



Gulf Power®

August 30, 2019

Mr. Adam Teitzman, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 20190002-EG

Dear Mr. Teitzman:

Attached is Gulf Power Company's Preliminary List of Issues and Positions, to be filed in the above-referenced Conservation Cost Recovery Clause docket. Pursuant to the Order Establishing Procedure, a copy of this Preliminary List of Issues and Positions prepared using Microsoft Word is being provided to Commission staff and all parties.

Sincerely,

C. Shane Boyett
Regulatory, Forecasting and Pricing Manager

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Attachments

cc: Gulf Power Company
Russell Badders, Esq., VP & Associate General Counsel
Beggs & Lane

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Conservation Cost Recovery) Docket No. 20190002-EG
Clause) Date Filed: August 30, 2019
)

**GULF POWER COMPANY'S
PRELIMINARY LIST OF ISSUES AND POSITIONS¹**

Gulf Power Company, (“Gulf Power”, “Gulf”, or “the Company”), by and through its undersigned attorneys, files this Preliminary List of Issues and Positions, saying:

Generic Energy Conservation Cost Recovery Issues

- ISSUE 1:** What are the final conservation cost recovery adjustment true-up amounts for the period January 2018 through December 2018?
- GULF:** Over recovery of \$390,862. (Floyd)
- ISSUE 2:** What are the appropriate conservation adjustment actual/estimated true-up amounts for the period January 2019 through December 2019?
- GULF:** Over recovery of \$4,154,533. (Floyd)
- ISSUE 3:** What are the appropriate total conservation adjustment true-up amounts to be collected/refunded from January 2020 through December 2020?
- GULF:** Over recovery of \$4,545,395 to be refunded. (Floyd)
- ISSUE 4:** What are the total conservation cost recovery amounts to be collected during the period January 2020 through December 2020?
- GULF:** Recovery of \$6,249,300 (including prior true-up amounts and revenue taxes). (Floyd)

¹ This listing of issues and positions is preliminary in nature. Gulf Power reserves the right to challenge the wording and/or inclusion of additional issues to the extent additional issues are proposed prior to the hearing in this matter.

ISSUE 5: What are the conservation cost recovery factors for the period January 2020 through December 2020?

GULF: The Company's proposed conservation cost recovery factors by customer class for the period January 2020 through December 2020 are as follows: (Floyd)

RATE CLASS	CONSERVATION COST RECOVERY FACTORS ¢/kWh
RS	0.06
RSVP Tier 1	(2.800)
RSVP Tier 2	(0.840)
RSVP Tier 3	6.735
RSVP Tier 4	50.918
RSTOU On-peak	14.000
RSTOU Off-peak	(2.686)
RSTOU Critical Peak Credit	\$5.00 per event
GS	0.06
GSD, GSDT, GSTOU	0.056
LP, LPT	0.053
LPT-CPO On-Peak	(\$4.89) per kW
LPT-CPO Critical	\$58.68 per kW
PX, PXT, RTP, SBS	0.052
OSI, OSII	0.041
OSIII	0.052
CL Credit	\$5.57 per kW

ISSUE 6: What should be the effective date of the new conservation cost recovery factors for billing purposes?

GULF: The new conservation cost recovery factors should be effective beginning with the first billing cycle for January 2020 and thereafter through the last billing cycle for December 2020. The first billing cycle may start before January 1, 2020, and the last cycle may be read after December 31, 2020, so that each customer is billed for twelve months regardless of when the adjustment factor became effective. (Floyd)

ISSUE 7: Should the Commission approve revised tariffs reflecting the energy conservation cost recovery amounts and energy conservation cost recovery factors determined to be appropriate in this proceeding?

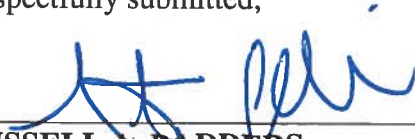
GULF: Yes. The Commission should approve revised tariffs reflecting the energy conservation cost recovery factors determined to be appropriate in this proceeding. The Commission should direct staff to verify that the revised tariffs are consistent with the Commission's decision. (Floyd)

ISSUE 10: Should this docket be closed?

GULF: This is an ongoing docket and should remain open.

Dated this 29th day of August, 2019.

Respectfully submitted,



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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Energy Conservation Cost)
Recovery Clause)

Docket No.: 20190002-EG

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by electronic mail this 30th day of August, 2019 to the following:

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