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(Writer's Direct Dial No. 727-820-4692)

#### COMMISSION CLERK

Dianne M. Triplett Associate General Counsel – Florida

January 20, 2011

Ms. Ann Cole, Commission Clerk Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

Re: Docket 100160-EG PEF's Petition for Approval of Demand-side Management Plan Response to Staff's 11th Data Request (Nos. 1 - 20.)

Dear Ms. Cole:

Enclosed for filing are the original and 5 copies of PEF's Supplemental Response to Staff's 11th Data Request in the above-referenced docket. This response contains PEF's answers to questions 15 through 20 along with 4 additional questions from Staff asking for additional information and clarification with respect to PEF's DSM plans.

Thank you for your assistance in this matter and please let me know if you have any questions.

Sincerely annonhyters

Tanne M. Triplett

CLK NOTE : CO was Forwarded to Staff For Further disposition. mas/9/8/11 00508 JAN 24 = **FPSC-COMMISSION CLERK** 

COM \_\_\_\_\_ APA \_\_\_\_\_ DMT/at ECR \_\_\_\_\_ GCL \_\_\_\_ GCL \_\_\_\_ GCL \_\_\_\_ CLK \_\_\_\_ Progress Energy Florida, Inc. Progress Ener

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic and U.S. Mail this  $\mathbb{Z}[ \overset{c}{day}$  of January, 2011 to all parties of record as indicated below.

Dianne M. Triplett

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# PEF'S RESPONSE TO STAFF'S 11TH DATA REQUEST

1. Please refer to the Staff-requested tables, found in Section IX of PEF's Revised Goal Plan. Please provide Total Cost tables for the following omitted programs: Business Energy Response, Technology Development, Qualifying Facilities, and Demand Side Renewable Portfolio (including any subcategories, as necessary). Please provide these tables in hardcopy and electronic (Excel) format.

Response: Responses provided on December 27, 2011.

Please refer to PEF's responses to Staff's 11<sup>th</sup> Data Request question 1 contained in attachments A and B.

2. Please provide electronic (Excel format) copies of all tables provided in the Revised Goal Plan and Original Goal Scenario. These include Cost Effectiveness (summaries only), Savings Estimates, and Program Participation for each program; and all Staff requested tables.

**Response:** Responses provided on December 27, 2011.

#### **Revised Goal Plan**

Please refer to PEF's responses to Staff's 11<sup>th</sup> Data Request question 2 contained in attachments C-E.

## **Original Goal Scenario**

Revisions to PEF's Responses to Staff's 11<sup>th</sup> Data Request question 2 are inclusive of modifications made in PEF's Responses to Staff's 10<sup>th</sup> Data Request, as requested by Staff during the meeting conducted on December 17, 2010. Below is a summary of the tables impacted as a result of these requested changes, when compared to similar tables contained in PEF's Original Goal Scenario filed on November 29, 2010.

## • Summary Tables:

- Please refer to PEF's responses to Staff's 11<sup>th</sup> Data Request question 2 contained in attachment G, tables II-2, II-4, and III-1.
- Program Plan Tables:
  - Please refer to PEF's responses to Staff's 11<sup>th</sup> Data Request question 2 contained in attachment F, all tables associated with Better Business.
- Staff Requested Tables:
  - Please refer to PEF's responses to Staff's 11<sup>th</sup> Data Request question 2 contained in attachment H, all program tables associated with Better Business, and summary tables IX-4.1, IX-4.2, and IX-5 Original Goal.

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3. Please provide, for the March 30, 2010, DSM Programs filing, the tables provided in the "Staff Requested Tables." Please provide these copies in hardcopy and electronically (Excel format). These should include Cost Effectiveness (summaries only), Savings Estimates, and Program Participation for each program; and all Staff requested tables from the compliance filing.

**Response:** Please refer to attachments I through J.

- 4. Please refer to the Business Energy Response Program for both the Original Goal Scenario and the Revised Goal Plan.
  - a. PEF provided an annual cost impact estimate for the Original Goal Scenario for this program, but has not done so for the Revised Goal Plan. Please provide this information.
  - b. Staff notes that the energy savings associated with the program are identical. If the annual cost amounts differ from the Original Goal Scenario, please explain the discrepancy.
  - c. As part of this response, please complete the following table and explain, if necessary, any variation in expenditures between the Original Goal Scenario and the Revised Goal Plan.

Business Energy Response					
Expenditures Energy S (\$) (kW					
<b>Original Goal Scenario</b>	\$166,258,566	155,370,072			
Revised Goal Plan		155,370,072			
Difference					

Response: Responses provided on December 27, 2011.

a. The Business Energy Response Program is the same for both plans. The Revised Goal Plan Cost estimate is the same as the Original Goal Scenario. Additionally, this information has been provided within this Data Request in response #1 and #2.

b. The energy savings associated with the program are identical. The annual cost amounts in the Original Goal Scenario are the same as the Revised Goal Plan.

c. See table below for filing data.

Business Energy Response					
Expenditures Energy Savings (\$) (kWh)					
Original Goal Scenario	\$166,258,566	155,370,072			
Revised Goal Plan	\$166,258,566	155,370,072			
Difference	0	0			

5. Please identify specific modifications, on a program-by-program basis, between the Original Goal Scenario and the March 30, 2010, filing.

## **Response:**

Please refer to attachment K for specific modifications, on a program-by-program basis, between the Original Goal Scenario and the March 30, 2010 filing.

Both plans, the March 30, 2010 and Original Goal Scenario filed November 29, 2010, were developed using the Iron's High-TRC Case incentive and program cost for Home Energy Improvement, Home Advantage, Better Business, and Business New Construction. Programs added to the portfolio (that were not part of the Itron High-TRC case) reflect Progress Energy's (PEF) best estimate of unit cost and used PEF's standard corporate assumption for escalation rates. Per unit measure impacts (demand and energy savings) remained the same.

Given the current anticipated schedule for Commission consideration of the proposed plans filed on November 29, 2010, it will not be possible to realize savings impacts in 2010 associated with <u>any new measures or programs</u> included in the Original Goal Scenario. Thus, the Original Goal Scenario reflects that any deficiency between the 2010 goals stated in Order No. PSC-10-0198-FOF-EG and PEF's 2010 demand and energy achievements anticipated to be realized under its currently approved plan are assumed to be achieved over the remaining 9 years (2011 - 2019).

6. a. Please explain and describe the differences between the Commercial/Industrial component of the Revised Goal Plan and the Original Goal Scenario.

b. As part of this response, please explain the difference in program demand and energy savings and program cost between the two Plans, on a program-by-program basis and for the Plans as a whole.

#### **Response:**

a. The Original Goal Scenario is closely aligned with the recommendations of the Itron potential study. In order to achieve the level of savings reflected in the Itron potential study, it assumed a high level of incentive costs. Additionally, the implied escalation rates utilized in the Itron potential study are higher than what PEF has reflected in the Revised Goal Plan. The Commercial/Industrial component of the Revised Goal Plan was established with participation projections that more closely reflect PEF's recent historical experience, which is slightly higher than the levels identified within Itron's study. In order to mitigate the cost impact to customers associated with the Itron cost assumptions utilized in the Original Goal Scenario, the Commercial/Industrial component of the Original Goal Scenario was designed by capping the level of achievement to only meet the Commission's Commercial/Industrial goals. All measure-specific demand and energy savings impacts per participant are the same within both Plans.

b. Refer to PEF's response to question 6a above regarding demand and energy savings. The difference in cost between the two Plans is attributable to the differences in the level of participation, the escalation rates used for participant and program costs, and the differences in

incentive costs. In the Original Goal Scenario, program and incentive costs were based on guidance from the Itron Study. The table below summarizes the above referenced assumptions for both Plans. The Itron study utilized in the Original Goal Scenario indicated that in order to reach a level of achievement commensurate with the Commission's goals, significant incentives would be needed. The differences in cost and demand and energy savings are summarized in PEF's responses to Questions 7 through 11.

	Participant Cost	Program Cost (admin./mktg. only)	Incentive Cost
Original Goal Scenario	5% Implied Escalation	5.5% Implied Escalation	50% to 100% of Participant Costs
Revised Goal Plan	2% Escalation	2.84% Escalation	25% to 50% of Participant Costs

7. Please refer to the Commercial/Industrial New Construction program for the Original Goal Scenario and the Revised Goal Plan. As detailed in the table below, there is an increase in the energy savings for the program in the Revised Goal Plan, but a significant decrease in program costs. Please explain the source of this variation between the two versions of the program, and why the more cost-efficient version was not incorporated into the Original Goal Scenario.

Commercial/Industrial New Construction			
	Expenditures (\$)	Energy Savings (kWh)	
Original Goal Scenario	\$31,229,315	30,133,205	
Revised Goal Plan	\$16,365,673	31,810,420	
Difference	(\$14,863,642)	1,677,215	

# **Response:**

As discussed in PEF's response to Question 6, the Original Goal Scenario was closely aligned with the cost assumptions utilized in the Itron/collaborative potential studies and that in order to mitigate the cost impact to customers associated with the Itron cost assumptions utilized in the Original Goal Scenario, the Commercial/Industrial component was designed to only meet the Commission's Commercial/Industrial goals. As further discussed in PEF's response to Question 6, the Revised Goal Plan reflects a higher level of participation with lower cost assumptions based on more recent experience.

8. Please refer to the Business Energy Check program for both the Original Goal Scenario and the Revised Goal Plan. As detailed in the table below, there is an increase in program cost for the Revised Goal Plan, but no subsequent increase in energy savings. Please explain the source of this variation between the two versions of the program, and why the Revised Goal Plan has a unique increase in cost without an increase in energy savings.

Business Energy Check				
Expenditures Energy Sav (\$) (kWh)				
Original Goal Scenario	\$40,751,751	19,699,151		
<b>Revised Goal Plan</b>	\$44,975,311	19,699,151		
Difference	\$4.223.560	0		

#### **Response:**

See table below for energy savings for PEF's two DSM Plans filed November 29, 2010. The Business Energy Check program consists of two primary measures: energy audits and energy efficiency kits. While both measures contribute to program costs, PEF's Plans assumed no demand and energy savings directly attributable to the energy audit. While the energy audits do not directly create demand and energy savings, they do drive participation levels in all Commercial/Industrial programs. Additionally, energy efficiency kits are not always provided as part of the energy audit. The number of energy efficiency kits assumed in both plans is assumed to be the same. The higher level of audits assumed in the Revised Goal Plan is consistent with the higher level of participation assumed in many of the Commercial/Industrial programs reflected in the Revised Goal Plan.

Busine	ess Energy Check			
Expenditures (\$) Expenditures (\$) Energy Sav Per Plan Fil (kWh)				
Original Goal Scenario	\$40,751,751	10,756,152		
Revised Goal Plan	\$44,975,311	10,756,152		
Difference	\$4,223,560	0		

9. Please refer to the Business Energy Saver program for both the Original Goal Scenario and the Revised Goal Plan. As detailed in the table below, there is a decrease in program cost for the Revised Goal Plan, but no subsequent decrease in energy savings. Please explain the source of this variation between the two versions of the program, and why the more cost-efficient version was not incorporated into the Original Goal Scenario.

Business Energy Saver					
Expenditures Energy Saving (\$) (kWh)					
Original Goal Scenario	\$1,425,727	2,580,190			
Revised Goal Plan	\$1,319,960	2,580,190			
Difference	(\$105,767)	0			

## **Response:**

The cost variance is attributed to the lower escalation rates assumed in the Revised Goal Plan as referenced in PEF's response to Question 6b.

10. Please refer to the Better Business program for both the Original Goal Scenario and the Revised Goal Plan. As detailed in the table below, the Revised Goal Plan version features a small increase in program cost but over double the energy savings. Please explain the source of this variation between the two versions of the program, and why the more cost-effective version was not incorporated into the Original Goal Scenario.

Better Business			
	Energy Savings (kWh)		
<b>Original Goal Scenario</b>	\$97,249,136	142,207,751	
<b>Revised Goal Plan</b>	\$106,254,585	325,749,301	
Difference	\$9,005,449	183,541,550	

#### **Response:**

The following table has been modified pursuant to PEF's response to Question 1a in Staff's 10<sup>th</sup> Data Request. For the reasons discussed in PEF's response to Questions 6a and 6b, the Revised Goal Plan reflects a higher level of participation with lower cost assumptions, which is more reflective of PEF's recent historic Commercial/Industrial experience.

	Expenditures (\$)	Energy Savings (kWh)
<b>Original Goal Scenario*</b>	\$115,038,442	166,219,125
Revised Goal Plan	\$106,254,585	325,749,301
Difference	(\$8,783,858)	\$159,530,176

11. Please refer to the Commercial Green Building New Construction program for both the Original Goal Scenario and the Revised Goal Plan. As detailed in the table below, the Revised Goal Plan version features an approximate six-fold increase in program costs, but an increase in energy savings of less than double the Original Goal Scenario's. Please explain the source of this variation between the two versions of the program, and why costs increase so dramatically for relatively little increase in savings for the Revised Goal Plan.

Commercial Green Building New Construction			
	Expenditures (\$)	Energy Savings (kWh)	
<b>Original Goal Scenario</b>	\$1,275,357	5,260,253	
Revised Goal Plan	\$8,051,477	9,154,301	
Difference	\$6,776,120	3,894,048	

## **Response:**

The following table reflects the correct expenditure information contained in PEF's November 29<sup>th</sup> Plan for the Original Goal Scenario. The cost and savings variances are more

Commercial Green Building New Construction			
	Expenditures (\$)	Energy Savings (kWh) 5,260,253	
<b>Original Goal Scenario</b>	\$6,925,482		
Revised Goal Plan	\$8,051,477	9,154,301	
Difference	\$1,125,995	3,894,048	

comparable. For the reasons discussed in PEF's response to Questions 6a and 6b, the Revised Goal Plan reflects a higher level of participation with lower cost assumptions,

1. Sum of total costs contained on page 257 of the Original Goal Scenario

12. In PEF's Introduction of the Revised Goal Plan, on Page 6, PEF states that it incorporates two measures from the March 30, 2010, Technical Potential Program filing into the Home Energy Improvement Program. These measures are HVAC Tune-Up and high SEER HVAC w/ECM. The March 30, 2010, filing suggests that HVAC Tune-Up was already incorporated into the Home Energy Improvement Program. The Revised Goal Plan also does not mention high SEER HVAC w/ECM. Please explain or describe how the Revised Goal Plan and Original Goal Scenario versions of the Home Energy Improvement Program differ from the March 30 filing.

## **Response:**

The HVAC Tune-Up measure referred to on page 6 of PEF's Revised Goal Plan, as described on page 100 of March 30, 2010 filing under the title of "HVAC Annual Maintenance", refers to a less comprehensive version of the HVAC Tune-up measure reflected in the Home Energy Improvement Program (HEIP). The participation associated with this less comprehensive version of the measure contained in the March 30, 2010 Technical Potential Program (TPP) is being, in part, absorbed within the HVAC Tune-up measure of the HEIP contained in the Revised Goal Plan.

The SEER HVAC w/ECM measure contained within the March 30, 2010 TPP generally pertains to systems with a SEER greater than 17. While not separately discussed in the Revised Goal Plan, this measure is included in the measure titled "High Efficiency HVAC Systems" referenced on page 34 of the Revised Goal Plan

The Original Goal Scenario and the March 30, 2010 filing are identical with respect to the HVAC Tune-up and SEER HVAC w/ECM measures reflected in the TPP.

13. In PEF's Introduction of the Revised Goal Plan, on Page 6, PEF states that it incorporates two measures from the March 30, 2010 Filing of the Technical Potential Program into the Low Income and Informational Education Initiatives. These measures are HVAC Tune-Up and Window Films. The March 30, 2010, Low Income Weatherization Assistance Program filing already includes both of these measures. Please explain or describe how the Revised Goal Plan and Original Goal Scenario versions of the Low Income Weatherization Assistance program differ from the March 30 filing.

## **Response:**

The HVAC Tune-Up measure referred to on page 6 of PEF's Revised Goal Plan, as described on page 100 of March 30, 2010 filing under the title of "HVAC Annual Maintenance", refers to a less comprehensive version of the HVAC Tune-up measure reflected in the Low Income Weatherization Assistance Program (LIWAP). The participation associated with this less comprehensive version of the measure contained in the March 30, 2010 Technical Potential Program (TPP) is being, in part, absorbed within the HVAC Tune-up measure of the LIWAP contained in the Revised Goal Plan.

PEF acknowledges that its statement on page 6 of PEF's Revised Goal Scenario regarding the window film measure was made in error, and is incorrect. The Low Income Weatherization Assistance Program continues to reflect a window film measure.

The Original Goal Plan and the March 30, 2010 filing are identical with respect to the HVAC Tune-up and Window Film measures reflected in the TPP.

- 14. PEF's response to Staff's 7th Set of Interrogatories, Interrogatory No. 73, issued in Docket No. 080408-EG, and represents the amount of residential annual energy savings based on measures excluded due to a payback of less than two years as 958 GWhs. PEF's Late-Filed Exhibit No. 2 represents the top ten technical potential measures with less than a 2 year payback and includes 8 residential measures that total 1904 GWhs in annual energy savings.
  - a. Please explain how PEF determined the excluded residential measures and their represented savings as provided in response to Interrogatory No. 73 of Staff's 7th Set of Interrogatories.
  - b. Please explain what data was relied upon to project the residential annual energy savings of 958 GWhs.
  - c. Please explain how PEF determined the 8 residential measures and their represented savings as provided in Late-Filed Exhibit No. 2.
  - d. Please explain what data was relied upon to project the 1,904 GWhs of residential annual energy savings from these 8 measures.
  - e. Please explain how the savings from the 8 excluded residential measures (1,904 GWhs) can be greater than the savings for <u>all</u> excluded residential measures (958 GWhs)

## **Response:**

- a. Itron/collaborative potential studies results were utilized. The measures excluded were those that were deemed as "naturally occurring" (or occurring without utility incentives) over the 10 year plan period due to less than 2 year payback. The DSM/Assyst Model utilized by Itron determines how the payback of each measure drives an adoption rate for each year. 958 GWh was the sum of the expected energy impact for all residential measures with less than 2 year payback.
- b. PEF relied on output from Itron/collaborative potential studies which included the results of the DSM/Assyst Model utilized by Itron. Refer to PEF's response to 14a (above). The 958 GWh is *not* the aggregate technical potential of all residential

measures deemed "naturally occurring" due to less than 2-year payback.

- c. Using the output from the Itron/collaborative potential studies, the 8 residential measures were a subset of the highest top 10 residential and commercial measures with less than 2-year payback. The ranking of the top 10 measures was based on the technical energy potential of the measures. The aggregate technical energy potential for the top eight residential measures was 1,904 GWh.
- d. PEF relied upon the output from the Itron/collaborative Technical Potential study. The following table summarizes the top 10 residential and commercial measures with less than 2-year payback and their corresponding technical potential savings. The aggregate technical energy potential of the residential measures is 1,904 and was incorporated into the goals approved by the Commission.

Customer	Measure #	Measure Name	TECH GWh Savings	TECH Sum Pk Sav (MW)	TECH Win Pk Sav (MW)
Residential	231	CFL (18-Watt integral ballast)	681.43	35.65	50.84
Commercial	131	CFL Screw-in 18W	402.3	77.9	43.3
Commercial	111	Premium T8, Electronic Ballast	243.42	46.93	28.04
Residential	802	High Efficiency One Speed Pool Pump (1.5 hp)	211.83	45.23	8.79
Residential	801	Two Speed Pool Pump (1.5 hp)	210.32	44.90	8.73
Residential	114	Proper Refrigerant Charging and Air Flow	202.50	77.09	-
Residential	141	Electronically Commutated Motors (ECM) on Air Handler	181.81	58.50	109.94
Residential	121	Default Window with Sunscreen	161.27	120.83	(17.77)
Residential	408	Water Heater Blanket	132.70	10.51	29.33
Residential	112	AC Maintenance (Outdoor Coil Cleaning)	122.03	47.12	-
		Total	2,549.59		
		Residential only	1,903.89		

e. "Naturally occurring" potential is the subset of technical potential as shown in figure 3-2 below. Technical potential has no constraints, such as time, cost effectiveness or other barriers.

The technical potential of all excluded residential measures was 2,436 GWh.

The "naturally occurring" potential of the all excluded residential measures was 958 GWh. The technical potential of the 8 excluded residential measures was 1,904 GWh.

The "naturally occurring" potential of the 8 excluded residential measures was 734 GWh.



Figure 3-2, Conceptual relationship among definitions of energy efficiency potential<sup>1</sup>

15. Please provide the projected incentive and customer equipment cost, by program and measure, for each of the company's DSM Plans. As part of this response, provide the participant's equipment cost, before and after the incentive is applied. Please also provide the incentive amount per participant, the incentive's unit (such as square feet, equipment unit, or monthly bill credit), and the incentive amount per unit. Please provide a hardcopy and electronic (Excel format) version of this table as part of the response.

## **Response:**

Please refer to attachments L-N, which contain projected incentives (per participant and with associated incentive unit), and customer equipment cost (before and after the incentive is applied), by program and measure, for each of the company's DSM Plans.

16. Please provide the projected annual demand and energy savings, by program and measure, for each of the company's DSM Plans. As part of this response, please include the savings by participant as well. Please provide a hardcopy and electronic (Excel format) version of this table as part of the response.

#### **Response:**

Please refer to attachments O-Q, which contain projected annual demand and energy savings (by participant), by program and measure, for each of the company's DSM Plans.

<sup>&</sup>lt;sup>1</sup> Chapter 3, page 3-3 of the final technical report titled: <u>Technical Potential for Electric Energy and Peak Demand Savings</u> in Progress Energy Florida, by Itron, Inc.

17. Please provide the projected rate impact, by program and measure, for each of the company's DSM Plans. Please provide a hardcopy and electronic (Excel format) version of this table as part of the response.

## **Response:**

Please refer to attachments R-T, which contain projected rate impact, by program, for each of the company's DSM Plans.

18. Please provide the projected ECCR expenditures, by program and measure, for each of the company's DSM Plans. Please provide a hardcopy and electronic (Excel format) version of this table as part of the response.

#### **Response:**

Please refer to attachments U-Z, which contain projected ECCR expenditures, by program and measure, for each of the company's DSM Plans.

19. Please provide the projected lost revenues, by program and measure, for each of the company's DSM Plans. Please provide a hardcopy and electronic (Excel format) version of this table as part of the response.

## Response:

Please refer to attachments AA-CC, which contain projected lost revenues, by program, for each of the company's DSM Plans.

20. Please provide the cost-effectiveness test results for each program, by program and measure, for each of the company's DSM Plans. As part of this response, include the benefits and cost for each test. Please provide a hardcopy and electronic (Excel format) version of this table as part of the response.

#### **Response:**

Please refer to attachments DD-EE, which contain cost-effectiveness test results for each program, for each of the company's DSM Plans

# PEF'S RESPONSE TO ADDITIONAL STAFF AND INTERVENOR QUESTIONS

#### RE: Original and Revised Plans Filed 11/29/10

#### **Topic: Innovation Incentive**

The table on page 159 of the Revised Goal Plan contains a scrivener's error. The included table represents the participation numbers submitted in the March 30<sup>th</sup> filing at 2 participants per year. The corrected table is provided below and shows gradual growth from 4 to 25 participants over the 9 years of the Plan.

Year	Total Number of Customers <sup>(1)</sup>	Total Number of Measure Eligible Customers <sup>(2)</sup>	Annual Number of Program Measure Participants <sup>(3)</sup>	Cumulative Penetration Level (%) <sup>(4)</sup>
2011	170,886	170,886	4	0.0%
2012	175,147	175,147	8	0.0%
2013	178,542	178,542	10	0.0%
2014	182,030	182,030	12	0.0%
2015	185,461	185,461	15	0.0%
2016	188,717	188,717	17	0.0%
2017	191,817	191,817	20	0.0%
2018	194,809	194,809	23	0.0%
2019	197,848	197,848	25	0.0%

#### **Topic: Residential Energy Management**

Please refer to attachment GG, for the anticipated costs related to the Residential Energy Management Program. These costs were based on vendor estimates available at the time of program development. As technology evolves in this area and actual implementation takes place in the later years of the plan, program modifications may be filed to better reflect those future technologies and costs.

## **Topic: Technical Potential**

Please refer to attachment HH, for a file that presents the cost-effectiveness results and assumptions for the Technical Potential Program (TPP). The first three sheets contain the RIM, TRC and Participant test results, respectively, while the fourth sheet contains the program input assumptions. These results present the most realistic estimates of program cost-effectiveness given the high levels of participation required to reach technical potential levels, as well as the substantial amount (45%) of free-riders associated with all of the various "less than two-year payback" measures promoted by the program.

#### **Topic: Technology Development**

The Staff-Requested Tables contained in the Revised Goal Plan submitted on November 29<sup>th</sup> and included on page 271 differ from the Staff-Requested Tables contained in the Original Goal Scenario also submitted on November 29<sup>th</sup> and provided on page 261. The lower dollar amounts reflected in the Revised Goal Plan for Years 2011 through 2013 appropriately reflect the level of activity and projects assumed in years 2011 through 2013 for the Revised Plan. Expenditures to support that level of research were used throughout the development of the Revised Plan.

## **Topic: Escalation and Incentive Cost Assumptions**

The table below summarizes the escalation factors and incentive costs assumptions utilized by PEF in the development of the three proposed plans filed.

	Participant Cost	Program Cost (admin./mktg. only)	Incentive Cost
March 30, 2010 Filing and Original Goal Scenario	5% Implied Escalation	5.5% Implied Escalation	50% to 100% of Participant Costs
Revised Goal Plan	2% Escalation	2.84% Escalation	25% to 50% of Participant Costs





Jublic Service Commission

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

DATE:	March 25, 2011	
TO:	Division of Regulatory Analysis	
FROM:	Ann Cole, Commission Clerk, Office of Commission Clerk $~$	X
RE:	Data Request CD	

Attached please find one CD, entitled PEF's Supplemental Response to Staff's 11th Data Request and Additional Questions, regarding Docket Number 100160-EG, Document Number 00508-11, which is being forwarded to the Division of Regulatory Analysis for further disposition.

If you have any questions regarding this transmittal, please feel free to contact me.

Thank you.



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