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May 14, 2020

VIA E-PORTAL

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

Re: Docket No. 20200060-EG – Petition for Approval of Demand-Side Management Plan, by Florida Public Utilities Company

Dear Mr. Teitzman:

Attached for filing, please find Florida Public Utilities Company's responses to Staff's Second Data Requests in the above-referenced docket.

Should you have any questions whatsoever, please do not hesitate to contact me. Thank you for your assistance in this matter.

Sincerely,

Beth Keating

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215 South Monroe St., Suite 601
Tallahassee, FL 32301
(850) 521-1706

MEK
Cc://Parties of Record

Re: Docket No. 20200060-EG - Petition for approval of demand-side management plan, by Florida Public Utilities Company.

Below, please find FPUC's responses to Staff's Second Set of Data Requests in the above-referenced docket. Responses are included herewith in Microsoft Excel format with formulas intact.

1. For each of FPUC's demand-side management (DSM) programs, please identify the following based upon updated economic assumptions, from the 2019 goals proceeding, for avoided costs/benefits:
 - a. The cost-effectiveness test results from the Rate Impact Measure (RIM) Test, the Total Resource Cost Test (TRC), and the Participant Test.

FPUC Response:

The Excel Workbooks in Appendix 1A contain the results of the cost-effectiveness tests (with updated cost figures) that were used in FPUC's analysis to assess how to proceed with submitting a 2020 DSM Plan for satisfying the goals assigned in Docket 20190017.

The cost-effectiveness test period depicted in Appendix A was for ten years, running from 2015 through 2024 (the life of the current program). The updated cost figures from 2019 proceedings used within the workbooks in Appendix A include; Program Administration, Avoided Capacity & Energy, Non-Fuel Bill Portion, and Discount Rate.

FPUC'S current DSM plan was originally proposed and approved as a 10-year plan (through 2024), and the current DSM Plan has incurred high sunk costs. Continuation of the current DSM Plan and programs will better enable FPUC to explore new approaches to DSM as depicted the DSM Plan proposed.

The workbooks in Appendix 1A contain the RIM, Participants Test, and TRC Test results from this internal FPUC DSM analysis and can be found on the Blue, Green & Red tabs.

- b. The estimated savings for seasonal peak demand and annual energy consumption, per customer and for the system as a whole annually for the period 2020-2024.

FPUC Response:

The estimated savings for seasonal peak demand and annual energy consumption, per customer and for the system as a whole annually for the period 2020-2024, are listed within the tables in Appendix 1B.

- c. The total dollars to be spent for each program annually for the period 2020-2024.

FPUC Response:

FPUC estimated per program expenditures through 2024 are based on the prior 3 years of actuals and are depicted in Appendix 1C.

2. For each of FPUC's DSM programs that do not pass the RIM Test in question 1(a) above, please provide a revised version of that program with incentives reduced to make them cost-effective. As part of this response, please also provide updated values for the following factors for those programs:
 - a. The required change in incentive to make the program pass. If the program is unable to pass the cost-effectiveness tests, please explain why.

FPUC Response:

The tables in Appendix 2A illustrate the incremental effect from each of the updated costs versus the baseline test results from the current (2015) DSM Plan.

The updated cost figures in Appendix 2A include Program Administration, Avoided Capacity & Energy, Non-Fuel Bill Portion, and Discount Rate. Nearly all of the updated cost data inputs were found to individually contribute to incrementally lower cost-effectiveness test scores, while the collective effect of the updated costs resulted in significantly lower RIM and TRC scores.

The cost-versus-benefit disparity yielded by the updated cost data creates a scenario that could not be bridged with an altered incentive level. It is possible that this disparity could improve through the factoring in of additional benefits (beyond efficiency) to the cost-effectiveness formula.

- b. The cost-effectiveness test results from the RIM Test, TRC Test, and Participants Test.

FPUC Response

Not applicable given the response to question 2(a) above.

- c. The projected program participation annually for the period 2020-2024.

FPUC Response

Not applicable given the response to question 2(a) above.

- d. The estimated savings for seasonal peak demand and annual energy consumption, per customer and for the system as a whole annually for the period 2020-2024.

FPUC Response

Not applicable given the response to question 2(a) above.

- e. The total dollars to be spent for each program annually for the period 2020-2024.

FPUC Response

Not applicable given the response to question 2(a) above.

3. For each of the scenarios listed below, please provide estimates of the ECCR bill impact for a residential customer (1,000 kWh/month and 1,200 kWh/month) for the period 2020-2024:
 - a. FPUC’s proposed DSM Plan.

FPUC Response:

Appendix 3A contains the projected ECCR monthly impacts thru 2024.

- b. FPUC’s proposed DSM Plan modified with reduced incentives to make programs cost-effective under RIM.

FPUC Response:

Not applicable given the response to question 2(a) above.

4. Please identify the historic monthly average ECCR bill impact for a residential customer (1,000 kWh/month and 1,200 kWh/month) for the period 2015-2019.

FPUC Response:

Year	Docket	Levelized Factor	1,000 kWh/Mo.	1,200 kWh/Mo.
2015	160002-EG	\$ 0.00135	\$1.35	\$1.62
2016	150002-EG	\$ 0.00100	\$1.00	\$1.20
2017	20170002-EG	\$ 0.00102	\$1.02	\$1.22
2018	20180002-EG	\$ 0.00097	\$0.97	\$1.16
2019	20190002-EG	\$ 0.00132	\$1.32	\$1.58