"), and retail rate design.

2

3 Q. Have you previously testified before the Florida Public
4 Service Commission ("Commission")?

5

6 A. Yes. I have testified before this Commission on
7 conservation and load management activities, DSM goals
8 setting and DSM plan approval dockets, and other ECRC
9 dockets since 1993, and ECRC activities since 2001.

10

11 Q. What is the purpose of your testimony in this proceeding?

12

13 A. The purpose of my testimony is to support the company's
14 actual conservation costs incurred during the period
15 January through December 2012, the actual/projected
16 period January to December 2013, and the projected period
17 January through December 2014. The projected 2014 ECRC
18 factors have been calculated based on the current
19 allocation methodology as well as the allocation
20 methodology proposed by Tampa Electric in Docket No.
21 130040-EI. Also, I will support the appropriate
22 Contracted Credit Value ("CCV") for participants in the
23 General Service Industrial Load Management Riders ("GSLM-
24 2" and "GSLM-3") for the period January through December
25 2014. In addition, I will support the appropriate

1 residential variable pricing rates ("RSVP-1") for
2 participants in the Residential Price Responsive Load
3 Management Program for the period January through
4 December 2014.

5
6 Q. Did you prepare any exhibits in support of your
7 testimony?

8
9 A. Yes. Exhibit No. _____ (HTB-2), containing two
10 documents, was prepared under my direction and
11 supervision. Document No. 1 includes Schedules C-1
12 through C-5 and associated data which support the
13 development of the conservation cost recovery factors for
14 January through December 2014 using the current 12
15 Coincident Peak ("CP") and 25 percent Average Demand
16 ("AD") allocation methodology. Document No. 2 includes
17 two pages supporting the proposed ECCR factors allocated
18 on a 12 CP and 50 percent AD basis, as proposed in Docket
19 No. 130040-EI.

20
21 Q. Please describe the conservation program costs projected
22 by Tampa Electric during the period January through
23 December 2012.

24
25

1 **A.** For the period January through December 2012, Tampa
 2 Electric projected conservation program costs to be
 3 \$53,249,836. The Commission authorized collections to
 4 recover these expenses in Docket No. 110002-EG, Order No.
 5 PSC-11-0531-FOF-EG, issued November 15, 2011.

6
 7 **Q.** For the period January through December 2012, what were
 8 Tampa Electric's conservation costs and what was
 9 recovered through the ECCR clause?

10
 11 **A.** For the period January through December 2012, Tampa
 12 Electric incurred actual net conservation costs of
 13 \$46,593,831, plus a beginning true-up over-recovery of
 14 \$597,093 for a total of \$45,996,738. The amount
 15 collected in the ECCR clause was \$49,438,657.

16
 17 **Q.** What was the true-up amount?

18
 19 **A.** The true-up amount for the period January through
 20 December 2012 was an over-recovery of \$3,444,245,
 21 including interest. These calculations are detailed in
 22 Exhibit No. ____ (HTB-1), Conservation Cost Recovery True
 23 Up, Pages 2 through 12, filed May 2, 2013.

24
 25

1 Q. Please describe the conservation program costs incurred
2 and projected to be incurred by Tampa Electric during the
3 period January through December 2013?

4
5 A. The actual costs incurred by Tampa Electric through July
6 2013 and projected for August through December 2013 are
7 \$48,946,486. For the period, Tampa Electric anticipates
8 an over-recovery in the ECCR Clause of \$3,596,613 which
9 includes the 2012 true-up and interest. A summary of
10 these costs and estimates are fully detailed in Exhibit
11 No. ___ (HTB-2), Conservation Costs Projected, pages 19
12 through 25.

13
14 Q. Has Tampa Electric proposed any new or modified DSM
15 Programs for ECCR cost recovery for the period January
16 through December 2014?

17
18 A. No.

19
20 Q. Please summarize the proposed conservation costs for the
21 period January through December 2014 and the annualized
22 recovery factors based on a 12 CP and 25 percent AD basis
23 applicable for the period January through December 2014?

24
25 A. Tampa Electric has estimated that the total conservation

1 costs (less program revenues) during the period will be
 2 \$51,689,379 plus true-up. Including true-up estimates,
 3 the January through December 2014 cost recovery factors
 4 allocated on a 12 CP and 25 percent basis for firm retail
 5 rate classes are as follows:

		Cost Recovery Factors
<u>Rate Schedule</u>		<u>(cents per kWh)</u>
8	RS	0.286
9	GS and TS	0.274
10	GSD Optional - Secondary	0.245
11	GSD Optional - Primary	0.243
12	GSD Optional - Subtransmission	0.240
13	LS1	0.148

		Cost Recovery Factors
<u>Rate Schedule</u>		<u>(dollars per kW)</u>
17	GSD - Secondary	1.04
18	GSD - Primary	1.03
19	GSD - Subtransmission	1.02
20	SBF - Secondary	1.04
21	SBF - Primary	1.03
22	SBF - Subtransmission	1.02
23	IS - Secondary	0.82
24	IS - Primary	0.81
25	IS - Subtransmission	0.81

1 Exhibit No. ____ (HTB-2), Conservation Costs Projected,
2 pages 14 through 18 contain the Commission prescribed
3 forms which detail these estimates.

4
5 **Q.** What are the annualized ECCR recovery factors based on a
6 12 CP and 50 percent AD allocation method for the period
7 of January through December 2014?

8
9 **A.** The January through December 2014 cost recovery factors
10 for firm retail rate classes utilizing the proposed 12 CP
11 and 50 percent AD methodology as shown in Document No. 2,
12 are as follows:

		Cost Recovery Factors
<u>Rate Schedule</u>		<u>(cents per kWh)</u>
16	RS	0.279
17	GS and TS	0.271
18	GSD Optional - Secondary	0.247
19	GSD Optional - Primary	0.245
20	GSD Optional - Subtransmission	0.242
21	LS1	0.185

		Cost Recovery Factors
<u>Rate Schedule</u>		<u>(dollars per kW)</u>
24	GSD - Secondary	1.04

1	GSD - Primary	1.03
2	GSD - Subtransmission	1.02
3	SBF - Secondary	1.04
4	SBF - Primary	1.03
5	SBF - Subtransmission	1.02
6	IS - Secondary	1.04
7	IS - Primary	1.03
8	IS - Subtransmission	1.02

9

10 **Q.** Has Tampa Electric complied with the ECCR cost allocation
 11 methodology stated in Docket No. 930759-EG, Order No.
 12 PSC-93-1845-EG?

13

14 **A.** Yes, it has.

15

16 **Q.** Please explain why the incentive for GSLM-2 and GSLM-3
 17 rate riders is included in your testimony?

18

19 **A.** In Docket No. 990037-EI, Tampa Electric petitioned the
 20 Commission to close its non-cost-effective interruptible
 21 service rate schedules while initiating the provision of
 22 a cost-effective non-firm service through a new load
 23 management program. This program would be funded through
 24 the ECCR clause and the appropriate annual CCV for
 25 customers would be submitted for Commission approval as

1 part of the company's annual ECCR projection filing.
2 Specifically, the level of the CCV would be determined by
3 using the Rate Impact Measure ("RIM") Test contained in
4 the Commission's cost-effectiveness methodology found in
5 Rule 25-17.008, F.A.C. By using a RIM Test benefit-to-
6 cost ratio of 1.2, the level of the CCV would be
7 established on a per kilowatt ("kW") basis. This program
8 and methodology for CCV determination was approved by the
9 Commission in Docket No. 990037-EI, Order No. PSC-99-
10 1778-FOF-EI, issued September 10, 1999.

11
12 **Q.** What is the appropriate CCV for customers who elect to
13 take service under the GSLM-2 and GSLM-3 rate riders
14 during the January through December 2014 period?

15
16 **A.** For the January through December 2014 period, the CCV
17 will be \$7.72 per kW. If the 2014 assessment for need
18 determination indicates the availability of new non-firm
19 load, the CCV will be applied to new subscriptions for
20 service under those rate riders. The application of the
21 cost-effectiveness methodology to establish the CCV is
22 found in the attached analysis, Exhibit No. ___ (HTB-2),
23 Conservation Costs Projected, beginning on page 61
24 through 65.

25

1 Q. Please explain why the RSVP-1 rates for Residential Price
2 Responsive Load Management are in your testimony?

3
4 A. In Docket No. 070056-EG, Tampa Electric's petition to
5 allow its pilot residential price responsive load
6 management initiative to become permanent was approved by
7 the Commission on August 28, 2007. This program is to be
8 funded through the ECCR clause and the appropriate annual
9 RSVP-1 rates for customers are to be submitted for
10 Commission approval as part of the company's annual ECCR
11 projection filing.

12
13 Q. What are the appropriate Price Responsive Load Management
14 rates ("RSVP-1") for customers who elect to take this
15 service during the January through December 2014?

16
17 A. The appropriate RSVP-1 rates during the January through
18 December 2014 period for Tampa Electric's Price
19 Responsive Load Management program are as follows:

<u>Rate Tier</u>	<u>Cents per kWh</u>
P4	32.563
P3	7.546
P2	(0.745)
P1	(2.466)

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

Page 66 contains the projected RSVP-1 rates for 2014.

Q. Does this conclude your testimony?

A. Yes it does.

1 **BEFORE THE PUBLIC SERVICE COMMISSION**2 **PREPARED SUPPLEMENTAL TESTIMONY**3 **OF**4 **HOWARD T. BRYANT**5
6 **Q.** Please state your name, address, occupation and employer.7
8 **A.** My name is Howard T. Bryant. My business address is 702
9 North Franklin Street, Tampa, Florida 33602. I am
10 employed by Tampa Electric Company ("Tampa Electric" or
11 "company") in the position of Manager, Rates in the
12 Regulatory Affairs Department.13
14 **Q.** Are you the same Howard T. Bryant that submitted prepared
15 direct testimony in this proceeding?16
17 **A.** Yes, I am.18
19 **Q.** What is the purpose of your supplemental testimony?20
21 **A.** The purpose of my supplemental testimony is to address
22 how the company's Energy Conservation Cost Recovery
23 Clause ("ECCR") is affected as a result of the
24 Stipulation and Settlement Agreement ("settlement")
25 reached between Tampa Electric and interveners and

1 approved by the Commission in Docket No. 130040-EI on
2 September 11, 2013.

3
4 **Q.** Did you prepare any exhibits to support your supplemental
5 testimony?

6
7 **A.** Yes. Revised Exhibit No. ___ (HTB-2) containing one
8 document, was prepared under my direction and
9 supervision. Document No. 1 includes Schedules C-1
10 through C-5 and associated data which support the
11 development of the conservation cost recovery factors for
12 January through December 2014 using the 12 Coincident
13 Peak ("CP") and 1/13th Average Demand ("AD") allocation
14 methodology.

15
16 **Q.** How has the settlement affected the ECCR clause?

17
18 **A.** The settlement resulted in two modifications on how the
19 2014 projected costs were calculated. The first
20 modification was the approved 12 CP and 1/13th AD
21 allocation methodology for demand related costs. The
22 second modification was to include the settlement return
23 on equity and equity ratio in the calculation of the
24 capital project costs.

25

1 Q. Based on these modifications, please summarize the
2 proposed conservation costs for the period January
3 through December 2014 and the annualized recovery factors
4 for the period January through December 2014?

5
6 A. Tampa Electric has estimated that the total conservation
7 costs (less program revenues) during the period will be
8 \$52,110,132 plus true-up. Including true-up estimates,
9 the January through December 2014 cost recovery factors
10 for firm retail rate classes are as follows:

		Cost Recovery Factors
<u>Rate Schedule</u>		<u>(cents per kWh)</u>
13	RS	0.295
14	GS and TS	0.279
15	GSD Optional - Secondary	0.244
16	GSD Optional - Primary	0.242
17	GSD Optional - Subtransmission	0.239
18	LS1	0.120

		Cost Recovery Factors
<u>Rate Schedule</u>		<u>(dollars per kW)</u>
22	GSD - Secondary	1.03
23	GSD - Primary	1.02
24	GSD - Subtransmission	1.01
25	SBF - Secondary	1.03

1	SBF - Primary	1.02
2	SBF - Subtransmission	1.01
3	IS - Secondary	0.78
4	IS - Primary	0.77
5	IS - Subtransmission	0.76

6

7 Revised Exhibit No. ____ (HTB-2), Conservation Costs
8 Projected, pages 8 through 12 contain the Commission
9 prescribed forms which detail these estimates.

10

11 **Q.** Based on the modifications described above, what are the
12 appropriate Price Responsive Load Management rates
13 ("RSVP-1") for customers who elect to take this service
14 during the January through December 2014?

15

16 **A.** The appropriate RSVP-1 rates during the January through
17 December 2014 period for Tampa Electric's Price
18 Responsive Load Management program are as follows:

19

20	<u>Rate Tier</u>	<u>Cents per kWh</u>
21	P4	33.087
22	P3	7.724
23	P2	(0.682)
24	P1	(2.465)

25

1 Q. Does this conclude your supplemental testimony?

2

3 A. Yes it does.

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

1 **CHAIRMAN BRISÉ:** Are there any exhibits?

2 **MS. GILCHER:** We've prepared a Stipulated
3 Comprehensive Exhibit List which includes the prefiled
4 exhibits attached to the witnesses' testimony. The list
5 has been provided to the parties, the Commissioners, and
6 the court reporter. This list is marked as the first
7 hearing exhibit, and the other exhibits should be marked
8 as set forth in the list.

9 **CHAIRMAN BRISÉ:** Okay. Thank you. I guess
10 we'll move those exhibits into the record.

11 **MS. GILCHER:** Yes, Chairman. At this time
12 staff would like to move Exhibits 1 through 13 into the
13 record as set forth in the Comprehensive Exhibit List.

14 **CHAIRMAN BRISÉ:** Okay. We'll move Exhibits 1
15 through 13 as set forth in the Comprehensive Exhibit
16 List into the record.

17 (Exhibits 1 through 13 marked for
18 identification and admitted into the record.)

19 **CHAIRMAN BRISÉ:** All right.

20 Commissioners, any questions or comments?

21 At this time I think we are in the proper
22 posture for a decision on the proposed stipulations.

23 Commissioner Edgar.

24 **COMMISSIONER EDGAR:** Thank you, Mr. Chairman.
25 Recognizing that all issues are stipulated,

1 and that a great deal of time, work, and review has gone
2 into it to get us to this point, I move approval of
3 Stipulated Issues 1 through 6.

4 **COMMISSIONER GRAHAM:** Second.

5 **CHAIRMAN BRISÉ:** Okay. It has been moved and
6 seconded.

7 Any further discussion or questions?

8 Seeing none, all in favor say aye.

9 (Vote taken.)

10 **CHAIRMAN BRISÉ:** Thank you very much.

11 Are there any other matters that need to be
12 addressed in the 02 docket?

13 **MS. GILCHER:** No, there are not.

14 **CHAIRMAN BRISÉ:** Thank you very much.

15 When can people expect the final order to be
16 prepared?

17 **MS. GILCHER:** The final order will be issued
18 by December 1st, 2013.

19 **CHAIRMAN BRISÉ:** All right. Thank you very
20 much.

21 And at this time we will adjourn Docket 02.
22 Thank you very much.

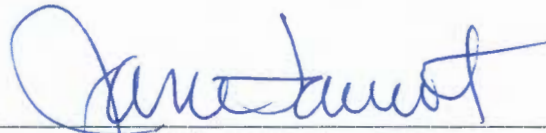
1 STATE OF FLORIDA)
 2 : CERTIFICATE OF REPORTER
 3 COUNTY OF LEON)

4
 5 I, JANE FAUROT, RPR, Chief, Hearing Reporter
 6 Services Section, FPSC Division of Commission Clerk, do
 hereby certify that the foregoing proceeding was heard at
 the time and place herein stated.

7 IT IS FURTHER CERTIFIED that I
 8 stenographically reported the said proceedings; that the
 same has been transcribed under my direct supervision; and
 9 that this transcript constitutes a true transcription of
 my notes of said proceedings.

10 I FURTHER CERTIFY that I am not a relative,
 11 employee, attorney or counsel of any of the parties, nor
 am I a relative or employee of any of the parties'
 12 attorney or counsel connected with the action, nor am I
 financially interested in the action.

13 DATED THIS 7th day of November, 2013.

14
 15 
 16 _____
 JANE FAUROT, RPR
 Official FPSC Hearings Reporter
 (850) 413-6732