

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Energy Conservation Cost
Recovery Clause

Docket No. 20240002-EG

Dated: October 14, 2024

**DUKE ENERGY FLORIDA, LLC'S
PREHEARING STATEMENT**

Duke Energy Florida, LLC (“DEF”), pursuant to the Order Establishing Procedure in this proceeding, Order No. PSC-2024-0028-PCO-EG dated February 6, 2024¹, hereby submits its Prehearing Statement:

A. **Known Witnesses** – DEF intends to offer the direct testimony of:

Witness	Subject Matter	Issues
Karla Rodriguez	Adjusted Net True-up, January – December 2023	1
Karla Rodriguez	Estimated/Actual True-up, January – December 2024 and ECCR Factors For January – December 2025	2 - 6
Karla Rodriguez	Tariff Approval	7
Karla Rodriguez	Close the Docket	10

B. **Known Exhibits** – DEF intends to offer the following exhibits:

Exhibit No.	Witness	Description	Issues
KR-1T	Karla Rodriguez	ECCR Adjusted Net True-Up for January - December 2023, Schedules CT1 – CT6	1 - 7
KR-1P	Karla Rodriguez	Estimated/Actual True-Up,	1 - 7

¹ DEF retains its right to challenge the wording and/or inclusion of any additional issues that may subsequently be raised by other parties.

January – December 2024 and
ECCR Factors for Billings in
January – December 2025,
Schedules C1 – C6

C. **Statement of Basic Position**

The Commission should determine that DEF has properly calculated its conservation cost recovery true-up and projection costs and should approve the conservation cost recovery factors for the period January 2025 through December 2025 set forth in the testimony and exhibits of witness Karla Rodriguez.

D. **Issues and Positions** - DEF's positions on the issues identified in this proceeding are as follows:

GENERIC CONSERVATION COST RECOVERY ISSUES

Duke Energy Florida, LLC

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

DEF: The adjusted net true-up for the period January 2023 through December 2023 is an over-recovery of \$3,699,623. (Rodriguez)

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

DEF: \$9,465,946 adjusted net true-up over-recovery. (Rodriguez)

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

DEF: \$13,165,569 adjusted net true-up over-recovery. (Rodriguez)

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

DEF: \$118,656,282. (Rodriguez)

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

DEF:	<u>Customer Class</u>	<u>ECCR Factor</u>
	Residential	0.326 cents/kWh
	General Service Non-Demand	0.286 cents/kWh
	@ Primary Voltage	0.283 cents/kWh
	@ Transmission Voltage	0.280 cents/kWh
	General Service 100% Load Factor	0.222 cents/kWh
	General Service Demand	0.89 \$/kW
	@ Primary Voltage	0.88 \$/kW
	@ Transmission Voltage	0.87 \$/kW
	Curtaillable	0.63 \$/kW
	@ Primary Voltage	0.62 \$/kW
	@ Transmission Voltage	0.62 \$/kW
	Interruptible	0.77 \$/kW
	@ Primary Voltage	0.76 \$/kW
	@ Transmission Voltage	0.75 \$/kW
	Standby Monthly	0.087 \$/kW
	@ Primary Voltage	0.086 \$/kW
	@ Transmission Voltage	0.085 \$/kW
	Standby Daily	0.041 \$/kW
	@ Primary Voltage	0.041 \$/kW
	@ Transmission Voltage	0.040 \$/kW
	Lighting	0.110 cents/kWh
		(Rodriguez)

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

DEF: The new factors should be effective beginning with the first billing cycle for January 2025, and thereafter through the last billing cycle for December 2025. The first billing cycle may start before January 1, 2025, and the last billing cycle may end after December 31, 2025, so long as each customer is billed for twelve months regardless of when the factors became effective. (Rodriguez)

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?

DEF: Yes. The Commission should approve DEF's revised tariffs reflecting the energy conservation cost recovery amounts and 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 decision.
(Rodriguez)

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 2025 through December 2025?

DEF: No position.

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?

DEF: No position.

CLOSE THE DOCKET ISSUE

Duke Energy Florida, LLC

ISSUE 10: Should this docket be closed?

DEF: No. While a separate docket number is assigned each year for administrative convenience, this is a continuing docket and shall remain open.

E. **Stipulated Issues** - None at this time.

F. **Pending Motions** - DEF has no pending motions at this time.

G. **Requests for Confidentiality** - DEF has no requests for confidentiality pending at this time.

H. **Objections to Qualifications** - At this time, DEF has no objection to the qualifications of any expert witnesses in this proceeding.

I. **Requirements of Order**- DEF believes that this prehearing statement complies with all the requirements of the Order Establishing Procedure.

Respectfully submitted this 14th day of October, 2024.

/s/ Stephanie A. Cuello
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CERTIFICATE OF SERVICE

Docket No. 20240002-EG

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic mail to the following this 14th day of October, 2024.

/s/ Stephanie A. Cuello

Attorney

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