



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

October 7, 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

Dear Mr. Teitzman:

Attached for electronic filing in the above docket is Florida Power & Light Company's ("FPL") Prehearing Statement.

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

Sincerely,

s/ William P. Cox
William P. Cox

Enclosure

cc: Counsel for Parties of Record

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Energy Conservation Cost Recovery
Clause

Docket No. 20220002-EG
Filed: October 7, 2022

FLORIDA POWER & LIGHT COMPANY’S PREHEARING STATEMENT

Florida Power & Light Company (“FPL”), pursuant to Order Nos. PSC-2022-0053-PCO-EG, hereby submits its Prehearing Statement regarding the issues to be addressed at the hearing scheduled for November 1-3, 2022.

1) WITNESSES

Witness	Subject Matter	Issue
Richard L. Hume	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. L. Hume	JNF-1	FPL’s Pre-Consolidated 2021 Final True-up Schedules CT-1 and CT-4	1
R. L. Hume J.N. Floyd	JNF-1	FPL’s Pre-Consolidated 2021 Final True-up Schedules CT-2 and CT-3	1
J.N. Floyd	JNF-1	FPL’s Pre-Consolidated 2021 Final True-up Schedules CT-5 and CT-6, Appendix A	1
J.N. Floyd	JNF-1	FPL’s Pre-Consolidated 2021 Final True-up Schedules CT-1 through CT-6, Appendix A	1
R. L. Hume	JNF-1	2021 Final True-up Capital Structure/Cost Rates	4
R. L. Hume	JNF-2	Gulf’s Pre-Consolidated 2021 Final True-up Schedules CT-1 and CT-4	1
R. L. Hume J.N. Floyd	JNF-2	Gulf’s Pre-Consolidated 2021 Final True-up Schedules CT-2 and CT-3	1

Witness	Exhibits	Description	Issue
J.N. Floyd	JNF-2	Gulf's Pre-Consolidated 2021 Final True-up Schedules CT-5 and CT-6, Appendix A	1
J.N. Floyd	JNF-2	Gulf's Pre-Consolidated 2021 Final-True up Schedules CT-1 through CT-6, Appendix A	1
R. L. Hume	JNF-2	2021 Final True-up Capital Structure/Cost Rates	4
R. L. Hume	JNF-3	2023 Projection Schedule C-1	3-5
R. L. Hume J.N. Floyd	JNF-3	2023 Projection Schedule C-2	4-5
R. L. Hume	JNF-3	2023 Projection Capital Structure/Cost Rates	4
R. L. Hume J.N. Floyd	JNF-3	2022 Actual/Estimated Schedule C-3	2-3
R. L. Hume	JNF-3	2022 Actual/Estimated Capital Structure/Cost Rates,	2
R. L. Hume	JNF-3	2022 Actual/Estimated Schedule C-4	2
J.N. Floyd	JNF-3	Schedule C-5	4-5

3) **STATEMENT OF BASIC POSITION**

FPL's 2023 Conservation Cost Recovery Factors for the January 2023 through December 2023 recovery period, which include separate 2021 net final true-ups for pre-consolidated FPL and pre-consolidated Gulf and the 2022 actual/estimated true-up for FPL, 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 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. (Hume)

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

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

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

FPL: FPL’s total conservation adjustment true-up amount to be refunded from January 2023 through December 2023 is \$19,184,730. (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 cost associated with the Energy Conservation Cost Recovery (“ECCR”) programs to be collected between January 1, 2023 and December 31, 2023, is \$145,212,705 (including prior and current true-up amounts). (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 for the ECCR programs are:

Rate Class	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		0.00038		
SL2/SL2M/GSCU1		0.00090		

(Hume)

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

FPL: The factors should be effective for meter readings that occur on or after January 1, 2023. These charges should continue in effect until modified by subsequent order of this Commission. (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 ECCR 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. (Hume)

ISSUE 10: Should this docket be closed?

FPL: No. This docket is an on-going docket and should remain open. (Hume)

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: Third request for extension of confidential classification filed on April 25, 2022, pertaining to materials provided to Staff of the Florida Public Service Commission pursuant to Audit No. 2015-013-4-1. (DN. 02612-2022)

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,

By: /s/ William P. Cox

William P. Cox
Florida Bar No. 0093531
Maria Jose Moncada
Florida Bar No. 0773301
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, Florida 33408-0420
Telephone: (561) 304-5662
Facsimile: (561) 691-7135
will.p.cox@fpl.com
maria.moncada@fpl.com

CERTIFICATE OF SERVICE
Docket 20220002-EG

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic delivery on this 7th day of October 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

Jon C. Moyle, Jr.
Moyle Law Firm, P.A.
118 North Gadsden Street
Tallahassee, FL 32301
jmoyle@moylelaw.com
mqalls@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