

Antonia Hover

From: Antonia Hover on behalf of Records Clerk
Sent: Wednesday, December 1, 2021 1:20 PM
To: 'katie@votesolar.org'
Cc: Consumer Contact
Subject: FW: Correspondence in Docket 20210121-EG
Attachments: Vote Solar letter to PSC 12.1.2021.pdf

Good Afternoon, Ms. Ottenweller.

We will be placing your comments below in consumer correspondence in Docket No. 20210121, and forwarding them to the Office of Consumer Assistance and Outreach.

Thank you!

Toni Hover

*Commission Deputy Clerk I
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399
Phone: (850) 413-6467*

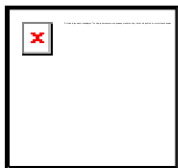
From: Katie Chiles Ottenweller <katie@votesolar.org>
Sent: Wednesday, December 1, 2021 11:08 AM
To: Records Clerk <CLERK@PSC.STATE.FL.US>
Subject: Correspondence in Docket 20210121-EG

Good morning,

Please place the attached letter into Docket 20210121-EG on behalf of Vote Solar.

Let me know if you have any questions.

Best,
Katie Chiles Ottenweller



Katie Chiles Ottenweller | Southeast Director

katie@votesolar.org | 706.224.8017

Vote Solar
Atlanta, Georgia
votesolar.org





December 1, 2021

Chairman Gary F. Clark
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399

RE: Docket No. 20210121-EG, Petition for approval of modifications to demand-side management program plan and participation standards, by Duke Energy Florida

Dear Chairman Clark and Members of the Public Service Commission:

On behalf of Vote Solar, a nonprofit organization with over 35,000 members in Florida, I am writing to ask you to approve Duke Energy Florida's petition for modification of its demand-side management program plan.

Vote Solar strongly believes in the need for collaboration to create solutions to Florida's challenges. To that end, we engaged in extensive discussions with Duke Energy concerning their rate case petition. Rather than engage in lengthy and resource-intensive litigation by intervening in Duke Energy's rate case, we opted to enter into a memorandum of understanding with Duke and other parties that resolved our concerns outside of the actual rate case docket. This type of constructive agreement should be encouraged by the Commission, because it avoids unnecessary litigation that would exhaust the PSC's and other parties' limited resources.

We are now coming to you and asking for the Commission to honor this agreement by approving Duke's petition for modifications to its DSM plan. Duke's request would modify three specific programs: 1) increasing its Neighborhood Energy Saver residential low-income program by 250 customers per year; 2) approving additional "Assistance Kits" for low-income customers who participate in the Home Energy Check program; and 3) providing direct assistance to low-income customers in arrears who participate in the demand response program.

The Assistance Kits alone will be available to up to 20,000 low-income customers each year from 2021 to 2024, providing energy saving measures that fail the two-year payback screen (an inappropriate screen for customers who are living paycheck to paycheck) and are cost effective.

These Assistance Kits will provide:

- 3 9W LEDs – saving 28 kWh each month
- 1 smart power strip – saving 53 kWh each month
- 1 switch plate thermometer – saving 73 kWh each month

- Hot water pipe insulation – saving 188 kWh each month

These measures represent **342 kWh of savings** for customers who participate – making a significant difference in their utility bills not just as a one-time savings, but each month going forward. Given the hardships facing customers during COVID and the prospect of rising electric bills in 2022, there has never been a more important time to make these measures available to the customers that need them most.

Even with the incremental costs related to these minor changes, Duke’s DSM programs remain cost-effective.

Further, circumstances have changed even since the MOU was filed, and there is now an urgent need for additional DSM investments now, given the need to mitigate the impact of rising natural gas prices on low-income consumers. Energy efficiency investments benefit everyone by lowering demand on DEF’s system and avoiding the need for energy purchases – which is especially true now given recent natural gas price increases. But these programs go further by delivering savings directly to the most vulnerable customers – those who are low income and at risk of being disconnected. These program modifications, while minor, will make a difference for the customers that participate, making their bills more affordable and lowering their energy consumption.

For the above reasons, we ask that the Commission approve Duke Energy’s request for modifications. Thank you for your consideration of this important issue.

Sincerely,



Katie Chiles Ottenweller
Southeast Director
Vote Solar
katie@votesolar.org