

Matthew R. Bernier SENIOR COUNSEL Duke Energy Florida, LLC

September 18, 2015

Ms. Carlotta Stauffer, Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

> RE: Docket No. 150002-EG Energy Conservation Cost Recovery

Dear Ms. Stauffer:

On behalf of Duke Energy Florida ("DEF"), please find attached for electronic filing in the above-referenced docket:

• DEF's Preliminary List of Issues and Positions

Thank you for your assistance in this matter. Please feel free to call me at (850) 521-1428 should you have any questions concerning this filing.

Sincerely,

/s/ Matthew R. Bernier

Matthew R. Bernier

MRB/at Enclosures cc: parties of record

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Energy conservation cost)
recovery clause.)
)

Docket No. 150002-EG

Filed: September 18, 2015

DUKE ENERGY FLORIDA, LLC'S PRELIMINARY LIST OF ISSUES AND POSITIONS

Duke Energy Florida, LLC ("DEF") hereby submits its Preliminary List of Issues

and Positions with respect to its Energy Conservation Cost Recovery factors for the

period of January through December 2016 and pursuant to Order No. PSC-15-0100-PCO-

EG issued February 10, 2015.¹

GENERIC ECCR ISSUES

- **<u>ISSUE 1</u>**: What are the final conservation cost recovery true-up amounts for the period January 2014 through December 2014?
- **DEF:** \$609,857 adjusted net true up amount of over-recovery. (Cross)
- **ISSUE 2:** What are the total conservation cost recovery amounts to be collected during the period January 2016 through December 2016?
- **<u>DEF</u>**: \$108,145,590. (Cross)
- **ISSUE 3**: What are the conservation cost recovery factors for the period January 2016 through December 2016?

DEF:	Customer Class	ECCR Factor
	Residential	0.325 cents/kWh
	General Service Non-Demand	0.268 cents/kWh
	@ Primary Voltage	0.265 cents/kWh
	@ Transmission Voltage	0.263 cents/kWh
	General Service 100% Load Factor	0.210 cents/kWh
	General Service Demand	0.98 \$/kW
	@ Primary Voltage	0.97 \$/kW

¹ DEF retains its right to challenge the wording and/or inclusion of any additional issues that may subsequently be raised by other parties.

@ Transmission Voltage	0.96 \$/kW
Curtailable	0.67 \$/kW
@ Primary Voltage	0.66 \$/kW
@ Transmission Voltage	0.66 \$/kW
Interruptible	0.84 \$/kW
@ Primary Voltage	0.83 \$/kW
@ Transmission Voltage	0.82 \$/kW
Standby Monthly	0.096 \$/kW
@ Primary Voltage	0.095 \$/kW
@ Transmission Voltage	0.094 \$/kW
Standby Daily	0.046 \$/kW
@ Primary Voltage	0.046 \$/kW
@ Transmission Voltage	0.045 \$/kW
Lighting	0.108 cents/kWh
	(Cross)

- **<u>ISSUE 4</u>**: What should be the effective date of the new conservation cost recovery factors for billing purposes?
- **DEF:** The new factors should be effective beginning with the first billing cycle for January 2016, and thereafter through the last billing cycle for December 2016. The first billing cycle may start before January 2016, and the last billing cycle may end after December 31, 2016, so long as each customer is billed for twelve months regardless of when the factors became effective. (Cross)

Respectfully submitted this 18th day of September, 2015.

/s/ Matthew R. Bernier

MATTHEW R. BERNIER Senior Counsel Duke Energy Florida, LLC 106 East College Avenue Suite 800 Tallahassee, FL 32301 Telephone: (850) 521-1428 DIANNE M. TRIPLETT Associate General Counsel Duke Energy Florida, LLC 299 First Avenue North St. Petersburg, FL 33701 Telephone: (727) 820-4692

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished

via electronic mail this 18th day of September, 2015 to all parties of record as indicated below.

/s/ Matthew R. Bernier

Dianne M. Triplett

Theresa Tan	Mr. Robert L. McGee Jr.
Office of General Counsel	Gulf Power Company
Florida Public Service Commission	One Energy Place
2540 Shumard Oak Blvd.	Pensacola, FL 32520-0780
Tallahassee, FL 32399-0850	rlmcgee@southernco.com
Ltan@psc.state.fl.us	
	Beth Keating
James D. Beasley / J. Jeffry Wahlen	Gunster Law Firm
Ashley M. Daniels	215 S. Monroe St., Suite 601
Ausley & McMullen	Tallahassee, FL 32301
P.O. Box 391	bkeating@gunster.com
Tallahassee, FL 32302	
jbeasley@ausley.com	Mike Cassel
jwahlen@ausley.com	Aleida Socarras
adaniels@ausley.com	Florida Public Utilities Company/Florida Division of
	Chesapeake Utilities Corporation
Jeffrey A. Stone / Russell A. Badders	1750 SW 14 th Street, Suite 200
Steven R. Griffin	Fernandina Beach, FL 32034
Beggs & Lane Law Firm	mcassel@fpuc.com
P.O. Box 12950	asocarras@chpk.com
Pensacola, FL 32591	
jas@beggslane.com	Robert Scheffel Wright / John T. LaVia, III
rab@beggslane.com	Gardner Law Firm
srg@beggslane.com	1300 Thomaswood Drive
	Tallahassee, FL 32308
Jon C. Moyle, Jr.	schef@gbwlegal.com
Moyle Law Firm	jlavia@gbwlegal.com
118 North Gadsden Street	
Tallahassee, FL 32301	Ms. Paula K. Brown
jmoyle@moylelaw.com	Tampa Electric Company
	P.O. Box 111
John Butler / Maria J. Moncada	Tampa, FL 33601
Florida Power & Light Company	regdept@tecoenergy.com
700 Universe Blvd.	
Juno Beach, FL 33408-0420	Kenneth Hoffman
Maria.moncada@fpl.com	Florida Power & Light Company
John.butler@fpl.com	215 S. Monroe Street, Suite 810
	Tallahassee, FL 32301-1858
Charles J. Rehwinkel / Patricia A. Christensen	Ken.Hoffman@fpl.com
Office of Public Counsel	· · · · · · · · · · · · · · · · · · ·
c/o The Florida Legislature	James W. Brew / Owen J. Kopon / Laura A. Wynn
111 West Madison Street, Room 812	Stone Matheis Xenopoulos & Brew, PC
Tallahassee, FL 32399	1025 Thomas Jefferson Street NW
rehwinkel.charles@leg.state fl.us	8 th Floor, West Tower
Christensen.patty@leg.state fl.us	Washington, DC 20007
	jbrew@smxblaw.com
	ojk@smxblaw.com
	laura.wynn@smxblaw.com