

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Commission review of numeric conservation goals (Florida Power & Light Company). : **DOCKET NO. 20240012-EG**
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In re: Commission review of numeric conservation goals (Duke Energy Florida, LLC). : **DOCKET NO. 20240013-EG**
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In re: Commission review of numeric conservation goals (Tampa Electric Company). : **DOCKET NO. 20240014-EG**
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In re: Commission review of numeric conservation goals (Florida Public Utilities Company). : **DOCKET NO. 20240015-EG**
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In re: Commission review of numeric conservation goals (JEA). : **DOCKET NO. 20240016-EG**
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In re: Commission review of numeric conservation goals (Orlando Utilities Commission). : **DOCKET NO. 20240017-EG**
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: **Filed: July 9, 2024**

**PREHEARING STATEMENT OF
WALMART INC.**

Pursuant to Florida Public Service Commission's ("Commission") Order No. PSC-2024-0022-PHO-EG, issued January 23, 2024, as amended by Order No. PSC-2024-0159-PCO-EG, issued May 17, 2024, Walmart Inc. ("Walmart") files its Prehearing Statement in the above-referenced Docket Nos. 20240012-EG, 20240013-EG, 20240014-EG, 20240015-EG, 20240016-EG, and 20240017-EG (the "Consolidated Dockets").

I. APPEARANCES

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II. WITNESSES

<u>Witness</u>	<u>Subject</u>	<u>Issue No.</u>
Steve W. Chriss	Mr. Chriss's testimony addresses the Utilities ¹ Demand-Side Management ("DSM") Goals Filings. Specifically, Mr. Chriss addresses FPL's proposed goals for commercial and industrial ("C&I") programs, DEF's proposed change to the credits for Interruptible General Service (IS-2 and IST-2), Curtailable General Service (CS-2, CS-3, CST-2, and CST-3), and General Service – Load Management – Standby Generation (GSLM-2), and TECO's proposed goals for C&I programs.	Issue Nos. 3, 4 and 8

¹ "Utilities" collectively refers to Florida Power & Light Company ("FPL"), Duke Energy Florida, LLC ("DEF"), Tampa Electric Company ("TECO"), Florida Public Utilities Company ("FPUC"), JEA, and Orlando Utilities Commission ("OUC").

III. EXHIBITS

<u>Exhibit</u>	<u>Description</u>
SWC-1	Witness Qualifications Statement
SWC-2	U.S. Energy Information Administration, "Capital Cost and Performance Characteristics for Utility-Scale Electric Power Generating Technologies," Table 1-2

IV. WALMART'S STATEMENT OF BASIC POSITION

Walmart has ambitious and significant company-wide renewable energy goals as set forth in the Direct Testimony of Steve W. Chriss filed in the Consolidated Dockets on June 5, 2024. In general, these renewable energy goals are met through a combination of self-funded initiatives and projects and participation in relevant utility-led DSM, energy efficiency ("EE") and renewable energy programs, as well as through third-party contracts such as power purchase agreements ("PPAs"). Walmart is participating in the Consolidated Dockets to both inform the Commission of its current company-wide renewable energy goals, and to provide recommendations to assist the Commission in its thorough and careful consideration of the customer impacts of each Utility's requests in the Consolidated Dockets.

In light of the number of facilities in each Utility's respective service territory, Walmart is focused on the proposals put forth by FPL, DEF, and TECO as those proposals pertain to C&I customers, having no opinion on proposed goals or programs for residential customers. Walmart takes no position as to the proposed goals of FPL and TECO, and does not oppose the C&I programs of either FPL or TECO. In DEF's Docket, Walmart recommends that the Commission reject DEF's proposed change to credits for Interruptible General Service (IS-2 and IST-2), Curtailable General Service (CS-2, CS-3, CST-2 and CST-3), and General Service - Load Management – Standby Generation (GSLM-2). Otherwise, Walmart takes no position on DEF's goals for its C&I customers and otherwise does not oppose DEF's proposed C&I programs.

V. **ISSUES**

Issue 1: Are the utility's proposed goals based on an adequate assessment of the full technical potential of all available demand-side and supply-side conservation and efficiency measures, including demand-side renewable energy systems?

Position: Walmart takes no position.

Issue 2: Are the utility's proposed goals based on savings reasonably achievable through demand-side management programs over a ten year period?

Position: Walmart takes no position.

Issue 3: Do the utility's proposed goals adequately reflect the costs and benefits to customers participating?

Position: Walmart takes no position as to any of the utility's positions except for DEF's position. With respect to DEF, Walmart is concerned that the benefits for the interruptible services programs and curtailable services programs are understated, which could potentially impact customer deployment of dispatchable distributed energy resources ("DER") to support grid reliability and resilience. DEF may use a value that is too conservative for base year avoided generating unit cost, as set forth in more detail in Walmart's Direct Testimony.

Issue 4: Do the utility's proposed goals adequately reflect the costs and benefits to the general body of rate payers as a whole, including utility incentives and participant contributions?

Position: Walmart takes no position as to any of the utility's positions except for DEF's position. With respect to DEF, Walmart is concerned that the benefits for the interruptible services programs and curtailable services programs are understated, which could potentially impact customer deployment of dispatchable distributed energy resources ("DER") to support grid reliability and resilience. DEF may use a value that is too conservative for base year avoided generating unit cost, as set forth in more detail in Walmart's Direct Testimony.

Issue 5: Do the utility's proposed goals adequately reflect the need for incentives to promote both customer-owned and utility-owned energy efficiency and demand-side renewable energy systems?

Position: Walmart takes no position at this time.

Issue 6: Do the utility's proposed goals adequately reflect the costs imposed by state and federal regulations on the emissions of greenhouse gases?

Position: Walmart takes no position.

Issue 7: Do the utility's proposed goals appropriately reflect consideration of free riders?

Position: Walmart takes no position.

Issue 8: Should demand credit rates for interruptible service, curtailable service, stand-by generation, or similar potential demand response programs be addressed in this proceeding or in the base rate proceedings for the rate regulated FEECA Utilities? If this proceeding, what demand credit rates are appropriate for purposes of establishing the utilities' goals?

Position: Demand credit rates for interruptible service, curtailable service, stand-by generation, or similar potential demand response programs should be addressed in the base rate proceedings.

FPL-Specific Issues

Issue 9: Should the savings associated with FPL's Residential Low Income Renter Pilot program be included in its conservation goals?

Position: Walmart takes no position

Issue 10: Is FPL's proposed HVAC On-Bill option for its existing Residential On-Call program with its associated HVAC Services Agreement (proposed Tariff sheets 9.858 through 9.866) a regulated activity within the jurisdiction of the Commission? If not, should the savings associated with FPL's HVAC On-Bill option and HVAC Services Agreement be removed from its conservation goals?

Position: Walmart takes no position.

Issue 11: Should the Commission approve FPL's proposed plan to cap participation for non-RIM Test passing programs once sector-level goals are achieved?

Position: Walmart takes no position.

All FEECA Electric Utilities Issues

Issue 12: What residential and commercial/industrial summer and winter megawatt (MW) and annual Gigawatt-hour (GWh) goals should be established for the period 2025-2034?

Position: Walmart takes no position.

Issue 13: What goals are appropriate for increasing the development of demand-side renewable energy systems?

Position: Walmart takes no position.

VI. CONTESTED ISSUES

There are no contested issues at this time.

VII. STIPULATED ISSUES

There are currently no stipulated issues.

VIII. PENDING MOTIONS OR OTHER ACTIONABLE MATTERS

Walmart has no pending Motions at this time.

IX. PENDING CONFIDENTIALITY REQUESTS OR CLAIMS

Walmart has no pending confidentiality requests or claims.

X. OBJECTIONS TO WITNESS QUALIFICATIONS AS AN EXPERT

Walmart does not object to any witness's qualifications as an expert.

XI. COMPLIANCE WITH ORDER NO. PSC-2024-0022-PGO-EG and ORDER NO. PSC-2024-0159-PCO-EG

There are no requirements of Order No. Order No. PSC-2024-0022-PHO-EG and Order No. PSC-2024-0159-PCO-EG with which Walmart cannot comply.

Respectfully submitted,

By /s/ Stephanie U. Eaton

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Dated: July 9, 2024

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 this 9th day of July, 2024.

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