



GUNSTER

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October 1, 2021

**E-PORTAL/ELECTRONIC FILING**

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

***Re: Docket No. 20210002-EG – Energy Conservation Cost Recovery Clause***

Dear Mr. Teitzman:

Attached for electronic filing, Florida Public Utilities Company's Prehearing Statement.

Thank you for your assistance with this filing. As always, please don't hesitate to let me know if you have any questions whatsoever.

Sincerely,

*s/Beth Keating*

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Beth Keating  
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MEK

cc: Parties of Record  
PSC Staff (Word)



c. FPUC's Statement of Basic Position

FPUC: The Commission should approve Florida Public Utilities Company's final net true-up for the period January through December 2020, the estimated true-up for the period January through December, 2021, and the projected conservation program expenses for the period January through December, 2022.

d. FPUC's Position on the Issues

**GENERIC CONSERVATION COST RECOVERY ISSUES**

**ISSUE 1:** What are the final conservation cost recovery adjustment true-up amounts for the January 2020 through 2020?

FPUC: The final end of period adjustment true-up amount is an over-recovery of \$34,158.

**ISSUE 2:** What are the appropriate conservation adjustment actual/estimated true-up amounts for the period January 2021 through December 2021?

FPUC: The estimated conservation true-up amount for the period January 2021 to December 2021 is an under-recovery of \$64,426.

**ISSUE 3:** What are the appropriate total conservation adjustment true-up amounts to be collected/refunded from January 2022 through December 2022?

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<sup>2</sup> As amended May 10, 2021.

FPUC: The estimated conservation true-up amount to be refunded during the period January 2022 to December 2022 is an under-recovery of \$30,268.

**ISSUE 4:** What is the total conservation cost recovery amount to be collected during the period January 2022 through December 2022?

FPUC: FPUC seeks to recover \$877,618, over the period January 2022 through December 2022.

**ISSUE 5:** What are the conservation cost recovery factors for the period January 2022 through December 2022?

FPUC: The Company asks for approval of a consolidated levelized conservation cost recovery factor for this period of \$.00134 per KWH.

**ISSUE 6:** 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?

FPUC: Yes. The Commission should approve revised tariffs reflecting the energy conservation cost recovery amounts and establishing 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.

**ISSUE 7:** What should be the effective date of the new conservation cost recovery factors for billing purposes?

FPUC: The factor should be effective beginning with the specified conservation cost recovery cycle and thereafter for the period January 2022 through December 2022. Billing cycles may start before January 1, 2022 and the last cycle may be read after December 31, 2022, so that each customer is billed for twelve months regardless of when the adjustment factor became effective.

### **COMPANY-SPECIFIC CONSERVATION COST RECOVERY ISSUES**

#### Tampa Electric Company

**ISSUE 8:** What is the Contracted Credit Value for the GSLM-2 and GSLM-3 rate riders for Tampa Electric Company for the period January 2022 through December 2022?

FPUC: No position.

**ISSUE 9:** What are the residential Price Responsive Load Management (RSVP -1) rate tiers for Tampa Electric Company for the period January 2022 through December 2022?

FPUC: No position.

### **CLOSE THE DOCKET ISSUE**

**ISSUE 10:** Should this docket be closed?

**POSITION:** This is an ongoing proceeding; however, upon the conclusion of this year's proceeding, this docket should be closed, and a new docket should be opened to address cost recovery for 2022.

e. Stipulated Issues

While not a party to any stipulations at this time, FPUC believes that it should be possible to reach a stipulation on each of the issues as they pertain to FPUC.

f. Pending Motions

FPUC has no pending motions.

g. Pending Confidentiality Claims or Requests

None.

h. Objections to Witness Qualifications as an Expert

FPUC has no objections to any witnesses' qualifications at this time.

i. Compliance with Order No. 2021-0075-PCO-EG

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

RESPECTFULLY SUBMITTED this 1st day of October, 2021.

s/Beth Keating

Beth Keating  
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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by Electronic Mail to the following parties of record this 1st day of October, 2021.

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