



October 7, 2020

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

RE: Docket No. 20200002-EG

Dear Mr. Teitzman:

Attached is the Prehearing Statement of Gulf Power Company to be filed in the above-referenced docket. Pursuant to the Order Establishing Procedure, a copy of this Prehearing Statement prepared using Microsoft Word is being provided to Commission staff and all parties.

Sincerely,

S/Richard Hume

Richard Hume
Regulatory Issues 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)
Clause)
)

Docket No. 20200002-EG
Date Filed: October 7, 2020

PREHEARING STATEMENT OF GULF POWER COMPANY

Gulf Power Company, (“Gulf Power”, “Gulf”, or “the Company”), by and through its undersigned attorneys, and pursuant to Order No. PSC-2020-0042-PCO-EG, issued January 31, 2020, establishing the prehearing procedure in this docket, files this prehearing statement, saying:

A. APPEARANCES

RUSSELL A. BADDERS, Esquire
Vice President & Associate General Counsel
Gulf Power Company
One Energy Place
Pensacola, FL 32520-0100

STEVEN R. GRIFFIN, Esquire
Beggs & Lane, R.L.L.P.
P.O. Box 12950
Pensacola, FL 32591-2950
On behalf of Gulf Power Company.

B. WITNESSES

All witnesses known at this time, who may be called by Gulf Power Company, along with the subject matter and issue numbers which will be covered by the witness' testimony, are as follows:

<u>Witness</u> <u>Direct</u>	<u>Subject Matter</u>	<u>Issues #</u>
John N. Floyd ¹	True-up; components of Gulf's conservation plan and associated costs; projections and program results	1, 2, 3, 4, 5, 6, 7

C. EXHIBITS

<u>Witness</u> <u>Direct</u>	<u>Proffered by</u>	<u>Exhibit #</u>	<u>Description</u>	<u>Issues #</u>
Floyd ¹	Gulf Power Company	JNF-1	Schedules CT-1 through CT-6	1
Floyd	Gulf Power Company	JNF-2	Schedules C-1 through C-6	2, 3, 4, 5

D. STATEMENT OF BASIC POSITION

Gulf Power Company's Statement of Basic Position:

It is the basic position of Gulf Power Company that the proposed ECCR factors present the best estimate of Gulf's Conservation expense at this time for the period January 2021 through December 2021, including the true-up calculations and other adjustments allowed by the Commission.

¹ The composite exhibit attached to Mr. Floyd's May 4, 2020 testimony (as corrected by errata dated August 6, 2020) contains the Company's CT schedules for the twelve-month period ending December 2019. The composite exhibit attached to Mr. Floyd's August 14, 2020 amended testimony contains the Company's C schedules for the twelve-month period ending December 2020 and includes data related to the current period January through June 2020, actual and July through December 2020, estimated.

E. STATEMENT OF ISSUES AND POSITIONS

Generic Energy Conservation Cost Recovery Issues

ISSUE 1: What are the final conservation cost recovery adjustment true-up amounts for the period January 2019 through December 2019?

GULF: \$981,017 over-recovery. (Floyd)

ISSUE 2: What are the appropriate conservation adjustment actual/estimated true-up amounts for the period January 2020 through December 2020?

GULF: \$910,075 over-recovery. (Floyd)

ISSUE 3: What are the appropriate total conservation adjustment true-up amounts to be collected/refunded from January 2020 through December 2020?

GULF: \$1,891,091 over-recovery. (Floyd)

ISSUE 4: What are the total conservation cost recovery amounts to be collected during the period January 2021 through December 2021?

GULF: \$9,269,790 (including prior true-up amounts and revenue taxes). (Floyd)

ISSUE 5: What are the conservation cost recovery factors for the period January 2021 through December 2021?

GULF: The Company's proposed conservation cost recovery factors by customer class for the period January 2021 through December 2021 are as follows: (Floyd)

RATE CLASS	CONSERVATION COST RECOVERY FACTORS ¢/kWh
RS	0.090
RSVP Tier 1	(2.700)
RSVP Tier 2	(0.830)
RSVP Tier 3	6.757
RSVP Tier 4	51.020
GS	0.091
GSD, GSDT, GSTOU	0.085
LP, LPT	0.081
PX, PXT, RTP, SBS	0.079
OSI, OSII	0.065
OSIII	0.079
CL	(\$5.57) per kW

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

GULF: The factors shall be effective for meter readings commencing January 1, 2021. These charges shall continue in effect until modified by subsequent order of this Commission. (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 amounts and 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: No. While a separate docket number is assigned each year for administrative convenience, this is a continuing docket and should remain open. (Floyd)

F. STIPULATED ISSUES

GULF: Yet to be determined.

G. PENDING MOTIONS

GULF: None at this time.

H. PENDING CONFIDENTIALITY REQUEST

GULF: None at this time.

I. OBJECTIONS TO WITNESS QUALIFICATIONS AS AN EXPERT

GULF: None at this time.

J. STATEMENT OF COMPLIANCE WITH ORDER ESTABLISHING PROCEDURE

GULF: To the best knowledge of counsel, Gulf has complied with all requirements set forth in the orders on procedure and/or the Commission rules governing this prehearing statement. If other issues are raised for determination at the hearings set for November 3-5, 2020, Gulf respectfully requests an opportunity to submit additional statements of position and, if necessary, file additional testimony.

Dated this 7th day of October, 2020.

Respectfully submitted,

A handwritten signature in cursive script that reads "Russell A. Badders". The signature is written in black ink and is positioned above a horizontal line.

RUSSELL A. BADDERS

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Energy Conservation Cost)
Recovery Clause)

Docket No.: 20200002-EG

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by electronic mail this 7th day of October, 2020 to the following:

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