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October 4, 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") Prehearing Statement. Pursuant to the Order Establishing Procedure, a Microsoft word copy of this Prehearing Statement 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

Enclosure

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

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Energy Conservation Cost Recovery Clause

Docket No. 160002-EG Filed: October 4, 2016

## FLORIDA POWER & LIGHT COMPANY'S PREHEARING STATEMENT

Florida Power & Light Company ("FPL"), pursuant to Order No. PSC-16-0102-PCO-EG, issued March 11, 2016, Order No. PSC-16-0265-PCO-PU issued July 12, 2016 and Order No. PSC-16-0394-PCO-PU issued September 20, 2016 establishing the procedure in this docket, hereby submits its Prehearing Statement regarding the issues to be addressed at the hearing scheduled for November 2-4, 2016.

### I. APPEARANCES

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### II. FPL WITNESSES

<u>Witness</u> <u>Subject Matter</u>

Renae B. Deaton Issues 1, 3, 4 & 5

Anita Sharma Issue 2

### III. EXHIBITS

Exhibit Content Sponsoring Witness

AS-1 Schedules CT-1 and CT-4 R B Deaton

AS-1	Schedules CT-2 and CT-3	R. B. Deaton A. Sharma
AS-1	Schedules CT-5 and CT-6, Appendix A	A. Sharma
AS-2	Schedule C-1 and C-4	R. B. Deaton
AS-2	Schedule C-2 and C-3	R. B. Deaton A. Sharma
AS-2	Schedule C-5	A. Sharma
AS-3	Schedule C-1	R. B. Deaton

### IV. STATEMENT OF BASIC POSITION

FPL's proposed Conservation Cost Recovery Factors for the January 2017 through December 2017 recovery period and true-up amounts for the prior periods are reasonable and should be approved.

### V. 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)

<u>ISSUE 2</u>: 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) (i)	Conservation Recovery Factor (\$/kwh)	RDC (\$/KW) (k)	SDD (\$/KW) (1)
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	-	-

If the Commission declines to accept FPL's proposed cost allocation methodology, the amounts calculated using 12CP and 1/13<sup>th</sup> are set forth in Exhibit AS-3. (Deaton)

# <u>ISSUE 4</u>: What should be the effective date of the new conservation cost recovery factors for billing purposes?

**FPL:** The factors shall 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 shall continue in effect until modified by subsequent order of this Commission. (Deaton)

# <u>ISSUE 5</u>: 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)

#### VI. STIPULATED ISSUES

None at this time.

#### VII. PENDING MOTIONS

FPL has no pending motions or other matters upon which it seeks action other than its pending petitions for approval.

### VIII. PENDING REQUEST FOR CONFIDENTIALITY

- 1. Florida Power and Light Company's Request for Confidential Classification of Materials Provided Pursuant to Audit No. 16-019-4-1, DN 03932-16 dated July 11, 2016.
- 2. Florida Power and Light Company's Request for Confidential Classification of Information Contained in Schedule CT-6 of True-Up Filing, DN 02667-16 dated May 2, 2016.

### IX. OBJECTIONS TO A WITNESS' QUALIFICATION AS AN EXPERT

None at this time.

### X. REQUIREMENTS OF THE PREHEARING ORDER THAT CANNOT BE MET

There are no requirements of the Order Establishing Procedure with which FPL cannot comply.

Respectfully submitted this 4th day of October 2016.

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By: s/Kenneth M. Rubin

Kenneth M. Rubin Fla. Bar No. 349038

## CERTIFICATE OF SERVICE Docket No. 160002-EG

**I HEREBY CERTIFY** that a true and correct copy of the foregoing Prehearing Statement has been served by electronic mail this 4<sup>th</sup> day of October 2016, to the following:

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