

October 7, 2022

Writer's E-Mail Address: bkeating@gunster.com

VIA E-PORTAL

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

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

Dear Mr. Teitzman:

Attached for electronic filing on behalf of Florida Public Utilities Company, please find the Company's Prehearing Statement.

Should you have any questions whatsoever, please do not hesitate to contact me. Thank you for your assistance in this matter.

Sincerely,



Beth Keating
Gunster, Yoakley & Stewart, P.A.
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(850) 521-1706

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Energy Conservation Cost) Docket No. 20220002-EG
Recovery Clause.)
_____) Filed: October 7, 2022

**FLORIDA PUBLIC UTILITIES COMPANY'S
PREHEARING STATEMENT**

Consistent with Order No. 2022-0053-PCO-EG, issued February 7, 2022, Florida Public Utilities Company ("FPUC") hereby submits this Prehearing Statement:

a. All Known Witnesses

<u>Witness</u>	<u>Subject</u>	<u>Issue</u>
Derrick M. Craig	Final True Up 2021	1-10
	and	
	2022 Cost Recovery Amounts and Factors for 2023	

b. All Known Exhibits

<u>Witness</u>	<u>Exhibit</u>	<u>Title</u>	<u>Issue</u>
Derrick M. Craig	Revised DMC-1(composite) ¹	Schedules CT-1, CT-2, CT-3, CT-4, CT-5 and CT-6	1, 10
Derrick M. Craig	DMC-2 (composite)	Schedules C-1, C-2, C-3, C-4, and C-5	2-7

¹ As amended August 5, 2022.

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 2021, the estimated true-up for the period January through December, 2022, and the projected conservation program expenses for the period January through December, 2023.

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 2021 through 2021?

FPUC: The Company over-recovered \$33,460 for the period January through December 2021, as compared to its previously anticipated under-recovery of \$30,268, which was based on six months of actual data and six months of estimated data. The difference between the actual/estimated amount and the actual/end of period amount is a final end of period true-up amount that is an over-recovery of \$63,728.

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

FPUC: The estimated conservation true-up amount for the period January 2022 to December 2022 is an over-recovery of \$44,251.

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

FPUC: The total conservation true-up amount to be refunded during the period January 2023 to December 2023 is an over-recovery of \$107,979.

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

FPUC: FPUC seeks to recover \$754,171, which includes the projected incremental conservation costs.

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

FPUC: The Company asks for approval of a consolidated levelized conservation cost recovery factor for this period of \$.00113 per KWH.

ISSUE 6: 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 2023 through December 2023. Billing cycles may start before January 1, 2023 and the last cycle may be read after December 31, 2023, so that each customer is billed for twelve months regardless of when the adjustment factor became effective.

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?

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 8: Should this docket be closed?

FPUC: 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

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. 2022-0053-PCO-EG

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

RESPECTFULLY SUBMITTED this 7th day of October, 2022.

s/Beth Keating

Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
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(850) 521-1706

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 7th day of October, 2022.

Florida Public Utilities Company Mike Cassel 208 Wildlight Ave Yulee, Florida 32097 mcassel@fpuc.com	Jon C. Moyle, Jr. Moyle Law Firm 118 North Gadsden St. Tallahassee, FL 32301 jmoyle@moylelaw.com
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s/Beth Keating

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