

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Energy conservation cost recovery clause. | DOCKET NO. 140002-EG

Date: September 26, 2014

SACE'S PREHEARING STATEMENT

Pursuant to Order No. PSC-14-0085-PCO-EG, issued February 4, 2014, Southern Alliance for Clean Energy ("SACE") hereby files its Prehearing Statement in the above-styled docket.

1. All Known Witnesses

SACE does not intend to call any witnesses.

2. All Known Exhibits

SACE does not intend to file any exhibits at this time.

3. SACE's Statement of Basic Position

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

4. List of Generic, Company-specific and Proposed Issues, and Positions

GENERERIC ISSUES

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

POSITION: 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?

POSITION: No position at this time.

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

POSITION: No position at this time.

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

POSITION: No position at this time.

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?

POSITION: 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?

POSITION: No position at this time.

PROPOSED ADDITIONAL ISSUES

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

POSITION: There is no end date prescribed in Commission Order No. PSC-09-0855-FOF-EG. As such, the programs should continue and the cost-effectiveness of the programs and the design should be better informed by a Value of Solar methodology proposed by SACE in Docket Nos. 130199-130202.

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?

POSITION: Pursuant to Rule 25-17.015, Florida Administrative Code, this docket is limited to cost recovery of Commission approved conservation programs. Therefore, this issue is beyond the scope of this docket. *See also* Order Nos. PSC-11-0507-PHO-EG, PSC-12-0576-PHO-EG.

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?

POSITION: Pursuant to Rule 25-17.015, Florida Administrative Code, this docket is limited to cost recovery of Commission approved conservation programs. Therefore, this issue is beyond the scope of this docket. *See also* Order Nos. PSC-11-0507-PHO-EG, PSC-12-0576-PHO-EG.

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?

POSITION: Pursuant to Rule 25-17.015, Florida Administrative Code, this docket is limited to cost recovery of Commission approved conservation programs. Therefore, this issue is beyond the scope of this docket. *See also* Order Nos. PSC-11-0507-PHO-EG, PSC-12-0576-PHO-EG.

5. Stipulated Issues

There are no stipulated issues at this time.

6. Pending Motions

SACE has no pending motions.

7. Pending Confidentiality Claims or Requests

SACE has no pending confidentiality claims.

8. Objections to Witness Qualifications as an Expert

SACE has no objections to any utility witness's qualifications as an expert.

9. Compliance with Order No. PSC-14-0085-PCO-EG

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

Respectfully submitted this 26th day of September, 2014 by:

/s/ George Cavros

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by electronic mail this 26th day of September, 2014, to the following:

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