



Kenneth M. Rubin
Senior Counsel
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408-0420
(561) 691-2512
(561) 691-7135 (Facsimile)
Kenneth.Rubin@fpl.com

September 27, 2016

-VIA ELECTRONIC FILING -

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

Re: Docket No. 160002-EG
Energy Conservation Cost Recovery Clause

Dear Ms. Stauffer:

Attached for electronic filing in the above docket is Florida Power & Light Company's ("FPL") Preliminary List of Issues and Positions. Pursuant to the Order Establishing Procedure, a Microsoft word copy of this Preliminary List of Issues and Positions is being provided to the Commission staff and all parties.

If there are any questions regarding this transmittal, please contact me at 561-691-2512.

Sincerely,

s/ Kenneth M. Rubin
Kenneth M. Rubin

Enclosures

cc: Counsel of record for parties (w/encl.)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Energy Conservation Cost Recovery

Docket No. 160002-EG

Filed: September 27, 2016

**FLORIDA POWER & LIGHT COMPANY'S
PRELIMINARY LIST OF ISSUES AND POSITIONS**

ISSUE 1: What are the final conservation cost recovery true-up amounts for the period January 2015 through December 2015?

FPL: \$11,839,478 over-recovery. (Deaton)

ISSUE 2: What are the total conservation cost recovery amounts to be collected during the period January 2017 through December 2017?

FPL: \$126,553,204 including prior period true-ups and revenue taxes. (Sharma)

ISSUE 3: What are the conservation cost recovery factors for the period January 2017 through December 2017?

FPL: FPL's Conservation cost recovery factors based on the proposed 12CP and 25% cost allocation methodology are as follows: (Deaton)

RATE CLASS	Conservation Recovery Factor (\$/kw) ⁽¹⁾	Conservation Recovery Factor (\$/kwh) ⁽¹⁾	RDC (\$/KW) ⁽²⁾	SDD (\$/KW) ⁽³⁾
RS1/RTR1	-	0.00125	-	-
GS1/GST1	-	0.00118	-	-
GSD1/GSDT1/HLFT1	0.41	-	-	-
OS2	-	0.00098	-	-
GSLD1/GSLDT1/CS1/CST1/HLFT2	0.46	-	-	-
GSLD2/GSLDT2/CS2/CST2/HLFT3	0.49	-	-	-
GSLD3/GSLDT3/CS3/CST3	0.50	-	-	-
SST1T	-	-	\$0.05	\$0.03
SST1D1/SST1D2/SST1D3	-	-	\$0.05	\$0.03
CILC D/CILC G	0.55	-	-	-
CILC T	0.54	-	-	-
MET	0.52	-	-	-
OL1/SL1/SL1M/PL1	-	0.00062	-	-
SL2/SL2M/GSCU1	-	0.00098	-	-

FPL: In the alternative, FPL's conservation cost recovery factors based on the current 12CP and 1/13th cost allocation methodology are as follows: (Deaton)

RATE CLASS	Conservation Recovery Factor (\$/kw) ⁽¹⁾	Conservation Recovery Factor (\$/kwh) ⁽¹⁾	RDC (\$/KW) ^(k)	SDD (\$/KW) ^(l)
RS1/RTR1	-	0.00126	-	-
GS1/GST1	-	0.00119	-	-
GSD1/GSDT1/HLFT1	0.40	-	-	-
OS2	-	0.00094	-	-
GSLD1/GSLDT1/CS1/CST1/HLFT2	0.45	-	-	-
GSLD2/GSLDT2/CS2/CST2/HLFT3	0.47	-	-	-
GSLD3/GSLDT3/CS3/CST3	0.48	-	-	-
SST1T	-	-	\$0.05	\$0.03
SST1D1/SST1D2/SST1D3	-	-	\$0.05	\$0.03
CILC D/CILC G	0.53	-	-	-
CILC T	0.52	-	-	-
MET	0.51	-	-	-
OL1/SL1/SL1M/PL1	-	0.00050	-	-
SL2/SL2M/GSCU1	-	0.00094	-	-

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

FPL: The factors should be effective beginning with the specified conservation cost recovery cycle and thereafter for the period January 2017 through December 2017. Billing cycles may start before January 1, 2017 and the last cycle may be read after December 31, 2017, so that each customer is billed for twelve months regardless of when the adjustment factor became effective. These charges should continue in effect until modified by subsequent order of this Commission. (Deaton)

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

FPL: Yes. The Commission should approve revised tariffs reflecting the energy conservation cost recovery factors determined to be appropriate in this proceeding. The Commission should direct staff to verify that the revised tariffs are consistent with the Commission's decision. (Deaton)

Respectfully submitted,

Kenneth M. Rubin, Esq.
Senior Counsel
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408
Telephone: (561) 691-2512
Facsimile: (561) 691-7135

By: /s/Kenneth M. Rubin
Kenneth M. Rubin
Florida Bar No. 349038

CERTIFICATE OF SERVICE
Docket No. 160002-EG

I **HEREBY CERTIFY** that a true and correct copy of the foregoing Preliminary List of Issues and Positions has been served by electronic mail this 27th day of September 2016, to the following:

Lee EngTan, Esq.
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
ltan@psc.state.fl.us

J. R. Kelly, Esq.
Patricia Ann Christensen, Esq.
C. Rehwinkel, Esq.
Office of Public Counsel
c/o The Florida Legislature
111 West Madison St., Room 812
Tallahassee, FL 32399-1400
kelly.jr@leg.state.fl.us
christensen.patty@leg.state.fl.us
rehwinkel.charles@leg.state.fl.us

Jeffrey Stone, Esq.
Russell Badders, Esq.
Steven Griffin, Esq.
Beggs & Lane Law Firm
Attorneys for Gulf Power Company
P.O. Box 12950
Pensacola, FL 32591
jas@beggslane.com
rab@beggslane.com
srg@beggslane.com

James D. Beasley, Esq
J. Jeffrey Wahlen, Esq.
Ashley M. Daniels
Ausley & McMullen
Attorneys for Tampa Electric
P.O. Box 391
Tallahassee, FL 32302
jbeasley@ausley.com
jwahlen@ausley.com
adaniels@ausley.com

James W. Brew, Esq.
Owen J. Kopon, Esq.
Laura A. Wynn, Esq.
Attorneys for PCS Phosphate - White
Springs Agricultural Chemicals, Inc.
Stone Mattheis Xenopoulos & Brew,
PC1025 1025 Thomas Jefferson St., NW
Eighth Floor, West Tower
Washington, DC 20007
jbrew@smxblaw.com
ojk@smxblaw.com
laura.wynn@smxblaw.com

Jon C. Moyle, Jr., Esq.
Moyle Law Firm, P.A.
Attorneys for Florida Industrial Power
Users Groups (FIPUG)
118 North Gadsden Street
Tallahassee, FL 32301
jmoyle@moylelaw.com

Beth Keating, Esq.
Gunster Firm
Attorneys for Florida Public Utilities
Company
215 So. Monroe St., Suite 618

Dianne Triplett, Esq.
Duke Energy Florida, Inc.
299 First Avenue North
St. Petersburg, FL 33701
dianne.triplett@duke-energy.com

Tallahassee, FL 32301- 1804
bkeating@gunster.com

Matthew R. Bernier
Duke Energy Florida, Inc.
106 East College Avenue
Suite 800
Tallahassee, FL 32301
Matthew.bernier@duke-energy.com

Robert L. McGee, Jr.
Regulatory and Pricing Manager
Gulf Power Company
One Energy Place
Pensacola, FL 32520
rlmcgee@southernco.com

Mike Cassel
Director/Regulatory and Governmental
Affairs
Florida Public Utilities Company
1750 SW 14th Street, Suite 200
Fernandina Beach, FL 32034
mcassel@fpuc.com

Paula K. Brown
Manager, Regulatory Coordination
Tampa Electric Company
P.O. Box 111
Tampa, FL 33601
regdept@tecoenergy.com

By: /s/Kenneth M. Rubin
Kenneth M. Rubin
Florida Bar No. 349038