



Dianne M. Triplett  
Deputy General Counsel

September 24, 2021

**VIA ELECTRONIC FILING**

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

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

Dear Mr. Teitzman:

On behalf of Duke Energy Florida, LLC ("DEF"), please find enclosed for electronic filing in the above-referenced Docket, DEF's Response to Staff's Second Data Request (Nos. 1-17) propounded on September 10, 2021.

Thank you for your assistance in this matter. If you have any questions concerning this Response, please feel free to contact me at (727) 820-4692.

Respectfully,

/s/ Dianne M. Triplett

Dianne M. Triplett

DMT/cmw  
Enclosures

cc: Takira Thompson  
Phillip Ellis  
Laura King  
Patti Zellner

**DUKE ENERGY FLORIDA, LLC'S RESPONSE TO  
STAFF'S SECOND DATA REQUEST RE. DEF'S PETITION FOR APPROVAL  
OF MODIFICATIONS TO DEMAND-SIDE MANAGEMENT PROGRAM  
PLAN AND PARTICIPATION STANDARDS**

1. Please refer to DEF's response to Staff's First Data Request, No. 1. For each column in the table, please provide the percentage of total customers reflected by the number of disconnections.

**RESPONSE:**

Disconnects for Non-pay completed								Total
Jan 7th - 31st	Feb	Mar	Apr	May	Jun	Jul	Aug	Jan 7th - Aug 20th
9,068	12,496	10,937	8,796	12,869	19,939	19,303	24,253	117,661
Removed Jan 2nd-6th (2,050)								

  

Number of Late Notices (5 day letter) mailed (All revenue classes)								Total
Jan 7th - 31st	Feb	Mar	Apr	May	Jun	Jul	Aug	Jan 7th - Aug 20th
241,703	256,286	244,106	236,965	245,122	263,580	275,040	277,860	2,040,662
Removed Jan 2nd-6th (2,050)								

  

Important Late Notice(5 day Letter) vs. Disconnects for Non-Payment								Total
Jan 7th - 31st	Feb	Mar	Apr	May	Jun	Jul	Aug	Jan 7th - Aug 20th
3.75%	4.88%	4.48%	3.71%	5.25%	7.56%	7.02%	8.73%	5.77%
Removed Jan 2nd-6th (2,050)								

  

Number of Billed accounts (All revenue classes)								Total
Jan 7th - 31st	Feb	Mar	Apr	May	Jun	Jul	Aug	Jan 7th - Aug 20th
1,469,461	1,804,799	1,973,652	1,891,192	1,896,998	1,813,860	1,792,679	1,818,577	14,461,218
Removed Jan 2nd-6th (2,050)								

  

Billed accounts vs. Disconnects for Non-Payment								Total
Jan 7th - 31st	Feb	Mar	Apr	May	Jun	Jul	Aug	Jan 7th - Aug 20th
0.6%	0.7%	0.6%	0.5%	0.7%	1.1%	1.1%	1.3%	0.8%
Removed Jan 2nd-6th (2,050)								

2. Please refer to DEF's response to Staff's First Data Request, No. 2. Please indicate how DEF recovers the costs associated with purchasing household income data.
  - a. In its response, DEF states that a mapping tool allows the Utility to identify areas that are "generally" below 200 percent of the poverty income guidelines. Please explain if DEF makes the final decision as to whether or not an area is considered a low-income area.

**RESPONSE:**

The DEF Program Manager selects and identifies areas where 50 percent or more of the customers are estimated to be below 200 percent of Federal Poverty Level income guidelines.

3. In part, DEF's response to Staff's First Data Request, No. 3, states that the Utility "will keep track of the number of low-income customers who complete an audit and receive an 'Assistance Kit' through the Home Energy [Check] Program." Describe the changes, if any, the Company plans to make to its March 1st Demand Side Management Annual Reports to report the number of low-income participants of the Home Energy Check Program who complete an audit and receive "Assistance Kits."

**RESPONSE:**

DEF plans to include the number of low-income participants in the Home Energy Check Program who complete an audit and receive "Assistance Kits" as part of the overall annual number of program participants. DEF will be able to identify and report the number of low-income participants separately, if requested

4. Please refer to DEF's response to Staff's First Data Request, No. 3. Please indicate when DEF intends to develop a monthly process to identify customers who qualify for the "Assistance Gift Cards," and when the Utility will develop a system to keep track of customers who receive gift cards. As part of this response, please indicate whether or not DEF plans to incorporate these processes into the Utility's DSM Program Standards document. If not, please explain.
  - a. Please explain why these processes have not yet been developed.

**RESPONSE:**

The process will be developed once the program is approved by the Commission.

5. Please refer to DEF's response to Staff's First Data Request, No. 3. Please detail how DEF intends to "broaden the neighborhood boundaries" for the Neighborhood Energy Saver Program.
  - a. Will DEF or a third-party contractor install the energy conservation measures for the additional participants? If these installations are to be done by a third-party contractor, please indicate whether or not DEF has verified that the contractors agree to the expansion. If not, please explain.

**RESPONSE:**

A third-party contractor will install the energy conservation measures for the additional participants. The existing third-party contractor has been notified and agrees with including the additional participants.

- 6. Please refer to DEF’s response to Staff’s First Data Request, No. 4, and Attachment A. Does DEF anticipate there will be a 5 percent increase associated with outreach, or the 4.1 percent increase reflected in Attachment A. If 5 percent, please indicate the total dollar amount this reflects, and provide a revised version of Attachment A.
  - a. Referring to Attachment A, please identify the reason for the large increase in the “Current Program Costs” column from 2021 to 2022 for the Neighborhood Energy Saver Program.

**RESPONSE:**

The 5 percent increase was based on incentives and not the total “Current Program Costs.”

- 7. Please refer to DEF’s response to Staff’s First Data Request, No. 9. Please indicate whether or not each of these measures are cost-effective.
  - a. Please provide the kW and kWh savings associated with each of these measures as done in the Utility’s response to Staff’s First Data Request, No. 14.

**RESPONSE:**

Single Family EE Kit								
kWh Impact/unit	SkW Impact/unit	WkW Impact/unit	Measure	Unit	kWh Impact	SkW Impact	WkW Impact	
125.00	0.07000	0.09800	M13W: V-Seal Adhesive Weatherstrip 17Ft. Roll	2	250.00	0.14000	0.19600	
0.62	0.00000	0.00000	55111-10/ea.: Switch & Outle Gasket Pack 10/ea.	1	0.62	0.00000	0.00000	
25.54	0.00200	0.00500	AMC109G: Hot Water Gauge	1	25.54	0.00200	0.00500	
44.00	0.00000	0.00000	Digital Refrigerator Thermometer	1	44.00	0.00000	0.00000	
9.52	0.00084	0.00088	9W LED	2	19.04	0.00168	0.00176	
69.59	0.00627	0.01349	Faucet Aerators	2	139.17	0.01254	0.02698	
295.00	0.02657	0.05720	Energy Efficiency Showerhead 1.5 GPM (standard white)	1	295.00	0.02657	0.05720	
569.27	0.10568	0.17457	Total		773.38	0.18278	0.28694	

\*None of the measures included in the Single Family EE Kit are cost-effective but will pass on meaningful bill savings to the recipients

8. Please refer to DEF's response to Staff's First Data Request, Nos. 9 and 13. Please explain the reason for the difference in price for the "9W LED" in each kit.

**RESPONSE:**

The "9W LED" cost used for the "Assistant Kits" reflects a cost drop in bulb prices. The current bulb price is \$1.10 per unit.

9. Please refer to DEF's response to Staff's First Data Request, No. 10. Please describe what actions (i.e. customer communications, waiting lists, etc.) DEF plans to take if more than 20,000 qualifying low-income customers, as a result of the Utility's target marketing efforts, contact DEF seeking to participate in the program's kit distribution.

**RESPONSE:**

While DEF does not anticipate exceeding 20,000 customers, in the event that DEF reaches the point where it believes it will exceed 20,000 customers, it will try to accommodate the participation or potentially work with customers to schedule their audit in the next calendar year, in the event the participation occurs later in the year.

10. Please refer to DEF's response to Staff's First Data Request, No. 17. Please explain if completion of a home audit is a requirement for any other programs.

**RESPONSE:**

No, a completion of a home audit is not a requirement for any other programs.

11. Please refer to DEF's response to Staff's First Data Request, No. 17. In its response, DEF states that ". . . the Neighborhood Program is designed to target specific neighborhoods and directly install measures in customer homes " Please explain if the portion of the Home Energy Check Program that will be providing additional "Assistance Kits" will be targeting specific neighborhoods as well.

- a. As part of the Home Energy Check Program, please explain if customers will be expected to install the measures included in the "Assistance Kits" themselves.

**RESPONSE:**

The measures included in the "Assistance Kit" are such that could be installed by customers who choose to do so but would be installed by the auditor at the time the audit is completed.

12. Please refer to DEF's response to Staff's First Data Request, No. 20. Please explain how adding the "Assistance Kits" to the Home Energy Check Program benefits the general body of ratepayers.

**RESPONSE:**

DEF believes Staff is referencing the requirement in § 366.82(3)(b), Fla. Stat., that the Commission consider the costs and benefits to the general body of rate payers in the DSM goal-setting process; DEF notes that there is no such requirement when analyzing a utility's Programs or Plans for meeting those goals, which is the current setting. However, DEF notes that any incentive that spurs customers to engage in a Home Energy Check has the potential to lead to increases in conservation measure adoption, which could lead to a decrease in demand and potential to avoid building additional generation, which is the stated purpose of FEECA.

- a. Please indicate whether or not the Florida Energy Efficiency Conservation Act specifically identifies a particular class of customers.

**RESPONSE:**

Yes, the Florida Energy Efficiency Conversation Act identifies the residential customer class in relation to in home audits; however, that is not the program at issue here.

13. Please refer to DEF's response to Staff's First Data Request, No. 21. Please indicate whether or not the \$30 gift card will only be available to customers currently participating in the Residential Load Management Program. Please explain.

**RESPONSE:**

Yes, per the terms of the MOU.

- a. Please indicate whether or not the \$30 gift card can be used for purposes other than bill relief. If so, please explain.

**RESPONSE:**

The \$30 gift cards can be used for purposes other than bill relief.

14. Please refer to DEF's response to Staff's First Data Request, No. 22. Please provide the monthly bills for each of the customers with accounts more than 60 days in arrears. As part of this response, please indicate the amount in arrears for each customer.

- a. Please identify the total number of customer accounts at the highest level of 60-day arrearages.

- b. Please explain why DEF projects that 1,000 gift cards will be provided each year, when there are currently only 453 low-income customer accounts that are more than 60 days in arrears.

**RESPONSE:**

Per agreement with Staff, DEF will provide this response at a future date.

15. Please refer to DEF's response to Staff's First Data Request, No. 26. Does DEF plan to update these schedules to reflect the \$30 gift cards? If so, please identify when DEF plans to update these schedules. If not, please explain.

**RESPONSE:**

No, DEF does not plan to update the schedules to reflect the \$30 gift cards as they are intended to provide immediate relief to customer in need.

16. Please refer to DEF's response to Staff's First Data Request, No. 30. Please indicate whether a customer disconnection has a negative or positive impact on demand response.

**RESPONSE:**

A customer disconnection has a negative impact on demand response as DEF would be unable to maintain control of the load of disconnected customers.

17. Please refer to DEF's response to Staff's First Data Request, Attachment B. Please explain why column 3 of benefits for the Neighborhood Energy Saver Program on page 4, are greater than column 3 of benefits for the Residential Load Management Program on page 1. As part of this response, please provide copies of the cost-effectiveness runs in Microsoft Excel format with formulas intact for each program.

**RESPONSE:**

The primary driver for the higher NPV benefits from capacity for NES relative to Residential Load Management is participation; DEF is projecting 5250 NES participants each year, while Residential Load Management is projected to add 2500 participants each year. Please see Attachment A attached hereto.

# **Attachment A**

**PROGRAM: Residential Load Management**

**PWRMGR**

**Rate Impact Measure (RIM) Test**

YEAR	BENEFITS				COSTS				NET BENEFITS
	(1) TOTAL FUEL & O&M SAVINGS \$(000)	(2) AVOIDED T&D CAP. COSTS \$(000)	(3) AVOIDED GEN. CAP. COSTS \$(000)	(4) TOTAL BENEFITS \$(000)	(5) UTILITY PROGRAM COSTS \$(000)	(6) INCENTIVE PAYMENTS \$(000)	(7) REVENUE LOSSES \$(000)	(8) TOTAL COSTS \$(000)	
2020	0	0	0	0	750	162	0	913	-913
2021	0	0	0	0	876	325	0	1,201	-1,201
2022	0	0	0	0	1,001	487	0	1,489	-1,489
2023	0	0	0	0	1,127	650	0	1,776	-1,776
2024	0	0	0	0	1,252	812	0	2,064	-2,064
2025	0	0	0	0	1,252	812	0	2,064	-2,064
2026	0	0	0	0	627	812	0	1,439	-1,439
2027	0	0	4,284	4,284	627	812	0	1,439	2,844
2028	0	0	4,307	4,307	627	812	0	1,439	2,868
2029	0	0	5,782	5,782	627	812	0	1,439	4,343
2030	0	0	5,832	5,832	627	812	0	1,439	4,393
2031	0	0	5,883	5,883	627	812	0	1,439	4,444
2032	0	0	4,731	4,731	627	812	0	1,439	3,292
2033	0	0	5,142	5,142	627	812	0	1,439	3,703
2034	0	0	5,245	5,245	627	812	0	1,439	3,805
2035	0	0	6,494	6,494	627	812	0	1,439	5,055
2036	0	0	6,549	6,549	627	812	0	1,439	5,110
2037	0	0	5,566	5,566	627	812	0	1,439	4,126
2038	0	0	5,678	5,678	627	812	0	1,439	4,238
2039	0	0	5,710	5,710	627	812	0	1,439	4,271
2040	0	0	5,909	5,909	627	812	0	1,439	4,469
2041	0	0	6,028	6,028	627	812	0	1,439	4,589
2042	0	0	6,062	6,062	627	812	0	1,439	4,623
2043	0	0	6,274	6,274	627	812	0	1,439	4,835
2044	0	0	6,494	6,494	627	812	0	1,439	5,055
2045	0	0	5,377	5,377	615	796	0	1,411	3,967
2046	0	0	4,174	4,174	602	780	0	1,382	2,793
2047	0	0	2,880	2,880	589	764	0	1,353	1,527
2048	0	0	1,491	1,491	577	747	0	1,324	166
2049	0	0	0	0	0	0	0	0	0
2050	0	0	0	0	0	0	0	0	0
2051	0	0	0	0	0	0	0	0	0
2052	0	0	0	0	0	0	0	0	0
2053	0	0	0	0	0	0	0	0	0
2054	0	0	0	0	0	0	0	0	0
2055	0	0	0	0	0	0	0	0	0
2056	0	0	0	0	0	0	0	0	0
2057	0	0	0	0	0	0	0	0	0
2058	0	0	0	0	0	0	0	0	0
2059	0	0	0	0	0	0	0	0	0
NOMINAL	0	0	115,895	115,895	20,557	21,768	0	42,325	73,570
NPV	0	0	38,752	38,752	10,153	9,030	0	19,183	19,569

Utility Discount Rate = 7.10%  
**Benefit Cost Ratio = 2.020**

**PROGRAM: Neighborhood Energy Saver HWLI**

**Rate Impact Measure (RIM) Test**

YEAR	BENEFITS				COSTS				NET BENEFITS
	(1) TOTAL FUEL & O&M SAVINGS \$(000)	(2) AVOIDED T&D CAP. COSTS \$(000)	(3) AVOIDED GEN. CAP. COSTS \$(000)	(4) TOTAL BENEFITS \$(000)	(5) UTILITY PROGRAM COSTS \$(000)	(6) INCENTIVE PAYMENTS \$(000)	(7) REVENUE LOSSES \$(000)	(8) TOTAL COSTS \$(000)	
2020	516	1,182	0	1,697	619	4,985	2,130	7,734	-6,037
2021	1,008	2,405	0	3,413	619	4,985	4,285	9,888	-6,475
2022	1,495	3,643	0	5,137	650	5,234	6,581	12,465	-7,328
2023	2,018	4,940	0	6,959	650	5,234	8,994	14,878	-7,919
2024	2,781	6,297	0	9,078	650	5,234	11,546	17,430	-8,352
2025	3,292	6,331	0	9,623	0	0	12,019	12,019	-2,396
2026	3,551	6,367	0	9,918	0	0	12,514	12,514	-2,596
2027	4,014	6,520	8,043	18,577	0	0	13,142	13,142	5,436
2028	4,230	6,678	8,085	18,993	0	0	13,672	13,672	5,321
2029	4,384	6,796	10,770	21,950	0	0	13,990	13,990	7,960
2030	4,663	6,880	10,744	22,287	0	0	14,230	14,230	8,057
2031	4,484	6,502	10,013	20,998	0	0	13,465	13,465	7,533
2032	4,259	6,099	7,398	17,755	0	0	12,569	12,569	5,185
2033	3,969	5,628	7,259	16,856	0	0	11,410	11,410	5,446
2034	3,625	5,181	6,672	15,478	0	0	10,430	10,430	5,048
2035	3,078	4,730	7,370	15,179	0	0	9,324	9,324	5,854
2036	3,065	4,789	7,364	15,218	0	0	9,376	9,376	5,842
2037	3,213	4,847	6,207	14,266	0	0	9,569	9,569	4,697
2038	3,412	4,928	6,301	14,641	0	0	9,991	9,991	4,651
2039	3,651	5,010	6,307	14,968	0	0	10,406	10,406	4,561
2040	3,033	4,126	5,259	12,417	0	0	8,664	8,664	3,753
2041	2,379	3,200	4,072	9,652	0	0	6,782	6,782	2,870
2042	1,643	2,180	2,730	6,553	0	0	4,668	4,668	1,886
2043	851	1,113	1,413	3,377	0	0	2,409	2,409	968
2044	0	0	0	0	0	0	0	0	0
2045	0	0	0	0	0	0	0	0	0
2046	0	0	0	0	0	0	0	0	0
2047	0	0	0	0	0	0	0	0	0
2048	0	0	0	0	0	0	0	0	0
2049	0	0	0	0	0	0	0	0	0
2050	0	0	0	0	0	0	0	0	0
2051	0	0	0	0	0	0	0	0	0
2052	0	0	0	0	0	0	0	0	0
2053	0	0	0	0	0	0	0	0	0
2054	0	0	0	0	0	0	0	0	0
2055	0	0	0	0	0	0	0	0	0
2056	0	0	0	0	0	0	0	0	0
2057	0	0	0	0	0	0	0	0	0
2058	0	0	0	0	0	0	0	0	0
2059	0	0	0	0	0	0	0	0	0
NOMINAL	72,613	116,371	116,008	304,992	3,186	25,673	232,167	261,026	43,966
NPV	34,819	59,280	48,119	142,218	2,785	22,442	116,558	141,785	432

Utility Discount Rate = 7.10%  
**Benefit Cost Ratio = 1.003**