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# Public Service Commission

April 7, 2025

William P. Cox  
Senior Counsel  
Florida Power & Light Company  
700 Universe Boulevard  
Juno Beach, FL 33408  
[Will.Cox@fpl.com](mailto:Will.Cox@fpl.com)

**STAFF'S FIRST DATA REQUEST  
VIA EMAIL**

**Re: Docket No. 20250048-EG - Petition for approval of proposed demand-side management plan, by Florida Power & Light Company.**

Dear Mr. Cox:

By this letter, Commission staff requests that Florida Power & Light Company (FPL or Utility) provide responses to the following questions:

1. Please provide a statement indicating if the programs included in FPL's proposed demand-side management (DSM) plan are the same as the programs used to develop the Utility's DSM goals approved by Order No. PSC- 2024-0505-FOF-EG. If there were any changes in program costs, savings, incentives/rebates, participation rates, cost-effectiveness test results, or other program parameters following approval of the Utility's goals, please detail and provide an explanation for the changes and how they were derived for each relevant program.
2. Please refer to Table 4 of FPL's proposed DSM plan for the following questions.
  - a. For each year of the 2025 through 2034 goals period, please indicate if the projected annual residential bill impact for FPL's proposed DSM plan is the same as the projected annual residential bill impact identified for the programs used to develop the Utility's DSM goals in Docket No. 20240012-EG. If not, please explain why.
  - b. Please provide this table in Microsoft Excel format.
3. For the period 2025 through 2034 and for each program in FPL's proposed DSM plan, please provide a table displaying the projected program participation, and the projected summer and winter demand, and annual energy savings that are expected to contribute to FPL's DSM goals.

4. Please refer to FPL's Conservation Research & Development program for the following questions.
  - a. Please indicate whether or not there is an annual cap for the program. If so, please identify the amount of the annual cap and explain how it was determined. If not, please explain why.
  - b. Please detail the projects investigated under this program from 2020 through 2024. As part of this response, please describe each project's objective, and identify the project costs.
  - c. Please identify each project FPL plans to pursue under this program for the 2025 through 2034 goals period. As part of this response, please describe each project's objective, and identify the projected costs. If no projects are planned, please explain why.
5. For each of FPL's existing programs, please identify any proposed modifications and provide an explanation for each of the modifications.
6. Please refer to FPL's petition, Attachment 1, Section II, DSM Program Descriptions for the following questions.
  - a. Please provide a brief summary of the program descriptions for each program included in FPL's proposed DSM plan.
  - b. Please refer to the Residential Load Management (On Call) and HVAC On-Bill (On Call) Pilot programs. Please explain why the per customer projected winter demand savings for the HVAC On-Bill Pilot program are higher than the per customer projected winter demand savings for the Residential On-Call program. If this is based on a difference in appliances included, provide the calculations supporting the differences. If this is based on the customer having a greater than minimum SEER appliance, please specify.
7. Please refer to FPL's petition, Attachment 1, Section II, DSM Program Descriptions, HVAC On-Bill (On Call) Pilot program for the following questions.
  - a. Please explain why the projected winter demand savings are higher than the projected summer demand savings.
  - b. Please explain how the number of eligible customers was determined.
  - c. Please indicate if FPL would be amenable to capping the projected annual program participants and programs costs at the estimates provided during the five-year pilot stage of this program. If not, please explain why.
  - d. Please also refer to Appendix A, FPL DSM Program Standards, HVAC On-Bill Pilot Program Standards. Please detail how the annual program costs are projected to

decrease if annual program participation is projected to increase, and HVAC Services Payments are leveled over the agreement terms.

- e. Please provide separately the annual program costs and revenues for each year of participation for the full duration of the applicable agreements (i.e. – For 2025 participants, costs and revenues for 2025 through 2040, for new 2026 participants, costs and revenues for 2026 through 2041, etc.).
8. What contract duration did FPL assume participants would select for the program cost estimates? If multiple durations were included, provide what percentage of each was included. Please refer to FPL’s petition, Attachment 1, Appendix A, FPL DSM Program Standards for the following questions.
    - a. Please provide a redline version of FPL’s proposed program participation standards that identifies any changes as compared to the Utility’s current program participation standards. As part of this response, please provide an explanation for any changes for each program.
    - b. Please refer to the Low-Income Renter Pilot Program Standards. Please indicate if FPL intends to collect information on landlord rent amounts before and after installation of the new HVAC systems. If so, please explain why this was not included as a requirement in the program standards, and indicate if FPL intends to include this information in its DSM annual report filings. If not, please explain why.
    - c. Please also refer to the HVAC On-Bill Pilot Program Standards, Section 4. Please indicate if it would be possible to only disconnect a participant’s HVAC system if the participant defaults on the monthly HVAC Service Charge portion of the bill, but is current on the remainder of the electric bill. If not, please explain why. If so, please explain if FPL would be amenable to revising this section of the program standards and any other associated HVAC On-Bill Pilot program parameters to reflect this change and if not, please explain why.
  9. Please refer to FPL’s petition, Attachment 1, Appendix B, Program-Level Cost Effectiveness Analyses. Please provide the cost-effectiveness test results for each program in Microsoft Excel format with formulas intact.
  10. Please indicate what, if any, alternatives FPL considered for participants who may no longer want to participate in the load control portion of the HVAC On-Bill Pilot program for the entire 10-, 12-, or 15-year agreement terms. As part of this response, please explain why each of these alternatives were dismissed.
  11. Please indicate if FPL considered aligning the HVAC On-Bill Pilot program with its Residential HVAC Program instead of its Residential On-Call to avoid the requirement that participants participate in a load control program long-term. If so, please explain why FPL opted against this option.
  12. Please refer to Attachment 2, Optional HVAC Services Rider. Regarding the Monthly Service Payment section, please explain what effect limiting the provision of the monthly

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credit amounts to option (ii), utilizing the monthly credit to offset the monthly program fees, would have on the monthly service charge. As part of this response, please explain if FPL would be amenable to revising this section of the rider and any other associated HVAC On-Bill Pilot program parameters to reflect this limitation, and further align the program with FPL's Residential On-Call program and if not, please explain why.

13. Please provide redline versions of FPL's HVAC On-Bill program Optional HVAC Services Agreement, Optional HVAC Services Rider, and Statement of Work documents provided in Docket No. 20240012-EG reflecting all changes, if any, following that proceeding. As part of this response, please also provide a clean version of the Statement of Work document, and an example version including estimated values for a typical residential customer.
14. For the HVAC Service Agreement, Section 6(c), HVAC Service Credits. Please provide the net present value (NPV) of the HVAC Services Credits for each contract term (10, 12, and 15 years) if option (i) is selected, as well as the nominal and NPV values if option (ii) was selected.

Please file all responses electronically no later than **Monday, April 21, 2025**, via the Commission's website at [www.floridapsc.com](http://www.floridapsc.com), by selecting the Clerk's Office tab and Electronic Filing Web Form (reference Docket No. 20250048-EG). In addition, please email the filed response to [discovery-gcl@psc.state.fl.us](mailto:discovery-gcl@psc.state.fl.us). If you have any questions, please contact me by phone at (850) 413-6592 or by email at [tthomps@psc.state.fl.us](mailto:tthomps@psc.state.fl.us).

Sincerely,

*/s/Takira Thompson*

Takira Thompson  
Engineering Specialist

TTT:da

cc: Office of Commission Clerk (Docket No. 20250048-EG)  
Kenneth A. Hoffman – [Ken.Hoffman@fpl.com](mailto:Ken.Hoffman@fpl.com)