

STATE OF FLORIDA

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# Public Service Commission

April 6, 2015

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P.O. Box 12950  
Pensacola, FL 32591-2950

## STAFF'S FIRST DATA REQUEST

RE: Docket No. 150086-EG- Petition for approval of demand-side management plan of Gulf Power Company.

Dear Mr. J.Stone/ R. Badders/ S. Griffin,

By this letter, the Commission staff requests that Gulf Power Company (“Gulf”, “utility” and “company”) provide responses to the following data requests.

- Please provide the estimated costs of each program’s incentives, administrative & equipment costs, and total costs for the ten-year goals period (nominal and net present value). Also, please provide the percentage of total costs that are used for incentives by program. As part of this response, please provide an electronic version of the table below in Excel format with your response.

Program Costs (Nominal)				
Program Name	Incentives	Administrative & Equipment	Total	Percent Incentives
[Residential]				
Residential Subtotal				
[Comm/Industrial]				
Comm/Ind. Subtotal				
Common Expenses				
<b>Total</b>				



3. For each program that includes “Outside Services” costs in Data Request No. 2 above, please detail what those “Outside Services” include.
4. For each program that includes “Other” costs in Data Request No. 2 above, please detail what those “Other” costs include.
5. Please provide the estimated costs of each program’s incentive costs, costs for the ten-year goals period (nominal and net present value), broken into the categories detailed in the table below. As part of this response, please provide an electronic version of the table below in Excel format with your response.

<b>Program Incentives (Nominal)</b>			
<b>Program Name</b>	<b>Incentives (Non-Recurring)</b>	<b>Incentives (Recurring)</b>	<b>Total</b>
[Residential]			
Residential Subtotal			
[Comm/Industrial]			
Comm/Ind. Subtotal			
Common Expenses			
<b>Total</b>			

<b>Program Incentives (NPV)</b>			
<b>Program Name</b>	<b>Incentives (Non-Recurring)</b>	<b>Incentives (Recurring)</b>	<b>Total</b>
[Residential]			
Residential Subtotal			
[Comm/Industrial]			
Comm/Ind. Subtotal			
Common Expenses			
<b>Total</b>			

6. Please provide for each program with demand and energy savings the net present value of the benefits and costs described in the Rate Impact Measure Test and detailed in the table below. As part of this response, please provide an electronic version of the table below in Excel format with your response.

Program Name	Benefits					Costs					Net Benefit
	Gen	T&D	Fuel	Other	Total	Utility	Incentives	Lost Revenues	Other	Total	
[Residential]											
Residential Subtotal											
[Comm/Industrial]											
Comm/Ind. Subtotal											
<b>Total</b>											

7. Please provide for each program with demand and energy savings the net present value of the benefits and costs described in the Total Resource Cost Test and detailed in the table below. As part of this response, please provide an electronic version of the table below in Excel format with your response.

Program Name	Benefits					Costs				Net Benefit
	Gen	T&D	Fuel	Other	Total	Utility	Participant	Other	Total	
[Residential]										
Residential Subtotal										
[Comm/Industrial]										
Comm/Ind. Subtotal										
<b>Total</b>										

8. Please provide for each program with demand and energy savings the net present value of the benefits and costs described in the Participants Test and detailed in the table below. As part of this response, please provide an electronic version of the table below in Excel format with your response.

Program Name	Benefits					Costs				Net Benefit
	Bill Savings	Tax Credits	Incentive	Other	Total	Equipment	O&M	Other	Total	
[Residential]										
Residential Subtotal										
[Comm/Industrial]										
Comm/Ind. Subtotal										
<b>Total</b>										

9. Please provide the actual and projected Energy Conservation Cost Recovery Clause annual funds in nominal dollars for the period 2010 through 2024. As part of this response, please provide an electronic version of the table below in Excel format with your response.

Year	ECCR Expenditures
2010	
2011	
2012	
2013	
2014	
2015	
2016	
2017	
2018	
2019	
2020	
2021	
2022	
2023	
2024	

10. Please provide the actual and projected monthly customer bill associated with the ECCR for a residential and commercial/industrial customer with the usage described in the table below, in nominal dollars. Please also provide the actual and projected total monthly customer bill. As part of this response, please provide an electronic version of the table below in Excel format with your response.

Year	Residential Customer 1,200 kWh/mo		Commercial/Industrial Customer 400,000 kWh/mo & 1,000 kW Peak	
	ECCR Portion (\$)	Total Bill (\$)	ECCR Portion (\$)	Total Bill (\$)
2010				
2011				
2012				
2013				
2014				
2015				
2016				
2017				
2018				
2019				
2020				
2021				
2022				
2023				
2024				

11. Do any of the programs in the company’s DSM Plan include savings associated with Compact Fluorescent Lightbulbs? If so, please identify the baseline used.
12. Please identify each program in the company’s DSM Plan that include measures with an estimated 2 year or less payback period, and which measures are included by program.

13. For each program that includes measures with an estimated 2 year or less payback period, please provide the amount of savings (kWh, Win kW, and Sum kW) associated with these measures for each program and for the entire DSM Plan. As part of this response, please provide an electronic version of the table below in Excel format with your response.

<b>[Program Name or DSM Plan Combined]</b>						
<b>Year</b>	<b>Program Savings from 2-Year Payback Measures (Savings @ Generator)</b>					
	<b>Per Customer</b>			<b>Total Annual</b>		
	<b>kWh Reduction</b>	<b>Winter kW Reduction</b>	<b>Summer kW Reduction</b>	<b>kWh Reduction</b>	<b>Winter kW Reduction</b>	<b>Summer kW Reduction</b>
<b>2015</b>						
<b>2016</b>						
<b>2017</b>						
<b>2018</b>						
<b>2019</b>						
<b>2020</b>						
<b>2021</b>						
<b>2022</b>						
<b>2023</b>						
<b>2024</b>						

14. Please provide the annual avoided cost savings associated with each of the following four scenarios for a measure that reduces energy or demand by: 1,000 kWh, 1 kW Summer Demand, 1 kW Winter Demand, or 1 kW Summer and Winter Demand. Please provide the savings through the longest time period used to evaluate the programs in your DSM Plan.





16. For each demand response program, use the table below to provide the information listed on an annual basis in seasonal peak demand and number of participants. Please also provide a summary of all demand response programs using the chart below. As part of this response, please provide an electronic version of the table below in Excel format with your response.

<b>[All Demand Response Programs Combined or By Demand Response Program Name]</b>										
<b>Year</b>	<b>Summer</b>					<b>Winter</b>				
	<b>Number of Events</b>	<b>Average Event Size</b>		<b>Maximum Event Size</b>		<b>Number of Events</b>	<b>Average Event Size</b>		<b>Maximum Event Size</b>	
	(MW)	(MW)	(Part.)	(MW)	(Part.)	(MW)	(MW)	(Part.)	(MW)	(Part.)
<b>2005</b>										
<b>2006</b>										
<b>2007</b>										
<b>2008</b>										
<b>2009</b>										
<b>2010</b>										
<b>2011</b>										
<b>2012</b>										
<b>2013</b>										
<b>2014</b>										

17. For each demand response program, use the table below to provide the information listed on an annual basis for seasonal peak activations. Please also provide a summary of all demand response programs using the chart below. As part of this response, please provide an electronic version of the table below in Excel format with your response.

[All Demand Response Programs Combined or By Demand Response Program Name]							
Years	Average Number of Participants	Summer Peak			Winter Peak		
		Activated During Peak?	# of Participants Activated	Capacity Activated	Activated During Peak?	# of Participants Activated	Capacity Activated
		(Y/N)	(MW)	(MW)	(Y/N)	(MW)	(MW)
2005							
2006							
2007							
2008							
2009							
2010							
2011							
2012							
2013							
2014							

18. For each demand response program, please describe whether the current credit is based upon the company’s most recent avoided unit. If not, please explain why and provide how the credit was derived.
19. For each demand response program, please provide the credit amount that would reduce the value of the program’s RIM Test to 1.0.
20. For each demand response program, please discuss whether the company considered reducing the credit provided to customers. As part of this response, please discuss the impacts a lower credit would have on existing participation levels.
21. Please discuss the methodology used to estimate expected participation for each program proposed by your company.
22. Please compare the projected participation rates of continuing programs with the actual participation rates for the previous ten years (or less, depending upon the start date of the program).
23. For all existing DSM programs that are being continued, please complete the chart below.

- a. For any existing program that Gulf is projecting lesser participation than has been previously realized please explain the reason for the decrease in the projection.
- b. For any existing program that Gulf is projecting greater participation than has been previously realized please explain the reason for the increase in the projection.

<b>Year</b>	<b>Actual Annual Number of Program Participants</b>	<b>Projected Annual Number of Program Participants (Docket No. 150086)</b>
<b>2008</b>		
<b>2009</b>		
<b>2010</b>		
<b>2011</b>		
<b>2012</b>		
<b>2013</b>		
<b>2014</b>		
<b>2015</b>		
<b>2016</b>		
<b>2017</b>		
<b>2018</b>		
<b>2019</b>		
<b>2020</b>		
<b>2021</b>		
<b>2022</b>		
<b>2023</b>		
<b>2024</b>		

- 24. Please describe how Gulf determined the rebate amounts provided in its demand-side management plan.
- 25. Please describe how the general assumptions associated with Gulf’s avoided unit were developed. In this description please discuss resources relied upon.
- 26. Please describe how Gulf’s Generation & Purchased Capacity assumptions were developed. In this description please discuss resources relied upon.

27. Please describe how Gulf's Transmission and Distribution Costs assumptions were developed. In this description please discuss resources relied upon.
28. Please describe the avoided unit used in the company's cost-effectiveness evaluations of the programs in its DSM Plan. Is the avoided unit the same as the one used in the goalsetting docket? If not, please explain why and the differences in avoided costs resulting from the change.
29. Please discuss whether any measure's demand and energy savings used in the company's cost-effectiveness evaluations of the programs in its DSM Plan differed from the one used in the goalsetting docket. If so, please explain why and the differences in demand and energy savings resulting from the change.
30. For several of Gulf's proposed programs the Company states that:  
  
The energy and demand savings associated with this program were developed using a variety of sources, including: measure savings data from the Itron study; computer-based engineering modeling software; and actual program performance data gathered by Gulf Power or its energy efficiency program contractors.
  - a. How did Gulf weigh the usage of the variety of sources used? Please provide an example.
  - b. Please identify any sources not mentioned that Gulf relied on to develop its energy and demand savings.
  - c. Please describe any computer-based engineering modeling software used by Gulf to estimate energy and demand savings associated with its proposed programs.
31. Please discuss the results of Gulf's Home Energy Reporting program.
32. For each program being discontinued by Gulf (see pages 1-4 and 1-5 of Gulf's DSM Plan), please explain why/how Gulf chose to discontinue the program.

33. For each program being discontinued by Gulf (see pages 1-4 and 1-5 of Gulf’s DSM Plan), please complete the table below.

<b>Program</b>	<b>RIM Value</b>	<b>Participant Test Value</b>	<b>TRC Value</b>

34. Please describe how Gulf selected its new programs to implement.
35. Please provide the following information regarding the Company’s current and proposed Conservation Demonstration and Development program:
- a. Provide any information/documentation regarding any planned areas of research under the proposed program.
  - b. Provide any information/documentation regarding how the Company plans to implement any proposed or future projects.
36. What projects are currently being evaluated under the Company’s Conservation Demonstration and Development program? As part of your response, please provide the following: name and description of the project, initial startup date of the project, and year-to-date dollars spent on each project. Additionally, please provide whether or not the company believes said project(s) could result in a potential conservation program. If the company perceives a program is imminent, please provide expected startup date.

<b>Conservation Demonstration and Development</b>			
<b>Project Name</b>	<b>Description</b>	<b>Implementation Date</b>	<b>Expenditures</b>

37. What current programs has the company offered to its customers as a result of the Conservation Demonstration and Development program? In addition to the name of the

program, please provide the description, startup date and year-to-date expenditures for each program.

38. Please provide the amount spent on Conservation Demonstration and Development programs for each of the past five years. Please provide the corresponding project name, implementation date, and dollar amount for each project.

39. Please complete the following chart using excel format to illustrate the Company’s expected projects in the Conservation Demonstration and Development:

<b>Conservation Demonstration and Development – Project Name</b>			
<b>Year</b>	<b>Project Name</b>	<b>Description</b>	<b>Expected Expenditures</b>
<b>2015</b>			
<b>2016</b>			
<b>2017</b>			
<b>2018</b>			
<b>2019</b>			
<b>2020</b>			
<b>2021</b>			
<b>2022</b>			
<b>2023</b>			
<b>2024</b>			

40. Please list any energy saving measures or products given to customers in the Residential Energy Audit and Education Program. Please separate your response by each sub-program. (example: the Energy Audit Program.)

41. On page 2-3 of its DSM plan filing, Gulf states that it intends to “expand its long standing energy efficiency outreach efforts to the low-income customer segment.” Please provide a detailed description of any planned expansion of the existing low income program.

42. Gulf describes the Residential Community Energy Saver program as an assistance to low-income families. In its 2013 ECCR final true-up report, Gulf reported 2,220 customers

participating with an average \$340 expended per customer/family. Gulf estimates that 2,500 families will participate in year 2015.

- a. What does Gulf propose that will increase participation in this program?
  - b. Please describe how will Gulf measure the effectiveness of this program in terms of energy and demand savings.
43. In Gulf's 2013 ECCR Final True-Up report, the company reported one participant in the Residential Custom Incentive Landlord/Renter Program with an expenditure of \$138,402. For the 2015 goal period, Gulf did not report any expected participation in this program.
- a. Please describe examples of measures that may be deployed through this program.
  - b. Please describe if these measures are provided to the landlord, renter/customer or both.
44. Gulf's proposed modifications to its Residential HVAC Efficiency Improvement program reduces assistance to the customer in 2015 and beyond. In the 2013 ECCR final True-up Report, Gulf reported 21,887 participants, while the proposed plan estimated participation is 3,700.
- a. Please explain the primary reasons why Gulf proposed these modification to its HVAC program?
  - b. Please discuss the primary reasons Gulf projects the reduction in customer participation compared to the existing program.
45. Gulf's Residential Building Efficiency program will continue with High Performance window programs and Reflective Roof Program and add a new program, Energy Star Window A/C program.
- a. Please explain why Gulf added the Energy Star Window A/C Program.

46. Gulf's Commercial HVAC Retro commissioning Program has adjusted this programs rebate to \$100. What prompted the company to make this rebate limit?
  
47. Gulf's Commercial Geothermal Heat Pump program reported the annual number of program participants in "Tons of A/C" and that 120 tons is estimated for 2015. Please also report the number of program participants.
  
48. Gulf's Commercial Ceiling/Roof Insulation program reported the annual number of program participants would be number of square feet installed. Please also report the number of program participants.
  
49. Gulf's Commercial Reflective Roof program reported the annual number of program participants as number of square feet installed. Please also report the number of program participants.
  
50. The table on page 2-23 of Gulf's proposed DSM Plan indicates that the individual measures contained in Gulf's Residential Building Efficiency Program do not pass RIM.
  - a. Please explain whether these measures pass RIM in Gulf's goal-setting analysis?
  - b. Does the Residential Building Efficiency Program pass RIM when all the individual measures are considered as a whole? If so, please provide the RIM analysis.
  - c. Did Gulf consider reducing the proposed incentives or any administrative cost savings in order to make the program cost-effective under RIM? If so, please explain. If not, why not?



- d. Why does Gulf contend that it is appropriate to include this program in its proposed DSM Plan, given the results of Gulf's RIM analysis?

Please file the original and five copies of the requested information by Monday, April 27, 2015, with Carlotta Stauffer, Commission Clerk, Office of Commission Clerk, 2540 Shumard Oak Boulevard, Tallahassee, Florida, 32399-0850. Please feel free to call me at (850) 413-6185 if you have any questions.

Sincerely,

*s/ Lee Eng Tan*

Lee Eng Tan

Senior Attorney

TLT/dml

cc: Office of Commission Clerk