

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Energy Conservation Cost )  
Recovery Clause. )  
\_\_\_\_\_ )

DOCKET NO. 20240002-EI  
FILED: October 14, 2024

**TAMPA ELECTRIC COMPANY'S  
PREHEARING STATEMENT**

**APPEARANCES:**

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On behalf of Tampa Electric Company

**(1) WITNESSES:**

<b><u>Witness Direct</u></b>	<b><u>Subject Matter</u></b>	<b><u>Issue No.</u></b>
M. Ashley Sizemore	Conservation Cost Recovery True-Up and Projection and Tampa Electric company-specific issues	1-10

**(2) EXHIBITS:**

<b><u>Witness</u></b>	<b><u>Proffered By</u></b>	<b><u>Exhibit No.</u></b>	<b><u>Description</u></b>	<b><u>Issue No.</u></b>
M. Ashley Sizemore	Tampa Electric	MAS-1	Schedules supporting cost recovery factor actual January 2023-December 2023	1
M. Ashley Sizemore	Tampa Electric	MAS-2	Schedules supporting conservation costs projected for the period January 2025-December 2025 (2021 rate case)	2-10
M. Ashley Sizemore	Tampa Electric	MAS-3	Schedules Supporting conservation costs projected for the period January 2025-December 2025 (2024 rate case)	2-10

### **(3) STATEMENT OF BASIC POSITION**

The Commission should determine that Tampa Electric properly calculated its conservation cost recovery true-up and projections and the conservation cost recovery factors set forth in the Direct Testimony and Exhibits of witness M. Ashley Sizemore for the period January 2025 through December 2025.

The Commission should approve the Contracted Credit Value in accordance with Order No. PSC-2021-0423-S-EI, issued November 10, 2021, in Docket No. 20210034 for the GSLM-2 and GSLM-3 rate riders for use during the period January 2025 through December 2025.

The Commission should also approve the Residential Price Responsive Load Management (RSVP-1) rate tiers for Tampa Electric Company for the period January 2025 through December 2025 as set forth in witness Sizemore's testimony and exhibits.

### **(4) STATEMENT OF ISSUES AND POSITIONS**

#### **GENERIC CONSERVATION COST RECOVERY ISSUES**

**ISSUE 1:** What are the final conservation cost recovery adjustment true-up amounts for the period January 2023 through December 2023?

**TECO:** A net over-recovery of \$846,045 including interest. (Witness: Sizemore)

**ISSUE 2:** What are the appropriate total conservation adjustment actual/estimated true-up amounts for the period January 2024 through December 2024?

**TECO:** An under-recovery of \$4,562,499, including interest. (Witness: Sizemore)

**ISSUE 3:** What are the appropriate total conservation adjustment true-up amounts to be collected/refunded from the period January 2025 through December 2025?

**TECO:** A collection of \$3,716,454, including interest.

Tampa Electric has certain proposals pending in its current base rate case in Docket No. 20240026-EI that may affect the company's energy conservation cost recovery charges and associated tariffs. The above energy conservation costs projected to be recovered may be amended to reflect revisions ordered by the Commission in that docket. (Witness: Sizemore)

**ISSUE 4:** What are the total conservation cost recovery amounts to be collected during the period January 2025 through December 2025?

**TECO:** \$52,109,529 with rate design and cost allocation as put forth in Docket. No. 20210034-EI.

Tampa Electric has certain proposals pending in its current base rate case in Docket No. 20240026-EI that may affect the company’s energy conservation cost recovery charges and associated tariffs. The above energy conservation cost recovery amount, including true-up amounts, and adjusted for taxes may be amended to reflect revisions ordered by the Commission in that docket.

**ISSUE 5:** What are the conservation cost recovery factors for the period January 2025 through December 2025?

**TECO:** For the period January 2025 through December 2025 the cost recovery factors for the rate design and cost allocation as put forth in Docket No. 20210034-EI are as follows:

<b><u>Rate Schedule</u></b>	<b><u>Cost Recovery Factors (cents per kWh)</u></b>
RS	0.294
GS and CS	0.292
GSD Optional – Secondary	0.210
GSD Optional – Primary	0.208
GSD Optional – Subtransmission	0.206
LS-1, LS-2	0.456

<b><u>Rate Schedule</u></b>	<b><u>Cost Recovery Factors (dollars per kW)</u></b>
GSD – Secondary	0.86
GSD – Primary	0.85
GSD – Subtransmission	0.84
SBD – Secondary	0.86
SBD – Primary	0.85
SBD – Subtransmission	0.84
GSLD - Primary	0.80

GSLD - Subtransmission  
(Witness: Sizemore)

0.87

Tampa Electric has certain proposals pending in its current base rate case in Docket No. 20240026-EI that may affect the company's energy conservation cost recovery charges and associated tariffs. The above cost recovery clause factors may be amended to reflect revisions ordered by the Commission in that docket.  
(Witness: Sizemore)

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

**TECO:** The factors should be effective beginning with the specified conservation cost recovery cycle and thereafter for the period January 2025 through December 2025. Billing cycles may start before January 1, 2025, and the last cycle may be read after December 31, 2025, so that each customer is billed for 12 months regardless of when the factor became effective. (Witness: Sizemore)

**ISSUE 7:** Should the Commission approve revised tariffs reflecting the energy conservation cost recovery factors determined to be appropriate in this proceeding?

**TECO:** Yes. The Commission should approve revised tariffs reflecting the energy conservation cost recovery factors determined to be appropriate in this proceeding.

The Commission should also grant Staff administrative authority to approve revised tariffs reflecting amended cost recovery clause factors that incorporate any revisions that are necessary as a result of the Commission's decision in Tampa Electric's current base rate case in Docket No. 20240026-EI.

(Witness: Sizemore)

### **COMPANY SPECIFIC CONSERVATION COST RECOVERY ISSUES**

**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 2025 through December 2025?

**TECO:** In accordance with Order No. PSC-2021-0423-S-EI, issued November 10, 2021 in Docket No. 202100034, the Contracted Credit Value by Voltage Level for the forthcoming cost recovery period, January 2025 through December 2025, for the GSLM-2 and GSLM-3 rate riders will be:

<u>Voltage Level</u>	<u>Contracted Credit Value (dollars per kW)</u>
Secondary	11.75
Primary	11.63
Subtransmission	11.52

(Witness: Sizemore)

**ISSUE 9:** What are the residential Price Responsive Load Management (RSVP-1) rate tiers for Tampa Electric Company for the period January 2025 through December 2025?

**TECO:** For the period January 2025 through December 2025, the Residential Price Responsive Load Management (RSVP-1) rates are as follows:

<u>Rate Tier</u>	<u>Cents per kWh</u>
P4	49.054
P3	9.505
P2	-1.608
P1	-3.053

(Witness: Sizemore)

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

**TECO:** Yes, Docket No. 20240002-EG should be closed once the Commission’s decisions on all of the issues in the docket have become final and the Commission has concluded that the docket has otherwise met the requirements for closure.

**(5) STIPULATED ISSUES**

**TECO:** None at this time.

**(6) MOTIONS**

**TECO:** None at this time.

**(7) PENDING REQUEST OR CLAIMS FOR CONFIDENTIALITY**

**TECO:** None at this time.

**(8) OBJECTIONS TO WITNESS' QUALIFICATIONS AS EXPERT**

**TECO:** Tampa Electric has no objections to any witness' qualifications as an expert in this proceeding.

**(9) REQUEST FOR SEQUESTRATION OF WITNESSES**

**TECO:** Tampa Electric does not request the sequestration of any witnesses at this time.

**(10) COMPLIANCE WITH PREHEARING ORDER NO. PSC-2024-0028-PCO-EI**

**TECO:** Tampa Electric has complied with all requirements of Order No. PSC-2024-0028-PCO-EI, which is the Order Establishing Procedure entered in this docket.

DATED this 14<sup>th</sup> day of October 2024.

Respectfully submitted,



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ATTORNEYS FOR TAMPA ELECTRIC COMPANY

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Prehearing Statement, filed on behalf of Tampa Electric Company has been furnished by electronic mail on this 14th day of October 2024 to the following:

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