

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Commission review of numeric conservation goals (Florida Power & Light Company).

DOCKET NO. 20190015-EG

DATED: July 22, 2019

COMMISSION STAFF'S PREHEARING STATEMENT

Pursuant to Order No. PSC-2019-0062-PCO-EG, filed February 18, 2019, the Staff of the Florida Public Service Commission files its Prehearing Statement.

1. All Known Witnesses

There are no known witnesses at this time.

2. All Known Exhibits

There are no known exhibits at this time.

3. Staff's Statement of Basic Position

Staff's positions are preliminary and based on materials filed by the parties and on discovery. The preliminary positions are offered to assist the parties in preparing for the hearing. Staff's final positions will be based upon all the evidence in the record and may differ from the preliminary positions stated herein.

4. Staff's Position on the Issues

ISSUE 1: Are the Company's proposed goals based on an adequate assessment of the full technical potential of all available demand-side and supply-side conservation and efficiency measures, including demand-side renewable energy systems, pursuant to Section 366.82(3), F.S.?

POSITION: No position at this time.

ISSUE 2: Do the Company's proposed goals adequately reflect the costs and benefits to customers participating in the measure, pursuant to Section 366.82(3)(a), F.S.?

POSITION: No position at this time.

ISSUE 3: Do the Company's proposed goals adequately reflect the costs and benefits to the general body of ratepayers as a whole, including utility incentives and participant contributions, pursuant to Section 366.82(3)(b), F.S.?

POSITION: No position at this time.

COMMISSION STAFF'S PREHEARING STATEMENT

DOCKET NO. 20190015-EG

PAGE 2

ISSUE 4: Do the Company's proposed goals adequately reflect the need for incentives to promote both customer-owned and utility-owned energy efficiency and demand-side renewable energy systems, pursuant to Section 366.82(3)(c), F.S.?

POSITION: No position at this time.

ISSUE 5: Do the Company's proposed goals adequately reflect the costs imposed by state and federal regulations on the emission of greenhouse gases, pursuant to Section 366.82(3)(d), F.S.?

POSITION: No position at this time.

ISSUE 6: What cost-effectiveness test or tests should the Commission use to set goals, pursuant to Section 366.82, F.S.?

POSITION: No position at this time.

ISSUE 7: Do the Company's proposed goals appropriately reflect consideration of free riders?

POSITION: No position at this time.

ISSUE 8: What residential summer and winter megawatt (MW) and annual Gigawatt-hour (GWh) goals should be established for the period 2020-2029?

POSITION: No position at this time.

ISSUE 9: What commercial/industrial summer and winter megawatt (MW) and annual Gigawatt hour (GWh) goals should be established for the period 2020-2029?

POSITION: No position at this time.

ISSUE 10: What goals, if any, should be established for increasing the development of demand-side renewable energy systems, pursuant to Section 366.82(2), F.S.?

POSITION: No position at this time.

ISSUE 10

SACE: What goals should be established for increasing the development of demand-side renewable energy systems, pursuant to Section 366.82(2), F.S.?

POSITION: No position at this time.

ISSUE 11: Should these dockets be closed?

POSITION: No position at this time.

CONTESTED ISSUES

SACE: Should distinct goals for low income customers be established, and if so, what should those goals be?

POSITION: No position at this time.

5. Stipulated Issues

There are no stipulated issues at this time.

6. Pending Motions

Staff has no pending motions.

7. Pending Confidentiality Claims or Requests

Staff has no pending confidentiality claims or requests.

8. Objections to Witness Qualifications as an Expert

Commission staff has no objections to witness qualifications as an expert.

9. Compliance with Order No. PSC-2019-0062-PCO-EG

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

Respectfully submitted this 22nd day of July, 2019.

/s/ Margo A. DuVal

MARGO A. DUVAL

STAFF COUNSEL

FLORIDA PUBLIC SERVICE COMMISSION

Gerald L. Gunter Building

2540 Shumard Oak Boulevard

Tallahassee, Florida 32399-0850

Telephone: (850) 413-6076

mduval@psc.state.fl.us

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that STAFF'S PREHEARING STATEMENT has been filed with the Office of Commission Clerk and that a true copy has been furnished to the following by electronic mail this 22nd day of July, 2019:

Kenneth A. Hoffman
Florida Power & Light Company
215 South Monroe Street, Suite 810
Tallahassee, Florida 32301
Ken.hoffman@fpl.com

William P. Cox
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, Florida 33408
Will.cox@fpl.com

Holly Henderson
Gulf Power Company
215 South Monroe Street, Suite 618
Tallahassee, Florida 32301
Holly.henderson@nexteraenergy.com

Russell A. Badders
Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0100
Russell.Badders@nexteraenergy.com

Steven R. Griffin
Beggs & Lane
P.O. Box 12950
Pensacola, Florida 32591
srg@beggslane.com

Beth Keating
Gunster Law Firm
215 S. Monroe Street, Suite 601
Tallahassee, FL 32301-1804
bkeating@gunster.com

Mike Cassel
Florida Public Utilities Company
1750 S.W. 14th Street, Suite 200
Fernandina Beach, Florida 32034-3052
mcassel@fpuc.com

Dianne M. Triplett
Duke Energy Florida, LLC
299 1st Avenue North
St. Petersburg, Florida 33701
Dianne.triplett@duke-energy.com

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

Robert Pickels
Duke Energy Florida, LLC
106 East College Avenue, Suite 800
Tallahassee, Florida 32301
Robert.pickels@duke-energy.com

CERTIFICATE OF SERVICE
DOCKET NO. 20190015-EG
PAGE 2

Robert Scheffel Wright
John T. LaVia, III
Gardner, Bist, Bowden, Bush,
Dee, LaVia & Wright, P.A.
1300 Thomaswood Drive
Tallahassee, Florida 32308
schef@gbwlegal.com
jlavia@gbwlegal.com

Gary V. Perko
Brooke E. Lewis
Hopping Green & Sams, P.A.
119 South Monroe Street, Suite 300
P.O. Box 6526 (32314)
Tallahassee, Florida 32301
gperko@hgslaw.com
blewis@hgslaw.com

Paula K. Brown
Tampa Electric Company
P. O. Box 111
Tampa, Florida 33601
regdept@tecoenergy.com

Bradley Marshall
Bonnie Malloy
Jordan Luebke
Earthjustice
111 S. Martin Luther King Jr. Blvd.
Tallahassee, Florida 32301
bmarshall@earthjustice.org
bmalley@earthjustice.org
jluebke@earthjustice.org
flcaseupdates@earthjustice.org

W. Christopher Browder
Orlando Utilities Commission
Reliable Plaza at 100 West Anderson Street
P. O. Box 3193
Orlando, Florida 32802
cbrowder@ouc.com

James D. Beasley
J. Jeffry Wahlen
Malcolm N. Means
Ausley McMullen
P.O. Box 391
Tallahassee, FL 32302
jbeasley@ausley.com
jwahlen@ausley.com
mmeans@ausley.com

J. R. Kelly, Public Counsel
Patricia Christensen, Associate Public Counsel
Thomas A. (Tad) David, Associate Public Counsel
A. Mireille Fall-Fry, Associate Public Counsel
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street, Room 812
Tallahassee, Florida 32399-1400
Kelly.jr.@leg.state.fl.us
Christensen.patty@leg.state.fl.us
David.tad@leg.state.fl.us
Fall-fry.mireille@leg.state.fl.us

George Cavros
Southern Alliance for Clean Energy
120 E. Oakland Park Blvd., Suite 105
Fort Lauderdale, Florida 33334
george@cleanenergy.org

Kelley F. Corbari
Joan T. Matthews
Allan J. Charles
Florida Department of Agriculture &
Consumer Services
Office of General Counsel
The Mayo Building
407 S. Calhoun Street, Suite 520
Tallahassee, FL 32399-0800
Kelley.Corbari@FreshFromFlorida.com
Joan.Matthews@FreshFromFlorida.com
Allan.Charles@FreshFromFlorida.com

James W. Brew
Laura A. Wynn
Stone Mattheis Xenopoulos & Brew, PC
1025 Thomas Jefferson Street, NW
Suite 800 West
Washington, DC 20007-5201
jbrew@smxblaw.com
law@smxblaw.com

Derrick Price Williamson
Barry A. Naum
Spilman Thomas & Battle, PLLC
110 Bent Creek Boulevard, Suite 101
Mechanicsburg, PA 17050
dwilliamson@spilmanlaw.com
bnaum@spilmanlaw.com

Jon C. Moyle, Jr.
Karen A. Putnal
Ian E. Waldick
Moyle Law Firm, P.A.
118 North Gadsden Street
Tallahassee, Florida 32301
jmoyle@moylelaw.com
kputnal@moylelaw.com
iwaldick@moylelaw.com
mqualls@moylelaw.com

Stephanie U. Eaton
Spilman Thomas & Battle, PLLC
110 Oakwood Drive, Suite 500
Winston-Salem, NC 27103
seaton@spilmanlaw.com

/s/ Margo A. DuVal

MARGO A. DUVAL
STAFF COUNSEL

FLORIDA PUBLIC SERVICE COMMISSION
Gerald L. Gunter Building
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850
Telephone: (850) 413-6076
mduval@psc.state.fl.us