

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Energy Conservation Cost Recovery
Clause

Docket No. 20210002-EG
Filed: October 5, 2021

FLORIDA POWER & LIGHT COMPANY'S PREHEARING STATEMENT

Florida Power & Light Company ("FPL"), representing the merged and consolidated operations of FPL and the former Gulf Power Company ("Gulf"), pursuant to Order Nos. PSC-2021-0075-PCO-EG, PSC-2021-0208-PCO-EG and PSC-2021-0344-PCO-EG, hereby submits its Prehearing Statement regarding the issues to be addressed at the hearing scheduled for November 2-4, 2021.

1) **WITNESSES**

Witness	Subject Matter	Issue
Rena B. Deaton	Conservation True-Up and Projection	1-7, 10
John N. Floyd	Conservation True-Up and Projection	1-2, 4

2) **EXHIBITS**

Witness	Exhibits	Description	Issue
R. B. Deaton	AS-1	Schedules CT-1 and CT-4	1
R. B. Deaton J.N. Floyd	AS-1	Schedules CT-2 and CT-3	1
J.N. Floyd	AS-1	Schedules CT-5 and CT-6, Appendix A	1
J.N. Floyd	JNF-1	Schedules CT-1 through CT-6	1
R. B. Deaton	JNF-2	Appendix I - Schedule C-1	1-5
R. B. Deaton J.N. Floyd	JNF-2	Appendix I - Schedule C-2	1-5
R. B. Deaton	JNF-2	Capital Structure/Cost Rates	4
J.N. Floyd	JNF-2	Appendix I - Schedule C-5	4-5
R. B. Deaton J.N. Floyd	JNF-3	Appendix II - Schedule C-3	2
R. B. Deaton	JNF-3	Capital Structure/Cost Rates	2
R. B. Deaton	JNF-3	Appendix II - Schedule C-4	2
J.N. Floyd	JNF-3	Appendix II - Schedule C-5	2
R. B. Deaton J.N. Floyd	JNF-4	Appendix II - Schedule C-3	2
R. B. Deaton	JNF-4	Capital Structure/Cost Rates	2
R. B. Deaton	JNF-4	Appendix II - Schedule C-4	2
J.N. Floyd	JNF-4	Appendix II - Schedule C-5	2

Witness	Exhibits	Description	Issue
R. B. Deaton	JNF-5	Appendix III - Schedule C-1	4-5
R. B. Deaton J.N. Floyd	JNF-5	Appendix III - Schedule C-2	4-5
R. B. Deaton	JNF-5	Capital Structure/Cost Rates	4-5
J.N. Floyd	JNF-5	Appendix III - Schedule C-5	4-5
R. B. Deaton	JNF-6	Appendix III - Schedule C-1	4-5
R. B. Deaton J.N. Floyd	JNF-6	Appendix III - Schedule C-2	4-5
R. B. Deaton	JNF-6	Capital Structure/Cost Rates	4-5
J.N. Floyd	JNF-6	Appendix III - Schedule C-5	4-5

3) STATEMENT OF BASIC POSITION

FPL's unified 2022 Conservation Cost Recovery Factors for the January 2022 through December 2022 recovery period, which include separate prior and current period true-ups for FPL and Gulf, are appropriate and reasonable and should be approved.

4) STATEMENT OF ISSUES AND POSITIONS

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

FPL: \$2,529,096 over-recovery. (Deaton)

Gulf: \$226,949 under-recovery. (Floyd)

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

FPL: \$9,673,286 over-recovery. (Deaton)

Gulf: \$1,748,223 over-recovery. (Floyd)

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

FPL: The total conservation cost recovery adjustment true-up amount to be refunded from January 2022 through December 2022 is \$13,723,656. (Deaton)

ISSUE 4: What are the total conservation cost recovery amounts to be collected during the period January 2022 through December 2022?

FPL: The total unified conservation cost recovery amount, including separate prior and current period true-up amounts for FPL and Gulf and revenues taxes, is \$156,246,950. Should the Commission approve FPL’s rate Settlement Agreement in Docket No. 20210015, FPL’s 2022 actual/estimated true-up amount will reflect the exclusion of the Regulatory Assessment Fee, which makes up revenue taxes. (Deaton, Floyd)

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

FPL: FPL’s unified 2022 conservation cost recovery factors for the period January 2022 through December 2022 based on the costs of consolidated conservation programs are:

RATE CLASS SUMMARY	Conservation Recovery Factor (\$/kw)	Conservation Recovery Factor (\$/kwh)	RDC (\$/KW)	SDD (\$/KW)
RS1/RTR1		0.00134		
GS1/GST1		0.00137		
GSD1/GSDT1/HLFT1/GSD1-EV	0.47			
OS2		0.00093		
GSLD1/GSLDT1/CS1/CST1/HLFT2/GSLD1-EV	0.52			
GSLD2/GSLDT2/CS2/CST2/HLFT3	0.54			
GSLD3/GSLDT3/CS3/CST3	0.50			
SST1T			\$0.06	\$0.03
SST1D1/SST1D2/SST1D3			\$0.06	\$0.03
CILC D/CILC G	0.56			
CILC T	0.56			
MET	0.45			
OL1/SL1/SL1M/PL1		0.00042		
SL2/SL2M/GSCU1		0.00101		

(Deaton)

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?

FPL: 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. (Deaton)

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

FPL: The factors shall be effective for meter readings that occur on or after January 1, 2022. These charges shall continue in effect until modified by subsequent order of this Commission. (Deaton)

ISSUE 10: Should this docket be closed?

FPL: This is a continuing docket and should remain open. (Deaton)

5) STIPULATED ISSUES

FPL: Yet to be determined. FPL is willing to stipulate that the testimony of all witnesses whom no one wishes to cross-examine be inserted into the record as though read, cross-examination be waived, and the witnesses' attendance at the hearing be excused.

6) PENDING MOTIONS

FPL: None at this time.

7) PENDING REQUESTS FOR CONFIDENTIALITY

FPL: None at this time.

8) OBJECTIONS TO WITNESS QUALIFICATIONS AS AN EXPERT

FPL: None at this time.

9) STATEMENT OF COMPLIANCE WITH ORDER ESTABLISHING PROCEDURE

There are no requirements of the Order Establishing Procedure with which FPL cannot comply.

Respectfully submitted,

Maria Jose Moncada, Esq.
Senior Attorney
Joel Baker
Principal Attorney
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408
Telephone: (561) 304-5795
Facsimile: (561) 691-7135

By: s/ Maria Jose Moncada
Maria Jose Moncada
Florida Bar No. 0773301

CERTIFICATE OF SERVICE

Docket No. 20210002-EG

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by

electronic service on this 5th day of October 2021 to the following:

Walt Trierweiler
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850
wtrierwe@psc.state.fl.us

Dianne M. Triplett
299 First Avenue North
St. Petersburg, Florida 33701
dianne.triplett@duke-energy.com

Matthew R. Bernier
Robert L. Pickles
106 East College Avenue, Suite 800
Tallahassee, Florida 32301
robert.pickles@duke-energy.com
matthew.bernier@duke-energy.com
FLRegulatoryLegal@duke-energy.com
Attorneys for Duke Energy Florida

Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe Street, Suite 601
Tallahassee, Florida 32301-1804
bkeating@gunster.com
**Attorneys for Florida Public Utilities
Company**

Mike Cassel
Director Regulatory Affairs
Florida Public Utilities Company
208 Wildlight Avenue
Yulee, Florida 32097
mcassel@fpuc.com

Richard Gentry
Patricia A. Christensen
Charles J. Rehwinkel
Stephanie Morse
Anastacia Pirrello
Mary Wessling
Office of Public Counsel
c/o The Florida Legislature
111 West Madison St., Room 812
Tallahassee, FL 32399-1400
gentry.richard@leg.state.fl.us
christensen.patty@leg.state.fl.us
rehwinkel.charles@leg.state.fl.us
morse.stephanie@leg.state.fl.us
pirrello.anastacia@leg.state.fl.us
wessling.mary@leg.state.fl.us

James D. Beasley
J. Jeffrey Wahlen
Malcolm N. Means
Ausley & McMullen
P.O. Box 391
Tallahassee, Florida 32302
jbeasley@ausley.com
jwahlen@ausley.com
mmeans@ausley.com
Attorneys for Tampa Electric Company

Paula K. Brown, Manager
Tampa Electric Company
Regulatory Coordinator
Post Office Box 111
Tampa, Florida 33601-0111
regdept@tecoenergy.com

Jon C. Moyle, Jr.
Moyle Law Firm, P.A.
118 North Gadsden Street
Tallahassee, FL 32301
jmoyle@moylelaw.com
mqualls@moylelaw.com
**Attorneys for Florida Industrial Power
Group**

Peter J. Mattheis
Michael K. Lavanga
Stone Mattheis Xenopoulos & Brew, PC
1025 Thomas Jefferson Street, NW
Suite 800 West
Washington, DC 20007
pjm@smxblaw.com
mkl@smxblaw.com
Attorneys for Nucor Steel Florida, Inc.

George Cavros
120 East Oakland Park Boulevard
Suite 105
Fort Lauderdale, FL 33334
george@cavros-law.com
**Attorney for Southern Alliance for Clean
Energy**

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

James W. Brew
Laura Wynn Baker
Stone Mattheis Xenopoulos & Brew, P.C.
1025 Thomas Jefferson Street, NW
Eighth Floor, West Tower
Washington, DC 20007
jbrew@smxblaw.com
lwb@smxblaw.com
**Attorneys for PCS Phosphate –
White Springs**

By: s/ Maria Jose Moncada

Maria Jose Moncada
Florida Bar No. 0773301