

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Conservation Cost Recovery
Clause

DOCKET NO. 150004-GU
FILED: October 9, 2015

PREHEARING STATEMENT OF THE OFFICE OF PUBLIC COUNSEL

The Citizens of the State of Florida, through the Office of Public Counsel, pursuant to the Order Establishing Procedure in this docket, Order No. PSC-15-0099-PCO-GU, issued February 10, 2015 and PSC-15-0204-PCO-PU issued May 21, 2015, submit this Prehearing Statement.

APPEARANCE:

CHARLES J. REHWINKEL, Esquire
Deputy Public Counsel
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street, Room 812
Tallahassee, Florida 32399-1400
On behalf of the Citizens of the State of Florida.

A. **WITNESSES:**

None.

B. **EXHIBITS:**

None.

C. **STATEMENT OF BASIC POSITION**

The utilities have the burden of proof to justify and support the recovery of costs and their proposal(s) seeking the Commission's adoption of policy statements (whether new or changed) or other affirmative relief sought, regardless of whether the Interveners provide evidence to the contrary. Regardless of whether the Commission has previously approved a program as meeting

the Commission's requirements, the utilities must still meet their burden of demonstrating that the costs submitted for final recovery meet the statutory test(s) and are reasonable in amount and prudently incurred.

D. STATEMENT OF FACTUAL ISSUES AND POSITIONS

GENERIC CONSERVATION COST RECOVERY ISSUES

ISSUE 1: What are the final conservation cost recovery true-up amounts for the period January 2014 through December 2014?

OPC: No position at this time.

ISSUE 2: What are the total conservation cost recovery amounts to be collected during the period January 2016 through December 2016?

OPC: No position at this time.

ISSUE 3: What are the conservation cost recovery factors for the period January 2016 through December 2016?

OPC: No position at this time.

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

OPC: No position at this time.

ISSUE 5: Should the Commission approve revised tariffs reflecting the conservation cost recovery amounts and establishing energy conservation cost recovery factors determined to be appropriate in this proceeding?

OPC: No position at this time.

E. STIPULATED ISSUES:

None.

F. PENDING MOTIONS:

None.

G. REQUESTS FOR CONFIDENTIALITY

Citizens have no pending requests for claims for confidentiality.

H. OBJECTIONS TO WITNESS QUALIFICATIONS AS AN EXPERT

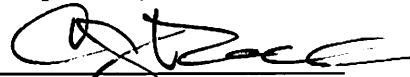
OPC has no objections to any witness' qualifications as an expert in this proceeding.

I. REQUIREMENTS OF ORDER

There are no requirements of the Order Establishing Procedure with which the Office of Public Counsel cannot comply.

Dated this 9th day of October, 2015.

Respectfully submitted,



Charles J. Rehwinkel
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Attorneys for the Citizens
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CERTIFICATE OF SERVICE
150004-GU

I HEREBY CERTIFY that a true and foregoing Notice of Service of Office of Public Counsel's Prehearing Statement has been furnished by electronic mail on this 9th day of October, 2015, to the following:

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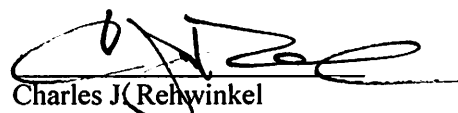
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