



**William P. Cox**  
**Senior Attorney**  
**Florida Power & Light Company**  
**700 Universe Boulevard**  
**Juno Beach, FL 33408-0420**  
**(561) 304-5662**  
**(561) 691-7135 (Facsimile)**  
**E-mail: will.cox@fpl.com**

August 26, 2022

**-VIA ELECTRONIC FILING -**

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

**Re: Docket No. 20220002-EG**  
**Energy Conservation Cost Recovery Clause**

Dear Mr. Teitzman:

I attach for electronic filing in the above docket Florida Power & Light Company's Preliminary List of Issues and Positions.

Please contact me if you have or your Staff has any questions regarding this filing.

Sincerely,

*s/ William P. Cox*  
\_\_\_\_\_  
William P. Cox

Attachments

cc: Counsel of record for parties (w/ attachments)

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Energy Conservation Cost Recovery  
Clause

Docket No. 20220002-EG  
Filed: August 26, 2022

**FLORIDA POWER & LIGHT COMPANY'S  
PRELIMINARY LIST OF ISSUES AND POSITIONS**

Florida Power & Light Company (“FPL”), through its undersigned counsel, hereby submits this Preliminary List of Issues and Positions to Order Nos. PSC-2022-0053-PCO-EQ.

**ISSUE 1: What are the final conservation cost recovery adjustment true-up amounts for the period January 2021 through December 2021?**

FPL: FPL’s final conservation cost recovery adjustment true-up amounts for the period of January 2021 through December 2021, includes the combination of the pre-consolidated Gulf and pre-consolidated FPL 2021 final net true-up over-recoveries in the amount of \$4,192,496. (FPL witness Hume)

**ISSUE 2: What are the appropriate conservation adjustment actual/estimated true-up amounts for the period January 2022 through December 2022?**

FPL: FPL’s conservation adjustment actual/estimated true-up amounts for the period of January 2022 through December 2022, including interest, is an over-recovery of \$14,992,234. (FPL witness Hume)

**ISSUE 3: What are the appropriate total conservation adjustment true-up amounts to be collected/refunded from January 2023 through December 2023?**

FPL: FPL’s total conservation adjustment true-up amounts to be refunded from January 2023 through December 2023 is \$19,184,730. (FPL witness Hume)

**ISSUE 4: What are the total conservation cost recovery amounts to be collected during the period January 2023 through December 2023?**

FPL: The total costs associated with the ECCR programs to be collected between January 1, 2023 and December 31, 2023, are \$145,212,705 (including prior true-up amounts). (FPL witness Floyd)

**ISSUE 5: What are the conservation cost recovery factors for the period January 2023 through December 2023?**

FPL: The appropriate FPL factors for the period January 2023 through December 2023 are:

FPL 2023 ECCR Factors

RATE CLASS SUMMARY	Conservation Recovery Factor (\$/kw)	Conservation Recovery Factor (\$/kwh)	RDC (\$/KW)	SDD (\$/KW)
RS1/RTR1		0.00122		
GS1/GST1		0.00125		
GSD1/GSDT1/HLFT1/GSD1-EV	0.43			
OS2		0.00085		
GSLD1/GSLDT1/CS1/CST1/HLFT2/GSLD1-EV	0.47			
GSLD2/GSLDT2/CS2/CST2/HLFT3	0.49			
GSLD3/GSLDT3/CS3/CST3	0.45			
SST1T			0.05	0.03
SST1D1/SST1D2/SST1D3			0.05	0.03
CILC D/CILC G	0.51			
CILC T	0.51			
MET	0.42			
OL1/SL1/SL1M/PL1/OSI/II		0.00038		
SL2/SL2M/GSCU1		0.00090		

(FPL witnesses Hume)

**ISSUE 6: 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, 2023. These charges shall continue in effect until modified by subsequent order of this Commission. (FPL witness Hume)

**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?**

FPL: 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 to verify that the revised tariffs are consistent with the Commission’s decision. (FPL witness Hume)

**ISSUE 8: Should this docket be closed?**

FPL: This docket is an on-going docket and should remain open. (FPL witness Hume)

Respectfully submitted,

William P. Cox  
Senior Attorney  
Maria Jose Moncada  
Managing Attorney  
Florida Power & Light Company  
700 Universe Boulevard  
Juno Beach, FL 33408-0420  
Telephone: (561) 304-5662  
Facsimile: (561) 691-7135

By: s/ William P. Cox  
William P. Cox  
Florida Bar No. 0093531

**CERTIFICATE OF SERVICE**  
**Docket No. 20220002-EG**

I **HEREBY CERTIFY** that a true and correct copy of the foregoing was served by electronic mail this this 26th day of August 2022 to the following:

Jacob Imig  
Walter Trierweiler  
Office of the General Counsel  
**Florida Public Service Commission**  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850  
jimig@psc.state.fl.us  
wtrierwe@psc.state.fl.us

J. Jeffrey Wahlen  
Malcolm N. Means  
Virginia Ponder  
Ausley & McMullen  
P.O. Box 391  
Tallahassee, Florida 32302  
jwahlen@ausley.com  
mmeans@ausley.com  
vponder@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

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 Users Group**

Mike Cassel  
Vice President/Government and  
Regulatory Affairs  
**Florida Public Utilities Company**  
208 Wildlight Ave.  
Yulee, Florida 32097  
mcassel@fpuc.com

Michelle D. Napier  
Director, Regulatory Affairs Distribution  
**Florida Public Utilities Company**  
1635 Meathe Drive  
West Palm Beach, FL33411  
mnapier@fpuc.com

Richard Gentry  
Patricia A. Christensen  
Charles J. Rehwinkel  
Stephanie Morse  
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  
wessling.mary@leg.state.fl.us

Matthew R. Bernier  
Stephanie A. Cuello  
Robert L. Pickels  
106 East College Avenue, Suite 800  
Tallahassee, Florida 32301  
matthew.bernier@duke-energy.com  
Stephanie.cuello@duke-energy.com  
Robert.pickels@duke-energy.com  
FLRegulatoryLegal@duke-energy.com

Beth Keating  
Gunster Law Firm  
215 South Monroe St., Suite 601  
Tallahassee, Florida 32301-1804  
bkeating@gunster.com  
**Attorneys for Florida Public Utilities  
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**

Mr. George Cavros  
**Southern Alliance for Clean Energy**  
120 E. Oakland Park Blvd., Suite 105  
Ft. Lauderdale, FL 33334  
george@cavros-law.com

Ms. Dianne M. Triplett  
299 First Avenue North  
St. Petersburg, FL 33701  
dianne.triplett@duke-energy.com  
**Attorneys and Staff for Duke Energy  
Florida, LLC**

Peter J. Mattheis  
Michael K. Lavanga  
Joseph R. Briscar  
Stone Mattheis Xenopoulos & Brew, PC  
1025 Thomas Jefferson Street, NW  
Eighth Floor, West Tower  
Washington, DC 20007-5201  
pjm@smxblaw.com  
mkl@smxblaw.com  
jrb@smxblaw.com  
**Attorneys for Nucor Steel Florida, Inc.**

By: s/ William P. Cox  
William P. Cox  
Florida Bar No. 0093531