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FILED 3/20/2020
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FPSC - COMMISSION CLERK
Russell Badders

Vice President, Associate General Counsel

March 20, 2020

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

RE: Petition of Gulf Power Company for Approval of Budget Billing Tariff
Modifications

Dear Mr. Teitzman:

Attached for filing, please find the Petition of Gulf Power Company for Approval of Budget Billing Tariff Modification. If you or your staff have any questions regarding this filing, please contact me at (850) 444-6550.

Sincerely,

A handwritten signature in blue ink that reads 'Melissa Darnes for'.

Russell Badders
Vice President & Associate General Counsel
Gulf Power Company

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Attachments

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Gulf Power Company’s Petition for Approval of Budget Billing Tariff Modification) Docket No.: 2020-_____ -EI
)
)
) Filed: March 20, 2020

GULF POWER COMPANY’S PETITION FOR APPROVAL OF BUDGET BILLING TARIFF MODIFICATION

Gulf Power Company (“Gulf Power,” or “the Company”), through undersigned counsel and pursuant to Sections 366.04 and 366.05, Florida Statutes, and Rule 25-6.033(3), Florida Administrative Code (“F.A.C.”), petitions the Florida Public Service Commission (the “Commission”) for approval of revisions to Tariff Sheet Nos. 6.32, 6.32.1, and 6.33 of its approved budget billing schedule, Rate Schedule BB. In support of this Petition, the Company states as follows:

1. The name, address, telephone number and facsimile number of the Petitioner are:

Gulf Power Company
One Energy Place
Pensacola, Florida 32520
(850) 444-6530
(850) 444-6026 (fax)

2. Gulf Power is a public utility subject to the jurisdiction of the Commission under Chapter 366, Florida Statutes.

3. All notices, pleadings and correspondence required to be served on the Petitioner should be directed to:

Russell A. Badders
Vice President & Associate General Counsel
Gulf Power Company
One Energy Place, Bin 100
Pensacola, Florida 32520-0100
(850) 444-6550
Russell.Badders@nexteraenergy.com
Attorney for Gulf Power Company

Kenneth A. Hoffman
Vice President, Regulatory Affairs
Florida Power & Light Company
134 W. Jefferson Street
Tallahassee, Florida 32301-1713
(850) 521-3919
(850) 521-3939 (facsimile)

Joel T. Baker
Principal Attorney
Joel.Baker@fpl.com
700 Universe Boulevard
Juno Beach, Florida 33408-0420
(561) 691-7255
(561) 691-7135 (facsimile)
Attorney for Gulf Power Company

4. This Petition is being filed consistent with Rule 28-106.201, F.A.C. The agency affected is the Florida Public Service Commission, located at 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399. This case does not involve reversal or modification of an agency decision or an agency's proposed action. Therefore, subparagraph (c) and portions of subparagraphs (b), (e), (f), and (g) of subsection (2) of that rule are not applicable to this Petition. In compliance with subparagraph (d), Gulf Power states that it is not known at this time which, if any, of the issues of material fact set forth in the body of this Petition may be disputed by any others who may plan to participate in this proceeding.

Introduction

5. Budget billing is an optional rider available to Gulf Power customers served under 11 different rate schedules. The Company's rate schedule associated with budget billing, Rate Schedule BB, was made effective in its current form in March of 2019. Rate Schedule BB is intended to provide stable electric bills to customers who have opted for budget billing by averaging and leveling out energy costs, which allows a customer to pay approximately the same amount each month.

6. In February 2020, the Company transitioned to a new billing system, called Customer Account Management System ("CAMS"). CAMS provides end-to-end customer service capabilities for Gulf Power and its customers, and serves as a platform to enhance customer communications and the digital experience for Gulf Power's customers. The Company's CAMS,

however, is not enabled to provide budget billing to lighting customers served under the Company's Rate Schedule OS, which covers outdoor electrical service such as street, roadway, and general lighting usage.

7. There are a limited number of budget billing customers served under Rate Schedule OS. Currently, of the approximately 38,000 Gulf Power customers served under Rate Schedule BB, only about 5,000 are Rate Schedule OS customers.

Tariff Revision and Correlated Effect

8. By way of this Petition, and consistent with the installed capabilities of the Company's new CAMS, Gulf Power is seeking to revise Rate Schedule BB to remove the budget billing option for service provided under Rate Schedule OS. With approval of this Petition, the Company will provide notice of termination to affected Rate Schedule OS customers pursuant to the terms of Rate Schedule BB. Any under- or over-billing will be charged or refunded in accordance with the terms of Rate Schedule BB.

9. The customers enrolled in budget billing under Rate Schedule OS have an average monthly lighting charge of \$11.10. With the removal of the budget billing option for that service, these customers on a going-forward basis will likely experience only a slight change in their annual billing. Moreover, the more stable and predictable monthly energy usage that is associated with outdoor lighting lessens the effect of budget billing (*i.e.*, since the monthly usage fluctuations for outdoor lighting tend to be modest, the bill fluctuations that budget billing levels out are also modest). The most apparent long-term change in billing for these customers will likely be that the Rate Schedule BB provision that requires rounding to the nearest whole dollar will no longer be applicable, thus giving these customers non-rounded Rate Schedule OS charges.

Gulf Power's Revised Budget Billing Tariff Sheets

10. For the reasons stated, the Company is seeking to modify Rate Schedule BB in order to exclude service provided under Rate Schedule OS, and is therefore proposing to cancel the following tariff sheets of Rate Schedule BB:

- Eighth Revised Sheet No. 6.32, Cancelling Seventh Revised Sheet No. 6.32;
- Sixth Revised Sheet No. 6.32.1, Cancelling Fifth Revised Sheet No. 6.32.1; and
- Third Revised Sheet No. 6.33, Cancelling Second Revised Tariff Sheet No. 6.33;

and replace them with:

- Ninth Revised Sheet No. 6.32, Cancelling Eighth Revised Sheet No. 6.32;
- Seventh Revised Sheet No. 6.32.1, Cancelling Sixth Revised Sheet No. 6.32.1;
and
- Fourth Revised Sheet No. 6.33, Cancelling Third Revised Tariff Sheet No. 6.33.

The proposed revised Sheet Nos. 6.32, 6.32.1, and 6.33 are attached hereto in legislative format as Exhibit A and in clean format as Exhibit B. Gulf Power requests that the revised tariff sheet become effective as of the date the Commission approves the proposed revision, and remain in effect pending the resolution of any protest.

WHEREFORE, Gulf Power respectfully requests that the Commission enter an order approving the revision to the Company's budget billing tariff sheets attached hereto as Exhibit A and granting any other relief as may be deemed appropriate.

Respectfully submitted this 20th day of March 2020.

Melissa Darnes for

RUSSELL A. BADDERS

Vice President & Associate General Counsel

Florida Bar No. 007455

Russell.Badders@nexteraenergy.com

Gulf Power Company

One Energy Place

Pensacola, FL 32520-0100

(850) 444-6550

Exhibit A

Ninth Revised Tariff Sheet No. 6.32, Seventh Revised Tariff Sheet No. 6.32.1, and
Fourth Revised Tariff Sheet No. 6.33, in legislative format



Gulf Power®

Section No. VI

~~Eighth-Ninth~~ Revised Sheet No. 6.32

Canceling ~~Eighth-Seventh~~ Revised Sheet No. 6.32

RATE SCHEDULE BB BUDGET BILLING (OPTIONAL RIDER)

PAGE
1 of 2

EFFECTIVE DATE
March 29, 2019

AVAILABILITY:

Available throughout the entire territory served by the Company.

APPLICABILITY:

This budget billing rider will, upon request by the Customer, be applied to any customer receiving electric service under Rate Schedules RS, RSVP, GS, GSD, GSDT, GSTOU, LP, LPT, PX, PXT, and RTP except those customers with current delinquent bills or those customers disqualified from the program within the twelve preceding months. Eligible customers will be notified of availability of this rider annually. Gulf Power shall have 30 days to establish Budget Billing upon request of the Customer.

BILLING:

Under the Budget Billing plan, the Monthly billing is determined as follows:

1. The Annual Base Amount is calculated using the most recent 12 months billings for the premises (~~including-excluding~~ billings for Rate Schedule OS, ~~if any,~~) and then averaged and rounded to the nearest whole dollar (Monthly Budget Billing Amount). If the customer has not occupied the premises for 12 months, the Annual Base Amount will be determined by the Customer's available monthly billings plus the previous occupant's billings. If the premises is new or sufficient actual consumption is not available, a 12-month estimated bill will be used.
2. The Monthly Budget Billing Amount is recalculated every month using the most recent Annual Base Amount plus any deferred balances (the difference in prior billings made under the Budget Billing Plan and that of actual charges).

$$\begin{array}{rclcl} \text{Monthly Budget} & = & \text{12-month Summation} & + & \text{Deferred} \\ \text{Billing Amount} & & \frac{\text{Actual or Est. Annual Base}}{12} & & \text{Balance} \end{array}$$

ISSUED BY: ~~Charles S. Boyett~~ Tiffany Cohen



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Section No. VI

~~Sixth~~Seventh Revised Sheet No. 6.32.1

Canceling ~~Sixth~~Fifth Revised Sheet No. 6.32.1

PAGE	EFFECTIVE DATE
	March 29, 2019

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ISSUED BY: ~~Charles S. Boyett~~Tiffany Cohen



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Section No. VI

~~Third~~Fourth Revised Sheet No. 6.33

Canceling ~~Third~~Second Revised Sheet No. 6.33

PAGE 2 of 2	EFFECTIVE DATE March 29, 2019
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(Continued from Rate Schedule BB, Sheet No. 6.32)

For each month except the annual review month, if the difference between the newly calculated Monthly Budget Billing Amount and the current Monthly Budget Billing Amount is greater than \$5.00 and 10%, then the Monthly Budget Billing Amount will be reestablished at the newly calculated amount (rounded to the nearest whole dollar). In the Customer's annual review month, the Monthly Billing Amount will be reestablished at the newly calculated amount.

3. At the Customer's option (in lieu of carrying the deferred balance forward in the recalculation of the Monthly Budget Billing Amount) any deferred balance that is outstanding at the Customer's annual review may be settled either through being applied to the Customer's new bill (if a credit balance) or direct payment to the Company (if a debit balance).

TERM OF CONTRACT:

Upon request of the Customer, billing under the provisions of this rider shall continue thereafter until terminated as provided below.

TERMINATION:

Billing under this agreement shall be subject to termination by either party giving notice to the other party. This agreement may be terminated by the Company if the account becomes delinquent. In the event billing under this agreement is terminated, any amount the Customer has been underbilled shall immediately become due and payable to the Company and any amount overbilled shall be refunded to the Customer. Billing may be terminated under this agreement without terminating or affecting any service agreement between the Company and the Customer. In such event, billing under the normal monthly billing procedure will be resumed subsequent to the settlement statement rendered by the Company; however, nothing in this agreement shall be construed to waive the Company's rights to discontinue service in the event of failure to pay bills or for any other lawful cause as set forth in its electric tariff.

Service under this rate schedule is subject to Rules and Regulations of the Company and the Florida Public Service Commission.

ISSUED BY: ~~Charles S. Boyett~~Tiffany Cohen

Exhibit B

Ninth Revised Tariff Sheet No. 6.32, Seventh Revised Tariff Sheet No. 6.32.1, and
Fourth Revised Tariff Sheet No. 6.33, in clean format



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Section No. VI
Ninth Revised Sheet No. 6.32
Canceling Eighth Revised Sheet No. 6.32

RATE SCHEDULE BB BUDGET BILLING (OPTIONAL RIDER)

PAGE 1 of 2	EFFECTIVE DATE
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AVAILABILITY:

Available throughout the entire territory served by the Company.

APPLICABILITY:

This budget billing rider will, upon request by the Customer, be applied to any customer receiving electric service under Rate Schedules RS, RSVP, GS, GSD, GSDT, GSTOU, LP, LPT, PX, PXT, and RTP except those customers with current delinquent bills or those customers disqualified from the program within the twelve preceding months. Eligible customers will be notified of availability of this rider annually. Gulf Power shall have 30 days to establish Budget Billing upon request of the Customer.

BILLING:

Under the Budget Billing plan, the Monthly billing is determined as follows:

1. The Annual Base Amount is calculated using the most recent 12 months billings for the premises (excluding billings for Rate Schedule OS) and then averaged and rounded to the nearest whole dollar (Monthly Budget Billing Amount). If the customer has not occupied the premises for 12 months, the Annual Base Amount will be determined by the Customer's available monthly billings plus the previous occupant's billings. If the premises is new or sufficient actual consumption is not available, a 12-month estimated bill will be used.
2. The Monthly Budget Billing Amount is recalculated every month using the most recent Annual Base Amount plus any deferred balances (the difference in prior billings made under the Budget Billing Plan and that of actual charges).

$$\begin{array}{rclcl}
 \text{Monthly Budget} & = & \text{12-month Summation} & + & \text{Deferred} \\
 \text{Billing Amount} & & \frac{\text{Actual or Est. Annual Base}}{12} & & \text{Balance}
 \end{array}$$

ISSUED BY: Tiffany Cohen



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Section No. VI
Seventh Revised Sheet No. 6.32.1
Canceling Sixth Revised Sheet No. 6.32.1

PAGE	EFFECTIVE DATE
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ISSUED BY: Tiffany Cohen



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Section No. VI
Fourth Revised Sheet No. 6.33
Canceling Third Revised Sheet No. 6.33

PAGE
2 of 2

EFFECTIVE DATE

(Continued from Rate Schedule BB, Sheet No. 6.32)

For each month except the annual review month, if the difference between the newly calculated Monthly Budget Billing Amount and the current Monthly Budget Billing Amount is greater than \$5.00 and 10%, then the Monthly Budget Billing Amount will be reestablished at the newly calculated amount (rounded to the nearest whole dollar). In the Customer's annual review month, the Monthly Billing Amount will be reestablished at the newly calculated amount.

3. At the Customer's option (in lieu of carrying the deferred balance forward in the recalculation of the Monthly Budget Billing Amount) any deferred balance that is outstanding at the Customer's annual review may be settled either through being applied to the Customer's new bill (if a credit balance) or direct payment to the Company (if a debit balance).

TERM OF CONTRACT:

Upon request of the Customer, billing under the provisions of this rider shall continue thereafter until terminated as provided below.

TERMINATION:

Billing under this agreement shall be subject to termination by either party giving notice to the other party. This agreement may be terminated by the Company if the account becomes delinquent. In the event billing under this agreement is terminated, any amount the Customer has been underbilled shall immediately become due and payable to the Company and any amount overbilled shall be refunded to the Customer. Billing may be terminated under this agreement without terminating or affecting any service agreement between the Company and the Customer. In such event, billing under the normal monthly billing procedure will be resumed subsequent to the settlement statement rendered by the Company; however, nothing in this agreement shall be construed to waive the Company's rights to discontinue service in the event of failure to pay bills or for any other lawful cause as set forth in its electric tariff.

Service under this rate schedule is subject to Rules and Regulations of the Company and the Florida Public Service Commission.

ISSUED BY: Tiffany Cohen