

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

**In re: Energy Conservation Cost  
Recovery Clause**

**Docket No. 20220002  
Filed: October 7, 2022**

**SOUTHERN ALLIANCE FOR CLEAN ENERGY'S  
PREHEARING STATEMENT**

Consistent with Order No. PSC-2022-0053-PCO-EG, issued February 7, 2022, Southern Alliance for Clean Energy (“SACE”) hereby submits its Prehearing Statement:

A. All Known Witnesses

SACE is not sponsoring any witnesses

B. All Known Exhibits

SACE does not plan to offer any exhibits at this time, but may introduce exhibits during the course of cross-examination.

C. SACE's Statement of Basic Position

SACE maintains that the utilities bear the burden of proof to justify the recovery of cost that they request in this docket, and that the previously approved conservation goals that are implemented through the conservation programs, for which the companies seek cost recovery in this docket, were proposed by the utilities and approved by the Commission using outdated cost-effectiveness and economic screening practices – primarily through reliance on the Rate Impact Measure (RIM) test and the arbitrary 2-year payback screen –

that depress energy efficiency potential results. The Commission should take the opportunity in its conservation goal setting rulemaking docket to modernize its conservation goal setting practices to reflect standard industry practice in order to successfully utilize demand-side management as a resource to reduce the state's reliance on fossil gas - and to mitigate massive bill impacts on customers from volatile fuel costs. Positions taken by SACE in this conservation programs cost recovery docket that do not contest cost recovery amounts, are not an endorsement of the Commission's current goals setting practices.

D. POSITIONS ON THE ISSUES

**GENERIC CONSERVATION COST RECOVERY ISSUES**

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

SACE: Agree with OPC.

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

SACE: Agree with OPC.

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

SACE: Agree with OPC.

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

SACE: Agree with OPC.

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

SACE: Agree with OPC.

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

SACE: Agree with OPC.

**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?

SACE: No position.

## **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 2023 through December 2023?

SACE: No position.

**ISSUE 9:** What are the residential Price Responsive Load Management (RSVP -1) rate tiers for Tampa Electric Company for the period January 2023 through December 2023?

SACE: No position.

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

SACE: 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 2023.

E. Stipulated Issues

None at this time.

F. Pending Motions

SACE has no pending motions.

G. Pending Confidentiality Claims or Requests.

SACE has no pending requests.

H. Objections to Witness Qualifications as an Expert

SACE has no objections to any witness qualifications at this time.

I. Compliance with Order No. PSC-2022-0053-PCO-EG

SACE has complied with all requirements of the Orders Establishing Procedure entered in this docket.

RESPECTFULLY SUBMITTED this 7th day of October, 2022.

/s/ George Cavros

George Cavros

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true copy and correct copy of the foregoing was served on this 7th day of October, 2022 via electronic mail on:

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