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Public Service Commission

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-M-E-M-O-R-A-N-D-U-M-

DATE:	July 31, 2019
то:	Adam Teitzman, Commission Clerk, Office of Commission Clerk
FROM:	Margo A. DuVal, Senior Attorney, Office of the General Counsel MA Rachael Dziechciarz, Senior Attorney, Office of the General Counsel AD
RE:	Docket No. 20180186-GU - Petition for approval of demand side management goals and residential customer assisted and commercial walk-through energy audit programs, by Peoples Gas System.

Please place the attached documents in the "Documents" section of the above-referenced docket file.

Thank you.

MAD RAD

MACFARLANE FERGUSON & MCMULLEN

ALTORNEYS & COUNSELORS AT LAW - EST, 1884

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> In Reply Refer to: Tampa <u>ab@macfar.com</u>

July 16, 2019

VIA E-PORTAL FILING

813.273.4200 Fax: 813.273.4396

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

> Re: Petition for Approval of Demand Side Management Goals and Residential Customer Assisted and Commercial Walk-through Energy Audit Programs, by Peoples Gas System; Docket No. 20180186-GU

Dear Mr. Teitzman:

Attached for electronic filing in the above docket on behalf of Peoples Gas System, please find a Notice of Service of Responses to Staff's Third Data Request (Nos. 1-2).

Your assistance in this matter is greatly appreciated.

AB/plb

cc: Office of Public Counsel, Patty Christensen Douglas Wright, Engineering Specialist, FPSC Mr. Mark R. Roche Ms. Paula K. Brown Ansley Watson, Jr., Esq.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Peoples Gas System for) approval of DSM Goals and Residential) Customer Assisted and Commercial) Walk-Through Energy Audit DSM Programs)

DOCKET NO. 20180186-GU

FILED: July 16, 2019

NOTICE OF SERVICE OF RESPONSES TO STAFF'S THIRD DATA REQUEST (Nos. 1-2)

Peoples Gas System, by its undersigned attorneys, files this its Notice of Service of Responses to Staff's Third Data Request (Nos. 1-2).

Dated this 16th day of July, 2019.

ANDREW M. BROWN, ESQUÌRE Phone: (813) 273-4209/Fax: (813) 273-4396 E-mail: <u>ab@macfar.com</u> ANSLEY WATSON, JR., ESQUIRE Phone: (813) 273-4321/Fax: (813) 273-4396 E-mail: <u>ab@macfar.com</u> <u>Macfarlane Ferguson & McMullen</u> <u>Post Office Box 1531</u> Tampa, FL 33601-1531

Attorneys for Peoples Gas System

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of the foregoing have been furnished via electronic mail, this 16th day of July 2019, to the following:

Office of Public Counsel J.R. Kelly/P. Christensen c/o The Florida Legislature 111 West Madison St., Room 812 Tallahassee, FL 32399-1400 kelly.jr@leg.state.fl.us Christensen.patty@leg.state.fl.us Paula K. Brown Regulatory Affairs Peoples Gas System P. O. Box 111 Tampa, FL 33601-0111 regdept@tecoenergy.com

Andrew M. Brown

PEOPLES GAS SYSTEM DOCKET NO. 20180186-GU STAFF'S THIRD DATA REQUEST REQUEST NO. 1 BATES STAMPED PAGES: 1 FILED: JULY 16, 2019

- 1. Please explain why PGS is requesting a waiver of the on-site or walk-through requirements for residential audits, yet offers (or plans to offer) on-site or walk-through energy audits to its commercial customers.
- Peoples Gas System believes it is important to offer Demand Side Management Α. ("DSM") programs that can be taken advantage of by all customers that are not opting out of the Natural Gas Conservation Cost Recovery ("NGCCR") clause, in addition to meeting the requirements of the Florida Energy Efficiency and Conservation Act ("FEECA"). The request for a waiver of the on-site or walkthrough requirements for residential audits is due to company having the ability to provide an electronic, online-only version of the computer-assisted audit that will provide residential customers the same type of feedback and recommendations regarding their energy usage and ways to improve the efficiency of the customers home or appliances as would be provided in an on-site or walk-through energy audit. The company is seeking approval in this Docket to establish an on-site walkthrough energy audit for commercial customers due to the various equipment. operations, processes and market segments of these customers, which establishes a walk-through type audit as a more appropriate energy audit tool to identify opportunities to lower their annual natural gas usage and energy costs.

PEOPLES GAS SYSTEM DOCKET NO. 20180186-GU STAFF'S THIRD DATA REQUEST REQUEST NO. 2 BATES STAMPED PAGES: 2 FILED: JULY 16, 2019

- 2. Please identify whether or not any other electric utilities and/or natural gas utilities provide on-site or walk-through residential audits throughout the Company's service territory, and clarify whether the Company's eligible residential customers already receive these offers or substantially similar offers from another source.
- A. The customer meter extract from the company's Geographical Information System ("GIS") shows that almost 100 percent of Peoples Gas System's service area is within the service areas of other FEECA electric utilities that offer on-site or walk-through residential energy audits to the company's same customers, in which they are eligible.